



LUXSOFT N.V.

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EXECUTIVE SUMMARY

The Product

Luxsoft N.V. provides online gambling solutions worldwide in B2C area with using own invented base platform.

The Leadership

Anatolii Shehirov founded the company after years in the online gambling industry. He serves as Founder and CTO.

The Overall Industry

Four master holder companies in Curacao dominated many years in the market. However, with the new regulatory changes in Curacao, Luxsoft N.V. aims to offer consumers a new alternative, with special attitude to each.

The Financial Status

Luxsoft N.V. wants to raise \$3 million to scale its operations during first year. Financial resources will be focused on developing a new websites and projects.

Future Plans

By 2026, the company plans to stand as a new major player in the online gambling market by extending to the B2B market.



Mission

To provide unique online gambling experience to all customer



Vision

To be a new key operator in online gambling market



COMPANY DETAILS

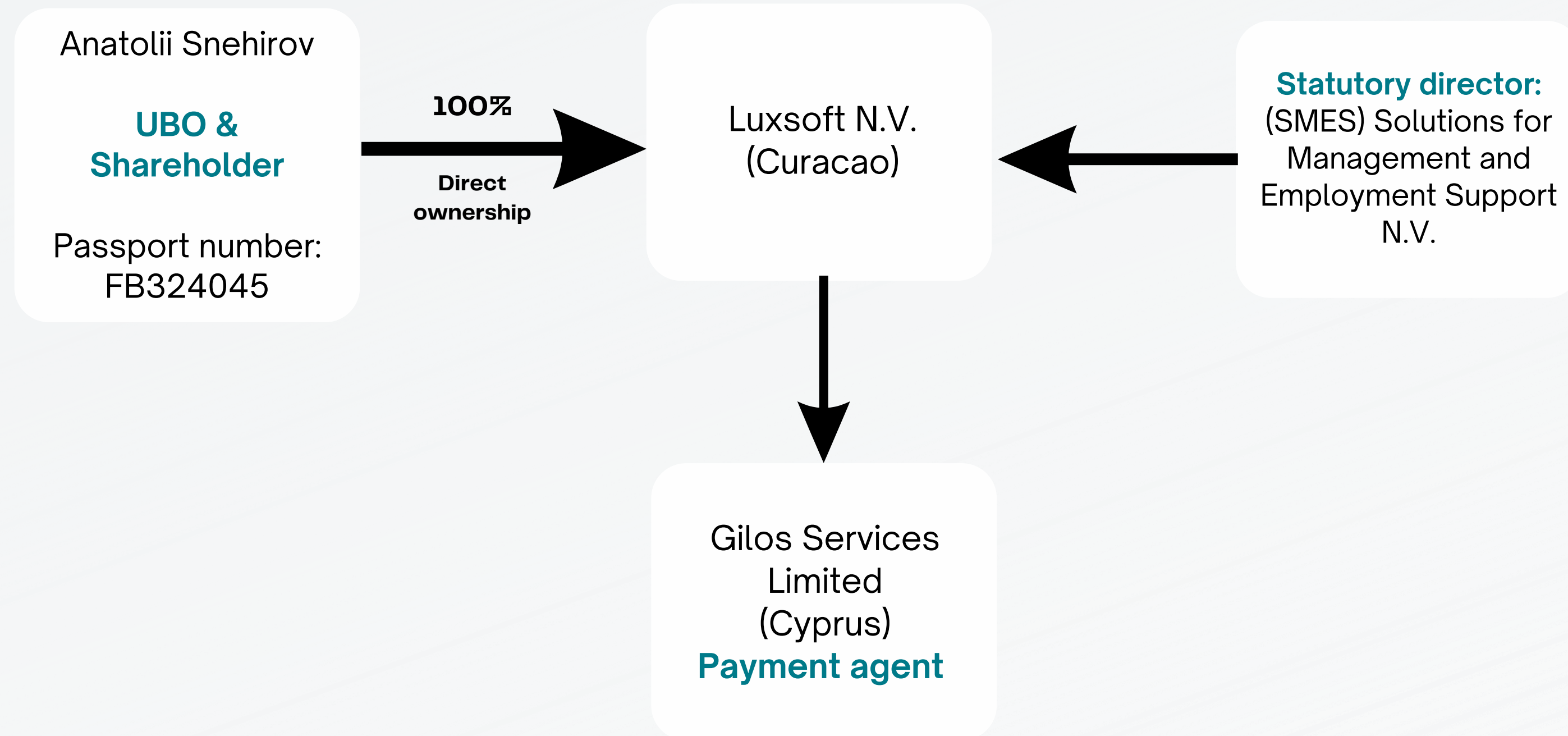


Luxsoft N.V. is incorporated in Curaçao.

The company was mainly set-up to provide B2C online gambling activities.

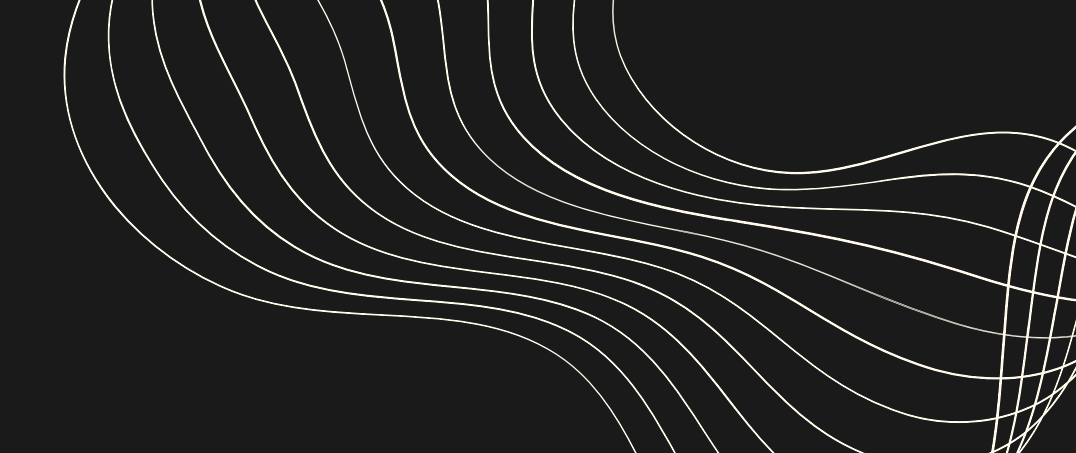
Company name	>	Luxsoft N.V.
Entity type	>	Limited Liability Company
Date of incorporation	>	February 13, 2024
Place of incorporation	>	Curaçao
Company number	>	166297
Registered adress	>	Dr. H. Fergusonweg 1, Curacao
Email adress	>	legal@gilos.io
Websites	>	santarix.com

ORGANIZATIONAL STRUCTURE OF THE PROJECT





LEGAL AND GOVERNANCE FRAMEWORK



01

The board of managing directors is under obligation to conduct administrative procedures to record the financial position of the corporation and its operational activities, in accordance with the requirements incidental to such activities, and to maintain the books, ledgers and other data bases pertaining thereto in such a manner as to ensure that the rights and obligations of the corporation may at any time be ascertained from same.

02

The board of managing directors has the power, without limiting its own responsibility, to appoint attorneys-in- fact, to determine their powers and the manner in which - they are to represent the corporation and to sign on its behalf. Every managing director has the power to authorize a co-director to represent him in his capacity of a managing director at meetings of the managing directors, with due observance of the terms set forth in the power of attorney.

03

In order to prevent the company board to be deadlocked, Legal department is responsible for providing legal support and advice within the company and to communicate with the partners outside of the company on the legal matters.

KEY MANAGMENT

Map of the Organization



Key Management Executives are tend to be invited to board meetings in addition to the board members



Sergiu Cravcenco

Chief Executive Officer

Experience:

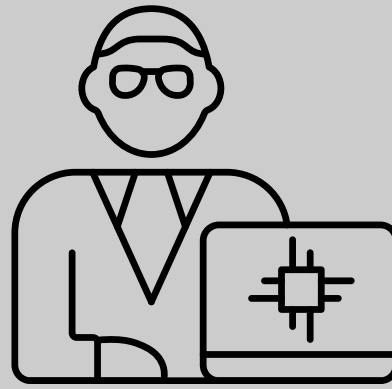
Sergiu Cravcenco is a CEO of **ADWA Group**. He is involved in IT department creation and its development from the beginning, and controlled all department's activity inside the company group. He has more than 10 years of experience in the gambling sphere, and half of it in key management roles.

During 2012-2015 year he was the head of customer support in the LSBet project, Moldova. He was involved in the development and maintenance of all company services connected with customer service.

During 2015-2016 he was in a Project Manager position at Joe Solutions N.V., where he was involved in company strategy development, business events organizations, and partnership establishment.

In 2016, Sergiu Cravcenco joined the **Soft2Bet** brand, which was in the lead position in the gambling market. His functions in this position included full management maintenance of the company, cooperation with all departments of the company, strategic plans preparation, and implementation.

The CEO of the Company ensures that the strategic, financial and overall control functions are in place. It is a direct responsibility of the CEO to provide that Company's strategic goals are reached and that top-level executives operate in line with the Company's long and short term strategy and look after the management processes in the respective departments. CEO shall also responsible for communicating with regulatory and supervisory government institutions of Curaçao. In addition to this, the CEO shall be controlling the Company's financial position and take care of payment service arrangements.



Anatolii Snehirov

Owner & Chief Technology officer

Experience:

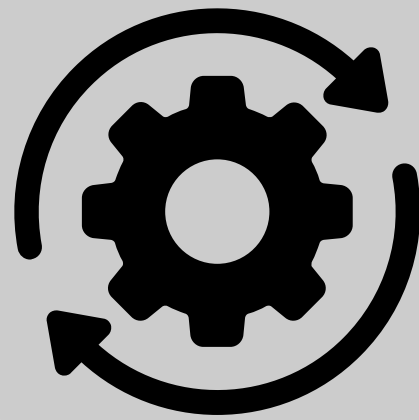
Anatolii Snehirov is an experienced tech and software development professional.

2013-2016 years - Junior Solution Architecture in the WhiteWeb. Anatolii contributed to various aspects of website development and consulting, showcasing his ability to handle diverse tasks, from planning sprints to developing comprehensive solution architectures.

2017-2018 years - Full Stack Web Developer in Tranzzo LTD, where he showcased versatility by engaging in front-end development and contributing to the backend development of PCI DSS-compliant pages.

2019-2022 years - Head of Research & Development/Solution Architecture in the DS Team, where he spearheaded critical roles in solution/system architecture, front-end development, and team management

CTO shall be responsible for developing Company's strategy for using technological resources, ensuring technologies are used efficiently and line with Company's business goals. One of the main aspects of CTO would be evaluating and implementing new technological infrastructure elements as well as supervise system infrastructure in general to ensure functionality and efficiency.



Serghei Medusevschii

Chief Operating Officer & Responsible Gaming Officer

Experience:

Serghei Medusevschii has more than ten years of experience in customer support and payment systems.

During 2011-2019 he provided information, technical support, and qualified assistance to clients across various projects. His responsibilities extended to staff training, conducting analytical work, and compiling reports. His work involved detecting unauthorized payments, conducting investigations to identify fraud cases and schemes, and implementing measures to prevent future occurrences. Moreover, Serghei was actively involved in handling disputes with clients, ensuring the serviceability of payment systems, and monitoring risks for prompt restoration of system operations.

Since 2020, he has played a pivotal role in providing information and technical support for online projects within the **ADWA project**. He excels in assisting clients with payments, offering recommendations to enhance customer attraction and service quality through live chat and email.

Serghei is actively involved in incident management, claims handling, and contributes to project promotions and bonus policy development. His commitment to excellence is evident in market monitoring activities aimed at improving service quality.

COO shall be responsible for Company's daily operations, ensuring that effective operational and procedures are in place. It shall be the direct responsibility of COO to oversee Company's risk, support services as well as business development. The COO shall optimize marketing initiatives and implement better business practices.



Igor Basistii

Head of KYC & MLRO

Experience:

Igor Basistii brings more than five years of dedicated expertise to his role as the Chief of KYC Department, demonstrating a keen understanding of financial documents and a thorough knowledge of various payment systems.

During 2014-2015, he held the position of Financial Manager at **Arax Development** from, where he contributed to financial oversight and management.

During 2015-2019, serving as the Chief of KYC Department at **Soft2Bet**, where he played a pivotal role in ensuring the authenticity of documentation and adherence to KYC policies.

Since 2019, he is Money Laundering Reporting Officer at **ADWA**, where he oversees crucial functions related to financial integrity and compliance.

MLRO shall be responsible for updating corresponding Policies and ensuring all relevant employees are aware of AML requirements.

In this respect, it is the duty of the MLRO to undertake regular reviews of the characteristics of existing Clients, new Clients, services and the measures, procedures and controls designed to mitigate any resulting risks from the changes of such characteristics.

It is also important for the MLRO to monitor and ensure that the proper procedures are being implemented, and the risk-based approach principle is truly being followed in all areas of the Company.

BUSINESS AND MARKETING DESCRIPTION

business activity

Our Online Casinos are going to be a leading gambling websites with a unique experience for users. We only have proven, honest, interesting and popular games from world-famous providers.

To make our guests comfortable, we look up to world online casinos and prioritize quality service. Customer support is available 24/7: we will resolve any issues as quickly as possible. An online casino license will guarantee customers data confidentiality, withdrawal of winnings, and correct operation of the website.

Online Casinos are the best choice for those looking for top online games that bring real cash prizes. A huge range of games allows players to find a game for every taste.

BUSINESS AND MARKETING DESCRIPTION

strategic plan (target KPIs and business objectives)

Luxsoft N.V. is looking forward to applying for an online gambling license for the provision of e-gaming services pursuant the laws and regulations of respective authorities of Curacao.

The Company plans to set up a remote betting operation with services available to a wide range of citizens and legal residents located in the countries where the Curacao license is legally allowed and can be used.

Curacao was selected for unique combination of factors. With favorable regulations in online gambling which is well known among the casino operators which creates strong competition in the market. The legal requirements for obtaining a license present the best choice for start-up companies with a comparatively smaller budget.

Nevertheless, the Company has an aim to establish itself in the local market, grow its market share with the help of strong marketing and advertising campaigns and reach the approximately turnover of EUR 18,000,000 in five years term. To achieve this goal the company intends to provide a high level customer satisfaction by introducing such key aspects as quality, integrity and client support together with a comprehensive play coverage across the most popular games.

The Company intends to establish an important role in offering its services and aiming to be highly preferred gaming operator in the market.

Focus on meeting the needs of the client, high quality of services, responsible gambling policy, and effective marketing strategy will allow us to become one of the leading companies in this sphere.

BUSINESS AND MARKETING DESCRIPTION

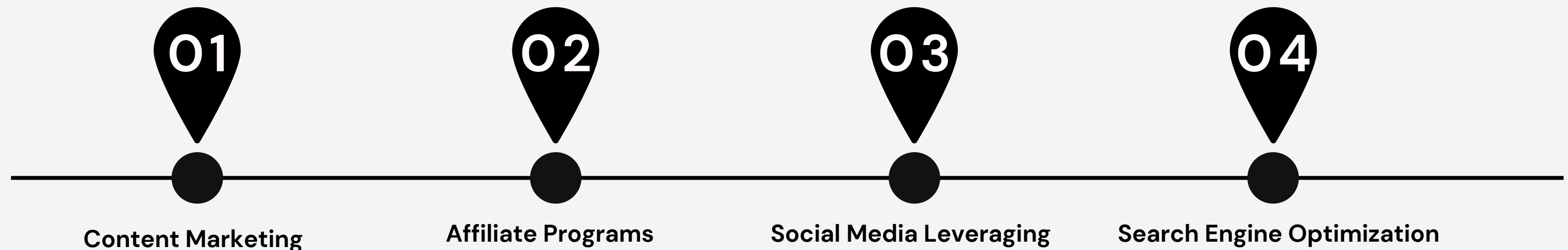
marketing strategy

Luxsoft N.V.'s brand intends to enter the market by offering great bonuses programme for players. Such position protects the Company from strong exposure in case of unexpected outcomes compared to more aggressive operators. At the same time, players should see sizeable payout value compared to conservative players.

Management will assign the marketing to outsourced department. Although in possession of sophisticated marketing techniques, the Company has decided to use advertising agencies that have adequate expertise in global markets, thus adapting appropriate advertising techniques to specifics of different market segments. Service contracts will be signed with SEO/Internet marketing studios, promotional agencies with experience in target markets. Moreover, the Company will take proactive approach in seeking sponsorship at popular betting and gaming events.

In order to achieve success in the field of providing online gambling activities, the company also needs to succeed in promoting its own brand. Company would employ all methods to promote the business and observe following tools for marketing strategy (according to the current legal restrictions).

Below is a summary approach that the company intends to take. Marketing plan will be adapted to changing environment and to result returned by the initial marketing trials:

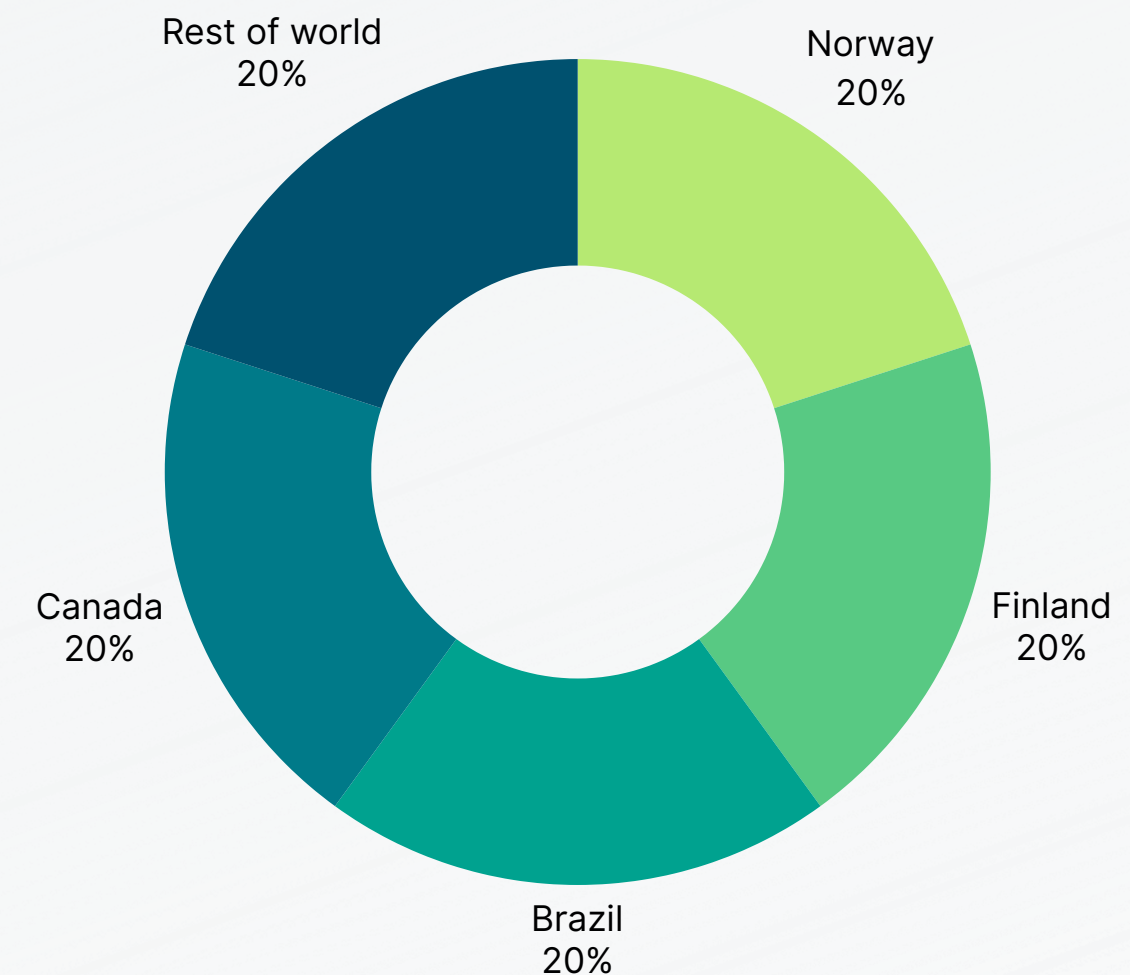


BUSINESS AND MARKETING DESCRIPTION

client area

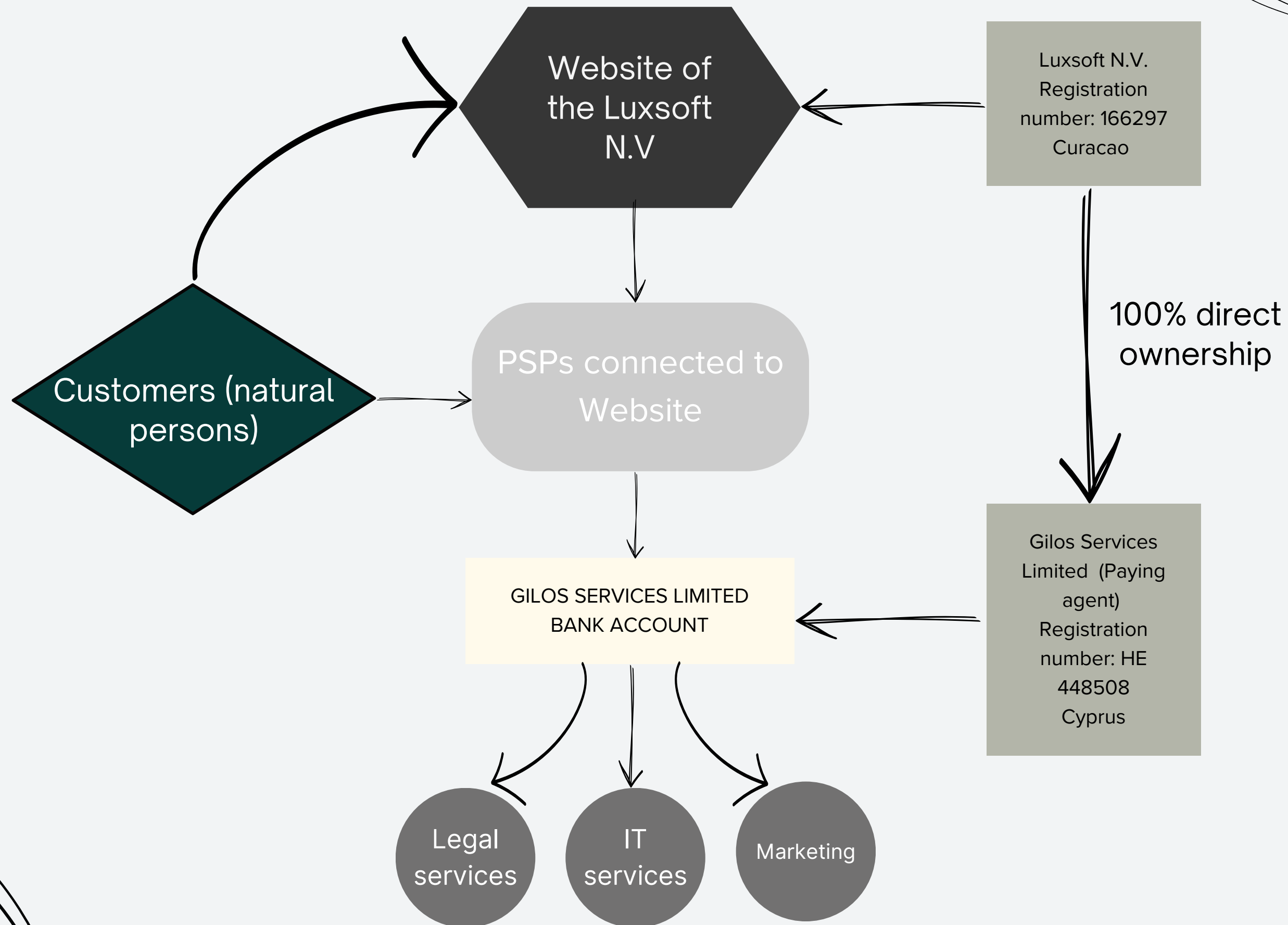
The Company will serve customers from Norway, Canada, Finland and jurisdictions where gambling is unregulated (excluding restricted countries regarding FATF list and regulators decisions), depending on available payment solutions.

All countries which are prohibited by the regulation will be geo-blocked.



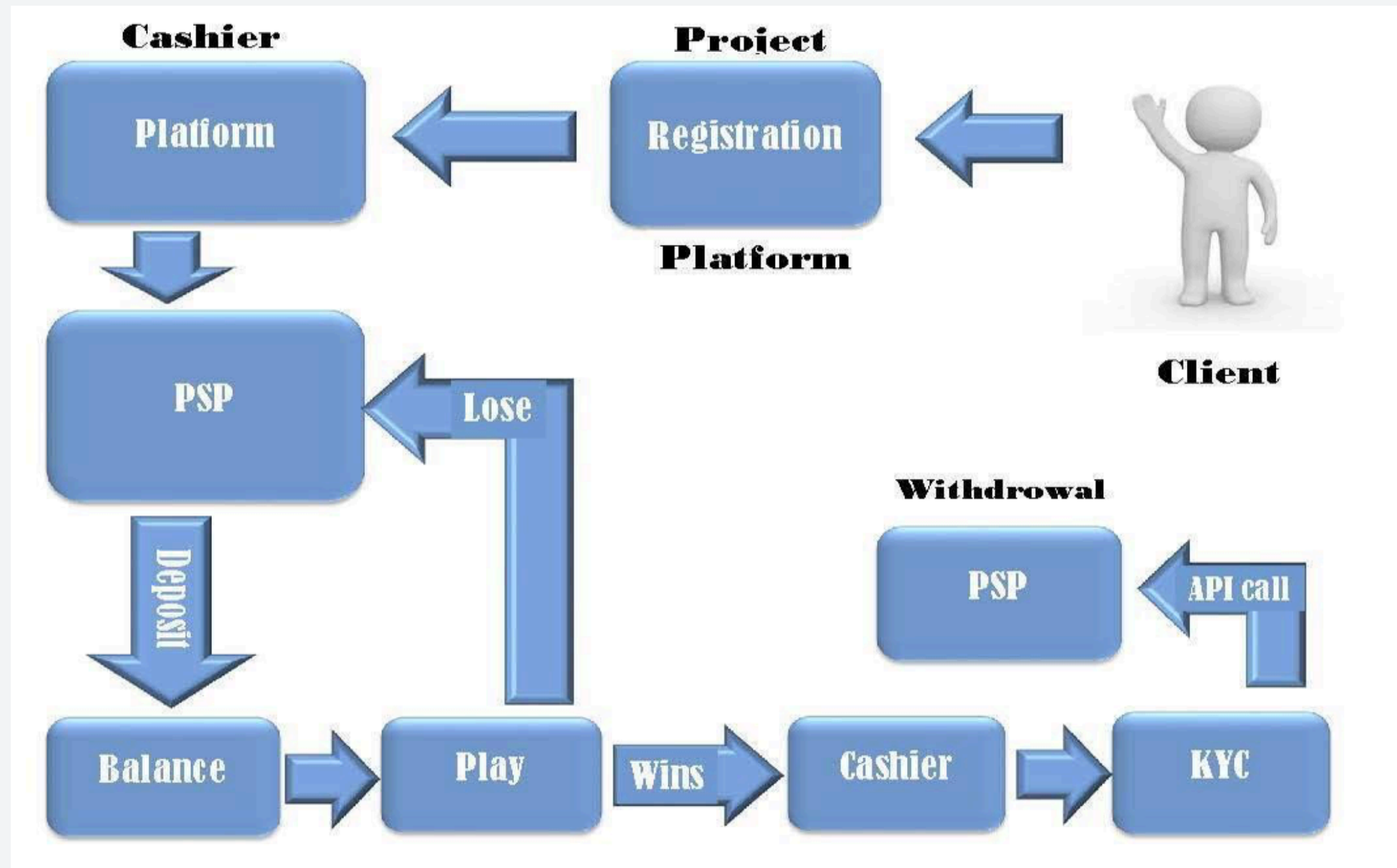
DESCRIPTION OF THE MONEY FLOWS

Natural persons use PSP in order to get services on websites connected to Luxsoft N.V. Funds accumulated in PSPs accounts will be send to GILOS SERVICES LIMITED bank account according to paying agent agreement



DESCRIPTION OF THE MONEY FLOWS

customer prospective



DESCRIPTION OF THE MONEY FLOWS

suppliers and partners

Below is a list of potential suppliers Luxsoft N.V. will cooperate with:

Arosal Limited	Netgame Entertainment N.V.	Slotegrator	Sum and Substance Ltd
• Legal service provider • Audit service provider • Bookkeeping service provider	• Game provider	Game and content service provier	• Network provider

The company is constantly working on establishing cooperation/signing contracts with new partners and suppliers in order to respond to the cases of loss or interruption the current critical suppliers.

FINANCIAL PLAN

Incorporation Expenses:

Shareholder will be meeting all the expenses relating to incorporation and operations of the company.

Financial Year End & Accounting Standard:

Company would every year close its financial books on 31st of December to ascertain profitability & financial performance. The financial statements would be prepared and if required audited as per the applicable regulatory laws and all the applicable financial reporting standards and accounting standards would be complied with.

Particulars	First year	2nd year	3d year	4d year	5d year
Total Revenue	2,729,000.00 EUR	4,850,120.00 EUR	7,900,180.50 EUR	10,550,600.00 EUR	15,380,189.00 EUR
Total Expenses	2,650,300.48 EUR	4,738,000.00 EUR	6,800,189.20 EUR	9,105,785.09 EUR	12,962,437.00 EUR
Net result	115,800.00 EUR	350,600.05 EUR	500,200.30 EUR	1,100,565.10 EUR	3,128,800.00 EUR

POLICIES AND PROCEDURES

AML - KYC Policy

The Compliance Department and staff are responsible for monitoring all transactions to and from the company and verifying the identity of all online registered players requesting a withdrawal, who have reached the €2,000.

They must also establish parameters by which any suspicious activity can be immediately noted, and form procedures by which to solve these issues while keeping the risk to a minimum.

Such staff must follow the guidelines and requirements as per the 6th EU Anti Money Laundering Directive. The Directive requires obliged entities to verify the player in such a way that the source of funds is also identified. The verification process will be documented in such a way that every player will have a profile and if any Suspicious Transaction Report needs to be filed, all evidence in respect of the player will be in hand.

POLICIES AND PROCEDURES

AML - KYC Policy

The following departments are directly targeted by the requirements of this procedure:

Board of Directors	All Key Functions	Customer Support	KYC Department	Finance	Compliance	MLRO	Security
Approval and Signature requirements, especially in high-risk scenarios	Knowledge of procedure and understanding of requirements	Understanding reporting requirements	Understanding and applying DD requirements	Understanding the risks posed by ML/TF	Ensuring all legislation requirements are met	Updating Policy and ensuring all relevant employees are aware of AML requirements	Understanding DD requirements

Company does not tolerate money laundering and supports the fight against money launderers. Money laundering occurs when funds from an illegal/criminal activity are moved through the financial system in such a way as to make it appear that the funds have come from legitimate sources.

POLICIES AND PROCEDURES

AML - KYC Policy

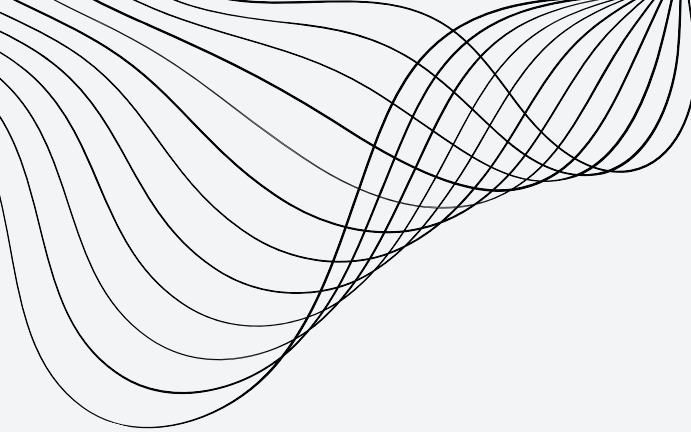
Senior Management of Luxsoft N.V. are aware of the stages of money laundering and ensure to take all preventative measures to combat, prevent and detect money laundering. Prevention is ensured by carrying out the following measures:

- Implement policies and procedures throughout the group of companies;
- Clearly communicate such policies and procedures to staff;
- Adopt a risk based approach;
- Internal Controls;
- Customer due diligence procedures;
- Record keeping and Monitoring;
- Suspicious activity reporting;
- Training

Luxsoft N.V. appointed a skilled Money Laundering Reporting Officer in order to implement full compliance with AML/CFT Laws and Regulations. Appointed MLRO has almost 10 years experience dealing with AML procedures and regularly attends advanced training courses. MLRO's experience and acquired skills allow him to work on improvement and necessary changes in the documents to stay abreast with regulations.

Company has internal policies in place to deter people from laundering money. These policies include: ensuring clients have valid proof of identification, maintaining records of identification information. Verification that clients have not known or suspected affiliation with any unlawful organizations or terrorist groups by checking their names in the lists of known or suspected criminal organizations. Informing clients that the information they provide may/will be used to verify their identity. Closely monitoring clients' money transactions.

In its activities the Company is guided by existing anti-money laundering legislation and fight against terrorist financing. The company requires correct input of personal data by the Client and verifies the identity of the Client using the means available to it for this.



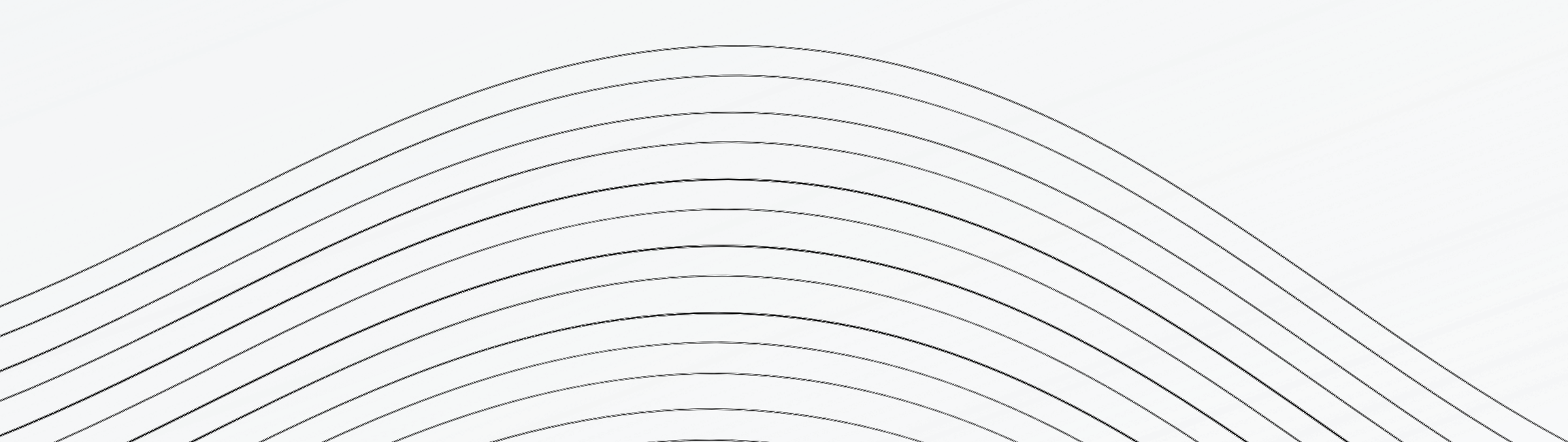
POLICIES AND PROCEDURES

Customer Acceptance Policy

The **Customer Acceptance Po Acce**(hereinafter the “CAP”), follows the principles and guidelines described in this document, defines the criteria for accepting new Clients and defines the Client categorization criteria which shall be followed by the company and especially by the employees who have direct involvement in the obtainment of information and data relating to the client as well as employees who will be tasked with evaluating such client information in order to make recommendations as to whether such client falls within the Company’s risk appetite in so far as the products or services being provided are concerned.

The KYC department shall be responsible for applying all the provisions of the CAP. In this respect, the Compliance Officer shall also be assisting the MLRO with the implementation of the CAP, as applicable.

The MLRO shall review and evaluate the adequate implementation of the CAP and its relevant provisions, at least annually, in accordance with the provisions of this policy, or at any other such interval as may be determined from time to time based on any changes in the company’s inherent and residual risk.



POLICIES AND PROCEDURES

Personal Data Processing Policy (Privacy Policy)

When processing personal data of Clients, the Company is guided by provisions generally accepted in world practice.

The Company ensures the safety of Clients' personal data in the same form as when they are entered by the Client in the registration forms on the official website Company and within the Client Profile. The Company stores this data in a protected server and does not provide it to anyone, except cases defined in the applicable legislation.

When working with the Company's website, the Company uses "cookies" technology to ensure the collection of statistical information.

The company has an affiliate program, but does not provide partners with any personal data about attracted clients (referrals).

POLICIES AND PROCEDURES

Responsible Gaming Policy

RESPONSIBLE GAMING

Gambling means for the majority of our Users, entertainment, fun and excitement. But we also know that for some of our Users gambling has negative side effects. In the medical science is pathologic gambling since many years as serious sickness recognised.

Since our first day we think about this problematic and try out best to help. Under “Responsible Gambling” We understand multiple steps of measures, with which a gambling provider can help to lower the possibility of negative side effects appearing.

In case they already appear we also try to take active steps against them. The most important instrument against negative side effects from gambling are knowledge and education about the risks of gambling too support our Users self-control in order to make sure they do not suffer from negative side effects.

POLICIES AND PROCEDURES

Risk Evaluation and Management Policy

This policy sets out the principles that Luxsoft N.V. uses to identify, assess and manage information risk, in order to support the achievement of its planned objectives, and aligns with the overall Luxsoft N.V. risk management framework and approach. This high-level Information Risk Management Policy sits alongside the Information Security Policy and Data Protection Policy to provide the high-level outline of and justification for the Luxsoft N.V. risk-based information security controls. Luxsoft N.V. applies the risk-based approach for the purposes of preventing and detecting fraud.



POLICIES AND PROCEDURES

Risk Evaluation and Management Policy

The following steps are followed in order to implement the risk-based approach:

01

Identification – The identification process involves the identification of internal and external risk factors which increase the risks being faced by the company.

Predominantly, Luxsoft N.V. must assess the domestic and foreign money laundering risks affecting their target market/s. In the case scenario, whereby players are registering from countries that are non-compliant with AML Regulations and fraud management procedures, an onus is imposed on the operator to ensure that all players comply with the procedures implemented by the company. In order to actively assess and be aware of the risks the business is facing, the company must update its business risk assessment on a yearly basis or whenever the need arises (whichever occurs first) so as to ensure that the company is constantly aware of the ever changing risk scenarios and mitigate such risks accordingly.

The Company differentiates risk according to four main categories:

1. a) Jurisdiction Risk
2. b) Interface Risk
- c) Customer Risk
- d) Product/Service Risk

POLICIES AND PROCEDURES

Risk Evaluation and Management Policy

02

Assessment – As an online gaming operator, management as well as the shareholder/s of the company understand and are aware that there is susceptibility to a certain level of high risk.

Furthermore, management must stimulate awareness to detect the lack of implementation of stringent measures in order to detect fraudulent activity; the sites may become an easy target to launder money, this is a clear example of inherent risk. In carrying out the risk assessment required, the company must take into account factors relating to:

- customers;
- the countries of geographic areas in which it operates; products and services including the transactions undertaken in the use of such;
- its delivery channels.

POLICIES AND PROCEDURES

Risk Evaluation and Management Policy

03

Monitoring and Follow up –The compliance department scrutinizes the risk assessments carried out in order to recognize gaps in procedures and areas of improvement in procedures to reduce inefficiencies. It is important to note that inefficiencies may be present in both procedures and lack of technical expertise adopted by staff.

04

Supervisory – This process includes the review of risk assessments reviewed and the compliance department ensures that training is provided to staff involved to ensure that any updates in Regulations are applied accordingly.

05

Risk Register - The calculations listed in the risk assessment process will form the basis of a risk register. All risks will be assigned an owner and a review date. The risk register is held in the Information Security document store, with access controlled by the Information Security Manager.

POLICIES AND PROCEDURES

Risk Evaluation and Management Policy

06

Risk Treatment - The risk register will include a risk treatment decision. The action will fall into at least one of the following categories:

- Tolerate the risk – where the risk is already below Luxsoft N.V. risk appetite and further treatment is not proportionate
- Treat the risk – where the risk is above Luxsoft N.V. risk appetite but treatment is proportionate; or where the treatment is so simple and cost effective that it is proportionate to treat the risk even though it falls below Luxsoft N.V. risk appetite
- Transfer the risk – where the risk cannot be brought below Luxsoft N.V. risk appetite with proportionate treatment but a cost-effective option is available to transfer the risk to a third-party
- Terminate the risk – where the risk cannot be brought below Luxsoft N.V. risk appetite with proportionate effort/resource and no cost-effective transfer is available.

The Information Security Manager in collaboration with the Information Asset Owner will review Medium and Low risks and recommend suitable action. The Information Security Board in collaboration with the Information Asset Owner will review High risks and recommend suitable action. In the event that the decision is to Treat, then additional activities or controls will be implemented via a Risk Treatment Plan.

Luxsoft N.V. take obligation to keep the GCB apprised regularly, especially in case of any substantial changes in the Business Plan.

SWOT ASSESSMENT

Strengths

Luxsoft N.V. benefits from a strong financial foundation, positioning it well for the development of its brand. The management team's extensive experience in the online gambling industry is a key asset, coupled with the introduction of innovative products and a commitment to quality service. The company's targeted marketing and advertising strategies aim to reach and satisfy a segmented audience through various channels

Weaknesses

As a startup, Luxsoft N.V. faces the challenge of establishing brand recognition within the industry and the market. Finding skilled labor with industry-specific experience may be challenging, potentially leading to increased costs and the need to relocate essential staff to optimize operations.

Opportunities

Luxsoft N.V. operates under the favorable framework of Curaçao's comprehensive gambling licenses, streamlining its online gambling products. Unlike other jurisdictions, Curaçao's licensing system requires only one type of license for all online gambling products, making it cost-effective and straightforward for new entrants. Luxsoft N.V. also benefits from Curaçao's favorable tax laws, simple gambling regulations, and dedicated services for bookmakers. The company has the opportunity to attract players from various countries outside Curaçao's jurisdiction, as the use of Curaçao licenses is not explicitly forbidden in most jurisdictions.

Threats

The government of Curaçao was one of the first in the world to pass legislation to regulate the online gambling market back in 1993, and in 1996 the Gaming Licensing Authority was established and began issuing the first licenses. Curacao has regulated gambling laws with affordable licensing requirements and a fast timeline for obtaining an online gambling license
Just now, Curaçao is on the verge of implementing legislative changes that will overhaul the entire gambling licensing system in this jurisdiction. Given this, it is not yet known exactly what the new regulation of gambling licensing in Curacao will be, and it is also difficult to predict how the market will react to the relevant changes in legislation.



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