

GREENWICH N.V.

BUSINESS PLAN

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CONFIDENTIALITY STATEMENT

This Business Plan is a confidential document of Greenwich B.V. – B2C licence applicant (herein referred to as ‘Greenwich’ or ‘the Company’). It contains confidential and/or proprietary information.

1. OVERVIEW

We live in an increasingly digital age. People discuss metaverses, video conferencing software has become more prominent as the result of the pandemic, streaming services are on the rise. Generally speaking, we see a clear tendency and demand among people of different nations and cultural backgrounds toward time preservation through the use of the Internet.

Nowadays people tend to give preference to on-demand services, rather than actually physically be present somewhere in order to consume content or get entertained. The iGaming market nowadays is flooded with similar offers. But quantity never equals quality, it is a well-known fact that applies to online games just as much as to any other means of entertainment.

On the one hand, not all operators and aggregators seek to maintain the high quality of services they provide. Additionally, a lot of sites operate without a real license, which in our opinion is at the very least unethical toward players, and it has a negative impact on the industry as a whole.

Here is our key features that allow Us to succeed:

- ✓ **A wide variety of game applications.** Apart from usual slots, Betsixty provides players with sports betting vertical, roulette and other types of card and live games.
- ✓ **Advanced bonus system.** Bonuses are an integral part of our gameplay. A staggered system of privileges allows to increase player's loyalty to the product.
- ✓ **24/7 technical support,** allowing players to get answers to any questions 24/7. Our staff has qualified specialists who are always eager to help both a beginner and an experienced player with any question.
- ✓ **Availability on both PC and mobile devices.** Website mobile version is adopted for smartphones and tablets in order to maximise the quality of experience.
- ✓ **Close attention to AML/CFT compliance.**

Our unique online casino project – **Betsixty**– has recently launched and the Company has already obtained a B2C license.

What We offer to our Players:

- ✓ a myriad of different slots of all colours and visual delights
- ✓ interactive games that make time fly by being extremely engaging and delightful;

- ✓ poker rooms for those that trust their skill, roulette for the lucky and a number of other card games for the picky;
- ✓ bets on classic sports, cybersports and virtual sports that test your luck and wit with satisfying monetary rewards;

Online gambling is a hobby, sometimes even a lifestyle for some. Yet, for each of every single player it starts with the very first experience, which shapes his/her attitude toward gambling for the rest of his/her life. If the player has bad experience the first time he/she plays, the gambling community might lose a member that never returns. If enough people have bad experiences because of bad actors in the industry, the general consensus toward gambling might shift within the society.

Bewtsixty is about that gambling experience we all love. The experience when all your concerns disappear, time halts, and you are in the zone. Not only that, but you receive back. Not only your winnings, but bonuses too - an integral part of the gameplay. We offer a staggered system of privileges that increases player loyalty to the product.

We believe gambling operators define experience within the industry, and it is our responsibility to make sure the experience is nothing short of joyful for any player that interacts with us. We plan to polish the product until there is no way forward for it, but to the hearts of gamblers around the world. Our team will carefully monitor loyalty of our players and swiftly resolve all issues. Customer satisfaction is what will separate us from the others.

Our primary goals are:

- ✓ continually improve our player retention rate;
- ✓ have new player sign ups continuously;
- ✓ increase the level of customer satisfaction with the platform.

2. BUSINESS OBJECTIVES

2.1. EXECUTIVE SUMMARY

Greenwich is seeking to adopt strategies of market development and market penetration to enhance its growth and presence in the gaming market. As part of its ongoing strategy, Greenwich is seeking to enter new markets with a Curacao B2C gaming license.

Greenwich's current goal is to initially operate under a license issued by Curacao, followed by securing more licences from different jurisdictions such as Canada, Malta or Germany. With the Curacao license, the target markets will consist of countries where there are no explicit restrictions on operations. These include several countries within the European Union and the European Economic Area, as well as countries in the LATAM region (Peru, Brazil, Mexico, Chile, Kenya, Nigeria, Montenegro, Ireland, Albania, India). Within these markets, we aim to become a well-trusted and well-regarded entity within the gaming industry. Another objective is that, albeit known that the investment is material, the operation becomes a profitable one within the first year of operation.

Another important objective for Greenwich is that we offer a good quality service in terms of design that reach and exceed the players' expectations as well as following a non-aggressive, non-invasive method of advertising the company's product. We want players to come to our website because they genuinely enjoy their experience with us. From an operational perspective, our aim is to develop and implement data analytics to develop and ultimately improve risk management effectiveness, resulting in better management and attaining better results for us, as all player wins would be adequately covered, allowing a good profit margin for the company.

We aim to be customer-focused, providing players with a stable gaming entertainment environment and fast personalised services through the customer support team. Services are simple to use with minimal bureaucratic processes, however not at the expense of becoming non-compliant. Hence due diligence requirements are being stated as part of the Terms & Conditions and players' accounts will be blocked, and players disallowed from playing if they fail to comply with the requirements as prescribed by law.

In order to achieve our index of success we apply the skills of our UBO – Mr. Eric Tom Biji with a unique blend of skills in strategic development, project management and gaming sector operations. M. Biri is known for a keen ability to improve business processes, foster client relationships, and drive growth.

Greenwich is set to generate stable profit by the end of its first year of operation and become a stable business in three years' time.

2.2. BUSINESS MODELS

Key partners: 1. Curacao-based iGaming experts 2. B2B game aggregators 3. B2B game developers 4. Payment service providers 5. Data Centres 6. Cloud provider	Resources: 1. Creative and competent staff 2. High-quality gambling content Key business activities: 1. Branding 2. Service development 3. Developing of the loyalty program 4. New customer engagement and customer retention	Valuable offers: 1. Accessibility 2. Convenience 3. Risk mitigation 4. Customer-oriented approach 5. Wide selection of casino games	Client interaction: 1. Remote support 2. Personal support 3. Community 4. Personal offers 5. Collective improvement of products Sales channels: 1. Advertising in social media 2. Advertising in internet and printed magazines 3. Affiliate programs 4. Direct sales	Client segment: 1. Players via affiliates 2. Casino players 3. Internet users
Expenses: 1. Hosting colocation rental 2. IGaming platform improvement 3. Commissions of games provider 4. License fees 5. Staff costs		Source of income: 1. Gross gaming revenue		

2.3. THREE-YEAR FINANCIAL PROJECTIONS

Based on our approximated estimates, Betsixty is expected to maintain a healthy financial standing over the next five years. This financial plan outlines financial development of the project. Initially, the project is funded by a \$50,000 contribution from the UBO. Mr. Biji is planning to add additional funding in accordance with the Company's growing needs. Additionally, the project has already started financing its growth through the cash flow itself.

Our running costs are approximately between \$60,000 and \$70,000 per month, which include staff compensation, hosting, software costs and other fixed costs. Such a wide price range is due to revenue fluctuations and hence the varying royalties we would have to pay for the software. Based on our estimations, we need at least 200 active players a day that deposit an average of 10 dollars each to reach the break-even point. The target is expected to be easily met and the number of players to be much greater than the break-even point. We believe that our Product is likely to easily reach and maintain profitability. Betsixty is expected to break even in the second month of operations.

Profitability is expected within the first year of operations. Profits are expected to increase over the next two years, as our customer base is established. The following table shows the projected profit and loss calculated to a lower side of the expectations for the next five years. The table does not include pay-outs to players.

P&L: 36 months Plan

	Year 1	Year 2	Year 3
	€	€	€
Revenue			
Revenue from casino	18 619 740	22 632 410	27 509 836
Player winnings from casino	16 199 174	19 690 197	23 933 558
Gross gaming revenue	2 420 566	2 942 213	3 576 279
	13%	13%	13%
Direct costs			
Marketing and other support service fee	540 000	648 000	777 600
Compliance Contribution	15 516	18 860	22 925
Total direct costs	555 516	666 860	800 525
Net profit	1 865 050	2 275 353	2 775 754
	77%	77%	78%
Administrative costs			
Compliance audit fee	-	5 000	-
Annual licensee fee	66 000	66 000	66 000
Financial statements audit fee	5 000	5 000	5 000
Rent	10 000	10 000	10 000
Personnel cost	70 000	70 000	70 000
Utilities	9 996	9 996	9 996
Marketing fees	30 000	30 000	30 000
Legal and professional fees	25 000	25 000	25 000
Bank charges	15 000	15 000	15 000
Other costs	9 000	9 000	9 000
Total Administrative costs	239 996	244 996	239 996
Profit before tax	1 625 054	2 030 357	2 535 758
Corporate tax	32 501	40 607	50 715
Net income	1 592 553	1 989 750	2 485 043

Balance sheet: 36 months plan

		Year 1	Year 2	Year 3
		€	€	€
ASSETS				
Cash		1 892 317	2 347 122	2 915 556
Funds held on behalf of the players		578 813	703 550	855 170
Accounts receivables		-	-	-
Total current assets		2 471 130	3 050 673	3 770 725
TOTAL ASSETS		2 471 130	3 050 673	3 770 725
LIABILITIES AND EQUITY				
LIABILITIES				
Current liabilities		262 263	311 765	374 798
Players liabilities		578 813	703 550	855 170
Dividend payable		1 592 553	1 989 750	2 485 043
Current tax due		32 501	40 607	50 715
Total liabilities		2 466 130	3 045 673	3 765 725
EQUITY				
Shareholders contribution		5 000	5 000	5 000
Retained earnings:		-	-	-
<i>Retained earning B/F</i>		-	-	-
<i>Net income</i>		1 592 553	1 989 750	2 485 043
<i>Dividend declared</i>		- 1 592 553	- 1 989 750	- 2 485 043
Total equity		5 000	5 000	5 000
TOTAL LIABILITIES AND EQUITY		2 471 130	3 050 673	3 770 725

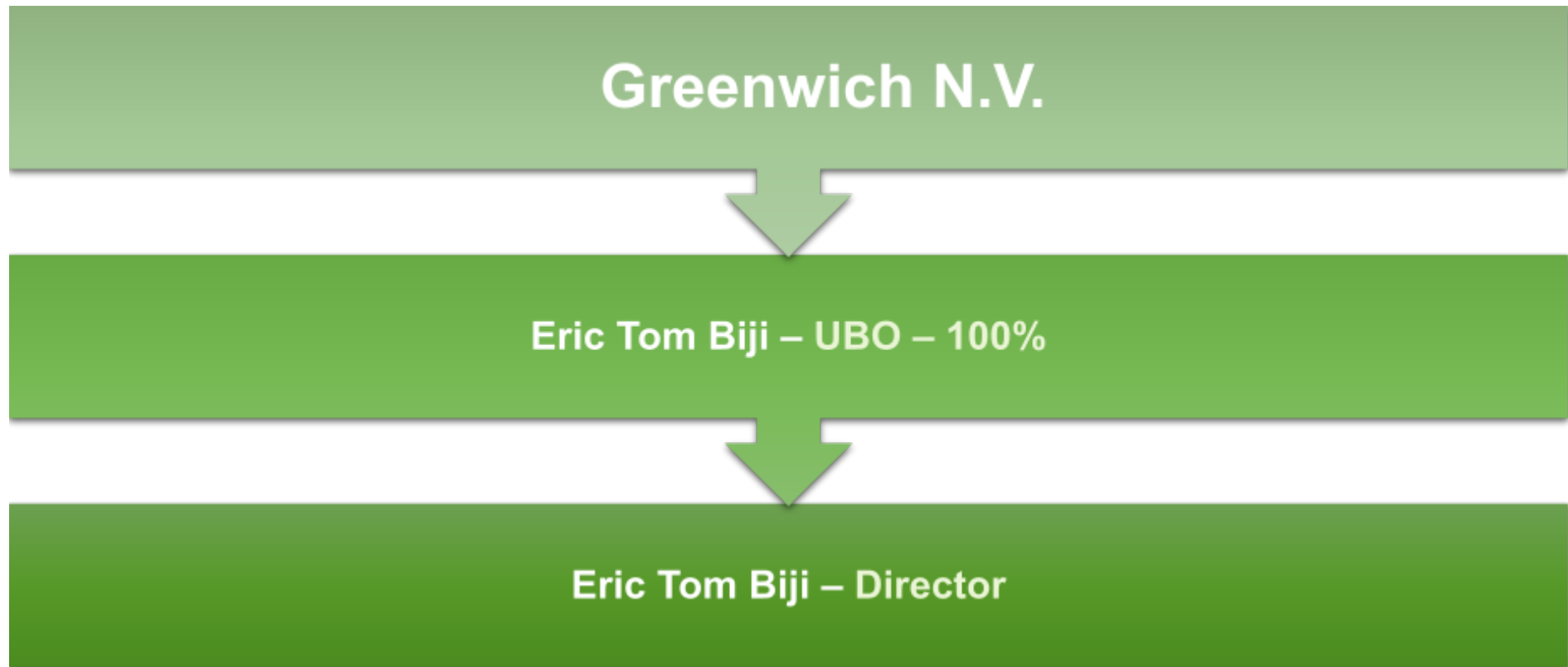
Cash flows: 36 months plan

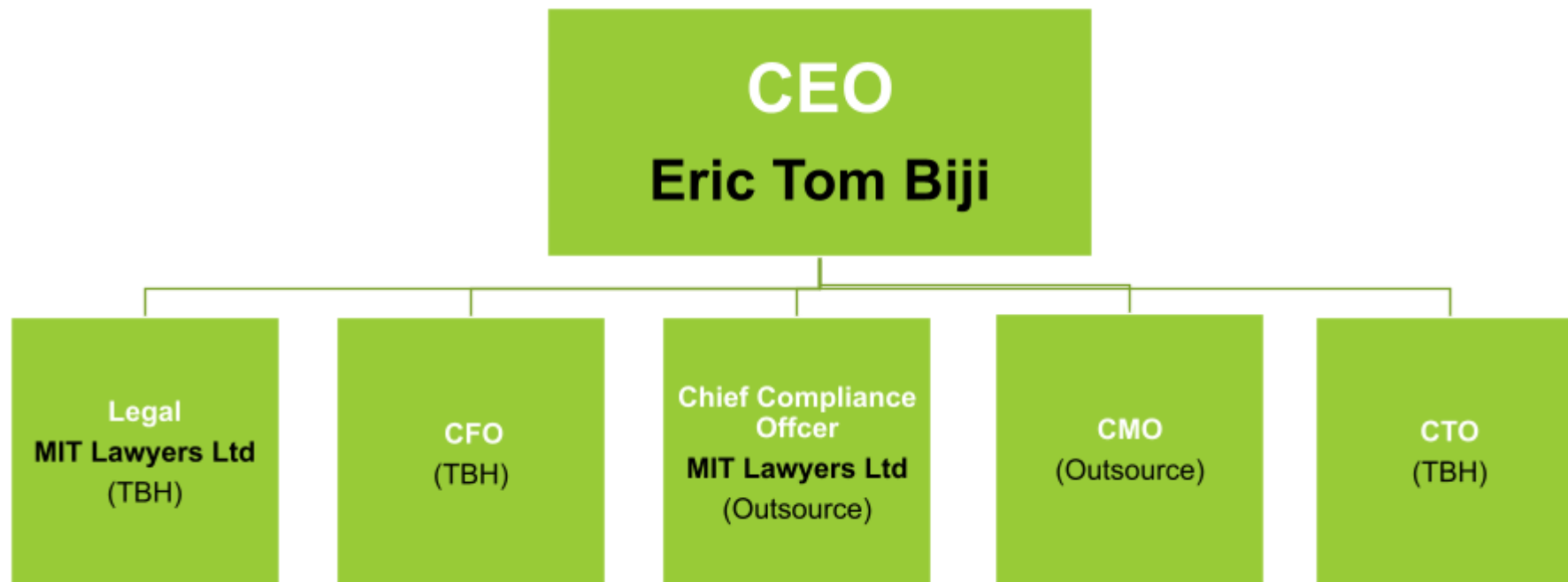
		Year 1	Year 2	Year 3
		€	€	€
Cashflows from operating activities				
Net profit before taxes		1 625 054	2 030 357	2 535 758
Movement in trade receivables		-	-	-
Movement in players liabilities		578 813	124 738	151 619
Movements in trade payables		262 263	49 502	63 033
Tax payments		-	32 501	- 40 607
Dividends paid		-	1 592 553	- 1 989 750
<i>Cash generated from operating activities</i>		2 466 130	579 543	720 053
Cashflow from investing activities				
Fixed assets		-	-	-
<i>Cash generated from/ (used in) investing activities</i>		-	-	-
Cashflow from financing activities				
Shareholders contribution		5 000	-	-
<i>Cash generated from/ (used in) financing activities</i>		5 000	-	-
<i>Cash movements</i>		2 471 130	579 543	720 053
<i>Funds held on behalf of the players</i>		- 578 813	- 124 738	- 151 619
Beginning balance		-	1 892 317	2 347 122
Cash at period/ year end		1 892 317	2 347 122	2 915 556

3.COMPANY STRUCTURE

3.1. MANAGEMENT

Greenwich company management structure is depicted in the chart below:





Growth and market share are Greenwich's main strategies and consequently, the Company has already started investing in growing a team who will be capable of achieving the desired objectives.

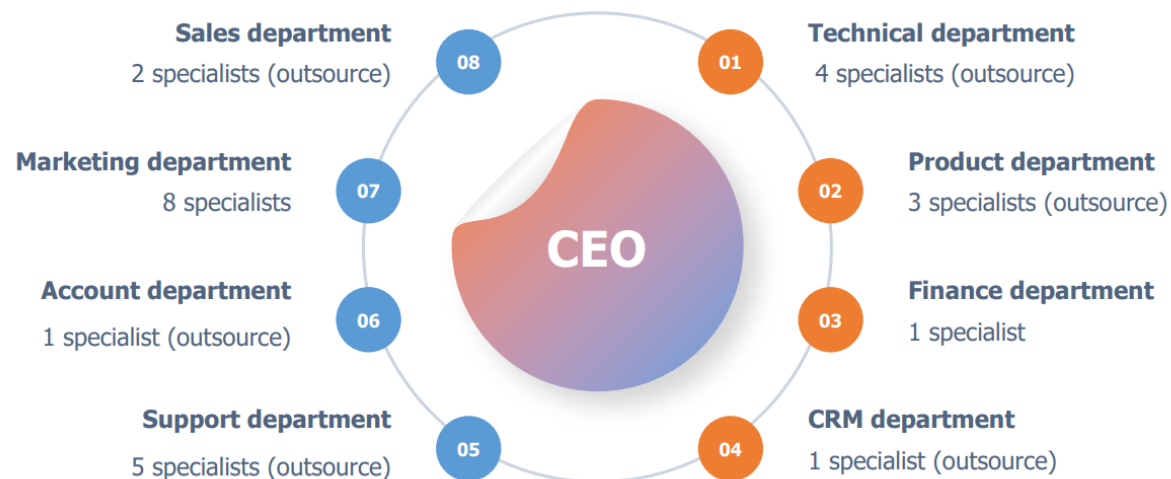
Financial support for Greenwich N.V. is provided by the UBO, on the one hand, and, on the other, the platform is already becoming self-sustainable, channelling the profits generated from our operational activities back into the company. This approach not only ensures operational continuity but also signifies our unwavering resolve to emerge as a "big player" in the iGaming industry.

At the present time Greenwich has almost finished optimization of the entire work in order to make sure the project runs as efficiently as possible.

Once everything launched and optimized, we will focus on our main goal – to **provide a high-quality product with 24/7 availability.**

In total, the company has 15 employees, but the team is steadily expanding as the business continues to grow. Compliance-related functions are currently designated to experienced iGaming experts. Their guidance and further commitment to grow with our company is an essential component to solidifying our progress in the industry.

Greenwich Management Team will be headed by the Company's UBO and CEO – Mr. Eric Tom Biji – and will be made up of employees working within the Company and outsourced if required. The goal is to eventually have a fully operational team required to operate under the GCB gaming license.



3.2. LEGAL & GOVERNANCE FRAMEWORK

Currently legal tasks are be outsourced to MIT Lawyers; subsequently, the company plans to form its own inhouse legal department from highly qualified specialists in the field of gambling law, financial monitoring and AML/CFT.

Our outsource specialists are responsible for conducting KYC procedures, ensuring AML/CTF regulations compliance, validating transactions, keeping essential documents for the lawful conduct of business, as well as resolving disputes, thereby maintaining a high level of reputation for our online platform.

Policies and procedures

Legal Advisors is also responsible for drafting the essential policies and procedures to maintain efficient and lawful operation of the Betsixty. The Company is going to adopt the following policies:

- Terms and Conditions
- Responsible Gaming Policy
- Self-Exclusion Policy
- KYC Policy
- AML Policy
- Dispute Resolution Policy
- Privacy Notice
- Cookie Notice

All the aforementioned documents will be displayed on the Betsixty website so that they can be accessed by our Players.

4. KEY SUPPLIERS

The Platform in use combines multiple systems and subsystems cumulatively representing a product offered to the company's clients for the latter to run online gaming businesses.

4.1. SET UP

Greenwich shall be utilising a rented platform, developed, and owned by Hubconnect LTD. for all player management, under the brand Hubconnect. The platform provider will conduct all necessary tests on the system to ensure that its security, stability and expected performance are maintained. Rollback functionalities will always be available to enable a quick return to a previous system state in the event that any unexpected behaviour is experienced after releasing software.

The games being offered by Greenwich are casino games, where players place bets against the house, which games are provided by other licensed B2B critical supply providers and are not owned by Greenwich.

4.2. GAMES – TYPE 1

Betsixty Gaming Platform will feature a suite of casino games from highly reputable and licensed casino game developers. All games will be integrated through an aggregator, game providers are all certified and have a good reputation in the market.

Greenwich has entered into relations with Slotegrator, SoftSwiss, Hubconnect LTD and InOut which will be key game providers for the Betsixty.

4.3. ONLINE PLATFORM – [HTTPS://BETSIXTY.COM](https://betsixty.com)

The web portal is based on CMS built-in which can be administered by the content administrator. A player will be required to register an account before he can access the full range of casino games. Other features include:

User Registration and Profile Management

- Account Creation: Secure sign-up process with verification (e.g., email confirmation, CAPTCHA).

User Profile Management:

- Personal Information: Securely store and manage personal details.
- Contact Information: Options to update email, phone number, etc.
- Payment Methods: Integration of various payment options (credit/debit cards, e-wallets, etc.).
- Document Upload: For identity verification, in line with KYC regulations.

Financial Transactions and Wallet

- Single Wallet System:
 - Transaction History: View past deposits, withdrawals, wins, and losses.
 - Balance Check: Real-time wallet balance display.
 - Deposit Funds: Secure deposit methods.
 - Withdrawal Requests: Compliance with AML policies.

Gaming Experience

- Game Access:
 - Real Money Play: Games available for betting with real money.
 - Bonus Play: Options to play with bonus or promotional credits.
- Game Fairness and Compliance: Ensuring all games meet regulatory standards for fairness.

Personalization and Communication Preferences

- Notification Settings:
 - Internal Email System: For in-portal communication.
 - Personal Email Notifications.
 - SMS Alerts.
- Privacy Settings: User control over data sharing and privacy.

Responsible Gaming

- Features for Responsible Gaming:
 - Self-Exclusion Options: Temporary or permanent account deactivation.
 - Deposit Limits: Daily, weekly, or monthly deposit limits.

- o Access to Responsible Gaming Resources.

Compliance with Kahnawake Legislation and EU Best Practices

- Regulatory Adherence:
 - o Licensing: Compliance with the Kahnawake gaming regulations.
 - o Player Protection: Measures to prevent underage and problem gambling.

Data Protection: Adherence to GDPR for data privacy and security.

Regular Audits and Certifications:

- Game Fairness: Regular audits by independent bodies (e.g., eCOGRA).
- Security Certifications: SSL encryption, firewalls, and other cybersecurity measures.

Additional Considerations

- Customer Support: 24/7 support via chat, email, and phone.
- Multi-Language Support: Catering to a diverse user base.
- Mobile Compatibility: Ensuring the website is mobile-friendly or offering a dedicated app.
- Marketing and Promotions: Compliance with advertising standards and bonus terms clarity.

Technical Infrastructure

- Scalability: Robust and scalable content management system.
- Integrity: Protection of user data and transaction records.

Responsible Gaming

Our website shall offer our players all the necessary functionalities related to responsible gaming applicable legislation and best EU practices.

Responsible Gaming and Compliance:

- The website is designed to adhere to the necessary functionalities required by the responsible gaming legislation.

- Additionally, the platform conforms to best practices established within the European Union (EU). This means that the features and guidelines on the website meet the highest standards of player safety and ethical gaming set by the EU.

Betting Limits:

- Players have the flexibility to determine their own betting limits. This puts them in control, allowing them to decide the maximum amount they wish to bet.
- This feature is particularly useful for players who want to keep their gambling habits in check and prevent excessive spending.

Account Deactivation:

- The system offers players the capability to deactivate their accounts temporarily or permanently.
- Once an account is deactivated, subsequent logins are prohibited. This means that players can't access their accounts until they decide to reactivate (if they've chosen a temporary deactivation).

Setting Deposit, Wager, and Loss Limits:

- Right after a player registers an account and logs in for the first time, they are given the immediate option to set limits on deposits, wagers, and potential losses.
- These limits can be defined for various timeframes, such as daily, weekly, or monthly, providing players with the flexibility to customise their gaming experience.
- By providing these options, the website ensures that players have the tools to manage and monitor their spending habits effectively.

Uniformity Across All Games:

- The aforementioned limits (bet, deposit, wager, and loss) are uniformly applicable across all games featured on the website.
- This means that if a player sets a limit for one game, the same limit will automatically apply to other games as well, ensuring consistency in the player's experience.

Continued Access to Limit Settings:

- Players can adjust their limits whenever they want. The functionalities to modify these settings are always accessible on the platform.
- This ensures that players have ongoing control over their gaming behaviour and can make necessary adjustments based on their individual circumstances.
- In essence, the website prioritises player safety, responsible gaming, and user autonomy, ensuring that players have the necessary tools and functionalities to have a controlled and enjoyable gaming experience

4.4. BACK OFFICE SYSTEM

The back office is a web-based tool for the administration and management of the gaming system.

Only the Greenwich staff will have access to the back office and the appropriate teams from our outsourcing partners. The employees have restricted access to the back-office modules and data according to their job roles.

INFORMATION SECURITY

1. Access to the back office is strictly through HTTPS (SSL) encrypted connection.
2. Submitted data on the web server uses encryption to support a high level of security and prevent unauthorised access.
3. All sensitive data that is stored in the database is encrypted to prevent unauthorised access.
4. The System will provide strong authentication at the Web server
5. The trusted subsystem model will be used, and per-user authorization will occur within the application.
6. User access and permission roles on module pages on the Web server will be controlled with authorization. Permissions within the database will be controlled by a user-defined role.

SCALABILITY

The system is built around loosely coupled components that exchange data through well designed APIs. The communication is secured and encrypted. The system is based on distributed architecture which allows vertical and horizontal scaling.

AVAILABILITY

All applications in the infrastructure for the Gaming System are deployed on a minimum of 2 servers and behind a load balancer to maintain high availability.

4.4.1. User Management and Access Controls

ACCESS CONTROL

Each action that exists in the system as well as the display field is mapped to specific privilege. All existing modules or functionalities also have specific privileges. For the user to be able to see or use specific action he must have the appropriate privilege, in one of the roles assigned to him.

4.4.2. Record logs, changes to games and audit requirements

All changes to player information and the player wallet will be permanently logged. Details including the timestamp and the respective user who carried out the change will form part of the logged information.

The system in use has the functionality to flag high betting volumes or high value winnings by a specific player. Flagged accounts will be investigated to ensure that there are no anomalies in the system or errors in the games that might have led to the high value winnings.

The system is tracking each action taken in the system with the following information:

1. Username;
2. Timestamp;
3. Action;
4. Changes made; and
5. Auto time outs.

4.4.3. Platform modules

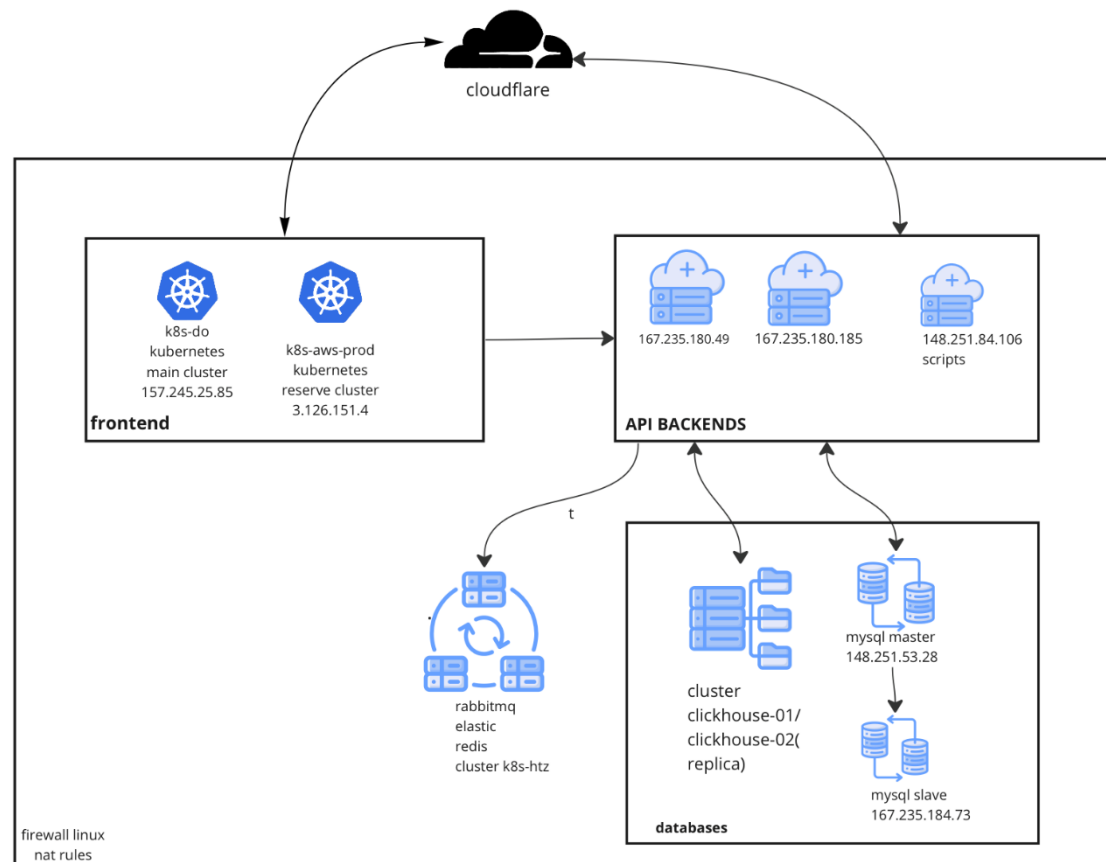
The system will contain the following sections:

1. Roles and access management;
2. Player management;
3. Management of player Segments;
4. Fraud Management;

5. Cashier (payments and transactions);
6. Bonuses;
7. Email templates management;
8. Responsible gambling/gaming;
9. Game management; and
10. Dashboards and reports.

5. TECHNICAL SETUP

A high-level schematic of the infrastructure is shown below:



Production servers

All servers required for gaming operations are physically hosted at the Hetzner data centre in Nuremberg, Germany, although they are managed remotely by the IT administrators. These currently consist of a web and queuing server, application server, and 2 database servers. The database server acting as the slave, together with the server located in Curacao are both a real-time replication of the master database, and therefore also act as a backup server in case the master database would crash or have any data which becomes corrupted.

Replication server in Curacao

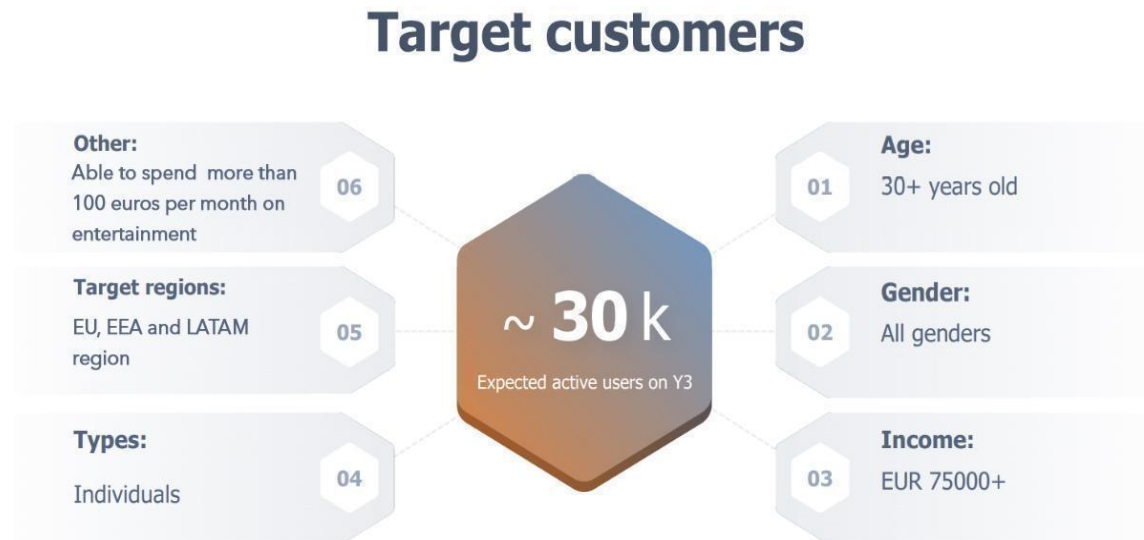
Player data, game and financial transactions shall be replicated on the physical server that is hosted at the Netshop ISP data centre located in Curacao. To eliminate possible lag issues, a direct MySQL replication service will be set up between the production database at the Hetzner datacentre in Germany and the server located in Curacao. All the relevant data will be replicated on the server located in Curacao.

Security details

The Hetzner data centre provides all the necessary security through its firewalls, anti-DDOS, and continuous monitoring systems. All servers are constantly monitored via admin-software focusing on the proper use, temperature, and any failures. The server rooms both in Germany and Curacao are equipped with all necessary cameras, temperature devices, fire protection equipment and other security related features. Both data centres are ISO/IEC:27001 certified.

6. TARGET KPI AND BUSINESS OBJECTIVES

6.1. MARKETING STRATEGY



The Company's aim is to reach out to players across our target regions. We understand that there may be some relevant imposed regulations in those target regions. The company will consider the legal requirements of each jurisdiction and will only target players in jurisdictions where the Curacao licence is accepted. Apart from legal requirements compliance, we will also perform a financial feasibility to gauge its viability.

The marketing is targeted to different age groups and utilising different marketing promotions, offers and bonuses to attract the various types of players. Greenwich ensures that no form of marketing is deemed to be attractive for underage players. What's more, Services provided by Greenwich N.V. shall stick to the principle of marketing for adults only. The aim is to attract players having the largest disposable income as well as prospective players that are attracted to this type of entertainment. We align our marketing targets to those age group of 30+ years old, which according to our research has the most disposable income.

Greenwich ensures adequate measures and controls that will manage such risks and any issues arising.

To boost our player database, we are currently adapting a suitable affiliate system. Independent affiliates will bring new players for a fee. The affiliates will be provided with their personal cabinet and an affiliate link, which allows the connection of players to the affiliate. An affiliate will get a fee for each registration, deposit or bet depending on a revenue share program. The company will also encourage player feedback through customer support to better understand what the players desire in their experience with Greenwich. Any complaints received, will also be logged, investigated, and even acted upon as soon as possible to ensure the best service to players.

7. RISK EVALUATION AND MANAGEMENT

In today's rapidly evolving digital landscape, effective risk evaluation and management are paramount to the success and sustainability of any platform. Recognizing this, our comprehensive approach to risk evaluation and management encompasses a wide array of strategies and technologies designed to identify, assess, mitigate, and monitor potential risks across various dimensions of our operation. This multifaceted approach ensures not only the resilience and reliability of our platform but also fosters trust among users, stakeholders, and regulatory bodies.

Our risk management framework integrates advanced technological solutions, industry best practices, and strategic partnerships to address a broad spectrum of risks, including system security threats, operational vulnerabilities, financial uncertainties, and compliance challenges. By leveraging the capabilities of leading service providers like Hubconnect and SUMSUB, along with integrating powerful tools such as QuickBooks for financial management, we establish robust defenses against potential threats and ensure compliance with international standards and regulations.

Key components of our risk evaluation and management strategy include:

Risk Assessment

Objective:

The primary objective of our Risk Assessment strategy is to identify, evaluate, and manage potential risks that could impact our operations, reputation, financial stability, and compliance obligations. This comprehensive approach ensures the resilience and sustainability of our platform.

Methodology:

Our Risk Assessment methodology encompasses a systematic process for identifying potential threats to our business, including but not limited to cybersecurity threats, operational disruptions, legal and compliance risks, and market fluctuations. We employ both qualitative and quantitative analysis techniques to evaluate the likelihood and impact of these risks, prioritizing them based on their potential effect on our business objectives.

Third-Party Integration:

We have partnered with SUMSUB, a leading provider of KYC and anti-fraud solutions, to bolster our risk assessment capabilities. This integration allows us to:

- Conduct thorough customer identity verification to mitigate fraud risk and ensure compliance with global anti-money laundering (AML) and KYC regulations.
- Leverage advanced analytics and machine learning technologies to detect and prevent fraudulent activities in real-time.
- Enhance our customer due diligence processes, providing a secure and trustworthy platform for our users.

Risk Mitigation Strategies:

Our risk mitigation strategies are tailored to address the identified risks effectively. These include:

- Implementing robust cybersecurity measures to protect against data breaches and cyber-attacks.
- Establishing comprehensive operational procedures and backup plans to ensure business continuity in the event of disruptions.
- Regularly updating our legal and compliance frameworks to stay ahead of regulatory changes.

- Diversifying our market presence to reduce the impact of market fluctuations.

Monitoring and Review:

Continuous monitoring of our risk landscape and the effectiveness of our mitigation strategies is vital. We conduct regular risk assessments to identify emerging threats and review our risk management policies and procedures to ensure they remain effective and aligned with our business objectives.

Our proactive and comprehensive Risk Assessment strategy is integral to our platform's success. By identifying potential risks early, integrating cutting-edge solutions like SUMSUB, and implementing effective mitigation strategies, we ensure the sustainability, security, and compliance of our operations, thereby safeguarding our customers and our business.

System Security

Our platform's system security is designed to protect against a wide array of digital threats, ensuring the integrity, confidentiality, and availability of our users' data. Recognizing the importance of robust security measures, we incorporate advanced technologies and best practices, including a strategic partnership with Hubconnect, to safeguard our operations.

Core Security Measures

- **Encryption:** We implement strong encryption protocols for data at rest and in transit, ensuring that all user and operational data is protected against unauthorized access and breaches.
- **Access Control:** Utilizing multi-factor authentication (MFA) and role-based access control (RBAC), we restrict access to sensitive information and critical system components, ensuring that only authorized personnel can perform sensitive operations.
- **Firewalls and Intrusion Detection Systems (IDS):** Our deployment of state-of-the-art firewalls and intrusion detection systems acts as a first line of defense, monitoring and blocking potentially malicious traffic and activities.
- **Regular Security Audits and Penetration Testing:** To identify vulnerabilities and strengthen our defenses, we conduct periodic security audits and penetration testing, leveraging external experts to simulate attack scenarios.

Hubconnect Integration

- **Enhanced Data Protection:** Through our partnership with Hubconnect, we enhance our platform's security capabilities. Hubconnect's solutions are integrated into our system, providing advanced tools for data protection, including secure backup and replication services.
- **Backup and Replication:** Hubconnect aids in implementing robust backup and replication strategies. This ensures operational data is regularly backed up and replicated across multiple secure locations, enabling swift recovery and maintaining service continuity in case of data loss or system failures.
- **Disaster Recovery Planning:** With Hubconnect's support, our disaster recovery planning is strengthened, ensuring comprehensive preparation for various scenarios. This includes rapid data recovery and system restoration capabilities, minimizing downtime and operational disruption.
- **Compliance and Security Standards:** Leveraging Hubconnect's platform ensures our security measures meet industry compliance standards, including GDPR, PCI DSS, and more, providing an additional layer of regulatory assurance.

Continuous Improvement and Monitoring

- **Employee Training:** Recognizing the critical role of human factors in system security, we conduct ongoing employee training on security best practices and emerging threats, fostering a culture of security awareness.
- **Continuous Monitoring:** Our security operations center (SOC) continuously monitors system activity, employing advanced threat detection tools to identify and respond to threats in real-time.
- **Adaptation to Emerging Threats:** We are committed to staying ahead of the curve by adopting the latest security technologies and adapting our strategies to counter emerging threats.

Our comprehensive system security strategy, enhanced by our partnership with Hubconnect, demonstrates our unwavering commitment to safeguarding our platform and users. By implementing rigorous security measures, complying with international standards, and promoting a culture of security awareness, we ensure a secure and reliable environment for our users.

Implementation of an administrative panel for efficient management and oversight.

Objective

To further enhance the management and oversight capabilities of our platform, we are implementing an advanced administrative panel, incorporating key functionalities and services provided by Hubconnect. This integration aims to streamline operations, bolster security, and provide comprehensive insights into platform performance and user activities.

Features and Functionalities

- **Hubconnect Integration:** Leveraging Hubconnect's robust API, our administrative panel will seamlessly interact with Hubconnect's suite of tools and services. This integration enables enhanced user management, financial transactions oversight, and access to a wide range of gaming content and services.
- **Real-Time Monitoring and Alerts:** With Hubconnect's support, the panel will offer real-time monitoring of platform operations, including gaming activities, financial transactions, and security alerts. Administrators can promptly address any issues, ensuring uninterrupted and secure platform performance.
- **Comprehensive User Management:** The panel will facilitate detailed management of user accounts, leveraging Hubconnect's advanced KYC and AML compliance tools. Administrators can activate, suspend, or modify user accounts, ensuring a safe and compliant gaming environment.
- **Configurable System Settings:** Administrators can easily configure system settings to adapt to changing business needs and regulatory requirements, all within Hubconnect's framework. This includes game offerings, payment methods, and security settings.
- **Enhanced Reporting and Analytics:** Utilizing Hubconnect's analytics capabilities, the administrative panel will provide deep insights into user behavior, financial performance, and operational efficiency. These analytics support data-driven decision-making and strategic planning.

Implementation Strategy

- **Customized Development with Hubconnect:** The panel will be custom-developed to ensure full compatibility and integration with Hubconnect's platform, tailored to our specific operational requirements.

- **Security and Compliance Focus:** Development will prioritize security, with robust encryption and access controls to protect sensitive data and comply with industry standards, leveraging Hubconnect's compliance expertise.
- **Scalability and Flexibility:** Designed for scalability, the panel will accommodate future growth and the integration of additional Hubconnect services as our platform evolves.
- **Training and Empowerment:** Our team will receive comprehensive training on utilizing the panel, enhanced by Hubconnect's support and resources, to maximize operational efficiency and user satisfaction.

Expected Outcomes

- **Streamlined Operations:** Integration with Hubconnect significantly enhances our operational capabilities, enabling more efficient management and oversight of all platform aspects.
- **Superior Management Insight:** The administrative panel will provide unparalleled visibility into platform dynamics, supported by Hubconnect's extensive data analytics and reporting tools.
- **Enhanced Compliance and Security:** By incorporating Hubconnect's compliance and security solutions, the panel ensures our platform operates within regulatory parameters and maintains the highest security standards.

The implementation of an administrative panel integrated with Hubconnect is a pivotal step in advancing our platform's management and oversight capabilities. This strategic initiative will streamline operations, enhance security, and provide comprehensive insights, driving our platform's success and ensuring a superior user experience.

Financial Controls and Audit

Our platform's financial controls and auditing capabilities are designed to ensure accuracy, compliance, and transparency in all financial transactions and reporting. Integrating Hubconnect's advanced platform functionalities with external accounting software like QuickBooks, we aim to establish a robust financial management system that supports real-time financial oversight, comprehensive reporting, and streamlined audit processes.

Hubconnect Integration for Enhanced Financial Management

- **Automated Financial Calculations:** Leveraging Hubconnect's platform, our system automates complex financial calculations, including payouts, commissions, and bonuses. This automation reduces human error and ensures accurate financial transactions.

- **Real-Time Financial Reporting:** Hubconnect's integration provides access to real-time financial data, enabling timely insights into financial performance, trends, and potential issues. This immediacy is crucial for dynamic financial management and decision-making.
- **Customizable Financial Settings:** Our administrative panel, powered by Hubconnect, allows for the customization of financial settings, including payment thresholds, commission rates, and bonus structures. This flexibility ensures our financial operations can adapt to changing market conditions and business strategies.

External Accounting Software Integration

- **QuickBooks Integration:** To further enhance our financial controls, we integrate with QuickBooks, a leading accounting software. This integration facilitates seamless financial tracking, expense management, and payroll processing, complementing our internal financial controls with comprehensive external accounting capabilities.
- **Audit Trail and Compliance:** The combination of Hubconnect's platform and QuickBooks provides a detailed audit trail of all financial transactions. This transparency is essential for internal audits, regulatory compliance, and financial integrity.

Financial Controls and Audit Procedures

- **Continuous Monitoring and Reconciliation:** Our financial team continuously monitors and reconciles financial transactions, ensuring they match with user activities and system records. This ongoing oversight is crucial for early detection of discrepancies and preventive action.
- **Regular Financial Audits:** Conducting regular internal and external audits, we assess the effectiveness of our financial controls, identify areas for improvement, and ensure compliance with accounting standards and regulatory requirements.
- **Security and Fraud Prevention:** Financial data security is paramount. Our integration with Hubconnect and QuickBooks includes advanced security measures, such as encryption and access controls, to protect against unauthorized access and financial fraud.

Training and Support

- **Employee Training:** We provide comprehensive training for our financial team on both Hubconnect's platform and QuickBooks, ensuring they are proficient in using these tools for effective financial management and reporting.
- **Vendor Support:** Ongoing support from Hubconnect and QuickBooks ensures we remain updated on the latest features, security practices, and compliance requirements, further strengthening our financial controls.

By integrating Hubconnect's platform capabilities with QuickBooks, we establish a robust framework for financial controls and audit. This approach not only enhances our financial management and reporting accuracy but also ensures compliance with regulatory standards and

industry best practices. Through continuous monitoring, regular audits, and a commitment to security, we maintain the highest standards of financial integrity and transparency, supporting our platform's growth and sustainability.

Onboarding processes and procedure of Know Your Customer (KYC) verification.

Objective

The objective of our onboarding processes and KYC verification procedures is to ensure a seamless, secure, and compliant user onboarding experience. By integrating SUMSUB, a leading KYC and identity verification service, we aim to enhance our platform's security, adhere to regulatory compliance standards, and minimize the risk of fraud.

Onboarding Processes

- **User Registration:** Our user-friendly registration process is designed to capture essential information while ensuring a smooth and efficient onboarding experience. This process is supported by SUMSUB's streamlined verification workflow, which guides users through the necessary steps for identity verification.
- **Automated Identity Verification:** Integrating SUMSUB's technology enables us to automate the identity verification process. SUMSUB's advanced algorithms and machine learning capabilities facilitate the rapid and accurate verification of documents and biometric data, significantly reducing the time and resources required for manual reviews.
- **Compliance with Global Standards:** SUMSUB's platform is designed to comply with international regulatory requirements, including Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards. This ensures that our platform adheres to the highest compliance standards across different jurisdictions.

KYC Verification Procedure

- **Document Verification:** Users are required to submit government-issued identification documents, which SUMSUB's system verifies for authenticity. This includes checks for document validity, tampering, and consistency with user-provided information.
- **Biometric Analysis:** SUMSUB's biometric analysis technology compares the user's live selfie with the photo ID provided, ensuring the person creating the account is the rightful owner of the submitted documents.
- **AML Screening:** SUMSUB's platform performs real-time screening against global watchlists, sanction lists, and PEP (Politically Exposed Persons) databases. This process helps in identifying and mitigating potential risks associated with money laundering and terrorist financing.

- **Ongoing Monitoring:** Continuous monitoring of user activities is conducted to detect and prevent fraudulent behavior. SUMSUB's platform facilitates the ongoing analysis of user transactions and behaviors, flagging any suspicious activities for further investigation.

Integration Benefits

- **Enhanced Security:** By leveraging SUMSUB's comprehensive verification services, we significantly enhance the security of our platform, protecting against identity fraud and ensuring that only verified users gain access.
- **Regulatory Compliance:** Our integration with SUMSUB ensures that we meet rigorous compliance standards, reducing the risk of regulatory penalties and building trust with our users and partners.
- **Streamlined User Experience:** SUMSUB's efficient verification process minimizes friction during onboarding, providing users with a quick and straightforward path to accessing our platform's features and services.

Conclusion

The integration of SUMSUB into our onboarding and KYC verification processes establishes a robust framework for user authentication and regulatory compliance. This strategic approach not only enhances our platform's security and integrity but also ensures a seamless onboarding experience for our users, fostering trust and promoting long-term engagement.