

## **1) Overview of the business products and services/brands as well as proprietary IP.**

The purpose of the corporation shall be to organize, market, promote, manage, support, and operate all types of activities related to online gaming and digital marketing, comprising all types of games, betting, and other betting exchange operations, interactive casinos, bingos, lotteries, and other interactive games and entertainment, for clients established or residing outside of Curaçao.

The company has the power to perform all acts necessary for the accomplishment of its purpose, objective, or related ends within the gaming industry in the broadest sense of the word, including participation in, incorporation, and management of other enterprises and companies.

The proprietary IP is [betagora.io](https://betagora.io)

## **2) Company management structure showing key management roles and reporting lines**

Felipe Vassallo Rei is the only shareholder and UBO of the Company, with 100% of the shares.

CEO Felipe Vassallo Rei

CFO João Paulo Rispoli

We are expecting to hire CTO and CCO in 3 to 6 months.

Compliance Officer João Vitor Amaral

## **3) Business forecasts for 3 years**

1<sup>st</sup> year

Base of 1M of leads

GGR 7-10M (last month)

Cash flow: 20% of GGR

Net Margin: 10%

2<sup>nd</sup> year

Base of 3M of leads

GGR 14-20M (last month)

Cash flow: 30% do GGR

Net Margin: 15%

3<sup>rd</sup> year

Base of 4M of leads

GGR 18-25M (last month)

Cash flow: 40% do GGR

Net Margin: 20%

#### **4) Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans**

- \* cost by target client: R\$25,00
- \* Conversion percentage 60%
- \* Retention percentage of clients: 10% - 20%
- \* LTV of client: R\$1.000,00
- \* Return on Marketing Investment (ROMI): 40%

#### **5) Who are the key suppliers and material dependencies?**

1. Oddsgate - Betting and gambling Software provider and WhiteLabel Platform
2. Pagfast – Payment Method
3. Starspay – Payment Method
4. PayBrokers – Payment Method
5. SendGrid – Email sender
6. LiveChat – Support Platform

#### **6) Risk evaluation and management**

Our company has been commitment to be constantly vigilant to prevent money laundering and combat terrorist financing, with the aim of minimizing and managing risks such as reputational risk, legal risk and regulatory risk. It is also committed to its social duty to prevent serious crimes and not to allow its systems to be abused to promote these crimes. The company will strive to maintain both national and international developments in relation to initiatives to prevent money laundering and terrorist financing. It undertakes to protect, at all times, the organization and its operations and safeguard its reputation and everything from the threat of money laundering, financing of terrorist activities and other criminal activities.

We will designate one of our senior officials as the designated Money Laundering Reporting Officer (MLRO), whose responsibilities will include the duties required by laws, regulations, and guidance notes.

All cases of suspicious money laundering attempts must be reported to the MLRO, but this suspicion must not be transmitted to the customer and subsequent actions must await their consent. The MLRO is then responsible for contacting, submitting reports of suspicious activities and obtaining consent from the legal authority responsible in the jurisdiction where the transaction was carried out, as appropriate. It will also ensure that adequate records are maintained for all related reports.

We have a complete KYC policy. This will help combat money laundering threats on the ground, as well as other fraud threats in general. Customers will be informed at the time of registration and, in general, on the non-transactional support website that the Company will use online verification tools and that, in cases where we cannot comply with the criteria, documents will be requested for identity and address verification.

We always keep a secure online list of all registered players and keep the identification and transactional documentation, as defined in the laws, regulations and guidance notes.

There are systems established to record all account transactions. These account histories will be subject to a program of periodic and continuous controls of indicators of fraud and social responsibility. When sponsors of bets and unusual earnings are detected, the history of calls will also be referenced to guarantee that the team is not in connivance with the customers or acting in an illicit manner.

We also maintain a register of customers that identify as high risk or politically exposed. These accounts will be subject to increased scrutiny and frequency of controls.

In general, when illegal or inappropriate behavior on the part of the staff is identified, the investigative and disciplinary procedures will follow those described in the contracts of the staff as they demand the guidelines of labor legislation and the need to use more probable measures such as suspension when, for example, transactional fraud. These activities are expected to form a standard part of the job description of an employee.

All transactions carried out on our website can be controlled to prevent money laundering or terrorist financing activities. The suspicious transactions will be reported to the corresponding authority according to the jurisdiction governing the transaction.

If our risk and fraud department suspects fraud, they can ask the player to provide the appropriate documentation. If there is sufficient evidence of fraudulent conduct (for example, bank repudiation, account operated by a third party, use of forged documents, fraud in payment methods, etc.), the account will be suspended until the situation is resolved. The suspension must be communicated to the competent authority together with the respective causes (recommended tests or tests) within 24 hours by the responsible authorities.

Our customers declare and expressly guarantees that all sums deposited and used to participate in the remote online games of our company come from legitimate sources and are not related to any fraudulent activity, money laundering or activities considered illegal by law, such as money laundering or financing of terrorism.

In accordance with the current legislation, and the rules that the regulator can dictate at any time in terms of preventing money laundering and financing terrorism, our company reserves the right to take the measures it deems necessary to comply with these requirements. Users cannot use loans to participate on the website. We will not grant the user any type of loan or mechanism that allows making loans or transferring funds between players, at any time. We reserve the right to supervise any transfer of funds that is deposited or withdrawn by any user and to report any user information to regulatory or penal authorities and/or payment service providers.

We maintain the money of players in an account that is legally separate from our own funds. It also reserves the right to retain all funds of a customer at its discretion if it considers that they are directly derived or related to illegal or fraudulent activities. After confirming the deposit, the customer can use the deposited funds to bet. The deposits are credited to the player's account once the bank transfer is successfully validated.

It is the customer's responsibility to check whether the bank charges a fee for these transfers. The customer declares that he is the owner of the payment account made available to our company and the payment methods used are associated with that same account, or by default, associate it with an account owned by the customer. The total balance of your player account includes the casino balance and the casino bonus balance.

The customer's deposit history is reviewed to confirm that suspicious payments have not been made to the customer's account. The frequency of deposits and the sum of deposits are reviewed to ensure that they are within the normal range for the customer according to their deposit history and the general range of deposits in our network.

Customer billing is reviewed to ensure that the customer has played at the casino and is not using our company as a method of moving money.

Whenever possible, the funds must always be returned to the original payment method used by the player to make a deposit. To comply with legal requirements, we must verify the identity of all players. For that, at the first moment of the withdrawal request, the client must send us an email with at least the following documents: Identity document with photo and birth certificate, home verification, Account ownership check.

Whenever our client wants to change their payment account, they must send a new proof of ownership of the new account.

Otherwise, their payment will not be processed. The player account should not be used or treated as a bank account. In the case of deposits or withdrawals without

game activity, or activity with reduced proportions of initial deposits, our company reserves the right to request explanations before transferring the withdrawal request in question. The withdrawal request made by our client will be canceled within 72 hours if they do not provide to us with the necessary information to allow verification of their identity. Any withdrawal is free.

## **7) Legal and governance framework**

Felipe Vassallo Rei is the only shareholder of the Company, with 100% of the shares. The Company Managing Director is e-Management N.V., a Company from Curaçao.

CEO Felipe Vassallo Rei

CFO João Paulo Rispoli

We are expecting to hire CTO and CCO in 3 to 6 months.

Compliance Officer João Vitor Amaral

All the day-to-day decisions are made by the CEO and CFO. He is the one who leads the company in all aspects and has the know how to make the company each year bigger.

The board/company cannot be deadlocked.

Legal support and advice are provided by HBM Group, e-Management N.V. and Vieites Mizrahi Rei Law Firm in Brazil.

## **8) Target KPIs and business objectives**

Objective 1: Validate the business model, conquering a stable user base.

1. Within 06 months, reach the break-even point and validate the business model
  - a.  $GGR - Costs \geq 0$

Objective 2: Convert users by structuring the platform's distribution channel and generating relationships with affiliates/influencers.

KPIs:

1. Active Affiliate & Influencer Contacts
  - a. Numbers of active affiliates
  - b. Number of active influencers
  - c. Number of links generated
  - d. Link Revenue
2. People in groups of own signs
  - a. Number of leads captured by affiliates
  - b. Number of active own signal groups
  - c. Number of contacts in groups

- d. Lead Conversion Rate for Groups
- 3. Depositors/month of the platform
  - a. Number of registrations on the platform/month
  - b. Number of monthly deposits within the platform
  - c. Average deposit amount per user

Objective 3: Retain the betting audience in the long term and generate brand awareness

KPIs:

- 1. Within customer referral strategies, customers being referred by users of the platform
  - a. Number of user invite links
  - b. Users coming from customer referrals
  - c. Referral gamification campaign performance - "Levels"
- 2. To be the Bet with the best crisis management, with the lowest number of complaints, lawsuits and pending issues being among the 5 best indicated by the *Reclame Aqui* (platform from Brazil that people can make reviews and complaints of companies).
  - a. Grade from *Reclame Aqui*
  - b. Service within *Reclame Aqui*
  - c. Sentiment of comments on official social media channels
  - d. Mapping comments on unofficial channels - Social Listening
  - e. Number of lawsuits and judicial assessments

Objective 4: Optimize the outreach operation to impact more people while consuming fewer resources

KPIs:

- 1. Return on investment of paid digital media campaigns, from all managed channels, 12 months period.
  - a. Ad ROAS
  - b. CTR of ads
  - c. Ad CPM
  - d. CPC of ads
- 2. Organic lead capture flow, from all managed channels, general reach of project accounts
  - a. Digital Channel Engagement
  - b. Reach of publications
  - c. Clicks on profile, stories, and bio links
  - d. Number of Organic Leads Generated
- 3. Influencer content campaigns, people impacted per month.
  - a. Number of pieces and posts produced by influencers
  - b. Reach of influencer posts
  - c. Influencer Post Engagement
  - d. Influencer Registration Links

## 9) Policies and Procedures

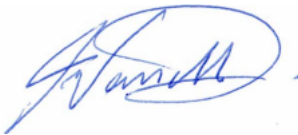
All policies and procedures are managed internally and externally with the support of our legal advisors.

Our website provides easy access to all users for our privacy policies, AML & KYC, Compliance, Sports betting rules and Terms and Conditions.

Our company upholds strict internal policies to ensure responsible gambling, combat money laundering, implement special measures to prevent gambling addiction, and is highly attentive to handling personal data in line with our corporate mission.

Any necessary reports required by the GCB will be promptly provided. In the event of more complex requests, the company will inform the GCB and request an extended period for the delivery of the required documents.

The company has been operating in this manner for years without encountering any issues. It fosters a healthy environment for its employees, partners, and consumers, rendering its approach to internal procedures and policies highly effective. All individuals involved in this endeavor are fully capable of executing their tasks proficiently.



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FELIPE VASSALLO REI  
UBO/Shareholder