



Business Plan
Gareton B.V.

TABLE OF CONTENT

BUSINESS OBJECTIVE.....	3
SERVICES.....	3
INTENDED MARKETS.....	3
CORPORATE AND MANAGEMENT STRUCTURE, DIRECTORS AND SHAREHOLDERS.....	4
MANAGEMENT AND GENERAL CONTROLS & DUTIES.....	5
MANAGEMENT CONTROL.....	5
GENERAL CONTROL.....	6
BUSINESS RISK RATIONALE.....	9
CONTRACTUAL MODEL WITH KEY SUPPLIERS.....	10
COMMERCIAL STRATEGY.....	10
MARKETING PLAN.....	10
PROBLEM WORTH SOLVING.....	11
OUR SOLUTION.....	11
OUR ADVANTAGES.....	11
FINANCIAL.....	11
FORECAST.....	12
TECHNOLOGY, SOFTWARE & PROVIDERS.....	12
SOFTWARE AND PAYMENT ARCHITECTURE.....	12
3RD PARTY PROVIDERS.....	12

BUSINESS OBJECTIVE

Gareton B.V. is a company with the purpose to provide online gambling products targeting the relevant various players (except the restricted countries) which are interested in its variety of Casino, as will be demonstrated further on.

Gareton B.V. makes it a priority to understand the needs of every customer by controlling and operating technical and customer support staff, to provide better service and build a true, honest, and reliable relationship with clients and partners.

The priorities are:

- Creating the most favorable conditions and best conditions in comparison to other Online companies:
- Providing high quality of service.
- Providing high quality support to its clients.
- Providing the newest and most desirable games in the market.

Gareton B.V. operates the <http://kennyslot.com/>, <https://www.bitstarz.com/>, <https://cashy.com/> - websites for online casino-game, Live Casino, where the client can play and/or place bets on any kind of events.

SERVICES

The services offered by Gareton B.V. will be:

Casino:

- Slots
- Live Casino
- Sports betting

INTENDED MARKETS

Gareton B.V. makes its services available in selected jurisdictions, subject to compliance with Curaçao licence conditions, applicable international standards (including FATF recommendations), international sanctions regimes, and applicable local legislation.

The Company's services may be made available to users located in the following jurisdictions, subject to ongoing legal and regulatory assessment and the implementation of appropriate compliance, risk management, and responsible gaming measures:

- Albania;
- Argentina;
- Armenia;
- Austria;
- Azerbaijan;

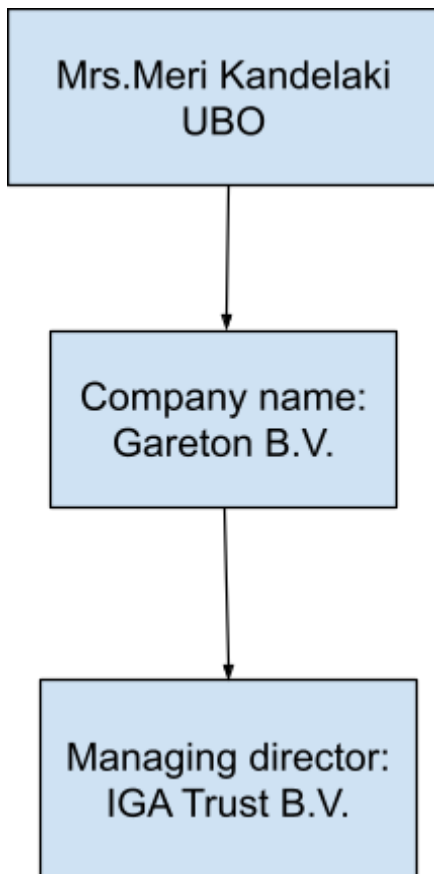
- Chile;
- Croatia;
- Czech Republic;
- Denmark;
- Finland;
- Georgia;
- Germany;
- Hungary;
- India;
- Ireland;
- Italy;
- Mexico;
- Montenegro;
- New Zealand;
- Norway;
- Slovenia;
- Sweden;
- Switzerland;
- United Arab Emirates.

The Company does not actively target jurisdictions where local licensing or regulatory frameworks would require specific authorisation unless such authorisation has been obtained or appropriate measures are in place.

CORPORATE AND MANAGEMENT STRUCTURE, DIRECTORS AND SHAREHOLDERS

The ultimate beneficial owner of Gareton B.V. is Mrs. Meri Kandelaki, who has 100% ownership interest in the company. Mrs. Meri Kandelaki has extensive experience in the gambling industry and will inherit key roles in the operation of the company.

IGA TRUST B.V. represented the company as the Managing Director of the Gareton B.V.



MANAGEMENT AND GENERAL CONTROLS & DUTIES

MANAGEMENT CONTROL

The Managing Director IGA Trust B.V., as the one exercising key control over the management and having extensive experience, carries out the following functions for Gareton B.V., including but not limited to:

1. Financial Administration;
2. Compliance Services;
3. Directorship;
4. Back Office Support.

Below is a detailed list of IGA Trust B.V.'s functions:

1. Financial Administration:
 - Recording Transactions;

- Maintaining Ledgers;
- Bank Reconciliation;
- Financial Reporting.

2. Compliance Services:

- Regulatory Compliance
- Corporate Governance;
- Tax Compliance;
- AML Services.
- Customer Due Diligence (CDD);
- Background check;
- Risk Management.

3. DirectorShip

- Operation Management.

4. Back Office

- Administrative Support;
- Para-Legal Support.

GENERAL CONTROL

Gareton B.V. has separate departments for development, finance, casino management, customer support, payments & fraud, business intelligence and marketing. This is the first control in place. Individuals have clearly defined roles and responsibilities including reporting lines within Gareton B.V. As a result, each department has both substance and clarity to enable its goals and objectives.

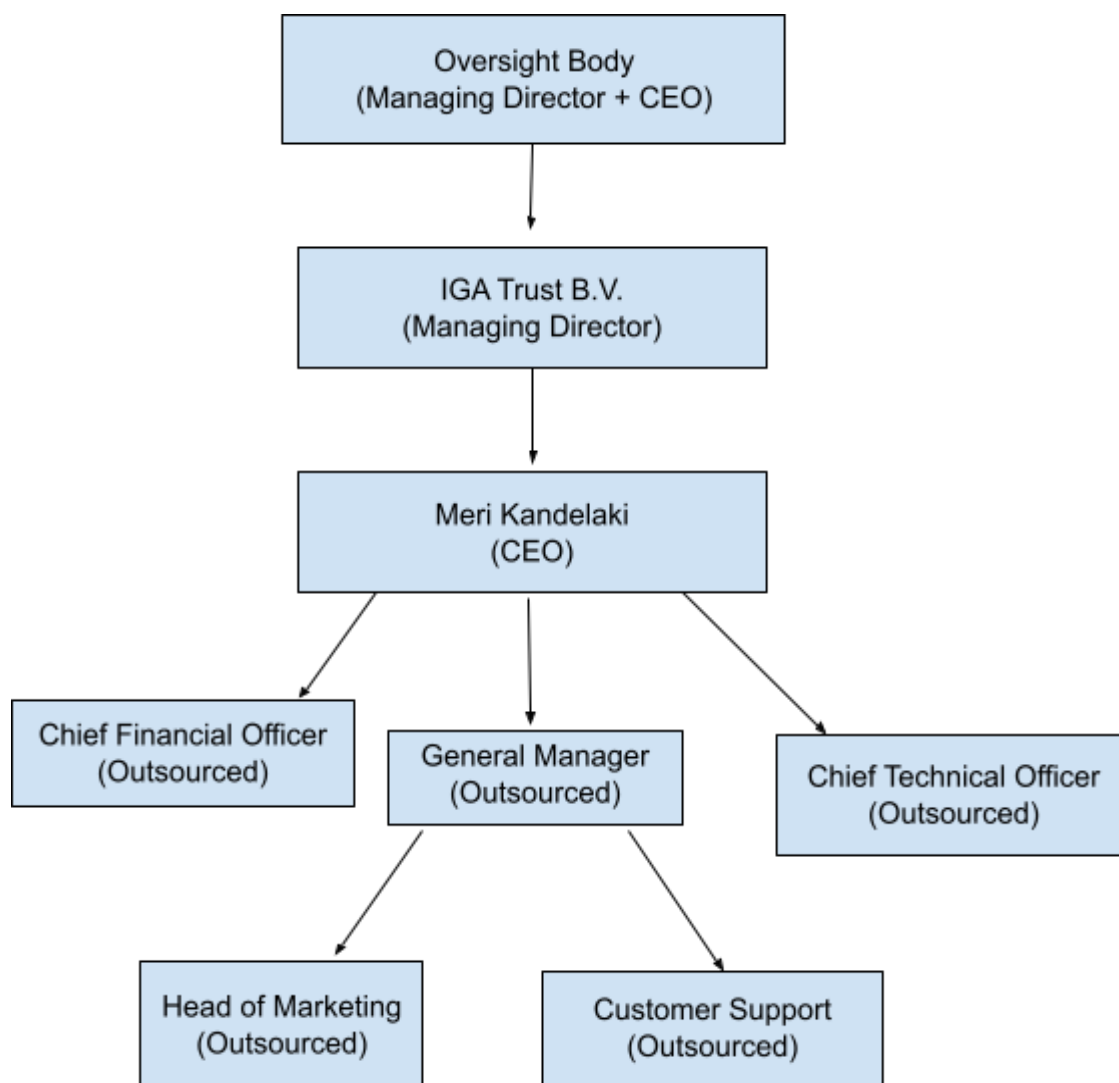
Gareton B.V. imposes restrictions and fully complies with the accepted legal age of 18+ being the players allowed to use online commercial gaming products.

The Compliance department is responsible for monitoring all transactions to and from Gareton B.V. and verifying the identity of all online registered players. Gareton B.V.(s) senior management, as well as all employees, are fully committed to adopting a risk-based approach to anti-money laundering ("AML") with effort focused where it is most needed to

be able to process payment transactions between Gareton B.V. (s) and customers in a way free of money laundering issues. An AML manual outlining the policy and procedures in relation to risk assessment and management has been prepared for this purpose.

The developed internal systems and procedures applied by Gareton B.V. are appropriate for remote gaming businesses. The Company appreciates that its money laundering and terrorist financing risk assessment is not a one-off exercise, and these are assessed regularly so that the adopted approach is effective at any time.

Planned Management Structure



Key positions have been filled with highly qualified professionals who possess extensive expertise in their respective fields. Their background, competencies, and industry experience position them well to provide strategic guidance and drive the further development and expansion of the business. We are confident that their contributions will play a crucial role in strengthening the company's operational capabilities and supporting its long-term growth objectives.

Please note that the final terms for some positions are still in the process of being agreed, and we will provide the updated details once the discussions are fully concluded.

BUSINESS RISK RATIONALE

The business risk rationale is a key part of our strategy because it shows that the company has carefully considered the various risks it faces and has put in place structured strategies to manage them. By clearly identifying, assessing, and mitigating risks, businesses can demonstrate their resilience and preparedness for challenges, which ultimately builds trust with stakeholders, investors, and partners.

Here's what we consider and include:

1. Identification of Risks

A comprehensive business risk rationale starts with identifying the various types of risks the business might face. These risks should be categorized into different types to give a structured overview. Below are the main categories of risks:

- **Market Risks:**
 - **Competition:** The risk of existing competitors becoming stronger or new competitors entering the market, potentially affecting market share.
 - **Market Demand:** The possibility of decreased customer demand for the product or service due to changes in consumer preferences, economic downturns, or seasonal variations.
- **Financial Risks:**
 - **Cash Flow:** Risks related to insufficient cash flow, delayed payments from clients, which could affect day-to-day operations.
- **Operational Risks:**
 - **Supply Chain Disruptions**
 - **Technological Failures**
- **Regulatory Risks:**
 - **Changes in Laws:** The risk of new laws or changes to existing regulations (e.g., tax policies) that could affect operations, compliance costs, or profitability.

2. Risk Evaluation (Likelihood and Impact)

Once risks are identified, each risk should be evaluated based on:

- **Likelihood:**
 - Assess how likely each risk is to occur. This can be classified on a scale such as:
 - **High:** Risk is very likely to occur
 - **Medium:** Risk has a moderate chance of happening

- Low: Risk is unlikely to happen but still possible
- Impact:
 - Assess the potential impact if the risk materializes. This can also be classified as:
 - High: The risk would have significant consequences on the business's operations, profitability, or reputation.
 - Medium: The risk would cause some disruption but could be managed effectively
 - Low: The risk has a minor effect and can be mitigated with little effort.

This risk assessment matrix helps prioritize the risks based on their severity and probability, which aids in determining which risks require immediate attention and which can be monitored.

CONTRACTUAL MODEL WITH KEY SUPPLIERS

The contractual model outlines the specific terms and conditions under which the Company engages with its suppliers. Here's what we cover: Supplier Selection Criteria

This includes factors such as:

- Quality Standards: The supplier's ability to meet the quality expectations of the business.
- Reliability and Reputation: The supplier's track record for on-time delivery, customer service, and performance in the industry.
- Capacity and Scalability: The supplier's ability to meet current and future demand as the business grows.
- Cost-effectiveness: The pricing structure and how it aligns with the business's budget or financial goals.
- Ethical and Sustainability Practices: The supplier's commitment to ethical practices, sustainability, and social responsibility, which could be important for the business's brand.

COMMERCIAL STRATEGY

MARKETING PLAN

Over the last years, online Gaming has been making its way into the online world. That is why it is necessary for a successful online business to have a competent marketing strategy with the emphasis on internet-marketing. Such instruments as SEO services, affiliate

marketing services, PPC services, social media, emailing services and Mobile Marketing services to help to attract the target audience.

PROBLEM WORTH SOLVING

The significant marginality of the online Gaming industry shows us that there's room for a wider offer of this kind of service. There aren't significant regional operators that we could identify as leaders, but the biggest and well-known platforms are European.

OUR SOLUTION

We have multiple years of experience in gaming and sports betting activities. We will make use of geo blocking for the Dutch Caribbean, Netherlands, United States, France, North Korea Syria, Israel and Iran. The services are provided exclusively in those jurisdictions that are permitted under the licensing requirements of Curaçao. To ensure adherence to compliance requirements, the company continuously monitors the list of allowed and restricted countries, implements appropriate technical and operational controls, and conducts regular reviews of its compliance framework.

OUR ADVANTAGES

Our team has experience related in gaming and sports betting activities, which gives us the possibility to offer a product that serves an engaging user experience. We are acquainted with the AML/KYC requirements and have compliance documents from our related activities.

FINANCIAL

FORECAST

We have prepared a forecast based on our own experience in the market, the overview shows the development from Year 1 through Year 3. Our forecast is that we will go live on June, 15th, 2024.

	<i>2024</i>	<i>2025</i>	<i>2026</i>
<i>Gross Gaming Revenue</i>	<i>134 813 253</i>	<i>148 294 578</i>	<i>162 738 855</i>
<i>Setup revenue</i>	<i>305 130</i>	<i>335 642</i>	<i>368 335</i>
<i>Support revenue</i>	<i>562 179</i>	<i>618 397</i>	<i>678 631</i>
<i>Other revenue</i>	<i>4 319 438</i>	<i>4 751 382</i>	<i>5 214 179</i>
<i>Total</i>	<i>140 000 000</i>	<i>154 000 000</i>	<i>169 000 000</i>
<i>Direct Expenses</i>	<i>119 930 104</i>	<i>131 923 115</i>	<i>144 772 769</i>
<i>Casino direct expenses</i>	<i>73 582 796</i>	<i>80 941 075</i>	<i>88 824 946</i>
<i>Software services</i>	<i>15 353 478</i>	<i>16 888 825</i>	<i>18 533 841</i>
<i>Payment agents commissions Expenses</i>	<i>675 379</i>	<i>742 917</i>	<i>815 279</i>
<i>General Affiliate expenses</i>	<i>1 920 573</i>	<i>2 112 630</i>	<i>2 318 406</i>
<i>Operators Profit</i>	<i>28 397 879</i>	<i>31 237 667</i>	<i>34 280 297</i>
<i>Overheads</i>	<i>13 710 718</i>	<i>15 081 790</i>	<i>16 550 796</i>
<i>Bank services</i>	<i>245 808</i>	<i>270 389</i>	<i>296 726</i>
<i>Legal services</i>	<i>93 475</i>	<i>102 822</i>	<i>112 838</i>
<i>Marketing and advertising</i>	<i>8 347 706</i>	<i>9 182 476</i>	<i>10 076 873</i>
<i>Other overhead expenses</i>	<i>4 310 806</i>	<i>4 741 887</i>	<i>5 203 759</i>
<i>Loans interest Expense</i>	<i>712 923</i>	<i>784 216</i>	<i>860 600</i>
<i>Total</i>	<i>133 640 823</i>	<i>147 004 905</i>	<i>161 323 565</i>
<i>Currency reimbursement</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Current PL</i>	<i>6 359 177</i>	<i>6 995 095</i>	<i>7 676 435</i>

TECHNOLOGY, SOFTWARE & PROVIDERS

SOFTWARE AND PAYMENT ARCHITECTURE

The games/services that will be provided will be mainly, slots, live casino. These will be provided through the platform/software provider such as SOFTSWISS. To stay competitive in this fast-growing era and to reach end users who prefer using electronic payments as a means of payment we have chosen to adopt on-line payments methods (safe and secured).

3RD PARTY PROVIDERS

- Games:
 - Evolution
 - Playson

- Payment Provider
- Paymix
- Gurupay