



Business Plan

RWB Solutions International N.V.

Prepared for Curacao Gaming Control Board

Strictly Private and Confidential

Contents



1. Executive Summary
2. Business Description
3. Company Structure and Organisational Structure
4. Market Overview
5. Customer Support and Complaints Handling
6. Marketing Strategy
7. Target Markets
8. Platform Overview
9. Technology
10. Financial Forecasts
11. Risk Management
12. Conclusion
13. Appendices
 - KYC Policy is attached as **Appendix 1.**
 - Responsible Gaming and Self Exclusion Policy is attached as **Appendix 2.**
 - Privacy Policy is attached as **Appendix 3.**
 - AML Policy is attached as **Appendix 4.**

1. Executive Summary



1.1 Business Overview

RWB Solutions International N.V. (“**RWB**” or the “**Company**”) is an entity incorporated in Curacao with Registration number: 166208. The Company is passionate about matching technology with a superior mobile player experience to deliver an innovative product to the iGaming industry.

Our mission is to provide exceptional entertainment experiences that captivate and engage our audience through a diverse range of gaming options including casino games, sports betting and eSports. We are committed to ensuring the safety and well-being of our players by implementing robust security measures and fostering a culture of responsible gaming. We strive to create a balanced and enjoyable environment where fun and safety is at the core of our mission driving us to continually enhance our offerings and maintain a safe and trusted gaming environment.

The company will leverage the considerable connections and extensive experience in the online gambling space that its founder and management team bring to the table. This wealth of industry knowledge and established relationships gathered over the years will be instrumental in navigating the competitive landscape and driving the company’s growth.

Proposed revenue streams are based on direct B2C and B2B sales with the company focusing its immediate attention on its own B2C operations. By prioritizing the development and enhancement of its B2C offerings, the company aims to grow its brand with a reliable and standout product that has a proven track record. This approach ensures that the company can build a strong foundation and establish a loyal customer base which is crucial for long-term success.

In addition to its B2C focus, the company has aspirations to further grow its presence in the B2B market. By offering white label solutions to operators, the company can expand its reach and tap into new revenue streams. White label solutions allow other businesses to rebrand and market the company’s products as their own thus providing a scalable and efficient way to increase market penetration and brand visibility.

The company’s strategy includes leveraging its technological expertise to develop innovative and customizable solutions that meet the diverse needs of different B2B clients. This flexibility and adaptability will be key in attracting a wide range of operators from established brands to emerging players in the online gambling industry.

Furthermore, the company plans to invest in marketing and promotional activities to raise awareness of its platform offerings through networking activities at gaming conferences and highlight the benefits of partnering with a trusted and experienced provider. By showcasing its successful track record and commitment to quality, the company aims to build strong and long-lasting partnerships that drive mutual growth and success.

The company’s dual focus on strengthening its B2C operations while expanding its B2B presence positions it well for sustainable growth while also diversifying its own revenue streams in the online gambling industry. By honing in on its B2C operations, the company aims to deliver a superior user experience that attracts and retains a loyal customer base. This involves continuously enhancing its product offerings, incorporating player feedback and staying ahead of industry trends to ensure that its platform remains competitive and engaging.



1.2 Vision

RWB aspire to become a premier online gaming platform recognized for its cutting-edge and innovative offerings. We are dedicated to setting industry standards by continuously introducing new and exciting features that enhance the gaming experience. Equally important is our unwavering commitment to player safety. We prioritize the well-being of our players by implementing rigorous security measures and promoting responsible gaming practices. Through these efforts, we aim to build a trusted and enjoyable environment for all our players and fostering a culture of responsible gaming with the aim to promote healthy gaming habits and ensure that our platform remains a trusted and enjoyable space for all players.

1.3 Objective

RWB's goal is to create a safe and fair gaming environment that prioritizes the well-being of our players and upholds the highest standards of integrity and accountability. The company is committed to implementing robust security measures to protect players' personal and financial information ensuring that they can enjoy their gaming experience with peace of mind.

Player well-being is at the heart of our mission. By ensuring strict adherence to regulatory standards and promoting responsible gaming practices, the company aims to create a safe, fair and enjoyable gaming environment for all our players. The company offers a range of responsible gaming tools and resources to help players manage their gaming habits and prevent problem gambling. These include self-exclusion options, deposit limits and access to support services for those who may need assistance.

By prioritizing the well-being of our players and maintaining the highest standards of integrity and accountability, the company aim to build a trusted and reputable gaming platform. RWB's ultimate goal is to provide a safe, fair and enjoyable gaming experience that players can rely on and return to with confidence.

2. Business Description

One of RWB's primary goals is to establish itself as a best-in-class provider of iGaming entertainment products in the industry. To achieve this, RWB has engaged with the highest quality game providers ensuring that its platform features some of the greatest games currently available on the market. By partnering with industry-leading game content providers, RWB offers a diverse and exciting range of gaming options including immersive casino games, dynamic sports betting and innovative esports betting.

In addition to its impressive game library, RWB has established a dedicated Customer Support Team to ensure that players have the best possible experience on its website. This team is staffed with highly trained professionals who are available 24/7 to assist users with any inquiries or issues they may



encounter. Whether it's technical support, account management or general questions, RWB's Customer Support Team is committed to providing prompt and effective assistance.

Furthermore, we will implement comprehensive training programs to equip our staff with the necessary skills and knowledge to excel in their roles. These programs will cover various aspects of our operations including customer service excellence, technical proficiency and regulatory compliance. By investing in our employee's professional development, we aim to build a highly skilled and motivated workforce that can deliver top-notch service and support to our players.

Fostering a robust and unified corporate culture is also essential. We firmly believe that our horizontal approach cultivates a superior work environment that encourages cohesiveness, creativity and innovation. We are committed to fostering an inclusive and collaborative environment where every team member feels valued and empowered by promoting open communication, encouraging teamwork and recognizing the contributions of all employees. By creating a positive and supportive workplace, we can enhance employee satisfaction and retention and ultimately driving the success of our business.

Our commitment to inclusivity and collaboration extends well beyond our internal operations. We strive to engage with our players through open and transparent communication actively seeking their feedback and incorporating their input into our development process. By maintaining an ongoing dialogue with our player community, we can continuously refine and enhance our offerings ensuring they align with market needs and expectations. This approach not only fosters strong relationships with our players but also solidifies our position as a serious competitor in the online gaming industry. Our dedication to inclusivity and collaboration helps us create an environment where players feel valued and ultimately driving our success and growth.

By incorporating diverse viewpoints and expertise, we can develop more robust strategies to enhance our product offerings and deliver exceptional value to players. This collaborative approach allows us to tap into a wide range of ideas and experiences fostering innovation and ensuring that our strategies are well-rounded and effective. Leveraging the unique strengths of our team members allows us to continuously refine our gaming platform and stay ahead of industry trends.

RWB also places a strong emphasis on user satisfaction and safety. We implement robust security measures to protect user data and ensure a secure gaming environment. Our commitment to responsible gaming practices is equally important and we provide a variety of tools and resources to help players manage their gaming activities responsibly. By prioritizing the well-being of our users and maintaining stringent security protocols, we create a trusted and enjoyable gaming experience. Our dedication to these principles not only safeguards our players but also reinforces our position as a respected brand in the online gaming industry.

Combining top-tier gaming content with exceptional customer service and a commitment to safety, our aim is to deliver a gaming experience that is unparalleled in quality ensuring that every interaction with our platform exceeds expectations offering players not only engaging and immersive contents but also the highest standards of support and protection.



2.1 Company History

RWB had previously been operating under the sub-license of 365/JAZ, which provided the necessary regulatory framework for its operations. This arrangement allowed RWB to offer its gaming services under the oversight of Gaming Services Provider N.V. However, with the exit of Gaming Services Provider N.V. from the market, RWB has transitioned to operating under a new license issued by the Anjouan Gaming Authority. This shift ensures that RWB continues to comply with all regulatory requirements and maintains the integrity of its operations.

Looking ahead, RWB is proactively taking steps to secure its own independent license from the Gaming Curacao Board. This application is being made under the entity RWB Solutions International N.V. Obtaining this license will enable RWB to continue its operations within the jurisdiction providing a stable and regulated environment for its gaming services. This move reflects RWB's commitment to adhering to the highest standards of regulatory compliance and operational excellence.

Since its inception, RWB's platform has undergone extensive upgrades and changes to keep pace with the rapid advancements in technology. Recognizing the dynamic nature of the tech landscape, our team has been dedicated to continuously monitor and integrating new technologies that can enhance our products and services. This proactive approach ensures that we not only meet but exceed the evolving demands of our players and the industry.

Our commitment to innovation is driven by a focus on product stability which remains the cornerstone of our operations. By prioritizing stability, we ensure that our platform delivers a seamless and reliable experience for our players minimizing disruptions and maximizing satisfaction. This dedication to maintaining a robust and stable platform has allowed us to build trust and loyalty among our player base.

Adopting a user-centric approach has been our driving force to continuously innovate and improve the user experience. We gather feedback from our players and leverage data analytics to identify areas for enhancement. This process allows us to refine our offerings and ensure that we provide the best possible experience for our players.

2.2 Games Offered

RWB offers a comprehensive and diverse range of gaming products from Sportsbook to RNG Slots and Live Dealer Casino designed to cater to a wide variety of player preferences and interests.

2.2.1 Sportsbook

RWB's Sportsbook platform is designed to offer competitive odds covering a wide array of popular sports ranging from football, basketball, baseball, tennis, cricket and motorsports giving players the best possible returns on their wagers. We continuously monitor the market to ensure our odds remain attractive and fair providing players with excellent value for their wagers.



RWB Sportsbook provides an extensive selection of sports betting options, covering major sports events and leagues from around the world as well as in-play/live betting. RWB's in-play/live betting feature allow players to wager on ongoing matches and live events. This dynamic betting option lets you react to the action as it unfolds, adding an extra layer of excitement to your sports viewing experience.

It boasts a user-friendly interface that makes it easy to navigate and place bets. Whether you are a seasoned bettor or new to sports betting, our intuitive design ensures a smooth and hassle-free experience. You can quickly find your favorite sports, view upcoming events and place your wagers with just a few clicks.

2.2.2 Slots

RWB also features a vast array of Random Number Generator (RNG) slots from reputable game content providers that deliver an exciting and fair gaming experience. Our slot offerings come in various themes and styles catering to a wide range of player preferences.

From classic fruit machines that evoke a sense of nostalgia to modern video slots with immersive graphics and engaging storylines, these games include advanced features such as multi-level bonus rounds, free spins and interactive elements that keep players entertained.

Each game is meticulously designed to provide players with thrilling gameplay and the chance to win big. The RNG technology employed by the game providers ensures that every spin is fair and random giving all players an equal opportunity to trigger payouts in their gaming sessions.

The commitment to fairness and excitement is at the core of our slot offerings ensuring that players have a rewarding and enjoyable gaming experience.

2.2.3 Live Dealer Casino

For those who crave the authentic casino experience, our Live Dealer Casinos bring the action directly to their screen. Players can interact with professional dealers in real-time creating a social and engaging atmosphere that replicates the excitement of a physical casino. Our live dealer offerings include popular table games such as blackjack, roulette, baccarat and poker.

The live streaming technology ensures a high-quality and immersive experience with multiple camera angles and HD video bringing every detail to life. Our live dealer games bring the authentic casino experience to players' screens with professional dealers and high-quality streaming creating a captivating atmosphere. This allows players to enjoy the thrill of a real casino from the comfort of their own home.

In addition to the visual and interactive elements, our Live Dealer Casino products offer various features to enhance the gaming experience. Players can chat with dealers and other players in real-time adding a social dimension to the games. The interface is user-friendly making it easy to place bets and follow the action. With detailed and easy to read game statistics and history, it assists players to make informed decisions and develop their strategies.

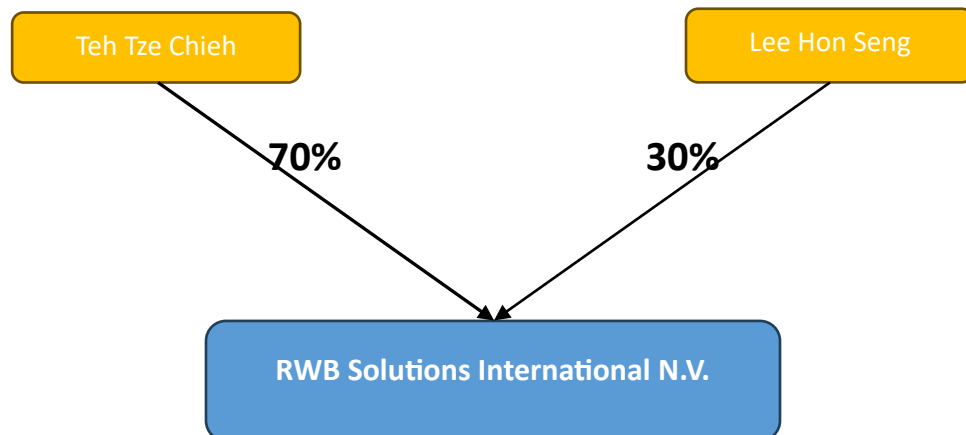


RWB ensures that there is something for every type of player. Our commitment to variety and quality allows us to provide an unparalleled gaming experience that keeps our players engaged and entertained.

3. Company Structure and Organisational Structure

Ownership structure of RWB

RWB's ownership structure is as below:



Key Officials

Jason Teh Tze Chieh

Director & UBO

Jason is a highly skilled and visionary entrepreneur who founded RWB out of the desire to create a competitive yet user-friendly eGaming solution for gaming operators based in Asia and beyond.

Born and raised in Malaysia, he attended college in the United Kingdom. His industry career saw him start in the field of sports trading before quickly rising through the ranks and ultimately founding RWB together with Lee Hon Seng.

A resident of Cebu, Philippines, Jason is well known in local business circles and highly respected for his various community focused efforts.



Lee Hon Seng

UBO

Mr. HS Lee (HS) is the co-founder and business partner for RWBs, as well as a long-time friend of Jason. He is a highly experienced and deeply respected industry professional with a distinguished track record that primarily focused on operational aspects.

HS is well-versed with operational knowledge and well-connected with business associates in the gambling industry. In his early career years in the gaming industries, he started from a call center task to manage daily operation, payment services, events and marketing campaign of the online B2C gaming, soon he in charge of the business day to day operation and progressively rose to the Chief Operating Officer position responsible for overseeing the success of a gaming platform. He has been taking up various global roles and he has been posted in many countries while serving the industry from working in Malaysia, followed by Philippines, then Hong Kong collaborating with colleagues in Sweden and Malta and then back to the Philippines. Thus, make him the best partner you can have to venture into the international gaming arena.

Compliance Officer: Kenny Soo

“Kenny” Soo Shen Heh has been doing business development in Software industries for the last 25 years. He is an insight entrepreneur that founded startup companies in many B2B and B2C platforms during his early career in Malaysia and China.

In the year 2000 which is his early career, Mr. Soo is a corporate sales manager in business intelligence system, Enterprise Resource Planning systems, human resources and payroll system. Soon he and his business associates founded Wowcher.com in 2010 to do online voucher system for Banks to target in credit card redemption. Wowcher.com was sold off to investors after 3 years to the MBF bank credit card department.

Soon on later Mr. Soo and his cofounder partners bought over a Certificate Authority license company from the Malaysia Ministry of Finance when the government decided to privatize non- profit GLC (government link company) back in 2012. He pursued his career as a PKI (public key infrastructure) expert for years in business developing CA and digital signature. Later they venture the business to China in the year 2014 to 2017 in the B2C travel and services platform.

During the years in China, Mr. Soo and his partners brought back the contract to resell Malaysia travel content in a Malaysia Pavilion as a sole distributor under the Alitrip.com by signing a partnership agreement with Alibaba group back in November 2016. They start to do B2C business in travel content. The company was sold to Salcon Berhad in 2018.

Kenny Soo later decided to join his long-time friend Mr. Jason Teh and move to Cebu, Philippines for a challenging e-gaming industry which he believes e-gaming and payment platform is an even more promising and bigger industry to be.



Information Technology/Security of registration and games/betting infrastructure: Tsvetan Himchev

Tsvetan is an experienced software architect with over ten years in the software industry having a Master's degree in Software Technologies and a Bachelor's degree in Computer Science.

His professional journey includes roles such as Chief Technology Officer, Software Architect, and Software Engineer, with significant contributions to companies like RWB and VertinityLabs LTD.

Tsvetan has a strong proficiency in various web and mobile development technologies, including .NET Core, TypeScript, Angular, Java, PHP, JavaScript, MSSQL, MySQL, HTML5, CSS3, Swift, and Dart. Notable projects include SellPro and Enko Crate Rental.

With his approach, Tsvetan is recognized for being an excellent team player focusing on optimizing and enhancing software applications and systems. His diverse skill set and extensive experience makes him a valuable asset in the software development field.

Financial Control: Feliz Tambago

Felisabel is a Certified Public Accountant and has a Masters of Management degree. She has been holding management capacity since 1994. She simultaneously managed various companies throughout her career in the Accounting and Finance Department. She is also a management consultant on matters of Finance and Accounting, and Human Resources.

Felisabel is currently managing the shared services of RWB. Share services support would include, Finance and Accounting, Human Resources and Administration Departments.

4. Market Overview

The online gaming industry is experiencing unprecedented growth fueled by significant technological advancements, widespread internet access and evolving consumer behaviors. Additionally, the proliferation of smartphones and high-speed internet has expanded the reach of online gaming to a broader audience. As a result, the global market is projected to surpass \$100 billion by 2026 according to a survey conducted by Grand View Research reflecting the industry's dynamic expansion and its increasing influence on entertainment and technology sectors.

The expansion of internet connectivity and easy access to mobile devices has led to a larger audience with the ability to access online casino platforms. As more people gain access to the internet, the potential player base for online casinos continues to grow year after year.

Continued technological advancements such as improved graphics, faster internet speeds and mobile optimization have contributed to the enhancement of the overall gaming experience of players. High-definition graphics and immersive sound effects make online casino games more engaging and realistic.

Mobile optimization has also played a significant role in the growth of online casinos. With the majority of internet users accessing the web via mobile devices, online casinos have adapted by developing



mobile-friendly websites and dedicated apps. These adaptations ensure that players can enjoy a seamless gaming experience regardless of the device they use.

The convenience of mobile gaming allows players to access their favorite casino games anytime and anywhere whether they are commuting, waiting in line or relaxing at home. This accessibility has significantly contributed to the popularity of online casinos as it fits seamlessly into the busy lifestyles of modern users.

Additionally, the integration of secure payment options has significantly streamlined the process for players to deposit and withdraw funds. This improvement not only provides convenience but also boosts user confidence by ensuring transactions are safe and protected. The commitment to providing secure and efficient financial solutions further solidifies our dedication to delivering an exceptional and seamless gaming environment.

This generational shift towards mobile optimization has been the key to the growth of online casinos. With the increase in people gaining access to the internet, the potential player base for online casinos is expected to continue growing year after year. By providing a convenient, accessible and engaging gaming experience coupled with mobile-friendly websites, it has attracted a larger audience and continues to contribute to the industry's ongoing expansion.

4.1 Target Demographic

Players aged 20 - 50 is the prime demographic for online gaming spanning both younger adults who are tech-savvy and older millennials and Gen Z individuals primarily from urban areas with high internet connectivity and access to digital devices. This age group is particularly significant due to their high engagement levels and willingness to explore various forms of online entertainment. While the trend is predominantly male, we are noticing a growing trend in the participation of female players who are starting to show interest particularly in eSports and slots.

Players are always on the lookout for attractive betting opportunities that offer the potential for significant returns. At RWB, we understand this desire and strive to provide a wide range of betting options and products that can cater to various interests and preferences.

Online casino games, such as blackjack, roulette, baccarat, poker and slots attract a substantial portion of this demographic. The appeal lies in the combination of skill and chance, as well as the potential for monetary rewards.

Players appreciate platforms that offer innovative game mechanics and realistic simulations. Advanced graphics and immersive sound effects enhance the gaming experience, making it feel almost like being in a physical casino. Features such as live dealer games where players can interact with real dealers in real-time adds an extra layer of authenticity and excitement.

Moreover, the convenience of playing from home or on the go is a significant draw. Mobile compatibility allows players to enjoy their favorite games anytime anywhere providing a seamless gaming experience across devices. The availability of various payment methods including cryptocurrencies adds to the appeal by offering secure and flexible transaction options.



In addition to fun and relaxation, the potential for monetary rewards is a major attraction. Many platforms offer lucrative bonuses and promotions such as welcome bonuses, free spins and loyalty programs which enhances the overall value and excitement of the gaming experience. Progressive jackpots and high RTP games further entice players offering the possibility of significant financial gains.

Many within this demographic are also avid sports fans who engage in betting on popular sports. With the rise of online platforms, players can place their wagers on a wide range of sports from football and basketball to more niche sports like cricket and eSports. The accessibility and variety of these platforms have significantly broadened the scope of sports betting making it more inclusive and engaging for a diverse audience.

Real-time analytics provide bettors with up-to-the-minute data helping them make informed decisions. Odds comparisons across different platforms allow players to find the best value for their wagers enhancing their overall betting experience. Live betting options also adds an extra layer of excitement as players can place their wagers while watching a game reacting to the action as it unfolds.

Highly proficient with digital devices including smartphones, tablets and laptops, they prefer platforms that offer mobile compatibility and seamless user experiences. The ability to place their wagers on the go is a significant advantage allowing players to engage with their favorite sports and betting activities anytime anywhere. User-friendly interfaces and intuitive navigation are crucial ensuring that even those new to online betting can easily participate.

4.2 Competitor Analysis

The online gambling industry is characterized by intense competition with key players leveraging strengths such as brand loyalty, diverse offerings and innovative technology. Major companies in the industry have built strong brand recognition and customer loyalty through years of consistent service and marketing efforts. Their diverse product offerings ranging from traditional casino games to sports betting and emerging sectors like esports allow them to attract a broad audience.

However, the industry faces several challenges that require companies to continually adapt and innovate. Regulatory scrutiny is a significant hurdle as different regions have varying laws and regulations governing online gambling. Companies must navigate these complex legal landscapes to operate legally and ethically. Additionally, maintaining consistent and localized customer service across various platforms and regions is crucial for retaining customer trust and satisfaction. Market saturation also poses a challenge as the increasing number of competitors makes it harder to stand out and attract new players.

Despite these challenges, RWB still believes there are numerous opportunities for growth in the online gambling industry. Emerging markets particularly in regions where internet penetration is increasing offers vast potential for expansion. New betting trends such as esports and mobile gaming are also gaining popularity and provide avenues for innovation and customer engagement. Companies that can effectively tap into these trends and offer unique and engaging experiences will likely see significant growth.



RWB believes in staying agile and responsive to market changes. By leveraging our strengths and continuously innovating, we can position ourselves for long-term success. Agility allows us to quickly adapt to new trends, regulatory changes and technological advancements ensuring we remain competitive in a fast-paced environment. Being responsive to market changes means actively monitoring industry developments and customer preferences allowing us to anticipate and meet the evolving needs of our players.

Ensuring consistent and high-quality customer service is crucial as it directly impacts customer retention and satisfaction. By capitalizing on our core strengths and unique capabilities, we can effectively differentiate ourselves from competitors in the market. This differentiation allows us to create compelling value propositions that not only attract new customers but also foster loyalty and retention among our existing players.

The following is a list of top 10 key competitors that RWB identifies as the major players in the iGaming industry. These companies are recognized for their innovative strategies, extensive product offerings and strong market presence:

1. Bet365
2. Pinnacle
3. SBOBET
4. 188BET
5. 888 Casino
6. 10CRIC
7. 1XBET
8. Betway
9. LeoVegas
10. William Hill

4.3 Competitive Advantage of RWB

RWB's platform features a clean and modern interface that is easy to navigate ensuring players can quickly find their favorite games with ease. We prioritize usability across all devices and browsers including desktop and mobile to cater to various user preferences. This commitment to accessibility ensures that every player regardless of their device can enjoy a seamless and intuitive gaming experience.

To further enhance player satisfaction, RWB implements personalized user experiences by utilizing advanced data analytics. By analyzing player's past behavior, preferences and popular trends we can recommend games that are most likely to appeal to each individual. This personalized approach extends



to tailored promotions and content which will be designed to engage players more deeply and enhance their overall satisfaction on our platform.

Fast loading times and smooth gameplay are also critical components of our platform. We continuously optimize our platform's performance to minimize lag and downtime ensuring players can enjoy uninterrupted gaming sessions. Our technical team will continuously monitor and improve the platform's performance and addressing any issues promptly to maintain a high-quality gaming experience.

By implementing a user-friendly interface, personalized experiences and robust performance, RWB strives to set a new benchmark in the gaming industry by delivering an unmatched gaming experience to players.

With a strong management team that boasts over a decade of experience in the industry coupled with our professionally trained customer support team, RWB is well-positioned to be a competitive player in the iGaming industry. Our leadership's extensive knowledge and strategic vision drive our innovative approach ensuring we stay ahead of market trends and deliver exceptional value to our players.

By leveraging our team's expertise and commitment to excellence, RWB aims to set new benchmarks in the industry, offering a superior gaming experience that meets and exceeds the expectations of our diverse player base.

5. Customer Support and Complaints Handling

Our customer support and sales office is strategically located in Cebu, Philippines, managed by RWB Smart Solutions International Inc. on behalf of RWB. This prime location enables us to effectively cater to our global customer base leveraging the skilled workforce, robust infrastructure and cost efficiencies of the region. Cebu is known for its strong pool of talent in the BPO industry providing us with a competitive advantage in delivering exceptional customer service.

Our customer support team is trained to the highest standards, equipped with extensive knowledge of our products and services and dedicated to providing prompt and effective assistance. Our rigorous training programs ensure that our team members are well-versed in handling a wide range of customer inquiries and issues from technical support to account management. We also emphasize continuous professional development, keeping our staff updated with the latest industry trends, best practices and technological advancements.

By offering 24/7 customer support, we aim to provide our users with timely and reliable assistance no matter their location or time zone. Whether addressing inquiries, resolving issues or offering guidance, our team strives to enhance the overall user experience ensuring that our customers feel valued and supported at all times. We also employ a dual-channel support approach including live chat and email to cater to the diverse preferences of our users.

This combination of seasoned leadership and top-notch customer service underpins our confidence in our ability to compete and thrive in the dynamic iGaming landscape. Our leadership team brings years of experience and expertise in the industry, guiding our strategic vision and ensuring operational



excellence. By prioritizing customer satisfaction and maintaining a high level of service quality, we aim to build long-lasting relationships with our users and foster a loyal customer base.

Our commitment to excellence in customer support is reflected in our continuous investment in training and development, ensuring that our team stays updated with the latest industry trends and best practices. This proactive approach allows us to adapt to the evolving needs of our customers and the industry positioning us as a reliable and trusted partner in the iGaming sector. Additionally, we regularly gather feedback from our users to identify areas for improvement and implement necessary changes reinforcing our dedication to providing the best possible user experience.

Furthermore, our robust internal systems and processes enable us to efficiently manage and resolve customer issues, minimizing downtime and ensuring a seamless gaming experience for our users. We leverage advanced technologies and data analytics to monitor customer interactions, identify trends and continuously improve our support services.

In summary, our customer support and sales operations in Cebu, Philippines, managed by RWB Smart Solutions International Inc., play a crucial role in our success. The combination of skilled personnel, strategic location and unwavering commitment to customer satisfaction positions us to excel in the competitive iGaming industry.

6. Marketing Strategy

RWB believes the key element of successfully entering a new region is choosing the best market entry strategy. The first step of entering a new market is conducting thorough market research. This involves analyzing the competitive landscape, understanding local regulations, identifying potential customer segments and assessing market demand. By gathering comprehensive data, RWB can make informed decisions and tailor its approach to meet the specific needs and preferences of the new market. Engaging content and targeted campaigns will be used to attract and retain customers creating a vibrant online community around the brand.

RWB uses a “RACE” Planning system to achieve its key performance indicators (KPIs):

REACH: This stage involves building awareness of the brand, its products and services across various channels including other websites, offline media and affiliate networks. The goal is to drive traffic to the website by maximizing reach over time and creating multiple interactions using different paid, owned and earned media touchpoints. Effective reach strategies ensure that potential players are consistently exposed to the RWB brand increasing the likelihood of engagement.

ACT: Short for Interact, this stage focuses on encouraging interactions on the RWB website and affiliate platforms. It is a critical phase as persuading players to take the next step whether it’s signing up for a newsletter, participating in a promotion or engaging with content. By creating compelling calls-to-action and interactive features, RWB aims to foster meaningful engagement and guide players towards deeper involvement with the brand.



CONVERT: This stage is about converting interactions into funded accounts. It means that players not only register an account on the RWB website but also proceed to make a real money deposit. Conversion strategies include offering attractive campaigns and bonuses, providing a seamless and secure payment process and ensuring that the onboarding experience is smooth and user-friendly. Successful conversion is a key indicator of the effectiveness of RWB's marketing efforts.

ENGAGE: The final stage focuses on long-term engagement which involves developing a lasting relationship with players to build brand loyalty. This includes offering personalized communication, loyalty programs, regular updates and exclusive offers. By continuously engaging with players and providing value, RWB aims to create a loyal customer base that contributes to sustained growth and success.

6.1 SEO Marketing

RWB's strategy to gain traction and market share within its target market involves a multifaceted approach that leverages SEO, content marketing together with an attractive affiliate program to effectively reach and engage target audiences.

By implementing robust SEO practices, RWB aims to improve its website's visibility on popular search engines. This involves optimizing website content with relevant keywords, improving site speed and ensuring mobile-friendliness. Additionally, creating high-quality backlinks and regularly updating content will help boost search engine rankings. The goal is to attract organic traffic from players who are actively searching for online gambling services thereby increasing brand awareness and driving conversions.

Utilising compelling and keyword-rich title tags and meta descriptions for each page to improve click-through rates from search engine results pages. Ensuring that title tags and meta descriptions are relevant, unique and compelling to help improve the visibility of our pages in search engine results.

RWB plans to create and distribute valuable, relevant and consistent content to attract and retain a clearly defined audience. This includes blog posts, articles, videos, infographics and other forms of content that provide useful information and entertainment to potential customers. Engaging contents not only helps in building trust and credibility but also encourages players to share it within their networks further expanding RWB's visibility and reach.

Combining these strategies ensures a cohesive and comprehensive marketing plan. SEO efforts will drive organic traffic and content marketing will engage and inform the audience to amplify reach and engagement. This integrated approach maximizes the effectiveness of each individual strategy creating a synergistic effect that enhances overall marketing performance.

Continuous monitoring and analysis of marketing efforts are crucial for success. RWB will utilize analytics tools to track the performance of SEO and content marketing. By analyzing metrics such as website traffic, conversion rates, engagement levels and ROI, RWB can identify what works and what needs improvement. This data-driven approach allows for ongoing optimization of marketing strategies to ensure they remain effective and aligned with business goals.



6.2 Affiliate Marketing

An attractive affiliate program will also be available as an additional channel for existing and new affiliates in the market to join us in building and sending traffic to RWB's websites. This program is designed to incentivize affiliates by offering competitive commission rates and a range of benefits that make it appealing for both seasoned affiliates and newcomers.

RWB is integrated with an award-winning affiliate system powered by a user-friendly portal where affiliates can easily track their performance and access marketing materials. The portal will provide real-time data on clicks, conversions and earnings allowing affiliates to monitor their progress with ease.

Affiliates can earn generous commissions based on the traffic and conversions they generate. This tiered commission structure rewards high-performing affiliates with higher payouts, motivating them to drive more traffic and increase their promotional efforts. The more traffic they generate the more they earn.

To ensure the success of our affiliates, we will provide comprehensive support and resources. This includes access to a dedicated affiliate manager, marketing materials and detailed performance reports.

We understand the importance of timely and convenient payments. Affiliates will have access to multiple payment options including bank transfers, e-wallets and cryptocurrencies ensuring they can choose the method that best suit their needs. Payments will be processed promptly providing affiliates with reliable and consistent income.

To further incentivize affiliates, exclusive promotions and bonus offers tailored specifically for different affiliates will encourage affiliates to maintain high levels of engagement and performance.

6.3 Campaigns and Offers

In addition to the aforementioned initiatives, RWB will continuously roll out enticing campaigns designed to keep players engaged. These incentives are designed to enhance the gaming experience providing additional value for players.

RWB will offer a variety of bonuses to reward both new and existing players. Welcome bonuses will be available to new players upon signing up giving them a head start with extra funds to explore the platform. Retention bonus campaigns will encourage ongoing engagement by providing additional funds when players top up their accounts. Special event bonuses tied to holidays or significant events such as birthday offers will add an extra layer of excitement and reward players for their loyalty.

Free spins will be a popular feature particularly for slot game enthusiasts. These free spins can be awarded as part of welcome packages, promotional events or loyalty rewards. By offering free spins, RWB allows players to try out new games or enjoy their favorites without risking their own money adding value and enhancing their overall gaming experience.

Tournaments will be a key component of RWB's engagement strategy. Regular scheduled tournaments will provide players with the opportunity to compete against other players for prizes and bragging rights. These tournaments can cover a range of games from poker, baccarat, blackjack to slots and eSports to



cater to different player interests. Leaderboards and real-time updates will add to the competitive atmosphere encouraging players to participate and strive for top positions.

In addition to bonuses, free spins and tournaments, RWB will implement a comprehensive loyalty program. This program will reward players for their continued engagement with points that can be redeemed for various perks such as exclusive bonuses, free spins and branded merchandise. The loyalty program will have multiple tiers with higher levels offering more significant rewards incentivizing players to stay active and loyal to the platform.

To further enhance player engagement, RWB will utilize data analytics to create personalized offers through player segmentation. By analyzing player behavior and preferences, RWB can tailor promotions and bonuses to individual players making them more relevant and appealing. This personalized approach ensures that players feel valued and appreciated increasing their overall satisfaction and loyalty.

7. Target Markets

- **Japan:** Japan presents a lucrative market for online gambling due to its large, tech-savvy population and increasing interest in digital entertainment. Our target audience in Japan will primarily consist of young adults and middle-aged individuals who are familiar with online gaming and have disposable income. We will focus on offering a wide range of popular casino games, sports betting options, and virtual sports to cater to the diverse preferences of Japanese players.
- **South Korea:** South Korea is known for its strong gaming culture and high internet penetration rates. Our target market will include tech-savvy young adults and professionals who engage in online gaming and are open to exploring online gambling. We will offer a variety of casino games, esports betting, and live dealer games to attract South Korean players, leveraging the country's robust gaming infrastructure and growing interest in online entertainment.
- **Malaysia:** Malaysia's diverse and youthful population, along with its increasing internet usage, makes it an attractive market for online gambling. Our target audience will include young adults and middle-aged individuals who are familiar with online gaming and have a penchant for digital entertainment. We will focus on offering a mix of traditional casino games, sports betting, and live dealer experiences to appeal to Malaysian players.
- **India:** India's rapidly growing internet user base and increasing smartphone penetration present significant opportunities for online gambling. Our target market will include young adults and millennials who are tech-savvy and have a strong interest in online gaming and sports betting. We will offer a wide range of casino games, fantasy sports, and cricket betting options to cater to the preferences of Indian players, leveraging the country's passion for sports and digital entertainment.



- **Thailand:** Thailand's vibrant gaming community and high mobile internet usage make it a promising market for online gambling. Our target audience will consist of young adults and professionals who are accustomed to online gaming and have disposable income. We will focus on providing a diverse selection of casino games, sports betting, and live dealer games to attract Thai players, capitalizing on the country's affinity for digital entertainment.
- **Vietnam:** Vietnam's growing internet penetration and increasing interest in online entertainment present a valuable market for online gambling. Our target market will include young adults and middle-aged individuals who are tech-savvy and have disposable income. We will offer a variety of casino games, sports betting, and esports betting options to appeal to Vietnamese players, leveraging the country's emerging digital landscape and gaming culture.

By targeting these initial markets with tailored offerings and marketing strategies, we aim to capitalize on the growing demand for online gambling in these regions. Our focus on providing a diverse and engaging gaming experience will help us attract and retain a loyal customer base ensuring sustainable growth and success in the online gambling industry.

In our strategy to target the markets of Japan, South Korea, Malaysia, India, Thailand and Vietnam for our online gambling business, we have thoroughly considered the associated risks. We recognize the importance of adhering to local regulations and are committed to maintaining compliance with the legal requirements. Our comprehensive risk assessment has identified potential challenges including regulatory changes, market conditions, cybersecurity threats and cultural differences.

Moreover, we have invested in advanced cybersecurity measures to protect our platform and customer data from potential threats. Our team continuously reviews and updates our security protocols to stay ahead of emerging risks. Additionally, we have developed tailored marketing strategies that respect cultural nuances and preferences, ensuring that our offerings resonate with the target audience in each country.

By staying vigilant and proactive, we aim to mitigate potential risks and maintain the integrity and success of our operations in these dynamic markets. We are confident that our strategic approach will enable us to navigate the complexities of these markets while delivering a secure and engaging experience for our customers.

8. Platform Overview

RWB's gaming platform was conceptualized and built in 2017 by a team of industry experts who has prior to joining RWB had accumulated years of experiences in the iGaming industry. These invaluable experiences over the years allowed the team members to contribute to the development of the platform in order to provide a safe and fair gaming experience to its players seamlessly.

The platform is designed with flexibility and customization in mind allowing operators to tailor it to their specific requirements. This adaptability ensures that the platform can meet the unique demands of different markets and business models.

One of the standout features of RWB's platform is its seamless integration capability. It is designed to integrate effortlessly with any third-party gaming system providing access to an extensive portfolio of



games. This means that the platform can offer a wide variety of gaming options to players simplifying the process and reducing operational complexity.

The platform is not only user-friendly but also robust and highly secure giving RWB complete control over all operational aspects of the business. This control is crucial for maintaining the integrity and reliability of the platform ensuring that it operates smoothly and efficiently.

By leveraging the expertise and experience of the core team members, RWB was able to enhance the overall integrity and reliability of its gaming platform implementing best practice solutions and process flow and has undergone continuous improvement and upgrades over the years with the addition of new features and functionalities to comply with industry standards.

In 2023, RWB undertook a comprehensive evaluation of its platform's stability and integrity by subjecting it to rigorous tests conducted by Gaming Laboratories International (GLI). This evaluation aimed to ensure that the platform's software from the Front-end game site to the Back-end administrative engine is built to be fair, reliable and secure.

The evaluation process which spanned several months involved a series of stringent tests and assessments performed by GLI. These tests were designed to scrutinize every aspect of the platform's functionality, security measures and overall performance. The goal was to verify that the platform meets the highest standards of fairness and reliability thus providing a secure environment for its players.

In December 2023, after successfully passing all the checks and tests conducted by GLI, RWB received the certification of compliance with the technical standards established for the industry. This certification is a testament to the platform's robust design and operational integrity confirming that it adheres to the stringent requirements set forth by GLI.

By achieving this certification, RWB has further solidified its reputation as a trusted and reliable service provider in the gaming industry. The successful completion of GLI's evaluation process underscores RWB's commitment to maintaining a fair, safe and secure gaming environment for its players. This accomplishment not only enhances the platform's credibility but also assures players of RWB's dedication to upholding the highest standards of integrity and security.

9. Technology

We employ a Privileged Access Management (PAM) system to enhance our security infrastructure by controlling and monitoring access to critical systems and sensitive information. The PAM system ensures that only authorized users can perform specific tasks and access vital resources, thereby significantly reducing the risk of unauthorized access and potential security breaches.

Our PAM system includes several key components:

- **User Authentication**
Implementing robust multi-factor authentication (MFA) methods to verify the identity of users before granting access to privileged accounts. This adds an extra layer of security beyond just usernames and passwords.



- **Access Controls**
Defining and enforcing strict access controls based on the principle of least privilege, where users are given the minimum level of access necessary to perform their duties. This helps limit the potential damage that could be caused by compromised accounts.
- **Session Monitoring and Recording**
Continuously monitoring and recording sessions involving privileged accounts. This allows us to detect any suspicious activities in real-time and provides a detailed audit trail for forensic analysis in case of a security incident.
- **Credential Management**
Securing by encryption and managing privileged credentials such as passwords, API keys and SSH keys to ensure they are stored and used securely. This may include automated password rotation and encryption to prevent unauthorized access.
- **Incident Response**
Implementing an incident response plan to quickly identify, contain and mitigate the impact of any security breaches involving privileged accounts. This includes predefined procedures for notifying relevant parties and conducting thorough investigations.
- **Notifications**
Automated email notifications will be triggered in the event that any critical service within our platform experiences downtime. These notifications will promptly alert relevant stakeholders to the issue enabling swift resolution and minimizing disruption to our operations. This proactive approach ensures that our team can address and rectify any service interruptions quickly, maintaining the reliability and integrity of our platform.

By employing a comprehensive PAM system, we ensure that our organization's critical assets are protected, and we maintain a high level of trust and integrity in our operations. This approach not only safeguards our sensitive information but also enhances our overall security posture.

To ensure a high-performance platform, the applications are logically divided into two separate parts: Core and Client.

- **Core Applications**
All Core applications are developed using the .NET Core framework version 6.0 and higher. This choice ensures that the platform leverages the latest features and improvements supported by Microsoft providing a robust and scalable foundation. The Core applications handle the business logic, data processing and other backend functionalities essential for the platform's operation.
- **Client Applications**
To enhance overall system performance and minimize client response time and loading speed, the client application architecture is designed as a Single Page Application (SPA). This architecture uses the Angular framework, which is built with TypeScript. Angular provides a



dynamic and responsive user interface, allowing for a seamless user experience.

- **Database Infrastructure**

For the database infrastructure, the platform utilizes Microsoft SQL Server 2019. This choice offers advanced data management capabilities, high availability and robust security features ensuring that the platform can efficiently handle large volumes of data and complex queries.

- **Communication**

The client applications communicate with the Core system using HTTP and WebSocket protocols. HTTP is used for standard request-response interactions while WebSockets enable real-time bidirectional communication. This combination ensures efficient data transfer and real-time updates further improving the responsiveness and performance of the platform.

9.1 Security Measures

RWB has implemented a comprehensive set of security measures to protect itself and its players from potential threats and security breaches. These measures are designed to ensure the integrity, confidentiality and availability of data providing a secure environment for all gaming activities. The key security measures include:

Data Encryption

- Use SSL/TLS encryption for data in transit to secure communication between players and the platform.
- Encrypt sensitive data at rest such as personal information and financial details.

Secure User Authentication

- Implement multi-factor authentication (MFA) to add an extra layer of security during login.
- Use strong password policies including requirements for complexity and periodic updates.

User Identity Verification

- Implement Know Your Customer (KYC) processes to verify the identity of players post registration and making withdrawals.
- Use advanced verification methods such as document uploading software.

Fraud Detection and Prevention

- Build-in mechanisms to monitor betting patterns and detect suspicious activities.
- Set up limits on betting amounts and transactions to minimize potential losses and risks.

Secure Payment Processing

- Use reputable payment gateways that comply with Payment Card Industry Data Security Standard (PCI DSS).
- Offer secure and diverse payment options including e-wallets.



Regular Security Audits and Vulnerability Testing

- Conduct regular security assessments and penetration testing to identify and fix vulnerabilities.
- Implement a bug bounty program to encourage third-party security experts to identify weaknesses.

Physical Security

- Ensure that data centers and server locations have robust physical security measures including access controls and surveillance that only authorized employees have access to.
- Store backups in secure geographically diverse locations to prevent data loss.
- Secure VPN connection to the servers.
- Cloudfront service to hide the real location of the servers.

9.2 User Interface

RWB's gaming platform is dedicated to providing an exceptional user experience by focusing on three key areas: intuitive design, easy user navigation, and mobile compatibility.

Seamless Wallet Approach

RWB's platform adopts a seamless wallet approach which allows players to manage their funds effortlessly across different games and services eliminating the need to transfer account balances in order to enjoy the games offered.

Intuitive Design

Our gaming site is crafted with an intuitive design that prioritizes user-friendliness and accessibility. This means:

- **User-Centered Approach**
We design with the user in mind ensuring that the interface is easy to understand and interact with.
- **Simplified Interface**
Designing a clean and straightforward interface that minimizes clutter and highlights essential features.
- **Clear Visuals**
Utilizing clear and consistent visual elements that guide users effortlessly through the site.
- **Immediate Feedback**
Providing immediate feedback for user actions such as button clicks and form submissions to enhance the overall experience.

Easy User Navigation

We emphasize easy user navigation to ensure that players can find what they need quickly and efficiently. This includes:



- **Simple Menus**
Designing straightforward and intuitive menus that allow users to access different sections of the site with ease.
- **Consistent Navigation Patterns**
Maintaining consistent navigation patterns throughout the site to reduce the learning curve and improve user confidence.
- **Search Functionality**
Implementing robust search functionality that helps users locate content and features efficiently.

Mobile Compatibility

Recognizing the importance of mobile access, our gaming site is fully optimized for mobile compatibility. This involves:

- **Responsive Design**
Ensuring that the site adapts to various screen sizes and orientations providing a consistent experience across all devices.
- **Mobile-First Approach**
Designing with a mobile-first mindset by prioritizing the needs of mobile users and ensuring that all features are accessible on smaller screens.
- **Performance Optimization**
Optimizing performance for mobile devices by minimizing load times and ensuring smooth interactions even on slower networks.

10. Business Financial Forecasts

Please refer to the attached Financial Forecasts provided in Microsoft Excel document provided separately

11. Risk Management

11.1 Contingency Plans for Technical Issues

To ensure the platform's resilience and minimize downtime, we have developed comprehensive contingency plans for technical issues. These plans include:

- **Redundant Systems**
Implementing redundant systems and failover mechanisms to maintain service continuity in case of hardware or software failures.
- **Regular Backups**
Conducting regular backups of all critical data to prevent data loss and facilitate quick recovery.



- **Monitoring and Alerts**
Setting up advanced monitoring tools and alert systems to detect and address issues promptly.
- **Disaster Recovery Plan**
Establishing a detailed disaster recovery plan that outlines the steps to be taken in the event of a major technical failure ensuring a swift return to normal operations.

11.2 Contingency Plans for Data Breaches

Protecting user data is a top priority and we have robust contingency plans in place to address potential data breaches. These plans include:

- **Incident Response Team**
Forming a dedicated incident response team trained to handle data breaches efficiently.
- **Immediate Containment**
Implementing procedures for the immediate containment of breaches to prevent further unauthorized access.
- **Forensic Analysis**
Conducting forensic analysis to understand the breach scope and impact to identify the root cause.
- **Notification Protocols**
Establishing protocols for timely notification to affected users and relevant authorities in compliance with legal requirements.
- **Post-Breach Review**
Performing a thorough post-breach review to improve security measures and prevent future incidents.

11.3 Contingency Plans for Regulatory Changes

Staying compliant with evolving regulations is crucial, and we develop contingency plans to adapt to regulatory changes. These plans include:

- **Regulatory Monitoring**
Continuously monitoring regulatory developments to stay informed about upcoming changes.
- **Compliance Audits**
Conducting regular compliance audits to ensure adherence to current regulations and identify areas for improvement.
- **Policy Updates**
Updating internal policies and procedures to align with new regulatory requirements.
- **Training Programs**
Implementing training programs to educate employees about regulatory changes and their implications.



- **Stakeholder Communication**

Maintaining open communication with stakeholders to keep them informed about changes and how they impact the platform.

12. Conclusion

RWB is poised to make a significant impact in the rapidly growing online gaming market with a strong emphasis on enhancing user experience, promoting responsible gaming and ensuring strict compliance with industry regulations.

Seamless Wallet Approach

Our seamless wallet approach reduces unnecessary clicks for players providing a smoother and more efficient gaming experience allowing players to focus more on enjoying their favorite games.

User Experience

Our primary focus is on delivering an exceptional user experience. We are committed to creating a seamless, engaging and enjoyable gaming environment for our players. This involves continuous improvements to our platform's interface ensuring it is intuitive and user-friendly. We also prioritize the integration of innovative features and technologies that can enhance gameplay and provide a superior gaming experience.

Responsible Gaming

At RWB, we believe in promoting responsible gaming practices. We are dedicated to implementing measures that protect our players and encourage healthy gaming habits. This includes providing tools and resources for players to manage their gaming activities such as setting limits on spending and playtime and offering support for those who may need assistance with gaming-related issues.

Compliance

Compliance with industry regulations is a cornerstone of our operations. We adhere to the highest standards of security and fairness ensuring that our platform is safe and trustworthy. By maintaining rigorous compliance protocols, we aim to protect our players' data and provide a safe and secure gaming environment.



Marketing Strategies

To establish ourselves as a trusted leader in the online gaming industry, we are implementing effective marketing strategies that highlight our unique value propositions. Our marketing efforts are focused on building brand awareness and loyalty, attracting new players and retaining existing ones. We leverage a diverse range of channels and strategic partnerships to effectively reach our target audience. This approach allows us to communicate our unwavering commitment to quality and integrity ensuring that our message resonates with those we aim to serve.

Operational Standards

Maintaining high operational standards is essential to our success. We strive for excellence in all aspects of our operations from customer support to technical infrastructure. Our team is dedicated to providing prompt and efficient service ensuring that any issues are resolved quickly and effectively. By upholding these standards, we aim to build a reputation for reliability and trustworthiness in the online gaming community.



13. Appendices

Appendix 1

KYC Policy

Know Your Customer (KYC) Policy

1. Purpose

The purpose of this KYC process is to ensure that we comply with legal and regulatory requirements for identifying, verifying and monitoring players, thereby mitigating risks associated with money laundering, terrorist financing and other financial crimes.

2. Scope

This process applies to all players who wish to engage in online gambling activities on Crownplay's website.

3. Customer Identification

3.1. Required Documents: players will be required to provide the following documents. Failure to do so may result in the suspension of account access and services.

- Identity Verification Document (e.g., passport, driver's license, national ID)
- Proof of Address
- Proof of Payment Instrument Ownership

4. Risk Assessment

4.1. Customer Risk Profiling: Players will be assigned a risk profile based on factor such as:

- Transaction patterns and volumes
- Change of Withdrawal receiving accounts
- Attempts to request for Withdrawals to a Payment Instrument that does not belong to you
- Inability to provide the requested KYC documents

4.2. Enhanced Due Diligence (EDD): For players deemed to be higher risk, additional due diligence measures will be taken, including:

- Obtaining additional information about the player's source of funds and wealth
- Conducting more frequent monitoring of transactions
- Enhanced scrutiny of complex or unusually large transactions



5. Ongoing Monitoring

- **Transaction Monitoring:** Continuous monitoring of player transactions will be conducted to detect suspicious activities. Any unusual or suspicious transactions will be flagged and reported to the designated officer for further investigation.
- **Periodic Reviews:** Player information and risk profiles will be periodically reviewed and updated to ensure accuracy and relevance.

6. Record Keeping

- **Documentation:** Records of all player identification information, risk assessments and due diligence measures taken will be maintained within the player's account profile.
- **Confidentiality:** All player information will be kept confidential and protected against unauthorized access or disclosure.

7. Policy Review

This KYC process will be reviewed and updated periodically to ensure continued compliance with legal and regulatory requirements and to address any changes in business operations or risk profiles.



Appendix 2

Responsible Gaming and Self Exclusion Policy

Responsible Gambling

Gambling means for the majority of our players, entertainment, fun and excitement. But we also know that for some of our players, gambling has negative side effects. In the field of medical science pathological gambling has long been recognized as a serious illness.

Since our inception, we have been mindful of the potential issues associated with gambling and have consistently strived to address them. Under our 'Responsible Gambling' initiative, we implement various measures to help minimize the risk of negative side effects. Additionally, if any issues do arise, we actively take steps to mitigate them and support affected players.

The most important tool in preventing negative side effects from gambling is knowledge and education about its risks. By informing our players and enhancing their self-control, we aim to ensure they do not suffer from the adverse effects of gambling.

Information and contact

Our Support will help you via email at all time without any additional costs for you:

- email: *<insert support email >*

Our Support will of course not give out any information about you without your consent to anyone else

In addition, you can also take a self-test to determine if you may be experiencing gambling addiction at: <https://www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/>

And you can also find additional information about gambling addictions at: <https://www.begambleaware.org/safer-gambling/>

Helpful hints for responsible gambling

We recommend you think about the following hints, before gambling in order to insure gambling stays fun for you and without any negative side effects:

- **Set yourself a deposit limit:** Before you start gambling, consider how much you can afford to gamble based on your financial situation. Play with amounts that are within your budget and meant for fun and entertainment.
- **Do not try to win back a loss at every cost:** Try to not take to huge risks to win back what you lost before at any cost. Play for Entertainment and not to earn money.
- **Set yourself a time limit:** Set yourself a time limit and do not break it. Keep in mind gambling should stay in balance with your other hobbies and not be Your only hobby.



- **Play smart:** It is smarter to not play when you are extremely stressed, depressed or under too much pressure. Also do not play when you are under the influence of Medications, Drugs or Alcohol.
- **Take breaks:** You should take breaks when you noticed that you get tired or can't concentrate anymore.
- **Only one account:** To make it easier to have an overview how much time and money you spend on gambling it is highly advised to not create more than one Account per Person.

Minor Protection

To use our service, you have to be 18 years or older. To avoid abuse, keep your login data save from any minors near you.

Principally we recommend a filter program to avoid minors, especially children to access any context on the internet which is not healthy for them.

For parents, we recommend a list of internet filters to help them keep their children safe from inappropriate content that is not suitable for them:

<https://famisafe.wondershare.com/internet-filter/best-internet-filters.html>

Self-Exclusion:

If you are diagnosed with a gambling addiction or are trying to stay away from gambling for any other reason, we want to help you avoid anything that may be harmful to you. 'Self-Exclusion' means that you voluntarily choose to exclude yourself from all gambling services. This exclusion cannot be undone for a set period of time. If you wish to self-exclude, please contact our support team and provide them with a time frame between 6 months and 5 years. They will explain all future steps and what is needed from you.

- email: <insert support email>

Please keep in mind that Self Exclusion is permanent for the set time span and will not be undone for your own protection.

During Self Exclusion you are not allowed to create a new Account and every attempt to create a new Account during Self Exclusion is a violation of our Terms of Service and may result in the permanent ban of your original account.



Appendix 3

Privacy Policy

Safeguarding your privacy is important. We are dedicated to protecting and respecting your personal information in compliance with all relevant data protection and privacy laws. If you have any questions or concerns about how we handle your data, we encourage you to review our Privacy Policy.

Please note that acceptance of our Privacy Policy is integral to agreeing to our Terms & Conditions, and it is a prerequisite for account registration. Please also note that we may periodically update the Privacy Policy and will notify you accordingly. We recommend that you revisit our Privacy Policy regularly.

Collected Information

We consider information that may be used to identify an individual, including, but not limited to, first and last name, date of birth, home or other physical address, email address, phone number or other relevant information to be Personal Information ('Personal Information'). You may be asked to provide Personal Information when you use our website, register for an account or use our services. The Personal Information that we collect may include information such as: contact information (including telephone number), shipping information, billing information, transaction history, website usage preferences, and feedback regarding the Services. This information is held by us within our local servers. When you interact with the services, our servers keep an activity log unique to you that collects certain administrative and traffic information including: source IP address, time of access, date of access, web page(s) visited, language use, software crash reports and type of browser used. This information is essential for the provision and quality of our services. We do not collect Personal Information about you without your knowledge.

Other Data

We may automatically collect certain data as discussed above and receive Personal Information about you where you provide such information through the services or other communications and interactions within our website. We may also receive Personal Information from online vendors and service providers, and from customer lists lawfully acquired from third-party vendors. In addition, we may engage the services of third-party service providers to provide technical support process your online transactions and maintain your account. We will have access to any information you provide to such vendors, service providers and third-party e-commerce services, and we will use the Personal Information as set out in this Privacy Policy below. This information will only be disclosed to third parties outside the company in accordance with this Privacy Policy. We take steps to ensure that our arrangements with third-party service providers and online vendors protect your privacy.

Use of Information

We use the Personal Information we collect from you to deliver our Services, to provide customer support, to undertake necessary security and identify verification checks, to process any of your online transactions, to assist your participation in third-party promotions, to meet certain business requirements and for any other purpose related to the operation of the Services. As such, we may share



your Personal Information with our carefully selected partners (including any other parties that have data sharing arrangements with the latter).

Your Personal Information may also be used by us to provide you with: (1) promotional offers and information regarding our products and services; and (2) promotional offers and information regarding the products and services of our partners, in order to enlarge the range of provided products and improve our customer service. From time-to-time, we may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary and you have the choice of whether or not to disclose such information. Information requested may include contact information (such as name, correspondence address and telephone number), and demographic information (such as zip or postal code or age). By accepting any contest prize or winnings from us, you consent to use of your name for advertising and promotional purposes without additional compensation, except where prohibited by law. Unless you have elected not to receive promotional information, we may also use your Personal Information (including your email address and phone number) to provide you with information regarding our products, services and promotions, including other gaming products (including online poker, casino, betting, backgammon) and products and services from third parties carefully selected by us.

Information Disclosure

We may disclose your Personal Information if required to do so by law, or if we believe in good faith that such action is necessary to: (1) comply with any legal process served on us, any of our sites or the services or in circumstances where we are under a substantially similar legal obligation; (2) protect and defend our rights or property; or (3) act to protect the personal safety of users of the services or the public. If, in our sole determination, you are found to have cheated or attempted to defraud us, the company, or any other user of the services in any way including but not limited to game manipulation or payment fraud, or if we suspect you of fraudulent payment, including use of stolen credit cards, or any other fraudulent activity (including any chargeback or other reversal of a payment) or prohibited transaction (including money laundering), we reserve the right to share this information (together with your identity) with other online gaming sites, banks, credit card companies, appropriate agencies and relevant authorities. (4) For the purpose of research on the prevention of addiction, data can be made anonymous and passed on to the respective institutions.

Access

You may prefer to 'exclude' yourself to receive any promotional communications just by unchecking a preference box via your account settings available on our site or in an email you receive from us, or at any time by sending an email, or by writing to us at Customer Service.

In addition, you may contact us if you: 1) want to confirm the accuracy of the Personal Information we have collected about you; 2) would like to update your Personal Information; and/or 3) have any complaint regarding our use of your Personal Information. If requested, we will (1) update any information you have provided to us, in case you prove the necessity for such changes or (2) mark any information to prohibit future use for marketing purposes. For the avoidance of doubt, nothing in this Privacy Policy shall prevent us from retaining your Personal Information where we are required to do so by law.



Cookies

Information stored in your device

When accessing our services, we may store information on your device. This information is referred to as cookies, which are small text files that are stored on your device when you visit online pages that record your preferences. We also use Local Shared Objects or 'flash cookies'. 'Flash cookies' are similar to browser cookies. They allow us to remember things about your visits across our sites. Neither cookies nor flash cookies can be used to access or use other information on your computer. We only use these methods to track your use of our services. Cookies help us monitor traffic to the site, improve our services and make it easier and/or more relevant for your use. We use flash cookies and third-party cookies to help us show you more relevant and desirable advertisements.

Strictly necessary cookies

Strictly necessary cookies are essential to allow a user move around a website and use its features, such as accessing secure areas of the website or making financial transactions. Without these cookies, we would not be able to make our websites work efficiently.

During Registration

These cookies will hold information collected during your registration and will allow us to recognize you as a customer and provide you with the services you require. We may also use this data to better understand your interests while online and to enhance your visits to our platforms.

On Site

For visitors logging into our website, we use cookies to collect information. Our servers use three different types of cookies:

A 'session-based' cookie: This type of cookie is only allocated to your computer for the duration of your visit to our website. A session-based cookie helps you move around our website faster and, if you're a registered customer, it allows us to give you information that is more relevant to you. This cookie automatically expires when you close your browser.

A 'persistent' cookie: This type of cookie will remain on your computer for a period of time set for each cookie. Flash cookies are also persistent.

'Analytical' cookies: This type of cookie allows us to recognize and count the number of visitors to our site and see how visitors use our services. These helps us improve the way our sites work, for example, by ensuring you can find what you are looking for easily.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but, if you prefer, you can usually modify your browser setting to decline cookies. The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether.



Flash cookies

You can modify your Flash Player settings to prevent the use of flash cookies. The Settings Manager of your Flash Player allows you manage your preferences. To disallow flash cookies from all third-party content, go to the 'Global Storage Settings' panel of the Settings Manager and de-select the check box labelled 'Allow third party flash content to store information on your computer' and close the Settings Manager. Alternatively, you can also adjust your settings for specific websites you visit through the 'Website Storage Settings' panel which is also found in the Settings Manager.

If you are using an old version of Flash Player or older web browser, the Settings Manager may not be available to you. We recommend that you ensure that you refresh your Flash Player and browser to the latest available versions.

If you choose to decline cookies, you may not be able to experience all of the interactive features on our sites.

Consent to Security Review

We reserve the right to conduct a security review at any time to validate the registration data provided by you and to verify your use of the services and your financial transactions for potential breach of our Terms and Conditions and of applicable law. By using our services and thereby agreeing to our Terms and Conditions you authorize us to use your Personal Information and to disclose your Personal Information to third parties for the purposes of validating the information you provide during your use of our services, including, where necessary, the transfer of information outside of your country. Security reviews may include but are not limited to ordering a credit report and/or otherwise verifying the information you provide against third-party databases. In addition, to facilitate these security reviews, you agree to provide such information or documentation as we may request.

Security

We understand the importance of security and the techniques needed to secure information. We store all of the Personal Information we receive directly from you in an encrypted and password-protected database residing within our secure network behind active state-of-the-art firewall software. (Our Services support SSL Version 3 with 128-bit encryption). We also take measures to ensure our subsidiaries, agents, affiliates and suppliers employ adequate security measures.

Minors Policy

Our Services are not intended for or directed at persons under the age of eighteen (18) (or the lawful age in their respective jurisdiction). Any person who provides their information to us through any part of the services signifies to us that they are eighteen (18) years of age (or the lawful age in their respective jurisdiction) or older. It is our policy to uncover attempts by minors to access our services which may involve having to initiate a security review. If we become aware that a minor has attempted to or has submitted personal information via our services, we will not accept their information and will take steps to purge the information from our records.



Third-party Practice

We cannot ensure the protection of any information that you provide to a third-party online site that links to or from the services or any information collected by any third party administering our affiliate program (if applicable) or any other program, since these third-party online sites are owned and operated independently from us. Any information collected by these third parties is governed by the privacy policy, if any, of such third party.

Legal Disclaimer

The Services operate 'AS-IS' and 'AS-AVAILABLE' without liability of any kind. We are not responsible for events beyond our direct control. Due to the complex and ever-changing nature of our technology and business, we cannot guarantee nor do we claim that there will be error-free performance regarding the privacy of your Personal Information, and we will not be liable for any indirect, incidental, consequential or punitive damages relating to the use or release of said Personal Information.

Consent to Privacy Policy

Your use of our services constitutes an agreement to our Privacy Policy.

This is our entire and exclusive Privacy Policy and it supersedes any earlier version. This Privacy Policy should be read in conjunction with our Terms and Conditions and any additional applicable terms posted on our platforms. We may periodically update the Privacy Policy and will notify you accordingly. Your continued use of our services following any changes to this Privacy Policy constitutes your acceptance of the changes. We recommend that you revisit our Privacy Policy regularly.

Other Websites

Our website may contain links to other web sites, which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you, which will be used by them in accordance with their privacy policy, which may differ from ours and we will not be responsible for it. The operators of these websites shall be responsible for their functionality or possible errors on the linked sites.



Appendix 4

AML Policy

What is Money Laundering?

Money laundering is the act of concealing money obtained illegally so that its source appears legitimate. We adhere to strict laws that render it illegal for us or any of our employees or agents to knowingly engage in or attempt to engage in activities related to money laundering. Our anti-money laundering policies enhance investor protection and client security while also ensuring safe payment processes.

Reporting

AML regulations require us to monitor and track suspicious transactions and report such activities to relevant law enforcement agencies. We reserve the right to deny a transfer at any stage if we believe it is connected to criminal activity or money laundering. The law prohibits us from informing customers about reports submitted to law enforcement agencies and regulatory bodies concerning suspicious activity.

Source of Wealth

The company is required to request and hold documentation regarding players' deposits and comply with anti-money laundering rules and regulations. If the information and evidence provided are not satisfactory and do not justify your claims and financial transactions, the company will request further documentation. If you fail to provide the requested documentation within a reasonable timeframe, your account will be blocked.