

BITFI CAPITAL B.V.

BUSINESS PROPOSAL

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1. CONFIDENTIALITY STATEMENT

The information contained herein is confidential between BitFi Capital B.V. our Curacao advisors Sadeyka and the Curacao Gaming Board. This document contains private information that may not be divulged or discussed with anyone outside the aforementioned organisations without written consent from BitFi Capital B.V. The information contained herein shall limitedly and exclusively be used for the purpose it is being provided, that is, the approval of online gambling services.

2. DEFINITIONS

- (i) *Account* means a personal account opened by a Player and maintained by the Company so as to allow this person to place Bets;
- (ii) *Applicable law* shall refer to the *laws of Curacao*
- (iii) *Bets* shall refer to the act of placing a Wager;
- (iv) *Company* and/or BitFi Capital B.V. and/or '*BitFi Capital*' – shall mean BitFi Capital B.V., the company registered under the laws of Curacao and bearing registration number 166885.
- (v) *Game(s)* shall refer to the games available for Players to participate in through the Website;
- (vi) *Games for Free* can be accessed by any internet Visitor who can play for free. Registration is still required, however the Visitor will not wager real money;
- (vii) *Games for Real* can be accessed only by Players. In a Game for Real the Player can wager his money.
- (viii) *Online Registration* is the online registration which a Visitor needs to undertake to become a Player. All data posted by the Player or modified in the future will be the property of BitFi Capital B.V. The identity of the Player will be kept strictly confidential.
- (ix) *Promoters* shall refer to the ultimate beneficial owners of BitFi Capital B.V.
- (x) *Player* is the person who has successfully completed the Online Registration by filling in a registration form and accepting the Portal's terms and conditions. The person will receive a user ID and a password. These will permit access to the various private areas within the Website.
- (xi) *Visitor* is the person who will visit and browse through the Website to read the general content within the Website and play Games for Free. To play Games for Free, the Visitor will be required to undertake Online Registration.
- (xii) *Wager* is an agreement under which each Player pledges a certain amount depending on the outcome of an unsettled matter.
- (xiii) *Website* shall refer to the site operating the games, that is, www.webetcoin.com

3. EXECUTIVE SUMMARY

BitFi Capital B.V. has been formed with the intention to provide online gaming services to its clients.

While the Company is being launched as a new operation in Curacao, the Promoters and Senior Management have many years of experience in the sector. The team behind the operation is composed of highly technical personnel with diverse backgrounds ranging from experience in project management, marketing and software consultancy. The executive director of BitFi Capital B.V. comes with an educational background in information technology, communications, marketing and software engineering amongst others.

This business plan indicates the Company's intention to be regulated in Curacao in accordance with the Applicable law. The licence will be held by BitFi Capital B.V. a company registered according to the law n ° 2003-036 of January 30th, 2004 on commercial companies, which has its registered address at

Subject to the attainment of the necessary authorization by the Curacao Gaming Board, the Promoters envisage the commencement date of operations to be in the next quarter.

4. ENTERPRISE DESCRIPTION

4.1. Class of License

Following the issuing of the necessary regulatory approvals by the Curacao Gaming Board, BitFi Capital B.V. will operate an online casino website. We only intend to offer Casino and Slots as product verticals.

4.2. Structure

BitFi Capital B.V. is, in its majority, owned by Mr Yaniv Cohen. The ultimate legal and beneficial owner.

Shareholder	Number of Shares
Yaniv Cohen	5000

4.3. The Team

While BitFi Capital B.V. is being launched as a brand-new operation, the Senior Management of the Company has been operating in their respective industries for a number of years and brings a wealth of experience and expertise to this venture. A brief summary of the skills and expertise of the members of the international business team is provided below – further details in respect of the directors and the ultimate beneficial owners can be found in the supporting documentation being supplied together with this business plan.

The management team as described below and which boasts significant experience and expertise, shall be heavily involved in managing BitFi Capital B.V. on a remote basis. As the business grows the following aspirational organisation structure will be implemented leveraging the Senior Management Team's network of recruitment agencies focusing on the gaming sector.



Executive Officer – Yaniv Cohen

Mr Cohen has established, led and expanded businesses in the Casino Industry and the Financial Industry. Businesses that have become highly successful enterprises in a highly competitive industry. Mr Cohen has built a reputation, through his entrepreneurial flair and focus on delivering exceptional results. He has over 18 years of experience managing and organizing Junket Group around the world. His work has taken him around the world including London, Romania, Europe, Singapore, Dubai and USA. Yaniv has a passion for business development, with an emphasis on the Casino Industry and building high performing teams to challenge what is considered “high standard” and exceed the expected results. He achieved these results through hiring the right people and learning how to motivate everyone to achieve their best. He is a proactive business leader who focuses on developing partnerships around the world.

Compliance Officer – Andrew Coyne

Mr Coyne has held a number of different management roles throughout his career, enabling him to obtain thorough knowledge of operations. In particular, Mr Coyne excels in his understanding of risk analysis and fraud prevention.

Mr Coyne has been involved in the online gaming sector for the last 15 years. He has worked with many B2C operators from tier one multinational businesses to start-ups which managed to grow to challenge the market incumbents. Mr Coyne has been recognised and awarded personal management licences in European jurisdictions and vetted as an individual with the expertise necessary to ensure regulatory and legal compliance with the standards required by the relevant local authorities.

As part of his responsibilities, Mr Coyne has managed both financial and operational risk, making him the ideal candidate to recruit and train risk management staff, determine company policy and liaise with other departments internal as well as with any relevant external authorities. Mr Coyne shall be instrumental in planning, designing and implementing the risk management strategy and the payment processing procedures for BitFi Capital.

Head of Casino, Marketing and KYC – Christopher Hazell

Mr Hazell has been involved in the remote gaming industry since 2003 when he started his career in the gaming sector within the multinational sports betting company Ladbrokes dealing with customer service, handling of players' bets and payments.

Mr Hazell later held the position of Chief Commercial Officer at the Kazakhstan-based sports betting operator Olimp, over a five-year period. Responsible for the sourcing of new products, negotiations and contracts, he played a key role in the growth of the business, whilst assisting with the fulfilment of the company's ambitions to expand geographically. Mr Hazell participated in the creation of numerous partnerships with third parties and represented the business at a number of industry events each year.

Mr Hazell has also worked at global leading sports data firm Sportradar, picking up invaluable experience from a B2B perspective. Mr Hazell's knowledge of the remote gaming and sports industries coupled with his experience in business management provides him with the tools required to perform these roles for the Company.

Chief Commercial Officer (Finance and Technical) – Faraz Majidulla

Mr Majidulla has years of experience in commercial real estate. Holding the position of Commercial Director in the international business group, Mr Majidulla was responsible for management of the firm's sales and marketing department.

Having been involved in the gaming industry since 2017, Mr Majidulla has quickly established himself as a highly respected professional. A key figure in the establishing of the new business, Mr Majidulla has all the experience and credentials required to be responsible for the commercial activities for the Company. Since joining the industry Mr Majidulla has held the roles of Business Development Manager along with Commercial Director and has been responsible for successfully securing deals with sportsbook providers, casino providers, and technology partners.

Internal Group Governance

An independent Risk and Compliance Committee which has the necessary independence from any group company board, meets on at least a monthly basis to discuss business risks, monitor and regulatory change and plan mitigation strategies for any identified risk(s). The purpose of the Committee is to ensure that Hexopay's growth as a company is mirrored by its compliance with all applicable regulatory and legal obligations. The committee is intended to be a cross departmental working group who review existing processes, policies and documentation, alongside monitoring new requirements and ensuring steps are taken to ensure ongoing compliance.

Responsibilities

The Committee has a collective responsibility for ensuring that:

- The Risk Register is up to date and accurate
- Projects within the risk register are monitored (e.g. GDPR)
- Policies are reviewed and updated where necessary
- External legislative and regulatory updates are communicated and action plans where appropriate are developed

Meetings are chaired and minuted and the Committee has the authority to act as required. The board is updated and reports are received by the CEO. The Committee Chair is Andrew Coyne who acts as Compliance Officer and is the MLRO. Mr Coyne acted as MLRO for tier one EU gambling operators in previous roles prior to joining and holds both a Advanced Certificate in AML practice from the International Compliance Association (ICA) and a Personal Management Licence (PML) from the United Kingdom Gambling Commission (UKGC). Christopher Hazell supports the MLRO in establishing AML controls and supervising the implementation of internal policy framework.

Mr Coyne also acts as Data Protection Officer (DPO) for the group supported in a technical capacity by the technical team. The group has robust reporting mechanisms for any suspected money laundering or breaches in data privacy and have dedicated email addresses to allow all employees to report notifiable events and or whistle blow as may be appropriate.

The senior management team meets weekly and relevant information is cascaded to a weekly company wide meeting where all employees are required attendees. Owing to the global nature of the business and geographic

spread of teams meetings take place using video conferencing software. Meetings of critical importance are recorded.

A company wide meeting is held weekly after the senior management meeting to cascade information to the entire employee base and compliance initiatives are supported by a tailored eLearning suite provided by Ihasco. All employees are required to have at least annual training on the following modules:

- Anti Money Laundering
- Anti Bribery and Corruption
- Cyber Security
- General Data Protection Regulation

Training records are kept electronically and all employees are required to pass an online test to evidence their understanding of the course material.

All meeting outputs are cascaded up to the Board for approval. Similarly policies are developed in house with external legal support where necessary and signed off at Board level.

5. OPERATIONS PLAN

5.1. The Website

The domain operating the iGaming Website shall be owned by the Company and will operate on its servers. The website will sit on an iGaming platform leased from Betconstruct and operated by BitFi Capital on a revenue share arrangement. The casino and slot content will be from best in class providers through an aggregation model supplied ultimately by Betconstruct.

The Website will be accessible at www.webbetcoin.com. All Visitors can access the homepage of the Website, from where they can subsequently access other sub-pages. Visitors will have the facility of accessing one version of the Website in English. If at later stages, the Company shall explore the possibility of offering additional versions, comprising other languages, the Company shall ensure that the Website as it is produced in different languages shall always reflect the same content. A version adapted for the access of the Website on tablets and mobile phones shall be available.

The Website's home page shall include information on how Players may place Bets, access different bonuses and obtain further information about upcoming Events on which wagers may be placed.

The Website's main sub-pages shall be the following:

- Slots

- Casino
- Promotions
- Statistics
- Terms
- Responsible Gaming
- Privacy Policy
- Security Policy
- AML Policy
- Help/Contact Us

Following authorisation, a Player who has logged into their Account will gain access to the following:

- My Bets
- Deposit
- Withdrawal
- My Account

When viewing the content of the 'My Account' button, the Player will be able to view a full history of their transactions as well as deposit and withdraw funds.

Information about the Games, prizes and winners shall be accessible without the requiring the Visitor to log in. While a distinction applies between Bets with the use of 'real money' and other Bets, a login shall always be required for playing the Games.

5.2. The Games

Bets on casino and slot games

The Company's product shall be providing Players the possibility of placing Bets on casino-style games such as roulette and blackjack, in addition to online slot content. The result of such games shall be determined by a random number generator.

Playing the Game/s

Registration

Visitors may set up an Account, free of charge, by undertaking the Online Registration available on the Company's Website.

Quick Registration

Quick Registration, which enables the Player to make a Deposit and to place a Bet, shall require the Player to provide the following information:

- (i) Mobile phone number;
- (ii) Email address;
- (iii) Password of choice;
- (iv) Confirmation that the individual is over 18 years of age and that the Terms have been accepted.

Complete Registration

A Complete Registration must be processed prior to the Player making a Withdrawal request. A Complete Registration shall require the Player to provide the following information:

- (i) Full name;
- (ii) Date of birth;
- (iii) Residential address;
- (iv) Document Upload (passport; driving licence, national identity card).

A Withdrawal request will not be processed if the Player is unable to provide details of a valid identification document.

Logging into the Account

Players may manage their Accounts only after successfully logging in using their mobile phone number and password chosen during the Online Registration. Having secured positive authorisation, the Players may gain access to their Account from where they may access the following information:

- *My bets* - this section includes a full history of the Player's Bets on online casino and slot games and will enable the Players to filter the on-screen list they wish to view, for example limiting the list only to Bets which were placed during a particular calendar month etc.
- *Deposit* - this section enables Players to deposit funds into their Account using one of the accepted payment methods.
- *Withdrawal* - here the Players can lodge a request to withdraw any funds they wish to remove from their Account using one of the accepted withdrawal methods.
- *My account* - This shall include the Player's personal details including contact details, as provided during the Player's registration of the Account. Players will be able to edit personal information such as their address, email and mobile phone number. Players will also be able to change their password by inserting the existing Account password and the newly required password twice. For changes to identification documents and/or surname, Players may upload document images via their account management section online, or alternatively, contact Customer Support.

Depositing funds

Money may be deposited through payment service providers, the Company will endeavour to make alternative deposit methods available to Players, such as via payment cards and bank transfer. Deposits may be made by logging into the Player's Account through the Website, after which Players must select the method of deposit or follow instructions. Funds shall be transferred to the account immediately after verification of payment.

Placing Bets

Players may place Bets only when their Account balance is positive.

All outcomes of the Player's Bets will be accessible in the 'My bets' section of their Account.

Claiming the Prize

Prizes awarded by BitFi Capital B.V. on a winning Bet shall always be monetary prizes. Players may claim the Prize by logging into their Account from where they may select the preferred method of withdrawal.

Cancellation of Games

In light of the activity being proposed by the Company, Games may be cancelled for two main reasons, namely due to cancellation due to misconduct and cancellation due to interruption or system failure:

Cancellation due to misconduct

The Company shall reserve the right to declare a Bet, or a part thereof, as void or suspend the payment until any investigation is concluded in the event of suspicions of unfair practices. Equally, Bets may be declared void or suspended if made in violation of the Terms and Conditions, in the case of unauthorised access to the Company's software, apparent software errors or any other disputes which contest the fairness of a Bet.

Cancellation due to the Company's system interruption or failure

If the system were to malfunction and/or crash during the process when a Player is placing a Bet, there are two possible outcomes. If the information related to the Bet was recorded in the transactional database log then the Bet will be placed and settled according to the outcome. If the information was not recorded in the transactional database log then the Bet will not be placed and no payment will be removed from the Player's Account. Should this extremely rare situation occur, it is the Player's responsibility to check whether or not the Bet was placed, as soon as is practicable.

Since all hardware is mirrored which means that all system data is automatically backed up, if a server were to experience an unexpectedly serious problem, all of the recorded data will be retrievable from other servers. Additionally, the system is protected by a UPS (Uninterrupted Power Supply).

5.3. Risk Management

BitFi Capital shall adopt a risk avoidance approach and hence, shall have policies in place to assess and budget its risks. The Company intends not to perform any activity that could carry any risk. In attaining this, the Company shall set up three risk-management teams:

- (i) Compliance Risk Management: A risk management team that addresses financial, legal or criminal risk. This team would be responsible for addressing the risk of fraud, theft, money laundering and illegal registrations, *inter alia*.
- (ii) Operational Risk Management: A risk management team that addresses the structure of content available and processes underpinning Business As Usual (BAU) operations.
- (iii) Technical Risk Management: A risk management team for system security. This team shall be responsible for adopting measures that ensure IT security as well as maintenance and development of systems that prevent and combat hacking.

A summary of key risks and stated mitigation is below:

Risk	Description	Probability	Severity	Actions to Mitigate / Address
Loss of Key Banking Partners - segregated accounts	Company relies on third parties to meet safeguarding requirements	Low	Critical	Redundancy in place. No single point of failure
IT	System outage, Infrastructure falls over	Moderate	Severe	All servers backed up. Amazon Web Services support all Company infrastructure with failover datacentres if needed. 99.9% uptime in last 5 years
Financial Viability of Company	Company becomes insolvent	Low	Critical	Company has professional accountants and is within an established group with Parent Company who have considerable assets for organisation of its size. Robust financial reconciliation and

				lean processes on cost and expense management
Funds received subject to ML / POCA concerns	Low	Low	Severe	Due to the nature of activities, funds are from business to business. Robust Client Due Diligence Process supported by Transaction Monitoring and KYC tools will automate a warning system for manual review

Control System and Gaming Software

General Outline

The software shall be owned by the Betconstruct Group and licensed by the Company. Betconstruct shall carry out all software maintenance.

Betconstruct have robust SLAs in place ensuring any disruption to service is at a minimum and the service standards are at least at industry standard. Betconstruct are responsible for managing the site availability and ongoing maintenance.

Handling & Flow of Funds

Bank Accounts

For each currency of operation, the Company intends opening two main bank accounts:

- (i) Operations account - the operations account will be the primary account of the Company for the operation of the business. The profits by BitFi Capital B.V. from the Games will be transferred to this account. All transactions for the operation of the business, including payment to services providers, payment of salaries and other relative expenses shall be undertaken from this account.
- (ii) Players' account - the Players' account will be the account where all the money deposited by Players will be held. This will be a current account generating zero interest. This account will also be specially designated by the bank as holding players funds and thus enjoying the protection from creditors of the Company. BitFi Capital B.V. will hold the sums paid in the account by the Players in escrow, which sums will remain deposited in the said account until used by the Player for playing. Money may be withdrawn or deposited into this account by the Player in accordance with the terms and conditions of the Company. The balance will be adjusted by adding deposits made by the Player, subtracting the price for any participation in the Games and adding the winnings. Funds may also be held by a Payment Service Provider within the Company's corporate wallet..

BitFi Capital B.V. intends offering its Players the maximum safety and transparency in financial transactions and shall provide the Players with the possibility of using renowned and highly reliable payment gateways and e-wallets. All the money operations/transactions will take place in absolute privacy and confidentiality. No cash will be used at any stage.

Currency of Operation

The currency of operation will be the Euro (EUR).

Deposits, Withdrawals and Transfers

Deposits – The methods for accepting deposits shall be:

- (i) Debit and Credit Cards
- (ii) Cryptocurrencies

Withdrawals – Where possible all withdrawals will be made back to the same channel from where the deposit was made. Where this is not possible, then the withdrawal will only be made after accurate checks are done to establish that the destination of the withdrawal is to the same person that made the deposit through the initial channel.

5.4. Players' Protection

BitFi Capital will provide various security measures envisaged to protect both the Players and itself. The security measures can be principally divided into three main categories as follows:

Legal Protection

BitFi Capital B.V. will operate under the approval of the Ministry of Interior of Curacao and will be subject to all the protection envisaged under the Applicable law for players using the services of a Curacao Licensee. Hence, BitFi Capital shall observe all the rules and regulations regulating Curacao gaming licensees.

Information Technology Protection

The system to be used by the Company shall be certified by the and hence, shall satisfy all the security requirements according to the applicable law.

BitFi Capital B.V. will carry out thorough testing and regular verifications on the functionality of their system. In accordance with standard Regulations, the software will be controlled continuously.

Data confidentiality will be ensured by the encryption of all the pages in which the Players will insert their personal and bank data. This encryption will be achieved via the use of the SSL Certificates which are issued by the authorities for the safety of electronic commerce and of transmission of data and communications through the internet and will be accessible on the home page of the Website by selecting the appropriate link. Confidential data such as username and passwords will be encrypted with industry strength ciphers such as AES (Advanced Encryption Process).

Clients' Financial Protection

BitFi Capital B.V. is conscious that gaming can be addictive on the one hand, and that players expect to feel secure and confident in the Company on the other hand. In this regard, BitFi Capital B.V. shall adhere to all regulations protecting its Players with regards to the financial protection of Players. In particular:

- (i) In addition to details of the age restrictions of participating in the Games, the Website will display at all times and in a prominent place, warnings of the addiction possibilities of gaming.
- (ii) The website will include a Responsible Gaming Policy, outlining common symptoms of problem gambling, alongside advice on prevention. The Responsible Gaming Policy shall also include information on BitFi Capital B.V.'s internal policies related to Responsible Gaming.

5.5. Customer Support

General Outline

BitFi Capital B.V. takes pride in its customer care services. In this regard grievance procedures and contact details that can be availed of will be clearly laid out on BitFi Capital's Website. This is to ensure that the Players will then be able to contact BitFi Capital B.V. with their general queries or requests for assistance either in real time by telephone or live chat, or by email.

For the safety and protection of both the Player's and BitFi Capital B.V.'s interest, a copy of all correspondence will be kept for a period of not less than 12 months from resolution of the grievances.

5.6. Target Markets

The business is focused on acquiring players in Latin America, Europe and Africa.

i. Latam

Latin America presents a promising market for online casinos for several reasons:

Growing Internet Penetration: The region has seen a significant increase in internet access and smartphone usage, making online gambling more accessible to a larger audience.

Cultural Acceptance: Many Latin American countries have a cultural affinity for gambling, with traditional games and betting being popular. This cultural backdrop can facilitate the acceptance of online casinos.

Young Population: The demographic in many Latin American countries is relatively young, tech-savvy, and open to new forms of entertainment, including online gaming.

Economic Growth: As economies in the region continue to develop, disposable income is increasing, allowing more people to spend on entertainment, including online gambling.

Diverse Gaming Preferences: Latin America has a diverse range of gaming preferences, which allows online casinos to offer a variety of games that cater to different tastes, from traditional casino games to sports betting.

ii. Nordics

High Internet Penetration: The Nordic countries boast some of the highest internet penetration rates in the world, making online gambling easily accessible to a large portion of the population.

Strong Economy: The region has a high standard of living and disposable income, which means that people are more likely to spend on entertainment, including online gaming.

Tech-Savvy Population: The Nordic countries have a highly educated and tech-savvy population, which is more likely to engage with online platforms and new technologies, including online casinos.

Focus on Responsible Gaming: The Nordic market places a strong emphasis on responsible gaming practices, which can enhance the reputation of online casinos that prioritize player safety and well-being.

These factors make the Nordics an attractive market for online casinos looking to expand their operations and connect with a receptive audience.

iii. Africa

The continent of Africa shares many of the same criteria which makes Latam an attractive market in addition the online gambling sector in Africa is still probably at its most nascent in a global context which presents opportunities for innovative solutions and services that can meet the unique needs of African consumers.

6. MARKETING RESEARCH AND PLAN

6.1. Industry Analysis

The Company is considering placing itself in the gaming industry which has had a positive and constant growth in recent years. Within the gaming industry, the online sector has a more evident growth when compared to retail betting, thus giving more confidence of success to the Company. This growth is set to increase as forecasts indicate that the online gaming market will continue to grow steadily in the coming years.

6.2. Swot Analysis

Strengths

Experience of the Promoters

While BitFi Capital B.V. is a new project, the Promoters of the Company have the experience and the knowledge of running a similar business. In addition to guaranteeing reliable and efficient company management, this experience has led to the Promoters developing a strong reputation within the industry.

The efficiency and cost of operation

While having strong financial resources to develop its operation, BitFi Capital B.V., by using the online betting module, will have relatively low costs of operation without a compromise on quality.

Seeking to offer Players with the very best possible product, BitFi Capital is committed to develop partnerships with best in class content providers through the Betconstruct platform.

Attractiveness

At the forefront of the Company's strengths is the fact that BitFi Capital B.V. is committed to providing Players with a combination of attractive factors, including a wide range of innovative content.

Accessibility

An added strength of the Company is its relationship with several payment systems that ensure that Players may access the Company's services in a convenient and safe manner.

Credibility of the Licence

The Company is confident that the possession of the online gaming approval granted by the Curacao Gaming Board gives the Company credibility among its client base.

Weaknesses

Human or system failure

While committed to minimising human or system failure, the Company is conscious of the fact that regular training and system maintenance must be undertaken to prevent failure due to these two types of errors.

Opportunities

Trends of the industry

Having carried out a thorough market research, the Company is aware of the potential that the betting market presents. The Promoters deem this potential as an opportunity to achieve a good standing within the well-defined betting niche.

Learning opportunities

As part of its market study, the Promoters and the team have become well-acquainted with the vulnerabilities and weaknesses of existing competition. In this regard they are confident that they may learn from said vulnerabilities and weaknesses and act upon them.

Brand awareness

Committed to investing in marketing the Company's operation, the Promoters are committed to invest to secure brand awareness at an international level. They are confident that said awareness will instil brand loyalty and secure sustainable growth of its operation.

Threats

Competition from other operators

The primary threat that BitFi Capital B.V. will face is the threat of well-known, established competitors that operate in the same market. This threat is larger in instances where the competitors already have a large market share.

Interaction with many organisations

A threat identified by the Company is the high dependence on a number of organisations when conducting its business. This includes service providers, such as the bank, technology partners and payment gateways, among others. However, the Company believes that by taking care to work solely with trustworthy and reputable service providers and by maintaining good relations with the same, this threat will be successfully addressed.

6.3. Industry Analysis

The concept of betting services is not new to the market and hence the Company will face a degree of competitors providing the same types of activities.

Close inspection of competitor services has enabled us to recognise a number of innovations and opportunities which we plan to bring to the local market through our operations. These include but are not limited to:

- i) A faster website - enabling customers to easily open the website and place bets with minimal delay across both desktop and mobile (smartphone and cell phones);
- ii) A fairer deal – due to a strong contact network and relationships across the supply chain, the Company will be in a position to offer Players the most compelling content and the widest range of promotions;
- iii) Outstanding Customer Support – the Company boasts a wealth of industry experience and the team is united in its belief that every Player must feel valued. In order to achieve this key critical mission, the Company shall endeavour to provide a friendly and professional Customer Support service, with the express responsibility of ensuring that resolution times are kept to an absolute minimum.

6.4. Marketing Strategy

Building on the years of expertise of the operational team, the Company will be making significant investment in marketing and hiring of experts to build out its in-house team. The Company will use a combination of in-house and outsourced marketing teams in order to ensure that the business is adaptive to market needs in order to remain competitive.

The Company will focus on marketing strategies related to web marketing and traditional marketing; therefore, including a mix of both ends to attract as many internet users as possible, with the aim that such Visitors become Players and increase the number of transactions undertaken. In the initial phase the Company's strategy will be focused on building a recognisable brand name. Following that, the Company will primarily dedicate its marketing resources towards attracting more prospective Players.

Online and Offline Marketing

As part of its marketing efforts, BitFi Capital B.V. is currently looking at the placing advertisements in online, print and broadcast media.

Search Engines

The Company will plan the best approach for Google or other sources such as PPA (Pay Per Action) or PPC (Pay Per Click). BitFi Capital will also work on optimising its Website for better ranking on other search engines, such as Yahoo.

Web 2.0.

The Company also plans to market its operations through social media marketing that is, marketing through social network sites. Currently, the Company is assessing the marketing of users of social networks such as Facebook, Twitter, Instagram and Youtube.

Banner ads

An additional facet of the Company's online marketing activities shall be the use of web banners as a form of advertising of its product. Intended to attract traffic to its Website, BitFi Capital B.V. shall finance banners on other websites. The Company shall focus on websites that are frequently visited by internet users that are interested in the gaming industry or in betting.

Big Data Analytics and Automated Marketing

The Company shall invest in the latest marketing software to programmatic marketing, retargeting and real-time-buying targeted at desktop and mobile traffic sources for new customer acquisition and retention.

Implementation Timeline

Short-Term Goals

- Our core focus will be on initial setup, such as website optimization and launching initial marketing campaigns.

Long-Term Goals

- Plan for ongoing activities like content creation, affiliate management, and optimization based on performance data.

Projections

The following projections are based upon the executive team's considerable experience in the iGaming market. They show the initial investment which will be from the private wealth of the UBO - no loans or other expenditure is required to fund the Webetcoin project and will ultimately be self funding from the uplift in GGR across our target markets.

High Level 3 Year Financial Forecast

Year	Initial Investment (EUR)	Projected GGR (EUR)	PPC (EUR)	SEO (EUR)	Brand Awareness (EUR)	Total Marketing (EUR)	Platform Fee (10% of GGR)	Net Gaming Revenue (NGR) (EUR)
1	500000	800000	40000	24000	16000	80000	80000	640000
2	0	960000	48000	28800	19200	96000	96000	768000
3	0	1152000	57600	34560	23040	115200	115200	921600

3 Year Annual Breakdown by Target Market

Year	Region	Initial Investment (EUR)	Projected GGR (EUR)	PPC (EUR)	SEO (EUR)	Brand Awareness (EUR)	Total Marketing (EUR)	Platform Fee (10% of GGR)	Net Gaming Revenue (NGR) (EUR)
1	Europe	250,000	400,000	20,000	12,000	8,000	40,000	40,000	320,000
1	LATAM	150,000	240,000	12,000	7,200	4,800	24,000	24,000	192,000
1	ROW	100,000	160,000	8,000	4,800	3,200	16,000	16,000	128,000
2	Europe	0	480,000	24,000	14,400	9,600	48,000	48,000	384,000
2	LATAM	0	288,000	14,400	8,640	5,760	28,800	28,800	230,400
2	ROW	0	192,000	9,600	5,760	3,840	19,200	19,200	153,600
3	Europe	0	576,000	28,800	17,280	11,520	57,600	57,600	460,800
3	LATAM	0	345,600	17,280	10,368	6,912	34,560	34,560	276,480
3	ROW	0	230,400	11,520	6,912	4,608	23,040	23,040	184,320

The business will evaluate its success against achieving these projections on a monthly, quarterly and annual basis tracking month on month performance once into Y2. Alongside this the other key metrics that will be benchmarked and monitored by Senior Management are:

Revenue Metrics:

- **Gross Gaming Revenue (GGR):** The total amount wagered minus the winnings paid out to players. This is a primary indicator of the business's profitability.

- **Net Gaming Revenue (NGR):** GGR minus any bonuses, promotions, and taxes. This provides a clearer picture of actual earnings.

Customer Metrics:

- **Active Users:** The number of unique players who engage with the platform over a specific period (daily, weekly, monthly). This helps gauge customer retention and engagement.
- **Customer Acquisition Cost (CAC):** The total cost of acquiring a new customer, including marketing and promotional expenses. Lowering CAC while increasing customer numbers is a sign of effective marketing.
- **Customer Lifetime Value (CLV):** The total revenue expected from a customer throughout their relationship with the business. A higher CLV indicates successful customer retention strategies.

Engagement Metrics:

- **Average Bet Size:** The average amount wagered per bet, which can indicate player confidence and engagement levels.
- **Session Length:** The average duration of a player's gaming session. Longer sessions may suggest higher engagement and satisfaction.

Churn Rate: The percentage of customers who stop using the service over a specific period. A lower churn rate indicates better customer retention.

Conversion Rates: The percentage of visitors to the platform who complete a desired action, such as signing up or making a deposit. This helps assess the effectiveness of marketing and user experience.

Payment Metrics:

- **Deposit and Withdrawal Rates:** Monitoring the frequency and volume of deposits and withdrawals can provide insights into player behaviour and satisfaction.
- **Payment Processing Time:** The time taken to process transactions can impact customer satisfaction and retention.

Regulatory Compliance: Tracking compliance with local regulations and responsible gambling measures is crucial for long-term sustainability and reputation.

Market Share: Analyzing the business's share of the overall gambling market can help assess competitive positioning and growth potential.

By regularly monitoring these KPIs, a gambling business can make informed decisions, optimize operations, enhance customer experiences, and ultimately drive growth and profitability.