

BUSINESS PLAN

FairGame G.P. N.V.

1. Executive Summary

FairGame G.P. N.V. is providing diversified and innovative games to players and by means of modern technology solutions. Rooted in a strategic blend of innovation, reliability, and security, our mission is to redefine the landscape of global gaming, positioning ourselves as the go-to destination for gamers worldwide.

Our mission

To build a global brand, that will continuously offer disruptive innovation to customers, which has never been done before.

Our vision

To grow customers so that they can easily explore innovations and become early adapters.

Our values

Our aim is to lead the online gaming and betting market by consistently delivering innovative, reliable, and secure gaming sites. Our core values revolve around Customer Focus, Innovation, Reliability, and Integrity.

- Customer Focus: We put our customers first and strive to provide the best possible gaming experience to them.
- Innovation: We are committed to continuous improvement and strive to be at the forefront of gaming technology.
- Reliability: We deliver a high-quality gaming experience that is reliable and performs seamlessly.
- Integrity: We conduct our business with honesty, transparency, and professionalism.

These vision and values statements provide a foundation for an operator committed to excellence, customer satisfaction and responsible business practices.

2. Company Objectives

The primary objective of FairGame G.P. N.V. is to establish itself as a leading gaming and betting provider in the global market. Our goal is to provide the best possible gaming experience to our customers by developing and delivering innovative, reliable, and secure gaming software. To achieve this objective, we will focus on the following key areas:

- **Website Development:** We will invest heavily in research and development to have the best high-quality gaming and betting sites that are responsive, visually appealing, and user-friendly.
- **Marketing and Promotion:** We will use social media and other digital marketing channels to promote our brand and attract new customers. We will also collaborate with gaming influencers and enthusiasts to help spread the word about our offerings.
- **Customer Support:** We will provide exceptional customer support to ensure our customers have a positive gaming experience. We will also actively seek feedback from our customers and use it to improve our offerings.

3. Product review and key suppliers

Game Types

The Company intends to provide its customers with a wide array of services, focusing primarily on the provision of the following types of games:

- Slot Games, including Video Slots, Classic Slots
- Instant Win Games
- Virtual Sports Games, including Virtual Horse Racing
- Live Casino Games, including Blackjack, Roulette, Andar Bahar, Casino War
- Sports Betting (Sportsbook)

The Company aims to provide each of these types of games to its customers in desktop and mobile versions.

Main provider for gaming platform service will be Easy Rocket Software FZC, which has proven experience and well-known excellent reputation in gambling industry.

Game Service Providers

In providing its services, the Company understands that its customers will have different preferences and styles when it comes to their choice of games. In order to be able to cater for as many different preferences as possible, the Company intends to obtain its games from a number of different game service providers, each having their own specific unique selling points.

In selecting which game service providers to engage, the Company carries out a rigorous vetting exercise both from a market relevance perspective as well as from a reputation and reliability perspective. In particular, the Company assesses the popularity and success of the games developed by a game service provider, their attractiveness to end-customers in general and the likelihood that these games will appeal to its own customers.

The Company recognizes that the online slot games market is become increasingly competitive as a result of constant innovation efforts being undertaken by game service providers. This offers a positive advantage to the Company, as it will be in a position to constantly and continuously provide more novel and improved games to its end-customers. Additionally, the Company chooses to only enter into contractual arrangements with reputable game service providers having a proven track record of compliance with applicable rules and regulations. These game service providers shall be offering a selection of games running on a Random Number Generator which is tested and approved by certified testing laboratories.

Top Games providers:

- Pragmatic Play Live
- Evolution
- Play'n GO
- Relax Gaming
- Absolute Live Gaming
- Spinomenal
- BGaming
- ELK
- Endorphina
- Gamebeat
- Push gaming
- 3 Oaks

Technology & Devices

The Company shall primarily be offering its services via a website which will be available in desktop, tablet and mobile versions. In order to ensure its competitiveness on the market the Company intends to take full advantage of all the latest operating systems, devices and browsers. Additionally, the Company intends to adopt a responsive layout which will be split depending on the devices being used. Desktop and tablet devices will be considered as one unified experience in order for the layout to be responsive and cater for different resolutions. Customers making use of mobile devices will be given a different experienced, all being based on the same layout. The concept is intended to be made easier to interact with on smaller screens when a mobile device is used.

The Company plans on making its services available via the following operating systems and devices:

iOS Safari

Android App

Google Chrome

Apple Safari

Mobile PWA

Mobile, Desktop, Tablet

4. Organisation and Management: Service Providers

In order to provide its services, the Company will engage a number of experienced service providers, having expertise in a vast array of specializations to assist with the operations of the Company. These service providers carry out the following functions of the Company.

Technical Operations

The main objectives of this business area are as follows:

- To generally manage the operations of the Company from a technical perspective by liaising with the relevant service providers;
- To ensure that the Company's technical infrastructure is set-up in a manner which is compliant with the applicable legislation, regulations and licensing conditions to which the Company may be subject;
- To liaise with third parties for the purposes of maintaining the technical infrastructure in good order and for continuously developing said infrastructure in a manner that is in line with the Company's needs.

Front-End Development

The main objectives of this business area are as follows:

- To handle the development of the front-end of the website and the offering being provided by the Company.

Back-End Development & Platform

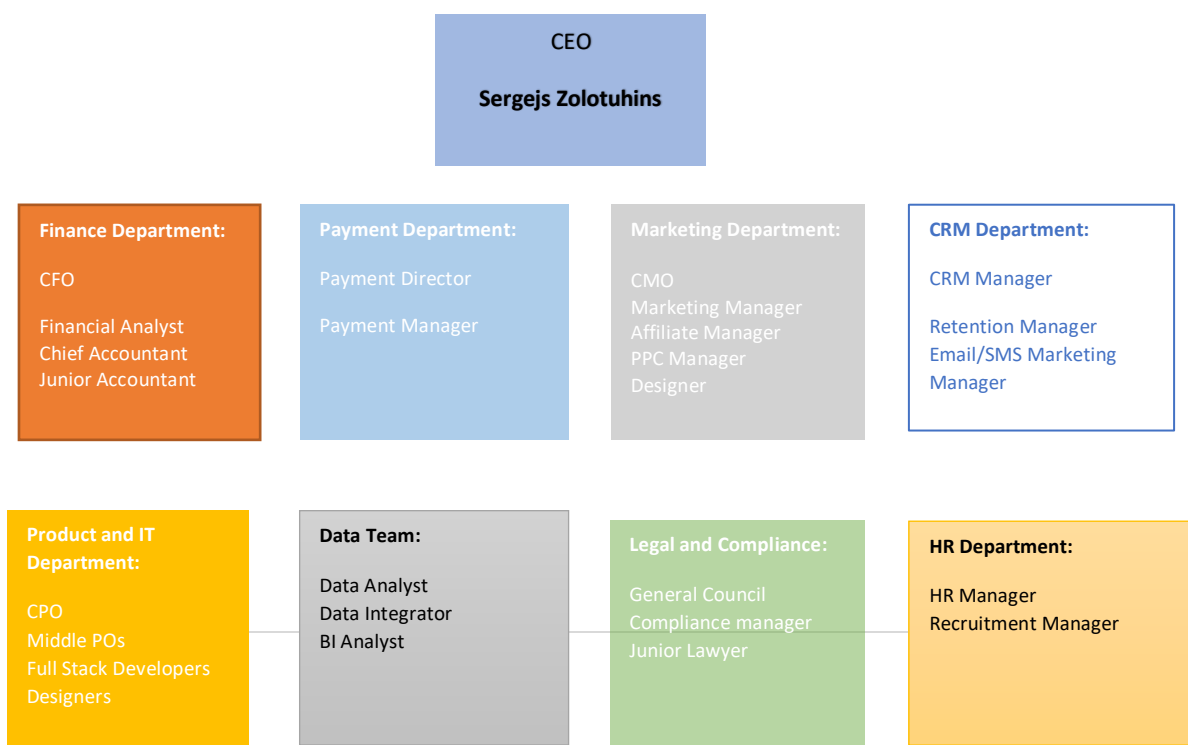
The main objectives of these business areas are as follows:

- To develop and provide a platform on which essential components of the game system shall reside;
- To develop a back-end system which will enable the Company to access key areas of the platform in a manner which is readable and user friendly;
- To develop and maintain the back-end system with the aim of meeting the Company's needs as these may change from time to time.

5. Organization & Management: Functional business processes

Led by a seasoned management team with extensive experience in gaming and betting, emphasizing product development, marketing, and customer support.

Appointed CEO (Chief Executive Officer): Sergejs Zolotuhins



Management Team

CEO - Chief Executive Officer: Sergejs Zolotuhins - with 7 years' experience in gaming industry.

CFO - Chief Financial Officer: Patricija Mihailuka - with 4 years' experience in gaming industry.

CTO - Chief Technology Officer: Denis Galaburda - with 6 years' experience in gaming industry.

COO - Chief Operations Officer: Dmitrijs Dobrovolskis - with 5 years' experience in gaming industry.

CCO - Chief Compliance Officer: Aleksandra Baranova - with 4 years' experience in gaming industry.

Finance Department

The main objectives of this business area are as follows:

- To prepare management accounts and financial statements on a periodic basis;
- To manage the Company's finances and financing plans.

Data Team

The main objectives of this business area are as follows:

- To manage and analyse statistical data being held by the Company for the purposes of identifying the strengths and weakness of its operations;
- To generate reports about the Company's operations as may be required for business, compliance or other reasons from time to time.

Customer Support

The main objectives of this business area are as follows:

- To act as a first point of contact for the Company's customers;
- To handle customer queries and complaints.
- To identify risks which customers may pose to the Company and to categorize those risks for the purposes of being able to set mechanisms for their prevention and mitigation;
- To conduct due diligence exercises on customers of the Company;
- To carry out actions for the purposes of preventing fraud;
- To handle payments to customers;
- To seek to develop relationships with new service providers such as payment solution and fraud prevention providers.

Human Resource Management

The main objectives of this business area are as follows:

- To recruit employees upon request by the Company;
- To coordinate and monitor the performance of employees employed with or servicing the Company;
- To handle the management of payroll and contractual agreements with respect to employees;
- To generally assist the Company in any administrative matters it may require.

Marketing Department

The main objectives of this business area are as follows:

- To establish relationships with external partners for the purposes of promoting the services being offered by the Company;
- To manage an Affiliate Program for the purposes of handling the relationship with all affiliates of the Company;
- To develop campaigns and other promotional activities for the Company;
- To carry out search engine optimization.

CRM Management

The main objectives of this business area are as follows:

- To establish a relationship with the customers of the Company and ensure that they are satisfied with the services that the Company is providing;
- To act as an extension of the Marketing & Advertising business area, dedicated more specifically to existing customers.

Product and IT Department

The main objectives of this business area are as follows:

- To generally manage the operations of the Company from a business perspective;
- To seek to develop relationships with new service providers such as game providers;
- To act as an intermediary between the Legal & Compliance business area and the rest of the business areas to ensure a smooth working collaboration;
- To act as an intermediary between the Management of the Company and the rest of the business areas in order to ensure that the business directions and requests provided by Management are met.
- To create designs and illustrations for the appearance of the Company's websites, content and marketing material;
- To identify key components for development with the aim of continuously improving the customer's experience on the Company's website.

Legal & Compliance

The main objectives of this business area are as follows:

- To handle all legal matters of the Company, including the liaison with external legal counsel and advisors engaged by the Company;
- To ensure that the Company's operations are being conducted in a manner which is compliant with the legislation, regulations and licensing conditions to which it is subject.
- To ensure that the Company processes personal data of individuals, including customers, employees, etc., in a manner which is compliant with the applicable legislation and regulations relating to data protection.
- To ensure that the Company conducts its operations in a manner which is applicable with the legislation, regulations and licensing conditions to which the Company may be subject from an anti-money laundering / counter-terrorist funding perspective;

- To monitor customer behavior in order to be in a position to flag any suspicious behavior or transactions;
- To report any suspicious activities to the relevant regulatory authority;
- To implement policies and procedures with the general aim of preventing the Company from being used as a vehicle for money laundering and/or terrorist funding.

5. CRM and Customers Retention

CRM department (Customer Relationship Management team) will have 3 main directions: Inbound, Outbound activities and Services for internal communication.

Role of CRM will be to segmentate customers and offer right promotions for each segment. Rewards used for retention will be the following:

Bonus types

- Free spins
- Pre-wager
- After-wager
- Cash

Triggers

- Signup
- Deposit
- Promo code
- Buy bonus
- Campaign
- Game play

CRM team tasks

- Defining the strategy for retention, defining the requirements for the future and planning the execution
- Planning and executing the monthly promotions relevant to each market, to each segment and to the sport events at the time.
- Setting up user flows and automation in the campaign management system, tracking it, maintaining, optimizing and reporting the results.
- Managing all communications with existing customers including offline and online
- Maintaining the website in terms of promotional materials and real estate, including compliance requirements and T&C for offers.
- Keeping up with competitors' activities and methods.

Measurements and metrics of CRM activities

- Conversion rates
- Monthly retention
- Budget – bonuses, rewards, prizes
- Churn rates
- Reactivation rates
- Frequency
- Value

6. Compliance. Policies and Procedures.

We developed and approved the following Policies and Procedures as a part of ensuring compliance with regulatory requirements, maintaining integrity and compliance with applicable laws and managing business risks:

- Anti-Money Laundering, Countering Financing of Terrorism and Combating Proliferation Financing Policy (AML/CFT/CPF).
- Customer Identification and Verification (KYC) Policy.
- Player Complaints Handling Procedure.
- Responsible Gaming Policy.
- Player Account and Fund Management Procedure.
- Player Account Suspension and Closure Procedure.
- Information Security Policy.

The above Policies and Procedures have been developed internally by Aleksandra Baranova, the Company's Compliance Officer and MLRO. We believe that Aleksandra Baranova has good qualification and competency, relevant skills and knowledge to prepare those Policies and Procedures, because Aleksandra Baranova is an experienced professional with a solid background in gaming industry, iGaming compliance standards and best practices.

Furthermore, Aleksandra Baranova assumes a role with the Company that is independent and separated from other management roles in terms of reporting lines in order to keep Compliance Officer role clearly independent and not conflicting with other business roles and senior management within the Company.

The above Policies and Procedures shall be regularly reviewed and, if necessary, revised to comply with applicable rules, regulations, policies, and best practices. The present Policies and Procedures must be adhered to by the Company and Company's staff to mitigate reputational, regulatory, legal and financial loss risks.

7. Swot Analysis. Risk Evaluation and Management

Strength

<i>Brand's concept and positioning</i>	FairGame G.P. N.V. is a high-tech online casino that gives user an opportunity to try a completely new gaming experience. User's passion and emotions are escalating due to the possibility of gambling while maintaining the security of personal data. Our product's legerity, understanding the needs of the audience and new technical solutions make casino closer to the user.
<i>Product</i>	User-friendly product design.
	Wide range of casino games from top providers.
	Big selection of currencies and payment systems. Possibility of creating multiple currency wallets.
	Fast payment transactions (deposit & withdrawal).
	Product localization for different geos.
	Good loyalty program based on player needs: great welcome offer pack, cashback on payment transactions, casino promos and bonuses.
	Product novations: - betshop with the ability to buy slot spins, chips, certificates; - chat rooms for players.
<i>Marketing</i>	Multi-channel marketing system (SMM, Paid Ads, SEO-optimized website and landing pages, Email&Push, PR).
	Affiliate program availability.
	Marketing activities and strategy based on conducted qualitative and quantitative market analysis.
	Uniformity of promotional materials and visuals design.
	Experience in engaging influencers.
<i>Client</i>	Communication and copyright based on understanding the values and needs of the target audience.
	Multi-channel player's support system: live chats and messengers (Telegram, WhatsApp).
	Efficiency of processing incoming support requests.

Weakness

<i>Competitors</i>	Strong existing competitors (local and international).
	Dynamic competitive landscape and low barriers to entry to the market.
<i>Brand</i>	Low brand awareness on the starting point.
	Limited market share.
<i>Marketing</i>	Non-availability of brand's offline promotion and presence in a range of countries according to law restrictions for gambling activity.
	High expenditures on maintaining marketing structure and brand promotion.
	No real ability to identify market insights.
<i>Client</i>	Limited share of target audience.
	Low awareness about the benefits of the product.

	Conservatism and adherence to older casino brands and their products.
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Opportunities

<i>Brand</i>	Increase brand awareness with the help of multi-channel marketing strategy and cooperation with influencers.
	Broaden geographic reach and expand internationally.
	Build “user love” for our brand.
	Develop gambling culture.
<i>Product</i>	Brand's product line extension with the ability to add betting product and sportsbook for it.
	Improvement of product quality and its design.
	Implementation of more unique and user-oriented product features.
<i>Marketing</i>	Development of clearer marketing strategy and direction.
	Amplification of our value proposition.
	Adding and testing new, in particular, alternative marketing channels.
<i>Client</i>	Automation of the processing incoming requests and implementation of AI technologies to speed up it.
<i>Competitors</i>	The opportunity to take leading position and crowd out competitors because of unique product and multi-channel marketing strategy.

Threats

<i>Legal & Compliance</i>	Changes in the geo's legislation: prohibition of gambling and activity of online casinos.
<i>Product</i>	Payment processing to be properly tested.
<i>Marketing</i>	Low player's FTD cost and low engagement rate.
	Low efficiency of chosen marketing channels and high financial and time expenditures for them.
	Incorrectly configured targeting of potential client.
	Incorrectly chosen TOI (tone of voice) for communication with the audience.
	Difficulties in attracting influencers.
<i>Competitors</i>	Extrusion of our brand by market leaders.
	Emergence of similar offers and casino products.
<i>Client</i>	The client's lack of interest in using new features and niche product in general.

8. Marketing Plan and Strategy for Business Growth

Leveraging digital channels, social media, search engine marketing, and collaborations to promote our brands. Revenue streams include organic customer acquisition and affiliate solutions.

Main Marketing Channels

- SMM
1. Running brand accounts in social networks - Facebook, Instagram, Twitter.
2. Brand channels in messengers - Telegram, WhatsApp.
3. Moderation of communities on forum platforms - Quora, Reddit.
4. Attracting local influencers for promotion.
- SEO-optimized brands' web products (main website, affiliate's platform, landing pages, blog)
- Affiliate marketing (partnership program)
- Email & push marketing (for existing clients)
- Paid Ads (GAds, FB Ads, Paid Push)
- Media Buying (high-coverage sources)
- PR

Marketing Activity plan - Paid Campaigns

Top of funnel (First touch campaigns)	Google	Category keywords research	Audience targeting	Ads creation	Setuping Conversion Tracking	Launch, A/B testing and ongoing optimization according to effectivity	Ongoing optimization
	Facebook	Preparation of visual and text content	Audience targeting	Ads creation	Setuping Conversion Tracking	Launch, A/B testing and ongoing optimization according to effectivity	Ongoing optimization
	Paid Push	Research and further selection of paid push networks	Preparation of visual and text content	Audience targeting	Ads creation and campaigns planning	Launch, A/B testing and ongoing optimization according to effectivity	Ongoing optimization
PR	Gambling ranking/review-websites	Preparation of brand's launch announcement and review materials.	Research on top review-websites and rankings. Preparation of the websites base for the brand's announcement placement.	Distribution of cooperation requests and release placement.	Announcement placements with main product's and affiliate platform's links and webmasters further checkup.	Content update and brand's review page creation on the review-websites.	Extension of the media-partners base with the offerings to join brand's affiliate program.
	Casino expert's blogs	Preparation of brand's launch announcement and review materials.	Research on top casino blogs. Preparation of the blogs base for the brand's announcement placement.	Distribution of cooperation requests and release placement.	Announcement placements with main product's and affiliate platform's links and admins further checkup.	Content update and brand's review page creation on the blog.	Extension of the media-partners base with the offerings to become brand's ambassadors.
Influencers		Research on potential influencers	Preparation of the influencer's base	Distribution of cooperation	Preparation of influencer's text scenarios and	Launch of influencer's brand	Deal extensions with the most

	according to their social channels, coverage and audience's engagement rate.	individually and in cooperation with the local influencer marketing agency.	requests with the further discussion on the terms - channel, format, media plan, cost.	accompanying content according to their audience's preferences and influencer's topic.	advertising and A/B testing of content, channels and analysis of influencer's effectivity.	effective influencers, adjunction of new content according to brand's updates, promos and news.
Media Buying	Research on the most high-coverage local platforms (websites & apps).	Distribution of cooperation requests with the further discussion on the terms - formats, targeting, duration, cost.	Agreements on the conditions of the contracts and their signing.	Preparation of the ads' content split and its distribution.	Launch of campaigns, A/B testing and ongoing optimization according to effectivity.	Deal extension with the most effective platforms.

Marketing Activity plan - Content

Website	Main platform	The launch of the "waiting list" of the brand's product with the option of subscription in order to get reminder on the launch date.	Website and its integrations testing.	Fact-checking and proof-reading of the website.	The official launch of the brand's website and launch of email-campaign to subscribers of "waiting list".	Ongoing SEO-optimization and content updates.
	Affiliate program platform	The launch of the "waiting list" of the brand's affiliate program with the option of subscription in order to get reminder on the launch date.	Website and its integrations testing.	Fact-checking and proof-reading of the platform.	The official launch of the brand's affiliate program's website and launch of email-campaign to subscribers of "waiting list".	Ongoing SEO-optimization and partner's materials and conditions updates.
	Landing pages	Preparation of landing pages' layouts and accompanying content to fill.	Landing pages' web.dev. and integration with analytics tools.	Fact-checking and proof-reading of the platform.	The official launch of landing pages and GAds campaigns.	A/B testing and ongoing optimization of landing pages. The ability to modify landing pages and share them as partners' materials in frames of affiliate program.
SEO	Keywords	Several keywords researches, including competitors' keywords research.	Preparation of semantic core collections and their usage.	Ongoing keyword analysis and updating on company's "branded keywords" in search engines.		
	Link building	Research on competitors' backlinks.	Optimization and update on internal links.	Preparation of linkbuilding plan.	Research on domains for potential incoming traffic and links "donation".	Ongoing optimization of/ and compliance to linkbuilding strategy.
	Content optimization	Optimization of all text content (titles, main text, etc.) based on keyword collection and competitors research.	Optimization of visual content.	Testing with help of SEO-tools.	Ongoing optimization of content.	

Assets	Advertising visual materials	Preparation of banners for ad placement on casino review-websites and blogs.	Preparation of visuals for Ad campaign's split.	Preparation of visuals for SMM channels.	Preparation of visuals for email campaigns.	Ongoing update on visual content.		
	Text content	Preparation of announcements and brands' review for casino review-websites, blogs and high-coverage platforms.	Preparation of text content for Ads campaigns.	Preparation of text content (scenarios) for influencers, bloggers, etc.	Preparation of text content for email campaigns.	Ongoing update on text content.		
	Affiliate program materials	Preparation of web banners (static and gifs) and their resizes for affiliate program's storage.		Preparation of SMM materials (Static visuals + videos) for affiliate program's storage.	Preparation of landing pages for affiliates.	Ongoing update of affiliate materials in their accounts' storage.		
Social Media	Facebook	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.		Preparation of media plan for social network.		1. Creation of the branded account in a social network and its maintenance according to the media plan. 2. Creation of the brand's community group and its moderation.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Mutual collaboration with influencers and bloggers (mentions, reposting, live-streaming). 2. Casino promotions and give-aways for followers' activity.
	Instagram	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.		Preparation of media plan for social network.		Creation of the branded account in a social network and its maintenance according to the media plan.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Mutual collaboration with influencers and bloggers (mentions, reposting, live-streaming). 2. Casino promotions and give-aways for followers' activity.
	Twitter	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.		Preparation of media plan for social network.		Creation of the branded account in a social network and its maintenance according to the media plan.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Mutual collaboration with influencers and bloggers (mentions, reposting).
	Telegram	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.		Preparation of media plan for social network.		1. The creation of the branded account in a social network and its maintenance	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Mutual collaboration with influencers and bloggers (mentions, reposting).

						according to the media plan. 2. Creation of the brand's community channel and its moderation.		live-streaming). 2. Casino promotions and giveaways for followers' activity.
	WhatsApp	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.		Preparation of media plan for social network.		The creation of the brand's community channel and its moderation.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Casino promotions and giveaways for followers' activity.
	Quora & Reddit	Research on target audience visual and text content preferences, research on the most popular topics and frequently-asked questions.	Creation of "ambassadors" accounts that will promote brand there by answering questions on online casino and cryptocurrency topics.	Preparation of media plan for social network.		The creation of the brand's community group and its moderation.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	
	YouTube	1. Research on target audience visual and text content preferences. 2. Selection of right tone of voice and format to communicate with the audience.	Preparation of video content.	Optimization of YouTube channel: preparation of playlists, adding the subtitles and timecodes.		The launch of brand's YouTube channel and ongoing filling it with the branded videos, tutorials, etc.	A/B testing of the content formats, analysis of its effectivity (referring, engagement, coverage).	1. Mutual collaboration with influencers and bloggers (mentions, reposting).
Email & Push Marketing		Definition of goals and topics for email and push campaigns.	Definition of metrics that will be used for user segmentation.	Development of email and push funnels. Preparation of email strategy.	Preparation of email layouts designs.	The launch of email campaigns for subscribers of "waiting lists" for the official brand's website and affiliate program website.	A/B testing of the content formats, analysis of its effectivity and ongoing optimization of email and push campaigns.	

9. Financial Projections/Business Forecast

Anticipating steady growth in revenue and profitability over the next 3 (three) years, based on conservative estimates and attracting a significant customer base. Financial expectations and projections for the next 3 (three) operational years are disclosed in the supplementary **Excel file „FairGame GP NV_Business Plan_Numbers “**.