

NOVAGAMING B.V.

Business Plan.

Submitted by:
NOVAGAMING B.V.

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Executive summary

NovaGaming B.V. is a B2B gaming provider focused on expanding its global presence, with a strategic emphasis on key international markets, particularly in Asia, including Thailand and Indonesia—targeting jurisdictions where online gaming is not restricted.

Operating under the brand name "novagaming" through our official website, novagaming88.com, we offer a dynamic portfolio of games designed to appeal to a wide player base without focusing on any specific demographic.

Our core offerings include live casino and slot games, delivering engaging, high-quality entertainment tailored to the needs of modern operators and players alike.

Why choose Curacao Gaming B2B License

1. New Legitimacy

- LOK came into effect in 2024.
- Introduced a new Curacao Gaming Authority (CGA) with stricter rules, AML supervision, and separate B2B and B2C licensing.
- Makes Curacao licenses more attractive for payment providers, game providers, and regulators globally.

2. Fast & Affordable Licensing

- Lower costs compared to Malta, Isle of Man, or UK.
- Application time: 4–12 weeks (depending on the structure and documents).
- Great for startups, aggregators, or studios entering the market.

3. No Market Restriction

- No geographic restrictions (but local laws still apply).
- Enables operators and suppliers to work globally—especially with unregulated or gray markets in Asia, LATAM, Africa.

4. Crypto-Friendly

- Accepts cryptocurrency gaming and payments with minimal red tape.
- Popular with crypto casinos, NFT integrations, and Web3 game suppliers.

5. Simple Corporate Structure

- It can be only one entity in Curacao and a sole shareholder.
- No need to establish a full physical presence on the island.

Marketing Strategy

1. Market Understanding & Positioning

- **Regulatory Sensitivity:** Understand each country's grey-zone laws (e.g., no official ban, but no license system). Operate cautiously with localized partners and AML/KYC standards.
- **Cultural Preferences:**
 - Thailand: High interest in slots, fish games, and mobile-friendly betting.
 - Indonesia: Preference for discreet platforms, with emphasis on Islamic compliance in tone (avoid bold casino imagery).
 - Vietnam/Philippines: High engagement with sports betting and live casino streams.
- **Position Your Platform:**
 - Highlight flexibility: "Localized content, global compliance."
 - Offer white-label, API aggregation, and custom branding as value-adds.

2. Target Audience Segmentation

- Startup Operators: Individuals or groups looking to launch online casinos.
- Existing B2C Brands: Operators seeking to expand game variety or payment options.
- Marketing Affiliates/Agents: B2B2C approach; they refer local traffic or manage customer acquisition.

3. Digital Marketing Channels

- LinkedIn & Telegram for B2B
 - Run paid LinkedIn Ads targeting job titles: iGaming CEO, Product Manager, Gambling Affiliate across Southeast Asia.
 - Active participation in Telegram groups: gaming operators, crypto casino forums, SEA gaming business chats.
- Regional Exhibitions & Partner Meetups
 - Attend or sponsor SiGMA Asia, ASEAN Gaming Summit, iGB Asia, or local affiliate meetups.
 - Organize gathering meetings with brokers or agents during events.

SWOT Analysis

Strengths

- Game aggregation includes popular Asian content (e.g., slots, fish games, live dealer) tailored to market preferences.
- Operating under Curacao or Anjouan license appeals to grey-zone jurisdictions with less stringent regulatory structures.
- Platform supports Thai, Bahasa Indonesia, Vietnamese, and English interfaces.
- Plug-and-play API, wallet integrations, white-label solutions speed up time-to-market for new operators.
- Trusted compliance setup reassures partners and prevents reputational risk.

Weaknesses

- New platform in a market dominated by established aggregators and local white-label providers.
- Operating in grey markets always carries legal ambiguity—policy shifts can impact operations or partnerships.
- Heavy reliance on regional sales agents and brokers can dilute direct control over customer relationships.
- Local gateways and crypto processors are prone to interruptions or regulatory blocks.

Opportunities

- Smartphone penetration in Southeast Asia is booming, especially in underserved provinces/cities.
- Many local entrepreneurs are eager to enter gaming but lack tech—offering turnkey platforms fills this gap.
- Demand is growing for local payment options—platforms offering these have a big edge.
Southeast Asia has strong affiliate cultures—B2B platforms that support affiliate management tools will attract operators.

- Myanmar, Cambodia, Laos, Bangladesh, and Nepal present emerging opportunities.

Threats

- Any policy changes banning online gambling can disrupt client operations and trigger shutdowns.
- Competing platforms with deeper capital or local networks can undercut pricing or offer more aggressive deals.
- B2B operators in grey markets often face chargebacks, money laundering attempts, or scam operators.
- Poor localization or communication could lead to lost deals or misaligned expectations.

Company shareholding structure



Organizational plan

Owner/CEO/CFO/CTO: Siaw Chuan Ha

Siaw Chuan Ha is an accomplished business leader with a diverse background spanning customer relationship management, sales, and operations, he brings over 6 years of industry experience. He has a proven track record in driving operational efficiency, improving client retention, and leading teams to exceed performance targets. Fluent in five languages and recognized with multiple sales awards, he excels at navigating multicultural business environments and fostering strategic growth. His expertise strengthens the company's client engagement strategy and operational execution across key markets.

Money Laundering Reporting Officer/ AML Compliance: Yanica Grech

Yanica Grech brings extensive experience in compliance and regulatory affairs within the remote gaming industry, particularly in online casinos, social casinos, and sweepstakes casinos. Currently serving as Senior Manager of Compliance at

Momentum Corporate Services FZ LLC, Yanica has a strong track record in developing and implementing company policies, compliance programs, and managing licensing applications.

Her previous role as Head of Compliance at RedAcre LIMITED (now under Funderpro Ltd) further honed her expertise in regulatory matters, both within the US and Curaçao jurisdictions. Yanica's ability to navigate complex regulatory landscapes and ensure adherence to evolving compliance standards will be pivotal in her role as the MLRO for our business, overseeing all Anti-Money Laundering (AML) functions and ensuring the highest standards of financial integrity.

Her comprehensive knowledge of compliance regulations, her experience in licensing and regulatory audits, and her proactive approach to staying ahead of industry changes make her an invaluable addition to our team.

Recruitment Plan

1. Goal: Hire skilled Sales Representatives, Commercial Managers, and Account Managers in Asia to support business growth and client engagement.
2. Key Steps:
 - Identify Needs: Determine exact number of hires based on market expansion and team capacity.
 - Job Descriptions: Create clear, concise role profiles highlighting key skills, experience, and language requirements.
 - Recruitment Channels: Use LinkedIn, local job boards, recruitment agencies, and employee referrals to source candidates.
 - Selection Process: Conduct resume screening, brief interviews, and role-specific assessments to select top candidates.
 - Onboarding: Provide market-specific training and assign mentors to ensure smooth integration.
3. Timeline:

Once our business goes live, we will begin recruitment plan. The hiring of Sales Representatives, Commercial Managers, and Account Managers in Asia will be completed within 3 months after the end of the second year of operations. This phased approach allows us to scale the team strategically based on business performance and market needs.
4. Estimated Budget (Per Hire)
 - Job Ads & Platform Fees, €200–€400
 - Recruitment Agency Fee (if used), €2,000–€3,500 (20–25% of annual salary)
 - HR/Interviewing Time (Internal), €300
 - Onboarding & Training, €500
 - IT & Tools Setup (Laptop, CRM Access, etc.), €1,000
 - Total Estimated Cost / Hire, €4,000 – €5,700
 - Multiply by number of hires for total recruitment budget (e.g., 6 hires = approx. €24,000 – €34,000).

Game Providers -Skyline Solutions Inc.

This company specializes in B2B gaming software distribution. Licensed and regulated by the Isle of Man Gambling Supervision Commission, Skyline Solutions offers a portfolio of over 3,500 products from industry leaders like Evolution, NetEnt, Red Tiger, and Ezugi. Their services include managed solutions such as 24/7 customer support, CRM systems, and customizable promotion engines. They leverage technologies like AI, blockchain, and immersive graphics to enhance gaming experiences.

Risk Evaluation Process

1. Risk Identification

- Identify potential risks across all operational areas, including:
- Regulatory compliance (e.g. license violations)
- Partner due diligence (e.g. onboarding unlicensed or high-risk clients)
- Technical failures (e.g. platform downtime)
- Financial risks (e.g. payment delays or fraud)
- Data protection risks (e.g. client data breaches)

2. Risk Assessment

- Evaluate each identified risk based on:
- Likelihood of occurrence (Low / Medium / High)
- Impact on the business (Low / Medium / High)
- Use a simple risk matrix to prioritize:
- High Risk = Immediate action required
- Medium Risk = Monitor and control
- Low Risk = Accept or monitor periodically

3. Risk Mitigation

- Apply appropriate controls to reduce the risk:
- Regulatory: Implement strong compliance checks and regular audits
- Financial: Perform KYC/AML checks on partners
- Technical: Ensure regular system backups and security updates
- Data: Use encryption and access control measures

4. Risk Monitoring

- Ongoing monitoring of key risks and performance indicators
- Regular reviews of partner activity, technical stability, and legal compliance
- Update risk assessments as the business scales or regulatory changes occur

5. Reporting

- Key risks and incidents are documented and reviewed quarterly
- Reports shared with the Compliance Officer

Legal Framework

1. Licensing Authority: Curaçao Gaming Authority (CGA): Under the LOK, the regulatory landscape for online gambling in Curaçao has been modernized to ensure greater transparency, international compliance, and responsible gambling practices.

The Curaçao Gaming Authority (CGA) is the newly established independent regulator overseeing.

2. Anti-Money Laundering (AML) Compliance: The Financial Intelligence Unit Curaçao (FIU-Curaçao) remains responsible for AML oversight under the National Ordinance on Identification when Rendering Services (NOIS) and the National Ordinance on the Reporting of Unusual Transactions (NORUT).

3. Corporate Structure and Local Representation: A local representative or director must be appointed to ensure accessibility for the CGA and to oversee compliance with the license conditions.

4. Taxation and Financial Reporting: All filings must be submitted to the Curaçao Tax Authorities and CGA in a timely manner.

Policies and Procedures

At NOVAGAMING B.V., we are fully committed to regulatory compliance, transparency, and strong corporate governance. As part of this commitment, we will submit the required Anti-Money Laundering (AML) Policy during the application process and the Information Security Policy to the Curacao Gaming Authority (CGA) within six months of receiving our license.

Furthermore, we are prepared to implement any additional regulatory or technical requirements set forth by the CGA. In particular, should a mandate for local server infrastructure in Curaçao come into effect, NOVAGAMING B.V. will establish and maintain a secure local server setup to ensure full compliance with data residency, operational integrity, and monitoring standards.

We take a proactive approach to compliance and will continuously align our operations with all applicable legal, technical, and ethical standards to uphold the integrity of our gaming operations and maintain the trust of all stakeholders.

Projections

Our revenue model is based on a 20% share of Gross Gaming Revenue (GGR) from our clients, along with an additional 10% marketing fee. We allocate 10% of GGR to our game provider. Based on this structure, we project total revenue of approximately EUR 2 million in our first year of operations.

Month	Clients	Total GGR (€)	Share Revenue 20%	Marketing Spend (€)	License Fee (€)	Compliance (€)	Salaries (€)	Server Fees (€)	Professional Fees (€)	Games Providers(€)	Total Monthly Expense (€)	Monthly Profit (€)
Month 1	8	1600000	320000	32000	25000	950	3000	2000	1500	160000	224450	95550
Month 2	8	1616000	323200	32320	0	950	3000	2000	1500	161600	201370	121830
Month 3	10	2000000	400000	40000	0	950	3000	2000	1500	200000	247450	152550
Month 4	10	2000000	400000	40000	0	950	3000	2000	1500	200000	247450	152550
Month 5	12	2400000	480000	48000	0	950	3000	2000	1500	240000	295450	184550
Month 6	12	2424000	484800	48480	0	950	3000	2000	1500	242400	298330	186470
Month 7	12	2448240	489648	48965	0	950	3000	2000	1500	244824	301239	188409
Month 8	13	2600000	520000	52000	0	950	3000	2000	1500	260000	319450	200550
Month 9	13	2626000	525200	52520	0	950	3000	2000	1500	262600	322570	202630
Month 10	13	2652260	530452	53045	0	950	3000	2000	1500	265226	325721	204731
Month 11	13	2600000	520000	52000	0	950	3000	2000	1500	260000	319450	200550
Month 12	13	2626000	525200	52520	25000	950	20000	2500	3000	262600	366570	158630
Month 13	13	2652260	530452	53045	0	950	20000	2500	3000	265226	344721	185731
Month 14	13	2678783	535757	53576	0	950	20000	2500	3000	267878	347904	187853
Month 15	14	2705570	541114	54111	0	950	20000	2500	3000	270557	351118	189996
Month 16	15	3000000	600000	60000	0	950	20000	2500	3000	300000	386450	213550
Month 17	15	3030000	606000	60600	0	950	20000	2500	3000	303000	390050	215950
Month 18	15	3060300	612060	61206	0	950	20000	2500	3000	306030	393686	218374
Month 19	15	3090903	618181	61818	0	950	20000	2500	3000	309090	397358	220822
Month 20	20	4000000	800000	80000	0	950	20000	2500	3000	400000	506450	293550
Month 21	20	4040000	808000	80800	0	950	20000	2500	3000	404000	511250	296750
Month 22	20	4080400	816080	81608	0	950	20000	2500	3000	408040	516098	299982
Month 23	22	4400000	880000	88000	0	950	20000	2500	3000	440000	554450	325550
Month 24	22	4444000	888800	88880	25000	950	20000	3000	3000	444400	585230	303570
Month 25	24	4800000	960000	96000	0	950	25000	3000	4000	480000	608950	351050
Month 26	24	4848000	969600	96960	0	950	25000	3000	4000	484800	614710	354890
Month 27	28	5600000	1120000	112000	0	950	25000	3000	4000	560000	704950	415050
Month 28	28	5656000	1131200	113120	0	950	25000	3000	4000	565600	711670	419530
Month 29	30	6000000	1200000	120000	0	950	25000	3000	4000	600000	752950	447050
Month 30	30	6060000	1212000	121200	0	950	25000	3000	4000	606000	760150	451850
Month 31	32	6400000	1280000	128000	0	950	25000	3000	4000	640000	800950	479050
Month 32	32	6464000	1292800	129280	0	950	25000	3000	4000	646400	808630	484170
Month 33	35	7000000	1400000	140000	0	950	25000	3000	4000	700000	872950	527050
Month 34	35	7000000	1400000	140000	0	950	25000	3000	4000	700000	872950	527050
Month 35	38	7600000	1520000	152000	0	950	25000	3000	4000	760000	944950	575050
Month 36	38	7600000	1520000	152000	0	950	25000	3000	4000	760000	944950	575050