

DOUBLE ENTERTAINMENT N.V.
BUSINESS PLAN

Table of Contents

Company Details	1
Main Contacts.....	1
Object of the business plan	1
Abstract	2
Summary.....	3
1 Introduction..	4
1.1 Mission Statement	4
1.2 Curacao	4
2. Twistercasino Corporate Structure	5
2.1 Corporate Structure.....	5
2.2 Organization Structure	6
2.3 Employees	6
3. Twistercasino Products & Services.....	7
3.1 Game Description	7
4. Twistercasino Marketing & Sales Plan	7
4.1 Influencers / Affiliate program.....	7
4. Market Expand	7
5. Systems	8
6. Regulatory Compliance.....	8
6.1 Rules & Regulations.....	8
6.2 Compliance Procedures	8
7. Financial Forecast.....	10
7.1 Source of Funds.....	10
7.2 Forecast.....	10

Company Details

Double Entertainment N.V. registered at Kaya W.f.G (Jombi) Mensing # 24 unit
A Willemstad, Curacao

Chamber of Commerce Number: **161218**

Main Contacts

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Object of the business plan

This document is being provided with the objective to obtain the rights to operates under the Master License of Curacao-eGaming (CEG) # 1668/JAZ to offer remote gaming services in the Polan, Turkey and Czech Republic.

Abstract

The business plan is separated into the following six (6) chapters.

Chapter one	(1): Introduction of Double Entertainment N.V.
Chapter Two	(2): Twistercasino Corporate Structure
Chapter Three	(3): Twistercasino Product & Services
Chapter Four	(4): Twistercasino Marketing & Sales Plan
Chapter Five	(5): Systems
Chapter Six	(6): Regulatory Compliance
Chapter Seven	(7): Financial forecast

Summary

Double Entertainment N.V. (**hereinafter referred to as “Twistercasino”**) is a company incorporated under the laws of Curaçao. Twistercasino aim is to offer online gaming services under a sub-license issuing by Curacao eGaming (1668/JAZ).

Twistercasino (www.twistercasino.com) are directly owned by Double Entertainment N.V. and focus to be fully operational on 1st September 2022.

The target market will be Polen, Turkey and Czech Republic. The target market will be expanded as the company expand.

Twistercasino is confident that providing the players with excellent user experience and adhere to the regulatory rules and regulations, twistercasino will become a top online gaming operator.

It is anticipated that obtaining this license will provide peace of mind to the players and partners knowing that they are dealing with a responsible operator that are supervized by regulators and where the players are given due consideration and respect.

1 Introduction

1.1 Mission Statement

Twistercasino has a well-grounded set of corporate values that will be accessible for clients and staff. Based on those values, Double Ent's mission statement is as follows:

Twistercasino shall have an uncompromising commitment to excellence. Twistercasino ensure to provide high qualities services to its clients. The triumph of Twistercasino can only be achieved with happy clients.

Integrity and honesty will be at the heart of Twistercasino. Twistercasino will hire experts who will be bound by solid commitment. This is important to allow Twistercasino to closely monitor the developments of its clients' and to scrutinize their continued compliance rigorously.

Twistercasino will be a dynamic organization. Twistercasino culture will be dynamic and flexible. Twistercasino continuously assess its services to ensure continual relevance to its clients'.

Confidentiality is important. Twistercasino will implement robust systems to safeguard its client's information.

1.2 Curacao

Curacao jurisdiction has been at the fore front in eGaming license. Twistercasino judgment is that Curaçao possess all the elements to its status as one of the most important eGaming license jurisdictions due to the expertise, stringent compliance and Anti-Money Laundering ("AML") requirements, infrastructure, stability and access to the world.

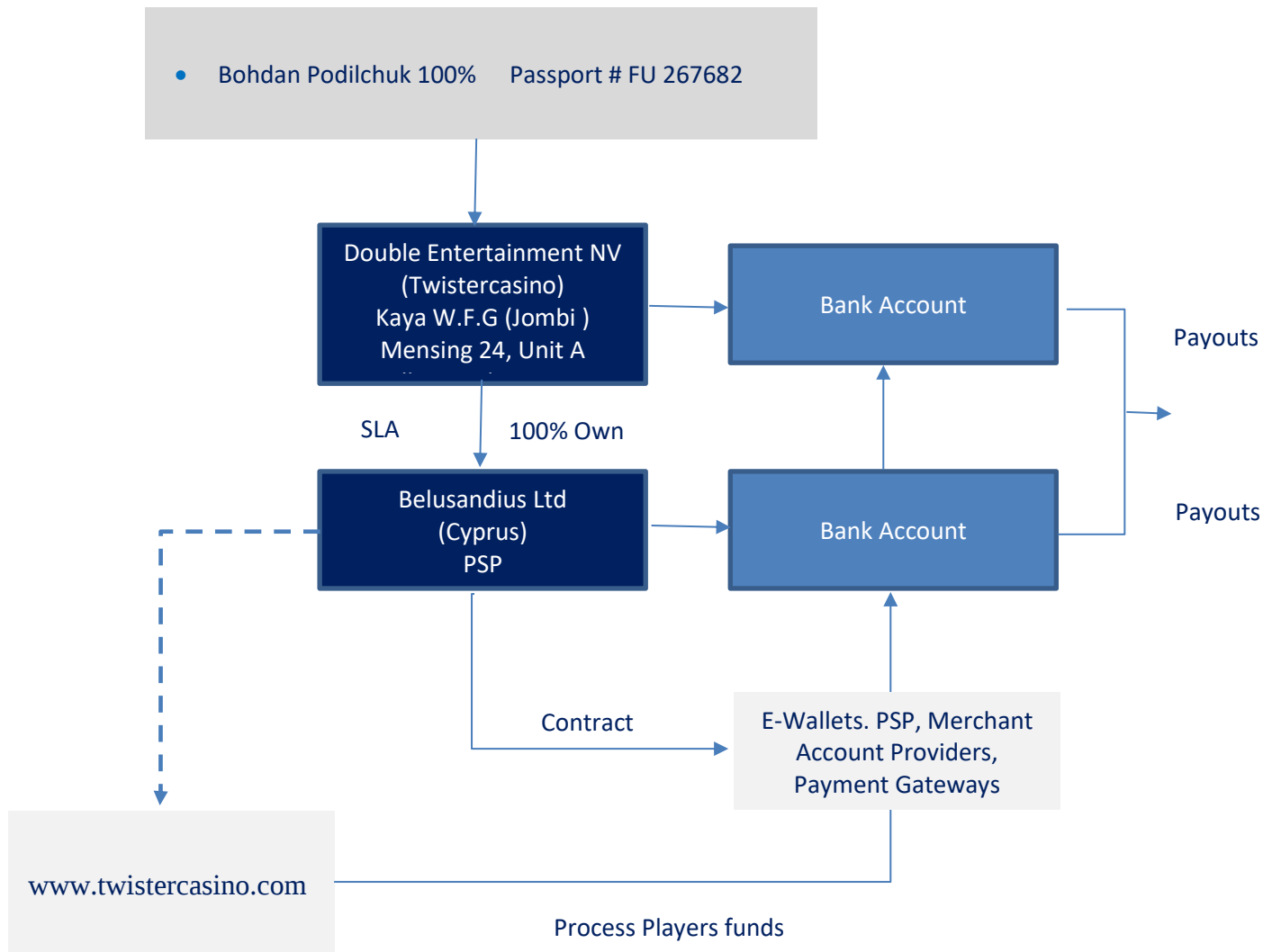
Curaçao is a jurisdiction of great reputation in the eGaming world. The list below, outlines why Twistercasino decide to choose for a Curaçao gaming sub-license.

Advantages:

- Curaçao being a jurisdiction of great reputé in the eGaming world;
- Excellent hosting infrastructure;
- Advantageous B2C Compliance Contribution;
- Most competitive corporate tax rate.

2 Twistercasino Corporate Structure

2.1 Corporate Structure



1. Mr. Bohdan Podilchuk is the 100% owner Double Entertainment N.V. in Curacao which will be the entity holding the Curacao Gaming License issue by Curacao eGaming (CEG).
2. Double Entertainment N.V. is 100% owner of Belusandius Ltd (Cyprus entity) which will be the subsidiary entity in Cyprus acting as the PSP for Double Entertainment N.V.
3. Double Entertainment N.V. will instruct Belusandius Ltd to function as a Payment processor through an SLA.
4. Belusandius Ltd will be the collector of payments flowing from the E-Wallets, PSP's Merchant Account providers.
5. Belusandius Ltd will hold a bank account in the name of Double Entertainment N.V. and from this account all expenses will be payout (For instance, contracts, License, Marketing, Leasing agreements etc.)

2.2 Organization structure

Twistercasino will be composed of the following departments:

- General Management;
- Customer Service Department;
- Marketing Department;
- Financial & Administration Department.

- **General Management team**

The key Foreign Management team is composed as follow:

- **CEO; (Bohdan Podilchuk 100% owner)**

In the first 6 months the CEO will take ownership of the majority of aspects of the business including but not limited to performing the duties of human resource, CFO, Marketing. During this period, the complex legal, financials and/or marketing affairs will be outsourced but will eventually be brought in-house.

- **CSP: Starkeast Management B.V.**

Furthermore, the general management along with Starkeast Management B.V., takes care of the business plus the ongoing Curacao license process

- **CFO; (To be hired)**

Will be in charge will the financials aspects of the company

- **Manager Customer Service; (To be hired)**

Will be in charge with the customer support activities of the company

- **Manager Marketing. (To be hired)**

Will be in charge of the marketing activities of the company

- **Customer Service Department**

- First line customer support.

- **Marketing Department**

- Direct media buying;
- Social media and SEO marketing;
- Affiliate marketing;
- Promotion and bonus management.

- **Financial & Administration Department**

- Accounting;
- Payroll.

2.3 Employees

Each department will be looking to hire the following professionals:

CRM: 1 Manager Customer Service, 2-3 Customer support officers;

Marketing: 1 Manager Marketing, 1 Affiliate manager, 1 Digital manager;

Finance: 1 CFO.

will be leading a team of 9-10 employees.

3 TwistercasinoProducts & Services

3.1 Game Description

Twistercasino intends to offer its gaming platform to players in Polen, Turkey and Czech Republic who wish to play Slots, Casino, live casino, Sports Bettings, Vitrual sport and Esport games. Twistercasino gaming contents will be market under www.twistercasino.com.

The content and software platform used under www.twistercasino.com are provided by some of the most reputable contents and software provider that posess all the appropriated licences and test.

Name of the game provider	Type of game	RNG Test
Habanero	Games	Annex
Pariplay	Games	Annex
Apollo	Games	Annex
WorldMatch	Games	Annex
EVERVEO INTERACTIVE LIMITED	Platform	

4 Twistercasino Marketing & Sales Plan

It is obvious that online gaming operators reached their customers through intense marketing campaigns. Twistercasino will utilize some of the most successful marketing channels (such as; Viral Marketing, Social Platforms, Affiliate programs, Grant of coupons, influencers (Sport, Social Media) to reach the targets in Polen, Turkey and Czech Republic.

The marketing & sales will be held in each target market to adapt the communication to the local specifications. As the primary target markets are Polen, Turkey and Czech Republic, the marketing team will consist of persons in these particular countries (Polen and Czech Republic). They will be hired as the business advanced (between the last quarter of 2022 or in the first quarter of 2023).

4.1 Influencers / Affiliate program

Twistercasino will develop partnership with experts and influencers which can drive the company to more publicity. Among these influencers there are famous sports journalists, former soccer players, social network influencers, famous actors, and famous musicians. This approach is supposed to bring credibility to the brand from scratch and a substantial number of users.

Furthermore, Twistercasino will apply the affiliate program which mean a referrals campaigns for users to recommend the platform in exchange for credit. Additionally, Twistercasino will also used the concept of granting credit coupons for users to enter and test the platform.

4.2 Market expand

It is obvious that Twistercasino initial focus is to target the audience in Polen, Turkey and Czech Republic. However, Twistercasino was born with a global and diverse DNA. Therefore, Twistercasino will seek for the oportunities to amplify its presence in others jurisdictions (such as in; LATAM & Asia region) as the company activities grows.

It is evident that Europeans players are well adapted to sportsbook gaming. At the contrary, In the LATAM, the presence of fantasy products have growing year over year. Hence,

Twistercasino will enter the LATAM market targeting Esports and Virtual sport gaming players on a later stage.

5 Systems

The technology, IT infrastructure and the technical development will be management by EVERVEO INTERACTIVE LIMITED.

The payments method that will be accepted are; Bank transfer, Cryptocurrency, Pre-Paid debit & Credit Card, Pre-pay voucher methods, Ewallet and Mastercard/Visa. The payment services provider that Twistercasino intent to used for the abovementioned payment method will be Jeton, Ezeewallet, Neosurf and more.

6 Regulatory Compliance

6.1 Rules & Regulations

Twistercasino will ensure to act always in line with the rules and regulatory obligations. Twistercasino will in turn adhere to all the Provisions and Guidelines on the Detection and Deterrence of Money Laundering and Terrorist Financing issued by the competent authorities. Twistercasino will setup a robust compliance procedures that will meet all international standards. To ensure this, tasks will be allocated and adhere to strict procedures which are explained in detail in the AML Manual.

Twistercasino will ensure to block access to the services for minors and for players from the jurisdictions strictly forbidden by Curacao eGaming Such as: USA, Netherlands, France, Germany, Cyprus, BES Island, Curacao and Aruba) and from countries listed by FATF. Twistercasino will make sure that all the Url's display appropriate information such as Term of Service, Responsible gaming, Dispute Resolution, Self-Exclusion, Account & Payouts & Bonuses, KYC policies, Privacy and management of personal data, Fairness etc.

Twistercasino will seek independent advice prior to enter a market. Furthermore, the Curacao local director (**Starkeast Management B.V.**) will take the relevant administrative and management role in order to ensure that both companies (Double Entertainments (Curacao) and Belusandius Ltd(Cyprus) will be always in good standing accordance with the local and international requirements.

6.2 Compliance procedures

Twistercasino is aware of the risk for money laundering and terrorist financing in the remote gaming. However, this risks can be mitigate as long as technological measures and controls to address the heightened risk of players risk are adopted.

It is particularly important for Twistercasino to know who their prospect players are before they will be accepted as a eligible player. Therefore, Twistercasino adopted the following mix of controls methods.

1. Players are required to provide some information in order to open an account:
 - I. *First Name and Last Name;*
 - II. *Place and Country of Residence;*
 - III. *Date of Birth;*
 - IV. *Correct e-mail address;*
 - V. *Password (twice for verification purposes).*
2. Players who do not register on the website are not able to play. Upon completion of the registration process and having accepted the terms and conditions and privacy policy, the player will be accepted as an eligible player.
3. Before the player is allowed to login for the first time, an e-mail is sent to the address specified in the registration form containing an activation link; it does not contain any sensitive information such as the player's username.
4. Players are required to prove their identity when they deposit or withdraw certain amounts. Documents can be submitted to the customer support email address provided on the website. Accepted documents are scanned copies of I.D. card, passport, driver's license and any recent utility bills showing the player's address, as well as any scans of credit cards or bank statements if required.
5. Players are not allowed to transfer any funds from one player account to another player account.
6. All transactions will be carried out to detect any potential money- laundering activities.
7. The customers deposit history is reviewed to confirm that no suspicious payments have been made to the customer's account. The frequency of deposits and the sum of deposits are reviewed to ensure they are within normal range for the customer based on his depositing history and the general depositing range throughout our network
8. The customer's turnover is reviewed to ensure that they have played in the casino and are not using Merchant as a method to move money
9. When possible, funds must always be refunded back to the original payment method used by the player to make a deposit
10. Suspicious Activity will be reported to the competent authority (FIU).
11. All staff will receive training on their obligations in respect of money laundering reporting and are aware of the procedures in place for escalation of any suspected incidents to the MLRO

As `Twistercasino` activities continue to expand, `Twistercasino` will hire more employees including a compliance/ legal officer at management level which will be in charge with compliance affairs. In the first year the complex legal and compliance activities will be outsourced, but will eventually be brought in-house on a later stage.

In the first year the CEO (Bohdan Podilchuk 100% owner) will take the compliance responsibilities and act as the MLRO and will be the contact person in connection for the Combined Quarterly Report (CQR) as required by the **Curacao eGaming**.

7 Financial Forecast

7.1 Source of Funds

The first investment to have Twistercasino fully operational is coming from a loan agreement.

7.2 Forecast

Double Entertainment is expecting a net small profit or small loss for the first year and a slight profit for the second year. A decent profit is expected as the 3rd year projection.

	Year 1 (2022)	Year 2 (2023)	Year 3 (2024)
New Players	3800	2200	3000
Total Players	3800	6000	9000
ARPU	€ 50	€ 55	€ 60
Total Revenue	€ 190,000	€ 330,000	€ 540,000
CEO	€ 30,000	€ 39,000	€ 42,000
Director CRM	€ 23,000	€ 26,000	€ 28,000
Affiliate Manager	€ 20,000	€ 19,000	€ 20,000
Director Financial	€ 24,000	€ 26,000	€ 28,000
Support Officers	€ 25,000	€ 26,500	€ 28,000
SEO, SMM	€ 16,000	€ 16,500	€ 17,500
Bonus Costs	€ 13,000	€ 24,500	€ 25,500
Payment Comm.	€ 13,000	€ 24,000	€ 25,000
Affiliates Costs	€ 12,000	€ 29,500	€ 36,000
Total Expenses	€ 176,000	€ 231,000	€ 250,000
PROFIT	€ 14,000	€ 99,000	€ 290,000