



Innovex B.V.

BUSINESS PLAN

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CONFIDENTIALITY STATEMENT

This Business Plan contains confidential and proprietary information belonging to Innovex B.V. – B2C licence applicant (herein referred to as ‘the Company’). It is intended solely for the use of the individual or entity to whom it is addressed and may contain privileged and confidential information. Any unauthorised disclosure, distribution, or copying of this Business Plan is strictly prohibited. If you have received this document in error, please notify us immediately and delete this document from your system.

I. OVERVIEW

The iGaming market is now quite saturated, and not all providers prioritise quality and ethics. To stand out in such a competitive environment, it is often necessary to focus on providing excellent services and maintaining high standards.

The iGaming market today is indeed a complex and dynamic landscape. It encompasses various forms of online gaming, including casino games, sports betting, poker, and more. Key trends and factors influencing the iGaming market currently include:

Mobile Gaming: The rise of mobile devices has significantly impacted the iGaming sector, with a growing number of players accessing games through smartphones and tablets.

Regulatory Environment: Regulatory frameworks continue to evolve, with some regions opening up to legalised online gambling while others impose stricter regulations.

Technological Advancements: Technologies such as virtual reality (VR), augmented reality (AR), and live dealer games are enhancing the gaming experience and attracting new players.

E-Sports Betting: The popularity of e-sports has led to the emergence of e-sports betting, where players can wager on competitive video gaming events.

Cryptocurrency and Blockchain: Some iGaming platforms are integrating cryptocurrencies and blockchain technology for secure payments and transparent gaming processes.

Focus on Responsible Gaming: There's a growing emphasis on responsible gaming practices, including measures to prevent addiction and promote safe gambling behaviours.

Competition and Innovation: With numerous operators vying for market share, innovation in game offerings, promotions, and customer experiences is key to staying competitive.

Navigating these trends and challenges requires a strategic approach that prioritises customer trust, quality services, compliance with regulations, and continuous innovation.

Key features that can contribute to success in the gaming industry:

- **A wide variety of game applications.** Apart from usual slots, «SLOTRAVE» provides players with sports betting vertical, roulette and other types of card and live games.
- **Bonuses and Promotions:**
 - Welcome Bonuses: Incentives for new users to sign up and make their first deposits.
 - Free Bets: Offers that allow users to place bets without using their own funds.
 - Reload Bonuses: Bonuses for existing users when they reload their accounts with additional funds.
 - Loyalty Programs: Rewards for regular and loyal customers, often based on their betting activity.
 - Promotional Events: Special contests, tournaments, and promotions tied to specific sports events or casino games.
- **24/7 Support:** Round-the-clock customer assistance via live chat, email, and sometimes phone.
- **FAQs and Help Center:** Comprehensive resources to address common queries and issues.
- **Availability on both PC and mobile devices.** A dedicated mobile app or a responsive website for placing bets and playing casino games on smartphones and tablets.
- **Close attention to AML/CFT compliance.**
- **Responsible Gaming:** Tools and features to promote responsible gambling, such as deposit limits, self-exclusion, and reality checks.

Here are some strategies to consider to achieve goals:

Attracting Users: we implement targeted marketing campaigns to reach your desired audience segments. We utilize social media, online advertising, SEO strategies, and partnerships with influencers or affiliates to attract new users.

Platform Optimization: we continuously optimize gaming platform for performance, user experience, and mobile responsiveness. We conduct regular testing, gather user feedback, and make data-driven improvements to enhance the platform's functionality and usability.

Market Expansion: we explore opportunities to enter new markets or expand your presence in existing markets. We research regulatory requirements, cultural preferences, and competitive landscapes to tailor your approach and maximize growth potential.

Security and Compliance: we strengthen security measures and ensure compliance with gaming regulations and industry standards. We invest in advanced cybersecurity tools, conduct regular audits, and stay updated on regulatory changes to maintain a secure and trustworthy gaming environment.

Game Portfolio Expansion: Regularly update and expand your game portfolio with new and popular titles. Consider partnering with game developers or creating exclusive games to differentiate your offerings and attract more players.

Innovex B.V. is a private company wholly owned by Mr. Daniil Kiselev. With a background in gambling businesses and holding lead operating positions, Mr. Daniil Kiselev expertise is a defining feature and core competence of Innovex B.V.

Innovex B.V. has a team of professionals who are well aware of the gambling industry. Not only do we know how to build an efficient business, but we also know how to make it work by complying with all regulations and requirements.

Innovex B.V. has a strong foundation in place for gaming business, with a proprietary software platform owned by GUGUJINDA LTD and a collaboration with reputable iGaming experts. This setup allows to ensure compliance with regulatory frameworks, such as the General Data Protection Regulations and Anti Money Laundering Regulations, implement robust internal controls, and enhance the overall iGaming experience for players.

To enhance the iGaming experience, Innovex B.V. collaborates with reputable iGaming experts. This partnership aims to support ongoing operational activities and foster profitable growth.

The business model's emphasis on simplicity, excellent customer experiences, responsible gaming, and security measures reflects a strong commitment to providing a positive and safe gaming environment for players. Choosing a Curacao licence for its comprehensive regulatory framework and the regulator's approachability seems like a strategic decision that aligns with our business objectives. The regulator's approachability and willingness to address both players' and operators' concerns are crucial for Innovex B.V. as it ventures into the remote gaming world.

Innovex B.V. will initially launch its iGaming services through the website <https://slotrave.com>. These websites will be promoted using various marketing tools and strategies to attract players and achieve the desired market share. Legal means of marketing in different jurisdictions will be considered, and substantial investments will be made to build player databases.

We offer to our Players:

- ✓ a myriad of different slots of all colours and visual delights
- ✓ interactive games that make time fly by being extremely engaging and delightful;
- ✓ poker rooms for those that trust their skill, roulette for the lucky and a number of other card games for the picky;
- ✓ bets on classic sports, cybersports and virtual sports that test your luck and wit with satisfying monetary rewards;

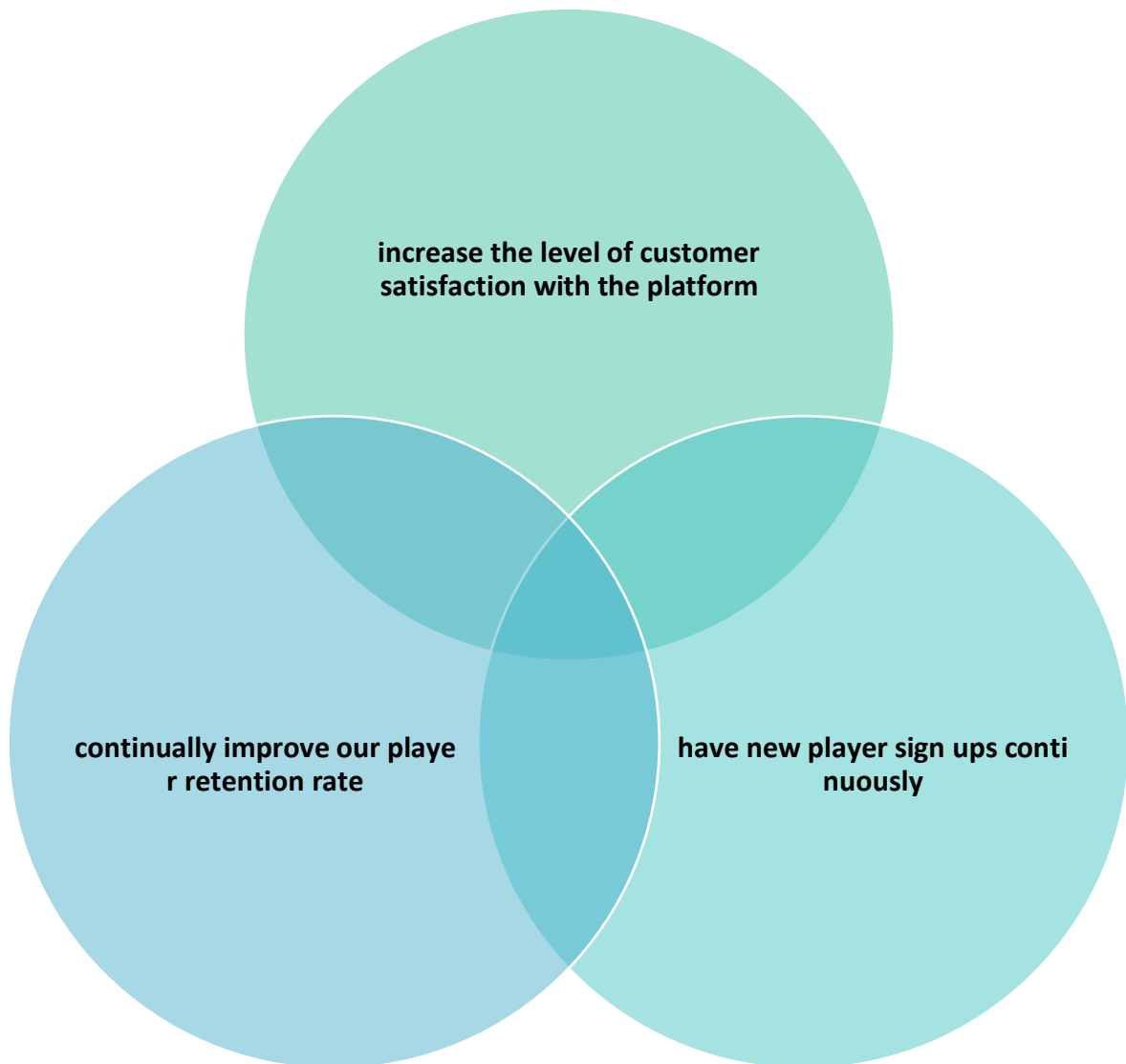
Online gambling is a hobby, sometimes even a lifestyle for some. Yet, for each of every single player it starts with the very first experience, which shapes his/her attitude toward gambling for the rest of his/her life. If the player has bad experience the first time he/she plays, the gambling community might lose a member that never returns. If enough people have bad experiences because of bad actors in the industry, the general consensus toward gambling might shift within the society.

SLOTRAVE is about that gambling experience we all love. The experience when all your concerns disappear, time halts, and you are in the zone. Not only that, but you receive back. Not only your winnings, but bonuses too - an integral part of the gameplay. We offer a staggered system of privileges that increases player loyalty to the product.

We believe gambling operators define experience within the industry, and it is our responsibility to make sure the experience is nothing short of joyful for any player that interacts

with us. We plan to polish the product until there is no way forward for it, but to the hearts of gamblers around the world. Our team will carefully monitor loyalty of our players and swiftly resolve all issues. Customer satisfaction is what will separate us from the others.

Our main goals are:



II. BUSINESS OBJECTIVES

2.1. EXECUTIVE SUMMARY

Innovex B.V. expanding into the Latin American market looks like a strategic move, considering the region's favourable market conditions and growing interest in digital leisure activities. The factors such as rising disposable income, increasing internet accessibility, tech-savvy demographics, and evolving regulatory frameworks create opportunities for growth and market penetration.

Latin America has seen a significant surge in internet penetration, thus providing a solid foundation for the expansion of online gaming platforms. The region is gradually experiencing a rapid adoption of online entertainment, with an increasing number of individuals gaining access to high-speed internet. Additionally, a sizable and youthful population in Latin America that is characterised by tech-savvy individuals is driving the demand for innovative and immersive online gaming experiences. This demographic is highly receptive to digital platforms and aligns well with Innovex B.V.'s commitment to delivering cutting-edge gaming solutions. Latin America's emergence of regulatory frameworks is also creating a more secure and transparent online gaming environment. Several countries in the region are adapting and formalising their regulatory frameworks for online gaming, positioning Innovex B.V. well to navigate and contribute to the evolving regulatory landscape with dedication to compliance. To sum up, Innovex B.V.'s strategic decision to expand its online gaming services to Latin America is a well-informed decision that leverages the region's growing demand for digital leisure activities, internet penetration, youthful demographics, and an evolving regulatory framework in the online gaming industry.

Innovex B.V. will leverage its proprietary in-house platform, exclusively developed and owned by the company, to manage all player interactions under the brand «SLOTRAVE». A comprehensive testing protocol will be implemented to ensure the security, stability, and anticipated performance of the system. Prior to production release, any proposed software changes will undergo rigorous testing in the staging environment, with rollback functionalities readily available to swiftly revert to a previous system state if unexpected issues arise.

Innovex N.V. commits to providing necessary patches and upgrades, demonstrating a proactive approach to system maintenance and improvement. The gaming offerings by Innovex B.V. include a variety of casino games, where players engage in betting activities against the house. It's noteworthy that these games are sourced from licensed B2B critical supply providers and are not proprietary to Innovex B.V. Furthermore, the company has established a contractual agreement with one of the market leaders, Softswiss, reinforcing its commitment to offering high-quality and innovative gaming content. This strategic partnership with Softswiss further enhances the gaming offerings on the <https://slotrave.com> platform, ensuring a captivating and reliable gaming experience for our players.

This meticulous approach to software development, testing, and ongoing system maintenance underscores Innovex B.V.'s dedication to delivering a secure, reliable, and enjoyable gaming experience for its players on the <https://slotrave.com> platform.

Innovex B.V. current goal is to initially operate under a licence issued by Curacao, followed by securing more licences from different jurisdictions such as Canada, Malta or Germany. With the Curacao licence, the target markets will consist of countries where there are no explicit restrictions on operations. These include several countries within the European Union and the European Economic Area, as well as countries in the LATAM region (Peru, Brazil, Mexico, Chile, Kenya, Nigeria, Montenegro, Ireland, Albania, India). Within these markets, we aim to become a well-trusted and well-regarded entity within the gaming industry. Another objective is that, albeit known that the investment is material, the operation becomes a profitable one within the first year of operation.

Another important objective for Innovex B.V. is that we offer a good quality service in terms of design that reach and exceed the players' expectations as well as following a non-aggressive, non-invasive method of advertising the company's product. We want players to come to our website because they genuinely enjoy their experience with us. From an operational perspective, our aim is to develop and implement data analytics to develop and ultimately improve risk management effectiveness, resulting in better management and attaining better results for us, as all player wins would be adequately covered, allowing a good profit margin for the company.

We aim to be customer-focused, providing players with a stable gaming entertainment environment and fast personalised services through the customer support team. Services are simple to use with minimal bureaucratic processes, however not at the expense of becoming non-compliant. Hence due diligence requirements are being stated as part of the Terms & Conditions and players' accounts will be blocked, and players disallowed from playing if they fail to comply with the requirements as prescribed by law.

In order to achieve our index of success we apply the skills of our UBO – Mr. Daniil Kiselev with a unique blend of skills in strategic development, project management and gaming sector operations. _Mr. Daniil Kiselev is known for a keen ability to improve business processes, foster client relationships, and drive growth.

Innovex B.V. is set to generate stable profit by the end of its first year of operation and become a stable business in three years' time. To achieve these targets, we consider focusing on strategies such as effective cost management, revenue growth initiatives, customer acquisition and retention efforts, and continuous improvement of the gaming platform.

2.2. BUSINESS MODELS

Partners: 1. Curacao-based iGaming experts 2. B2B game aggregators 3. B2B game developers 4. Payment service providers 5. Data Centres 6. Cloud provider	Resources: 1. Creative and competent staff 2. High-quality gambling content Main business activities: 1. Branding 2. Service development 3. Developing of the loyalty program 4. New customer engagement and customer retention	Valuable offers: 1. Accessibility 2. Convenience 3. Risk mitigation 4. Customer-oriented approach 5. Wide selection of casino games	Client interaction: 1. Remote support 2. Personal support 3. Community 4. Personal offers 5. Collective improvement of products Sales channels: 1. Advertising in social media 2. Advertising in internet and printed magazines 3. Affiliate programs 4. Direct sales	Client segment: 1. Players via affiliates 2. Casino players 3. Internet users
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Expenses:

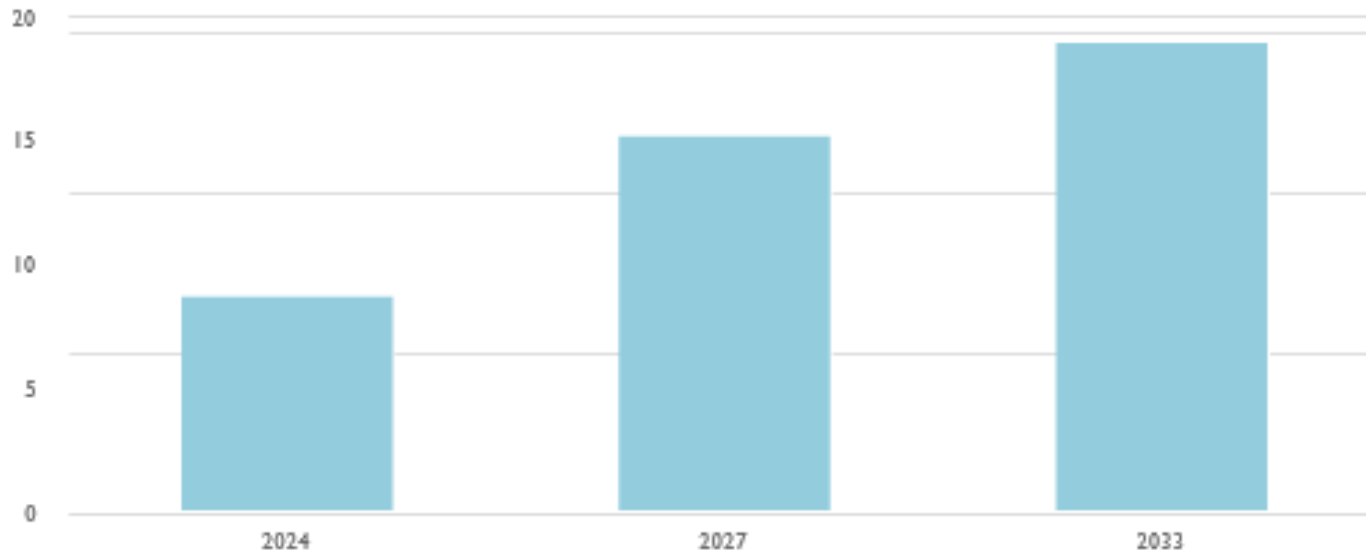
1. Hosting colocation rental
2. IGaming platform improvement
3. Commissions of games provider
4. Licence fees
5. Staff costs

Source of income:

1. Gross gaming revenue

2.3. THREE-YEAR FINANCIAL PROJECTIONS

MARKET SIZE (U.S. DOLLARS)



Latin America Gambling Market Revenue Share

Based on our approximate estimates, we are expected to maintain a healthy financial standing over the next five years. This financial plan outlines financial development of the project. Initially, the project was funded by a \$50,000 contribution from the UBO. Mr. Daniil Kiselev is planning to add additional funding in accordance with the Company's growing needs. Additionally, the project has already started financing its growth through the cash flow itself.

Our running costs are approximately between \$40,000 and \$50,000 per month, which include staff compensation, hosting, software costs and other fixed costs. Such a wide price range is due to revenue fluctuations and hence the varying royalties we would have to pay for the software. Based on our estimations, we need at least 200 active players a day that deposit an average of 10 dollars each to reach the break-even

point. The target is expected to be easily met and the number of players to be much greater than the break-even point. We believe that our Product is likely to easily reach and maintain profitability. Our project is expected to break even in the second month of operations.

Profitability is expected within the first year of operations. Profits are expected to increase over the next two years, as our customer base is established. The following table shows the projected profit and loss calculated to a lower side of the expectations for the next three years.

P&L: 36 months Plan

	Year 1	Year 2	Year 3
	€	€	€
Revenue			
Revenue from casino	18 619 740	22 632 410	27 509 836
Player winnings from casino	16 199 174	19 690 197	23 933 558
Gross gaming revenue	2 420 566	2 942 213	3 576 279
	13%	13%	13%
Direct costs			
Marketing and other support service fee	540 000	648 000	777 600
Compliance Contribution	15 516	18 860	22 925
Total direct costs	555 516	666 860	800 525
Net profit	1 865 050	2 275 353	2 775 754
	77%	77%	78%
Administrative costs			
Compliance audit fee	-	5 000	-
Annual licensee fee	66 000	66 000	66 000
Financial statements audit fee	5 000	5 000	5 000
Rent	10 000	10 000	10 000
Personnel cost	70 000	70 000	70 000
Utilities	9 996	9 996	9 996
Marketing fees	30 000	30 000	30 000
Legal and professional fees	25 000	25 000	25 000
Bank charges	15 000	15 000	15 000
Other costs	9 000	9 000	9 000
Total Administrative costs	239 996	244 996	239 996
Profit before tax	1 625 054	2 030 357	2 535 758
Corporate tax	32 501	40 607	50 715
Net income	1 592 553	1 989 750	2 485 043

Balance sheet: 36 months plan

		Year 1	Year 2	Year 3
		€	€	€
ASSETS				
Cash		1 892 317	2 347 122	2 915 556
Funds held on behalf of the players		578 813	703 550	855 170
Accounts receivables		-	-	-
Total current assets		2 471 130	3 050 673	3 770 725
TOTAL ASSETS		2 471 130	3 050 673	3 770 725
LIABILITIES AND EQUITY				
LIABILITIES				
Current liabilities		262 263	311 765	374 798
Players liabilities		578 813	703 550	855 170
Dividend payable		1 592 553	1 989 750	2 485 043
Current tax due		32 501	40 607	50 715
Total liabilities		2 466 130	3 045 673	3 765 725
EQUITY				
Shareholders contribution		5 000	5 000	5 000
Retained earnings:		-	-	-
<i>Retained earning B/F</i>		-	-	-
<i>Net income</i>		1 592 553	1 989 750	2 485 043
<i>Dividend declared</i>		- 1 592 553	- 1 989 750	- 2 485 043
Total equity		5 000	5 000	5 000
TOTAL LIABILITIES AND EQUITY		2 471 130	3 050 673	3 770 725

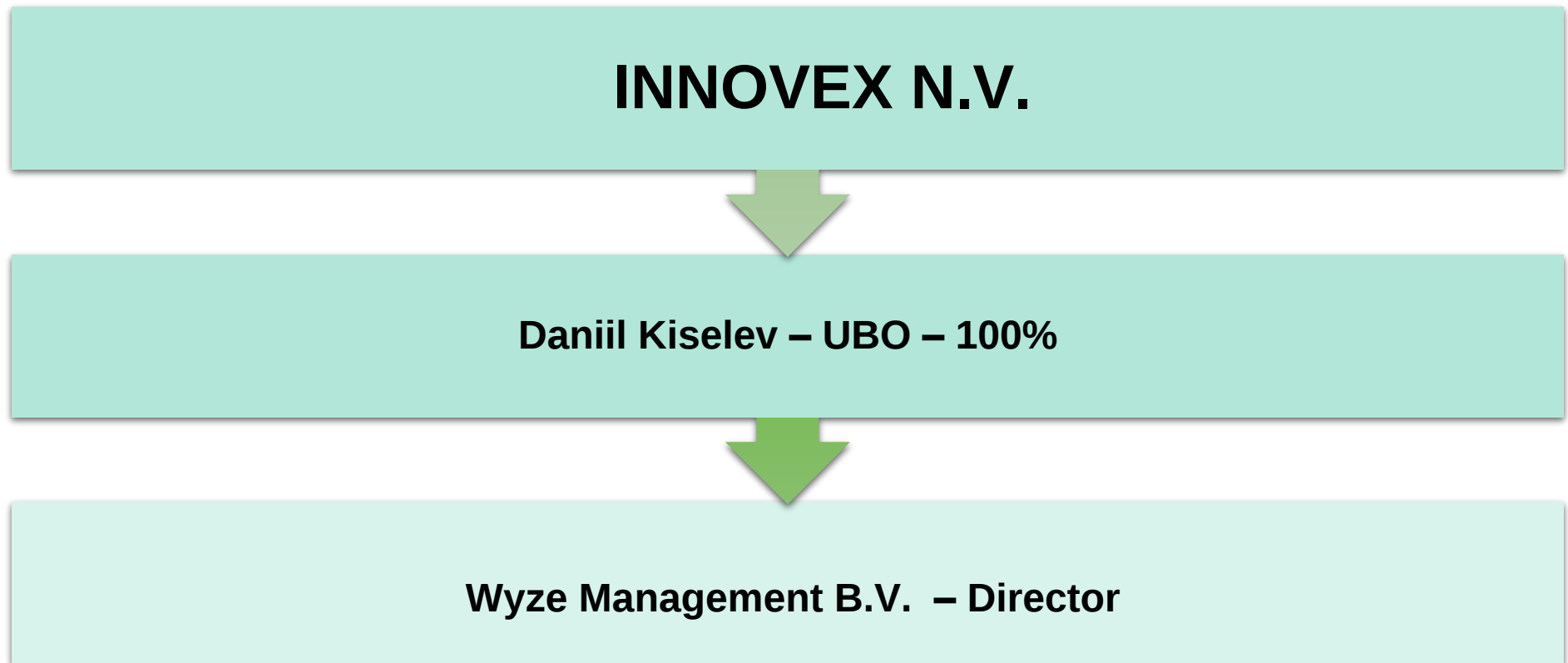
Cash flows: 36 months plan

		Year 1	Year 2	Year 3
		€	€	€
Cashflows from operating activities				
Net profit before taxes		1 625 054	2 030 357	2 535 758
Movement in trade receivables		-	-	-
Movement in players liabilities		578 813	124 738	151 619
Movements in trade payables		262 263	49 502	63 033
Tax payments		-	32 501	- 40 607
Dividends paid		-	1 592 553	- 1 989 750
<i>Cash generated from operating activities</i>		2 466 130	579 543	720 053
Cashflow from investing activities				
Fixed assets		-	-	-
<i>Cash generated from/ (used in) investing activities</i>		-	-	-
Cashflow from financing activities				
Shareholders contribution		5 000	-	-
<i>Cash generated from/ (used in) financing activities</i>		5 000	-	-
<i>Cash movements</i>		2 471 130	579 543	720 053
<i>Funds held on behalf of the players</i>		- 578 813	- 124 738	- 151 619
Beginning balance		-	1 892 317	2 347 122
Cash at period/ year end		1 892 317	2 347 122	2 915 556

III.COMPANY STRUCTURE

3.1. MANAGEMENT

INNOVEX N.V. company management structure is depicted in the chart below:



Managers

Chief Executive Officer (CEO):

The role as CEO of Innovex B.V., a visionary leader, is crucial in setting the strategic direction and driving the overall performance of the company. This includes making key decisions related to business strategy, market expansion, operational efficiency, customer satisfaction, regulatory compliance, and financial success.

Chief Technology Officer (CTO):

The Chief Technology Officer (CTO) with a focus on technological direction, security, scalability, and innovation is crucial in the online gaming industry. The CTO plays a key role in ensuring that the technology infrastructure supports the company's growth objectives, provides a seamless user experience, and meets regulatory requirements.

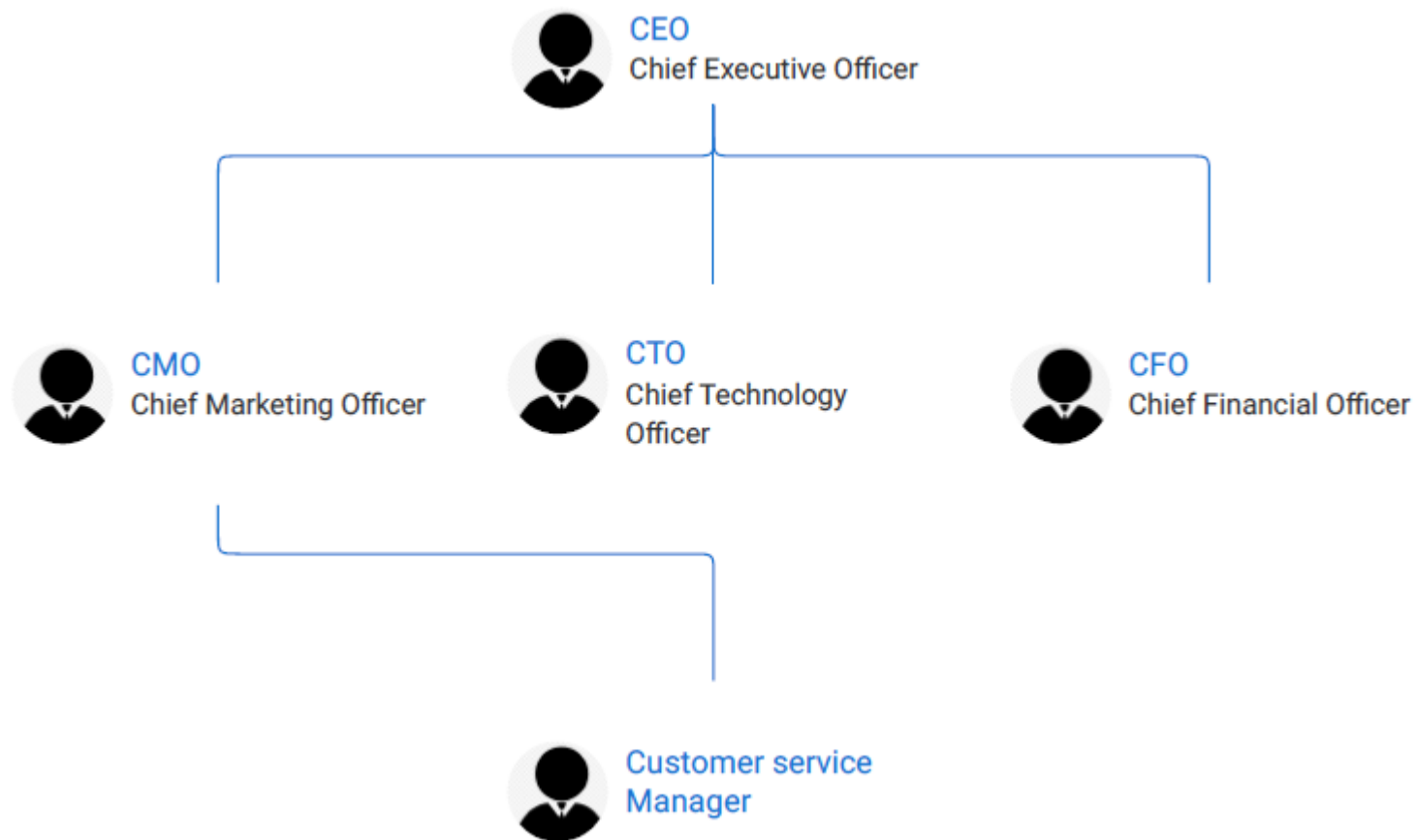
Chief Marketing Officer (CMO):

The Chief Marketing Officer (CMO) dedicated to developing and executing marketing strategies is crucial for reaching and engaging your target audience in the competitive gaming industry. The CMO plays a key role in creating brand awareness, driving customer acquisition and retention, implementing digital marketing campaigns, analysing market trends, and optimising promotional activities.

Chief Financial Officer (CFO):

The Chief Financial Officer (CFO) overseeing financial planning, reporting, and analysis is essential for maintaining the fiscal health and sustainability of Innovex B.V. The CFO plays a critical role in managing financial resources, forecasting budgets, monitoring expenses, analyzing financial performance, and ensuring compliance with regulatory standards.

Organisation chart



Growth and market share are INNOVEX N.V. main strategies and consequently, the Company has already started investing in growing a team who will be capable of achieving the desired objectives.

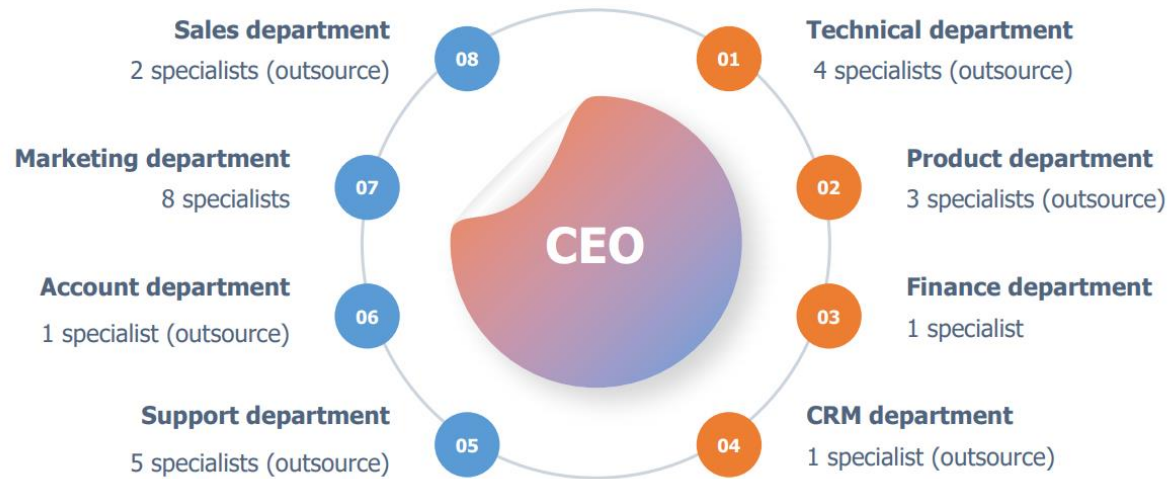
Financial support for INNOVEX N.V is provided by the UBO, on the one hand, and, on the other, the platform is already becoming self-sustainable, channelling the profits generated from our operational activities back into the company. This approach not only ensures operational continuity but also signifies our unwavering resolve to emerge as a “big player” in the iGaming industry.

At the present time INNOVEX N.V has almost finished optimising the entire work in order to make sure the project runs as efficiently as possible.

Once everything is launched and optimised, we will focus on our main goal – to **provide a high-quality product with 24/7 availability.**

In total, the company has 15 employees, but the team is steadily expanding as the business continues to grow. Compliance-related functions are currently designated to experienced iGaming experts. Their guidance and further commitment to grow with our company is an essential component to solidifying our progress in the industry.

INNOVEX N.V Management Team will be headed by the Company’s UBO and CEO – Mr. Daniil Kiselev – and will be made up of employees working within the Company and outsourced if required. The goal is to eventually have a fully operational team required to operate under the GCB gaming licence.



3.2. LEGAL & GOVERNANCE FRAMEWORK

Currently legal tasks are outsourced from different legal firms, subsequently, the company plans to form its own inhouse legal department from highly qualified specialists in the field of gambling law, financial monitoring and AML/CFT.

Our outsource specialists are responsible for conducting KYC procedures, ensuring AML/CTF regulations compliance, validating transactions, keeping essential documents for the lawful conduct of business, as well as resolving disputes, thereby maintaining a high level of reputation for our online platform.

Policies and procedures

Legal Advisors is also responsible for drafting the essential policies and procedures to maintain efficient and lawful operation of the Company. The Company is going to adopt the following policies:

- Terms and Conditions
- Responsible Gaming Policy
- Self-Exclusion Policy
- KYC Policy
- AML Policy
- Dispute Resolution Policy
- Privacy Notice
- Cookie Notice

IV. KEY SUPPLIERS

The Platform in use combines multiple systems and subsystems cumulatively representing a product offered to the company's clients for the latter to run online gaming businesses.

4.1. SET UP

Innovex N.V. shall be utilising a platform, developed, and owned by GUGUJINDA LTD for all player management. The platform provider will conduct all necessary tests on the system to ensure that its security, stability and expected performance are maintained. Rollback functionalities will always be available to enable a quick return to a previous system state in the event that any unexpected behaviour is experienced after releasing software.

The games being offered by Innovex N.V. are casino games, where players place bets against the house, which games are provided by other licensed B2B critical supply providers and are not owned by Innovex N.V.

4.2. ONLINE PLATFORM

The web portal is based on CMS built-in which can be administered by the content administrator. A player will be required to register an account before he can access the full range of casino games. Other features include:

User Registration and Profile Management

- Account Creation: Secure sign-up process with verification (e.g., email confirmation, CAPTCHA).

User Profile Management:

- Personal Information: Securely store and manage personal details.
- Contact Information: Options to update email, phone number, etc.
- Payment Methods: Integration of various payment options (credit/debit cards, e-wallets, etc.).
- Document Upload: For identity verification, in line with KYC regulations.

Financial Transactions and Wallet

- Single Wallet System:
 - Transaction History: View past deposits, withdrawals, wins, and losses.
 - Balance Check: Real-time wallet balance display.
 - Deposit Funds: Secure deposit methods.
 - Withdrawal Requests: Compliance with AML policies.

Gaming Experience

- Game Access:
 - Real Money Play: Games available for betting with real money.
 - Bonus Play: Options to play with bonus or promotional credits.
- Game Fairness and Compliance: Ensuring all games meet regulatory standards for fairness.

Personalization and Communication Preferences

- Notification Settings:
 - Internal Email System: For in-portal communication.

- o Personal Email Notifications.
 - o SMS Alerts.
- Privacy Settings: User control over data sharing and privacy.

Responsible Gaming

- Features for Responsible Gaming:
 - o Self-Exclusion Options: Temporary or permanent account deactivation.
 - o Deposit Limits: Daily, weekly, or monthly deposit limits.
 - o Access to Responsible Gaming Resources.

Data Protection: Adherence to GDPR for data privacy and security.

Regular Audits and Certifications:

- Game Fairness: Regular audits by independent bodies (e.g., eCOGRA).
- Security Certifications: SSL encryption, firewalls, and other cybersecurity measures.

Additional Considerations

- Customer Support: 24/7 support via chat, email, and phone.
- Multi-Language Support: Catering to a diverse user base.
- Mobile Compatibility: Ensuring the website is mobile-friendly or offering a dedicated app.
- Marketing and Promotions: Compliance with advertising standards and bonus terms clarity.

Technical Infrastructure

- Scalability: Robust and scalable content management system.
- Integrity: Protection of user data and transaction records.

Responsible Gaming

Our website shall offer our players all the necessary functionalities related to responsible gaming applicable legislation and best EU practices.

Responsible Gaming and Compliance:

- The website is designed to adhere to the necessary functionalities required by the responsible gaming legislation.
- Additionally, the platform conforms to best practices established within the European Union (EU). This means that the features and guidelines on the website meet the highest standards of player safety and ethical gaming set by the EU.

Betting Limits:

- Players have the flexibility to determine their own betting limits. This puts them in control, allowing them to decide the maximum amount they wish to bet.
- This feature is particularly useful for players who want to keep their gambling habits in check and prevent excessive spending.

Account Deactivation:

- The system offers players the capability to deactivate their accounts temporarily or permanently.
- Once an account is deactivated, subsequent logins are prohibited. This means that players can't access their accounts until they decide to reactivate (if they've chosen a temporary deactivation).

Setting Deposit, Wager, and Loss Limits:

- Right after a player registers an account and logs in for the first time, they are given the immediate option to set limits on deposits, wagers, and potential losses.
- These limits can be defined for various timeframes, such as daily, weekly, or monthly, providing players with the flexibility to customise their gaming experience.
- By providing these options, the website ensures that players have the tools to manage and monitor their spending habits effectively.

Uniformity Across All Games:

- The aforementioned limits (bet, deposit, wager, and loss) are uniformly applicable across all games featured on the website.
- This means that if a player sets a limit for one game, the same limit will automatically apply to other games as well, ensuring consistency in the player's experience.

Continued Access to Limit Settings:

- Players can adjust their limits whenever they want. The functionalities to modify these settings are always accessible on the platform.

- This ensures that players have ongoing control over their gaming behaviour and can make necessary adjustments based on their individual circumstances.
- In essence, the website prioritises player safety, responsible gaming, and user autonomy, ensuring that players have the necessary tools and functionalities to have a controlled and enjoyable gaming experience

4.3. BACK OFFICE SYSTEM

The back office is a web-based tool for the administration and management of the gaming system.

Only the staff will have access to the back office and the appropriate teams from our outsourcing partners. The employees have restricted access to the back-office modules and data according to their job roles.

1. Access to the back office is strictly through HTTPS (SSL) encrypted connection.
2. Submitted data on the web server uses encryption to support a high level of security and prevent unauthorised access.
3. All sensitive data that is stored in the database is encrypted to prevent unauthorised access.
4. The System will provide strong authentication at the Web server
5. The trusted subsystem model will be used, and per-user authorization will occur within the application.
6. User access and permission roles on module pages on the Web server will be controlled with authorization. Permissions within the database will be controlled by a user-defined role.

SCALABILITY

The system is built around loosely coupled components that exchange data through well designed APIs. The communication is secured and encrypted. The system is based on distributed architecture which allows vertical and horizontal scaling.

AVAILABILITY

All applications in the infrastructure for the Gaming System are deployed on a minimum of 2 servers and behind a load balancer to maintain high availability.

User Management and Access Controls

ACCESS CONTROL

Each action that exists in the system as well as the display field is mapped to specific privilege. All existing modules or functionalities also have specific privileges. For the user to be able to see or use specific action he must have the appropriate privilege, in one of the roles assigned to him.

Record logs, changes to games and audit requirements

All changes to player information and the player wallet will be permanently logged. Details including the timestamp and the respective user who carried out the change will form part of the logged information.

The system in use has the functionality to flag high betting volumes or high value winnings by a specific player. Flagged accounts will be investigated to ensure that there are no anomalies in the system or errors in the games that might have led to the high value winnings.

The system is tracking each action taken in the system with the following information:

1. Username;
2. Timestamp;
3. Action;
4. Changes made; and
5. Auto time outs.

Platform modules

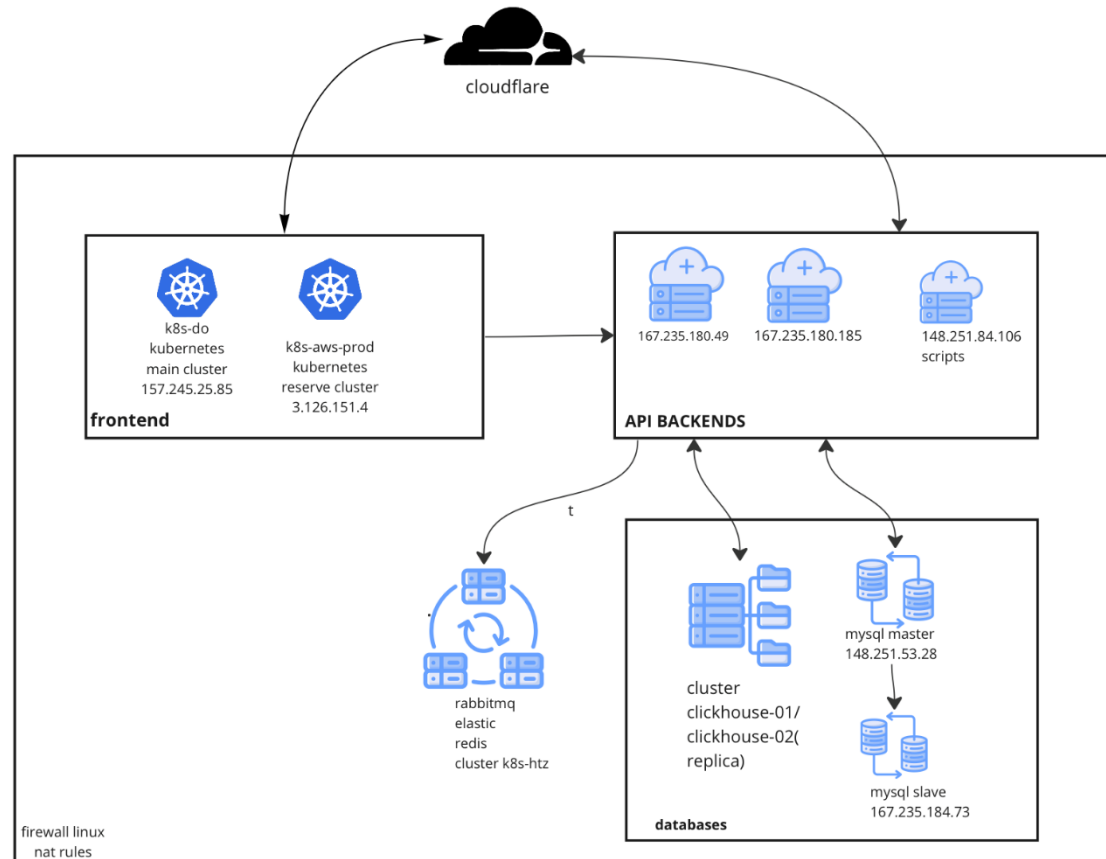
The system will contain the following sections:

1. Roles and access management;
2. Player management;
3. Management of player Segments;
4. Fraud Management;

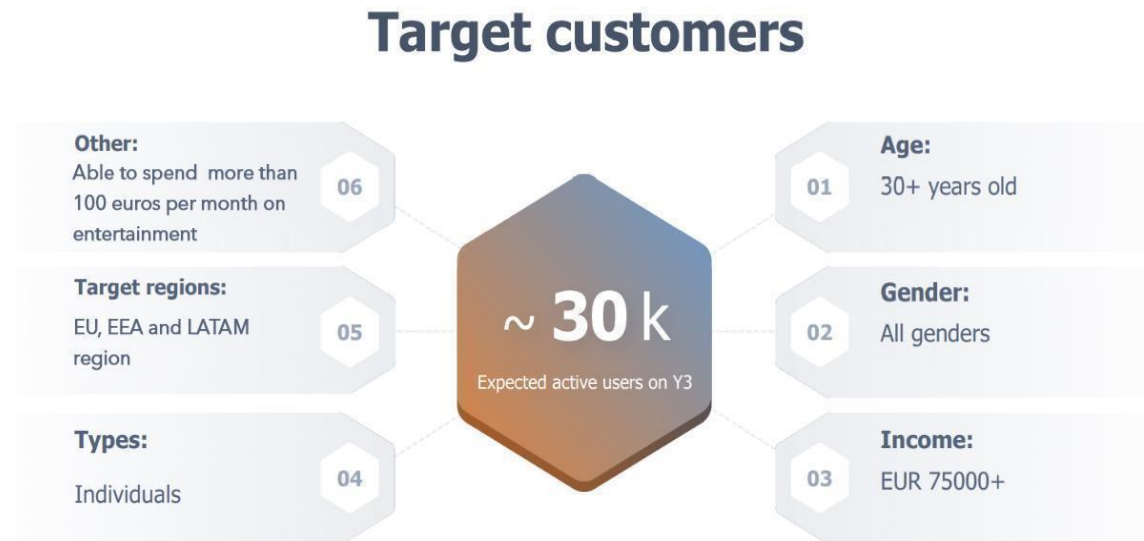
- 5. Cashier (payments and transactions);
- 6. Bonuses;
- 7. Email templates management;
- 8. Responsible gambling/gaming;
- 9. Game management; and
- 10. Dashboards and reports.

5. TECHNICAL SETUP

A high-level schematic of the infrastructure is shown below:



6. TARGET KPI AND BUSINESS OBJECTIVES



It's essential to consider both legal requirements and financial feasibility when expanding into new regions. By targeting jurisdictions where the Curacao licence is accepted and conducting thorough assessments of regulatory compliance and financial viability, Innovex B.V. can mitigate risks and maximise opportunities for successful market entry.

The marketing is targeted to different age groups and utilising different marketing promotions, offers and bonuses to attract the various types of players. Innovex N.V. ensures that no form of marketing is deemed to be attractive for underage players. What's more, Services provided by Innovex N.V. shall stick to the principle of marketing for adults only. The aim is to attract players having the largest disposable income as well as prospective players that are attracted to this type of entertainment. We align our marketing targets to those age groups of 30+ years old, which according to our research has the most disposable income.

Innovex N.V. ensures adequate measures and controls that will manage such risks and any issues arising.

Implementing an affiliate system is a smart strategy to expand your player database and reach new audiences. By providing affiliates with personalised tools and incentives, we can incentivize them to bring in new players and contribute to business's growth. Additionally, prioritising player feedback and promptly addressing complaints demonstrate a commitment to improving the overall player experience and ensuring customer satisfaction.

7. RISK EVALUATION AND MANAGEMENT

Comprehensive approach to risk evaluation and management demonstrates a proactive stance toward ensuring the resilience and reliability of the platform. By implementing strategies and technologies to identify, assess, mitigate, and monitor potential risks, Innovex B.V. can enhance trust among users, stakeholders, and regulatory bodies.

Our risk management framework integrates advanced technological solutions, industry best practices, and strategic partnerships to address a broad spectrum of risks, including system security threats, operational vulnerabilities, financial uncertainties, and compliance challenges.

Key components of our risk evaluation and management strategy include:

Risk Assessment

Risk assessment is a crucial process for identifying, evaluating, and prioritising potential risks that could affect the success, safety, or security of business. Here are key steps involved in risk assessment:

Objective:

The primary objective of our Risk Assessment strategy is to identify, evaluate, and manage potential risks that could impact our operations, reputation, financial stability, and compliance obligations. This comprehensive approach ensures the resilience and sustainability of our platform.

Methodology:

Our Risk Assessment methodology encompasses a systematic process for identifying potential threats to our business, including but not limited to cybersecurity threats, operational disruptions, legal and compliance risks, and market fluctuations. We employ both qualitative and quantitative analysis techniques to evaluate the likelihood and impact of these risks, prioritising them based on their potential effect on our business objectives.

Third-Party Integration:

- partnership with SUMSUB for KYC and anti-fraud solutions enhances risk assessment capabilities, improves fraud detection in real-time, and ensures compliance with AML and KYC regulations.

Risk Mitigation Strategies:

- risk mitigation strategies are comprehensive and well-aligned with industry best practices. Implementing robust cybersecurity measures, establishing operational procedures and backup plans, staying updated with legal and compliance frameworks, and diversifying market presence are essential steps in minimising risks and ensuring business resilience.

Monitoring and Review:

Continuous monitoring of our risk landscape and the effectiveness of our mitigation strategies is vital. We conduct regular risk assessments to identify emerging threats and review our risk management policies and procedures to ensure they remain effective and aligned with our business objectives.

Our proactive and comprehensive Risk Assessment strategy is integral to our platform's success. By identifying potential risks early, integrating cutting-edge solutions like SUMSUB, and implementing effective mitigation strategies, we ensure the sustainability, security, and compliance of our operations, thereby safeguarding our customers and our business.

System Security

Innovex B.V. prioritises system security to safeguard user data and operations. Incorporating advanced technologies, best practices, and strategic partnerships are effective strategies for ensuring the integrity, confidentiality, and availability of platform.

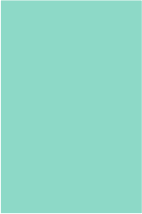
Core Security Measures

- **Encryption:** We implement strong encryption protocols for data at rest and in transit, ensuring that all user and operational data is protected against unauthorised access and breaches.
- **Access Control:** Utilising multi-factor authentication (MFA) and role-based access control (RBAC), we restrict access to sensitive information and critical system components, ensuring that only authorised personnel can perform sensitive operations.
- **Firewalls and Intrusion Detection Systems (IDS):** Our deployment of state-of-the-art firewalls and intrusion detection systems acts as a first line of defence, monitoring and blocking potentially malicious traffic and activities.
- **Regular Security Audits and Penetration Testing:** To identify vulnerabilities and strengthen our defences, we conduct periodic security audits and penetration testing, leveraging external experts to simulate attack scenarios.

Hubconnect Integration



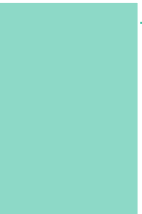
Enhanced Data Protection: Through our partnership with Hubconnect, we enhance our platform's security capabilities. Hubconnect's solutions are integrated into our system, providing advanced tools for data protection, including secure backup and replication services.



Backup and Replication: Hubconnect aids in implementing robust backup and replication strategies. This ensures operational data is regularly backed up and replicated across multiple secure locations, enabling swift recovery and maintaining service continuity in case of data loss or system failures.



Disaster Recovery Planning: With Hubconnect's support, our disaster recovery planning is strengthened, ensuring comprehensive preparation for various scenarios. This includes rapid data recovery and system restoration capabilities, minimising downtime and operational disruption.



Compliance and Security Standards: Leveraging Hubconnect's platform ensures our security measures meet industry compliance standards, including GDPR, PCI DSS, and more, providing an additional layer of regulatory assurance.

Continuous Improvement and Monitoring

Continuous improvement and monitoring are essential aspects of maintaining a successful gaming platform. Here are some strategies for continuous improvement and monitoring:

1. *Regular Updates:* update platform with new features, games, and improvements based on user feedback, industry trends, and technological advancements.
2. *Performance Monitoring:* Monitor platform performance metrics such as uptime, load times, and user engagement to identify areas for optimization and ensure a seamless user experience.
3. *Security Audits:* Conduct regular security audits and penetration testing to identify vulnerabilities and strengthen cybersecurity measures against evolving threats.
4. *Compliance Monitoring:* Stay updated with regulatory changes and conduct regular compliance checks to ensure adherence to legal requirements and industry standards.
5. *Customer Feedback:* Gather and analyse customer feedback through surveys, reviews, and support interactions to understand user preferences, pain points, and areas for improvement.
6. *Competitor Analysis:* Monitor competitor activities, strategies, and offerings to stay competitive and identify opportunities for differentiation and innovation.
7. *Data Analytics:* Utilise data analytics tools to track and analyse user behaviour, trends, and patterns, enabling data-driven decision-making for business optimization and strategy refinement.

By implementing these continuous improvement and monitoring strategies, Innovex B.V. enhance its platform's performance, security, compliance, and overall user experience, leading to sustained growth and success in the gaming industry.

Our comprehensive system security strategy, enhanced by our partnership with Hubconnect, demonstrates our unwavering commitment to safeguarding our platform and users. By implementing rigorous security measures, complying with international standards, and promoting a culture of security awareness, we ensure a secure and reliable environment for our users.

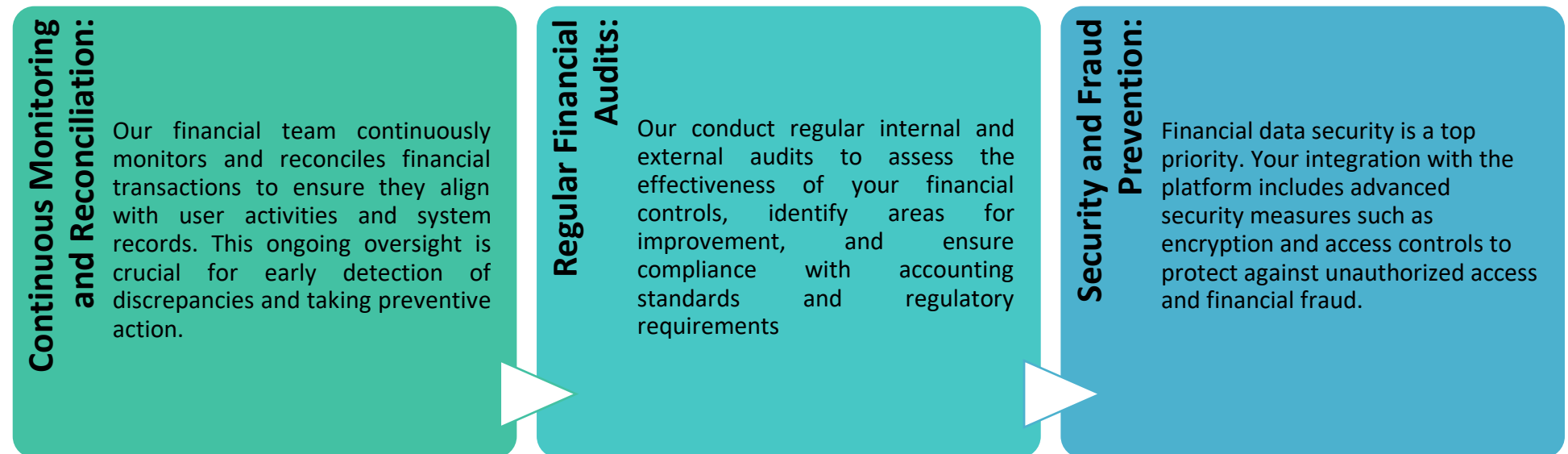
Implementation of an administrative panel for efficient management and oversight.

Implementing an advanced administrative panel with key functionalities from software provider is a strategic move to enhance management and oversight capabilities on the platform. Software Provider offers a range of tools and services tailored for iGaming businesses, including player management, analytics, reporting, and compliance solutions.

Financial Controls and Audit

Integrating advanced platform functionalities with external accounting software like QuickBooks is a smart approach to establishing robust financial controls and audit capabilities. This integration streamlines financial oversight, improves reporting accuracy, and facilitates efficient audit processes.

Financial Controls and Audit Procedures



These procedures collectively contribute to maintaining accuracy, compliance, and security in your financial transactions and reporting, which are vital for the success and trustworthiness of business.

Onboarding processes and procedure of Know Your Customer (KYC) verification.

Objective

The objective of our onboarding processes and KYC verification procedures is to ensure a seamless, secure, and compliant user onboarding experience. By integrating SUMSUB, a leading KYC and identity verification service, we aim to enhance our platform's security, adhere to regulatory compliance standards, and minimise the risk of fraud.

Onboarding Processes

User Registration:

The onboarding process begins with user registration on the platform, where users provide their basic information such as name, email address, and contact details. This process is supported by SUMSUB's streamlined verification workflow, which guides users through the necessary steps for identity verification.

Automated Identity Verification:

Integrating SUMSUB's technology enables us to automate the identity verification process. SUMSUB's advanced algorithms and machine learning capabilities facilitate the rapid and accurate verification of documents and biometric data, significantly reducing the time and resources required for manual reviews.

Compliance with Global Standards:

SUMSUB's platform is designed to comply with international regulatory requirements, including Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards. This ensures that our platform adheres to the highest compliance standards across different jurisdictions.

KYC Verification Procedure

- **Document Verification:** Users are required to submit government-issued identification documents, which SUMSUB's system verifies for authenticity. This includes checks for document validity, tampering, and consistency with user-provided information.
- **Biometric Analysis:** SUMSUB's biometric analysis technology compares the user's live selfie with the photo ID provided, ensuring the person creating the account is the rightful owner of the submitted documents.
- **AML Screening:** SUMSUB's platform performs real-time screening against global watchlists, sanction lists, and PEP (Politically Exposed Persons) databases. This process helps in identifying and mitigating potential risks associated with money laundering and terrorist financing.
- **Ongoing Monitoring:** Continuous monitoring of user activities is conducted to detect and prevent fraudulent behaviour. SUMSUB's platform facilitates the ongoing analysis of user transactions and behaviours, flagging any suspicious activities for further investigation.

Integration Benefits

- **Enhanced Security:** Leveraging SUMSUB's comprehensive verification services is a strategic approach to enhancing platform security and protecting against identity fraud. By ensuring that only verified users gain access, we can maintain a trusted environment for our platform and minimise the risk of fraudulent activities.
- **Regulatory Compliance:** Our integration with SUMSUB not only enhances security but also ensures regulatory compliance, which is crucial in the highly regulated gaming industry. Meeting rigorous compliance standards not only reduces the risk of regulatory penalties but also builds trust with users and partners, showcasing our commitment to operating ethically and responsibly.
- **Streamlined User Experience:** SUMSUB's efficient verification process indeed contributes to a smooth onboarding experience for users, reducing friction and streamlining the process of accessing our platform's features and services. This streamlined approach can enhance user satisfaction and encourage engagement with our platform..

Integrating SUMSUB into our onboarding and KYC verification processes is indeed a strategic move that enhances both security and user experience. This integration allows for robust user authentication, regulatory compliance, and streamlined onboarding, all of which contribute to building trust and encouraging long-term engagement on our platform.