

2024

KEEP ON ENTERTAINMENT N.V.

BUSINESS PLAN
KEEP ON ENTERTAINMENT

KEEP ON ENTERTAINMENT N.V. KAYA W.F.G (JOMBI) MENSING 24 UNIT A, CURACAO

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Company Details

Keep On Entertainment N.V. registered at Kaya W.F.G (Jombi) Mensing, 24 Unit A, Curacao

Chamber of Commerce Number: 168271

Date of Incorporation: 16th September 2024

Main Contact

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Business Plan Objective

This document is being provided with the precise intention to relicense with GCB. Currently Keep On Entertainment N.V. will apply for a license, with Gaming Curacao Authority.

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Executive Summary

Keep On Entertainment N.V. (hereinafter referred to as “Keeponwin”) is a company incorporated under the laws of Curaçao, focused on establishing itself as a leading operator in the global iGaming industry. The company is in the process of securing a gaming license from the **Curaçao Gaming Control Board (GCB)**, which will allow it to offer a wide range of online gaming products, including **casino games, sportsbook, and live dealer games** across multiple jurisdictions. The company plans to leverage its **proprietary IP** and strategic partnerships to gain a competitive edge in key markets.

The management team of **Keeponwin** comprises highly skilled professionals with extensive experience in the gaming industry.

- **Derviş Gürtekin** Chief Executive Officer (CEO)
- **Mustafa Güney**, as Chief Operating Officer (COO).
- **Tuncay Yusuf** collaborates as Chief Technology Officer- CTO
- **Ayca Gürtekin** as CFO- Chief Financial Officer.
- **Mark Cauchi**, Compliance Officer.

Keep On Entertainment N.V. developed its website, **keeponwin.com**, in partnership with **BetConstruct**. The site is technically ready to operate and is currently **closed to the public**, protected by a password, as it awaits its Curaçao gaming license. **BetConstruct’s** involvement ensures state-of-the-art **technology infrastructure** for the site, including **advanced algorithms for odds calculation** and **real-time data analytics**. Once licensed, the website will offer a **secure and immersive gaming experience** across a wide range of gaming products.

KeepOnTech Solutions Ltd., based in Cyprus, serves as a **strategic partner** for **Keeponwin**, providing both **technological infrastructure** and **financial backing** necessary for the development and expansion of our iGaming platform. This partnership ensures cross-border **data compliance** between Cyprus and Curaçao, enabling regulatory adherence in both jurisdictions. **BetConstruct** also plays a critical role as a supplier, providing key technology and risk management tools that ensure operational efficiency and continuity.

The vision of **Keep On Entertainment N.V.** is to become a global leader in the iGaming sector, known for **innovation, exceptional customer service, and responsible gaming practices**. The company’s **growth strategy** focuses on expanding its market presence through targeted marketing efforts, strategic partnerships, and continuous platform enhancements. The company is committed to **responsible gaming**, implementing measures such as **self-exclusion, betting limits, and support for problem gambling**, in alignment with **Curaçao’s regulatory standards**.

Business Risk and Compliance:

The company has conducted a **Business Risk Assessment**, covering financial, operational, and regulatory risks. **Key risks** include potential market fluctuations,

regulatory changes, and disruptions to **key suppliers** such as **BetConstruct**. To mitigate these risks, the company has implemented comprehensive **risk management policies** and regularly audits its **compliance and AML policies**. Internal audits ensure adherence to **GCB** regulations, and oversight is provided by **Mark Cauchi, Compliance Officer (CCO)**, with over 17 years of experience in **AML, Responsible Gambling, and regulatory compliance**.

Legal and Governance Framework:

The company's governance is overseen by the **Board of Directors**, which includes **key operational roles** such as the **CEO, CTO, COO, CFO**. Shareholders, based in Cyprus, provide **strategic oversight** but are not involved in day-to-day operations. The **Board of Directors** ensures compliance with **Curaçao Gaming Control Board** regulations and oversees all operational decisions. The company's legal support is provided by **Starkeast Management B.V. and My Gaming Consultants**, ensuring that all legal frameworks and governance standards are adhered to, and policies are regularly reviewed to ensure compliance.

Target Markets and Exclusions:

Keep On Entertainment N.V. will offer its casino and sportsbook in all jurisdictions permitted under the **GCB license**. The company's initial focus is on expanding its presence in **Europe, LATAM, and India**, where significant growth opportunities are anticipated. The platform will be available in **6 languages: English, Spanish, Portuguese, German, French, and Hindi**, catering to the company's diverse customer base in these regions. The company will strictly adhere to market exclusions, such as **the United States, Netherlands**, and other restricted jurisdictions, in compliance with **Curaçao's laws**.

1. Introduction to Keep On Entertainment N.V.

1.1. Mission Statement and Vision

At **Keep On Entertainment N.V.**, our mission is to transform the online gambling landscape by delivering a premier experience that emphasizes **innovation, fairness, and exceptional customer service**. Our company, founded by a dedicated team of professionals with extensive experience in the iGaming industry, aims to be a leader in this dynamic market by continuously adapting to industry trends and maintaining a steadfast commitment to **quality and transparency**.

We are driven by our core values of **integrity, customer satisfaction, and technological advancement**. Our platform offers a diverse range of betting options, including **sports betting, casino games**, and other emerging gaming experiences, all tailored to meet the preferences of our global customer base. Through sophisticated **customer relationship management (CRM)** tools and **targeted marketing efforts**, we provide personalized offers that enhance user engagement and loyalty.

Regulatory compliance is at the heart of our operations. We are in the process of securing a license from the **Curaçao Gaming Control Board (GCB)** and are

committed to adhering strictly to guidelines that ensure **fair play, responsible gambling, and robust data protection**. Our focus on compliance not only safeguards our users but also strengthens our reputation in the market.

With **BetConstruct** as our strategic technology partner, we ensure that our platform integrates cutting-edge features such as **responsible gambling tools, real-time player protection mechanisms, and advanced data encryption** to guarantee player safety and security.

Our dedication to **innovation and ethical business practices** positions us as a forward-thinking leader in the online gambling industry, ready to achieve **sustainable growth and long-term success**.

1.2. Curacao Jurisdiction

Keep On Entertainment N.V. selected **Curaçao** as its licensing jurisdiction due to several key factors:

- **Cost-effective:** Curaçao provides a cost-efficient licensing environment with lower fees compared to other jurisdictions, allowing us to allocate resources more efficiently into platform development and marketing.
- **Taxation:** The jurisdiction offers **favorable tax rates** for gambling operators, including a **2% tax rate on net profits**, enhancing profitability by significantly reducing the tax burden on our operations.
- **Flexibility:** Curaçao's licensing framework allows a wide range of gambling activities, including **casino games and sports betting**, all under a **single license**. This provides us with the flexibility to offer diverse gaming products without the need for multiple licenses.
- **Global Recognition:** Curaçao licenses are recognized globally, giving **Keeponwin** the credibility and legitimacy required to operate in multiple international markets, reassuring both players and partners of our lawful operations.
- **Infrastructure:** The jurisdiction offers a well-developed infrastructure to support online gambling, including legal, regulatory, and technical support. This robust ecosystem ensures **Keeponwin** operates within a reliable framework with access to skilled local professionals.
- **Regulatory Framework:** Curaçao's **Gaming Control Board (GCB)** has made significant updates to its regulatory framework to align with international standards, especially in areas like **anti-money laundering (AML), responsible gambling, and data protection**. **Keeponwin** is fully committed to adhering to these regulations, ensuring the highest standards of legal and ethical operation.

1.3. Our Professionals

Keep On Entertainment N.V. is led by a team of experienced professionals, bringing over 30 years of combined expertise in the iGaming industry. The company operates with a clear distinction between **strategic oversight** provided

by the shareholders and **day-to-day management**, which is handled by professionals based in **Curaçao**.

- **Derviş Gürtekin (UBO & CEO):**
Derviş brings extensive experience in technology and operational management from his prior role at **Nicosia Betting Ltd.** As one of the **Ultimate Beneficial Owners (UBOs)**, he focuses on guiding the company's strategic direction while ensuring that long-term growth objectives are met. **Derviş** has a strong background in **server infrastructure** and **network administration**, crucial for ensuring the company's technological edge.
- **Mustafa Güney (UBO & COO):** With over a decade of experience in the iGaming and betting sectors, **Mustafa** has played key roles in optimizing technical operations and managing the development of betting platforms. His expertise in **software development** and **database administration** allows him to contribute strategic insight into the company's operational structure.
- **Ayca Gürtekin (UBO & CTO):**
Ayca, with her background in **computer engineering** and **financial management**, provides strategic guidance on both the technological and financial fronts. Her experience from **Nicosia Betting Ltd.** ensures that **Keep On Entertainment N.V.** remains fiscally responsible while also maintaining cutting-edge technological solutions.
- **Tuncay Yusuf (UBO & CFO):**
Tuncay provides valuable strategic input, drawing from his extensive experience in financial management and compliance within the betting industry. His focus is on guiding the company through its financial strategies and ensuring compliance with the regulatory frameworks applicable to iGaming.
- **Compliance Officer:**
My Gaming Consultants serves as the compliance partner for **Keep On Entertainment N.V.**, ensuring that the company operates within the legal and regulatory frameworks set by the **Curaçao Gaming Control Board (GCB)**. The collaboration with **My Gaming Consultants**, led by **Mark Cauchi**, the company benefits from Mark's extensive experience in **AML**, **Responsible Gambling**, and **regulatory compliance**. Mark and his team provide valuable support in ensuring that the company adheres to all **GCB** regulations while maintaining high standards of player protection and operational efficiency.

A copy of the staff resume can be found attached (Annex A) of this document.

1. **Keep On Entertainment N.V. Products and Services**

1.1. **Platform & Content**

Keep On Entertainment N.V. partners with **BetConstruct**, a leading technology provider in the iGaming industry. **BetConstruct** delivers cutting-edge infrastructure, including advanced algorithms for **odds calculation**, **real-time data analytics**, and seamless integration across **web**, **mobile**, and **app** platforms. This robust technology

ensures an immersive and reliable gambling experience, enhancing both **customer satisfaction** and **retention**.

Keeponwin stays ahead of the curve through continuous **research and development**, exploring emerging trends, new technologies, and evolving consumer preferences. By integrating **cryptocurrency payments** and **advanced payment processing options**, **Keep On Entertainment N.V.** remains at the forefront of iGaming innovation, ensuring steady growth and relevance in the competitive online gambling market.

BetConstruct's platform enables **Keep On Entertainment N.V.** to offer its services in multiple languages, including **English, Turkish, German, Spanish, and French**, catering to a diverse global audience. This multi-language capability allows the platform to serve players across key markets with ease.

Unlike many competitors that focus solely on either **sports betting** or **casino games**, **Keeponwin** offers a comprehensive suite of gambling options, including **traditional casino games** like **poker, blackjack, and roulette**, as well as an extensive **sports betting** portfolio. Additionally, the platform capitalizes on emerging trends like **esports betting**, providing options that cater to both traditional and modern gaming audiences.

Through sophisticated **customer relationship management (CRM)** systems and **targeted marketing strategies**, **Keeponwin** delivers personalized promotions and recommendations based on user preferences, betting history, and behavior patterns. This tailored approach increases both **user engagement** and **conversion rates**, while also maximizing **customer lifetime value**.

Responsible Gambling and Data Protection: The platform is equipped with **responsible gambling tools**, such as **self-exclusion, deposit limits, and real-time monitoring** to promote safe gambling practices. **Data protection** and **security** are also paramount, with **SSL encryption, DDoS protection, and regular third-party audits** to ensure compliance with industry standards and international regulations, including **GDPR** and **Curaçao gaming laws**.

While **Keep On Entertainment N.V.** leverages third-party technology, all player data is contractually owned by the company. This ensures compliance with **data protection** laws and guarantees full control over **player information, wagering, and account management**.

2. **Keep On Entertainment N.V. Company Management and Structure**

2.1 **Ownership Structure**

Keep On Entertainment N.V. is a privately held company with ownership equally divided among four shareholders:

Name: Mr. Derviş Gürtekin - 25% Beneficial Owner

Name: Mr. Mustafa Güney - 25% Beneficial Owner

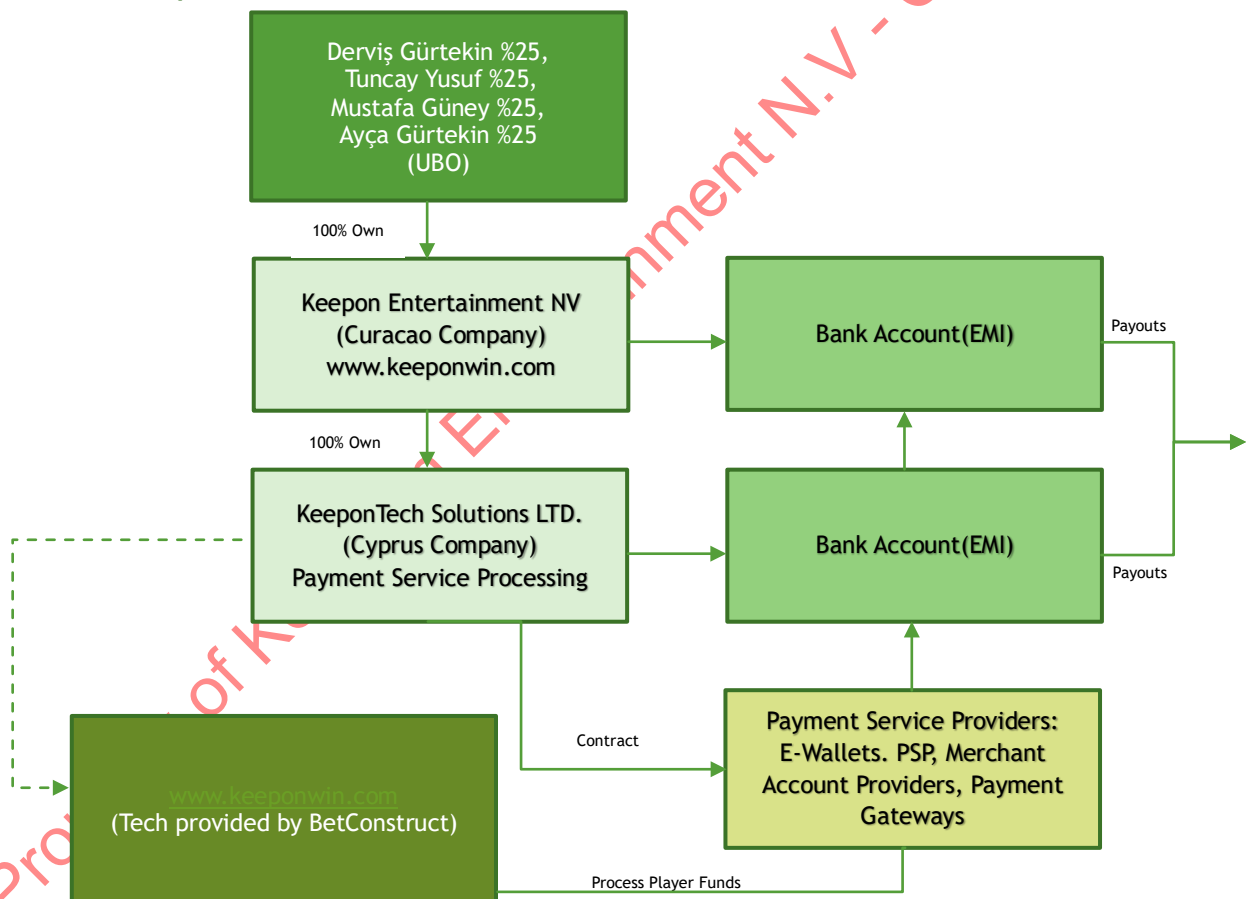
Name: Mr. Tuncay Yusuf - 25% Beneficial Owner

Name: Mrs. Ayça Gürtekin - 25% Beneficial Owner

Each shareholder holds **25% equity** in the company, providing balanced ownership. While the shareholders maintain **strategic oversight**, they do not participate in the operational management of the company. The company's **Board of Directors**, based in Curaçao, is responsible for managing day-to-day operations. A **Shareholders' Agreement** is in place to clarify the roles, responsibilities, and processes for decision-making, conflict resolution, and succession planning.



2.2 Corporate Structure



Keep On Entertainment N.V. is the parent company, licensed and regulated under the Curaçao eGaming License. It operates a **wholly owned subsidiary** in Cyprus, **KeeponTech Solutions Ltd.**, which provides essential IT services, payment processing, and operational support.

This structure allows the company to manage its global operations efficiently, taking advantage of Curaçao's favorable **gaming regulations** and Cyprus' advanced **technological infrastructure**.

A **Service Level Agreement (SLA)** governs the relationship between the parent company and **KeeponTech Solutions Ltd.**, ensuring coordination in areas such as **data management**, **payment services**, and **technical support**. All operations comply with **GDPR** regulations in Cyprus and **Curaçao Gaming Control Board (GCB)** standards to ensure the safe handling of player data and financial transactions.

2.3 Internal Cash Flow Structure

- **Ownership and Subsidiary Management:**
Keep On Entertainment N.V. is the 100% owner of two key subsidiaries:
 - **KeeponBet N.V. (Curaçao)**, which holds the **Curaçao Gaming License** issued by the **Gaming Control Board (GCB)**.
 - **KeeponTech Solutions Ltd. (Cyprus)**, which functions as the **payment agent** for all financial transactions.
- **Service Level Agreement (SLA):**
KeeponTech Solutions Ltd. operates under a **Service Level Agreement (SLA)** with **Keep On Entertainment N.V.**. The SLA outlines KeeponTech's responsibilities for collecting all payments from **Payment Service Providers (PSPs)**, maintaining **data security**, and adhering to **AML/KYC regulations**. Regular **audits** and **performance reviews** will ensure that KeeponTech Solutions Ltd. complies with the SLA.
- **Payment and Expense Management:**
KeeponTech Solutions Ltd. will manage a bank account in the name of **Keep On Entertainment N.V.** and is responsible for processing all **operational expenses** from this account. These expenses include contracts, licensing fees, marketing expenditures, and leasing agreements. Reconciliation with PSPs will be handled regularly to ensure financial transparency and security in cross-border transactions.

2.4 Player Cash Flow Structure

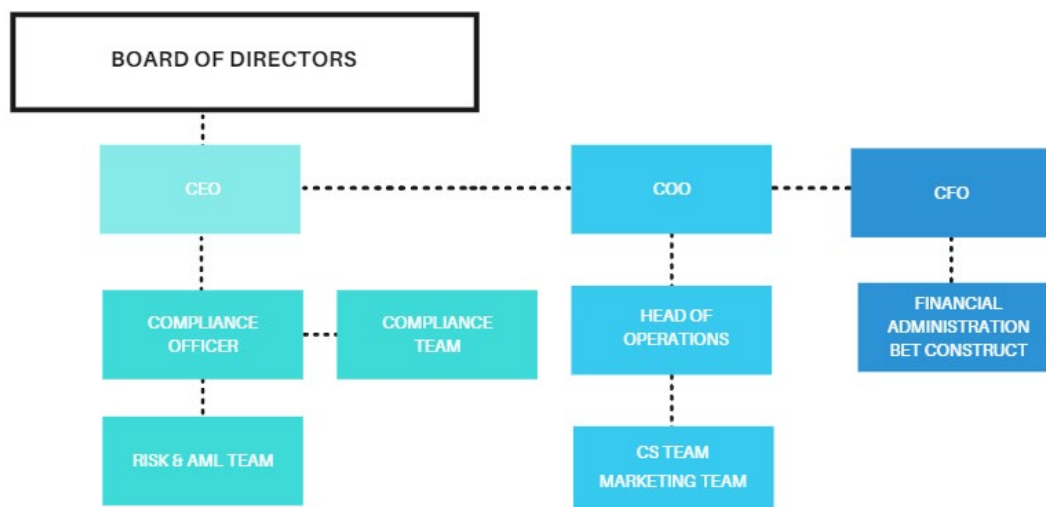
- **Deposit:** Players can deposit funds into their **Keeponwin** accounts using a variety of payment methods, including **credit/debit cards**, **e-wallets** (PayPal, Neteller), **bank transfers**, and **cryptocurrencies** (such as Bitcoin or Ethereum). To enhance player convenience, **Keeponwin** supports payment options tailored to regional preferences. All deposit transactions are secured with **SSL encryption** to ensure player safety and privacy. Minimum deposit amounts may vary depending on the selected payment method.
- **Gaming:** After depositing, players can use their account balance to wager on a wide variety of games, including **slots**, **table games** (blackjack, poker, and roulette), and **live dealer games**. The gaming platform is designed to meet diverse player preferences and is available in multiple

jurisdictions. **Responsible gaming tools**, such as **deposit limits** and **self-exclusion options**, are available to promote safe gambling practices.

- **Winning:** Winnings from gameplay, including **promotions**, **bonuses**, or **jackpots**, are automatically and instantly credited to the player's casino account. Keeponwin ensures that all winnings are processed in accordance with **fair play policies** and regulatory standards. Wagering requirements for **bonuses and promotions** may apply, and players are notified of these terms upfront.
- **Withdrawal Request:** Players can request to withdraw their winnings through the **Keeponwin cashier** or **banking section**. Withdrawal methods mirror deposit options, providing consistency for players. Withdrawal times vary based on the chosen method and any applicable processing fees or limits are clearly displayed before confirmation.
- **Verification:** To comply with **Anti-Money Laundering (AML)** regulations and prevent fraud, players are required to undergo **identity and account verification** before withdrawals can be processed. Verification includes submitting a **government-issued ID**, **proof of address**, and verification of the payment method used for deposits. The typical verification timeframe is **24-72 hours**, depending on the completeness of documentation.
- **Processing:** Once verification is complete, withdrawals are processed securely and efficiently. **Keeponwin** guarantees transparent disbursement of funds, and processing times vary by withdrawal method. **E-wallet withdrawals** are typically processed within **24 hours**, while **bank transfers** may take **3-5 business days**. Players are informed of any delays caused by weekends or public holidays, ensuring a transparent process.

2.5 Company Management Structure

KEEP ON ENTERTAINMENT N.V.



Keep On Entertainment N.V. will be comprised of the following departments:

Board of Directors:

- o Derviş Gürtekin - Chief Executive Officer (CEO)
- o Mustafa Güney - Chief Operating Officer (COO)
- o Ayça Gürtekin - Chief Technology Officer (CTO)
- o Tuncay Yusuf - Chief Financial Officer (CFO)

Customer Service (Managed by Starkeast Management B.V.)

- o Maintenance and Support (2 employees)
- o Customer Support (2 employees)
- o Risk and Compliance (2 employees)

Marketing

- o Head of Marketing (To be hired)
- o Head of Acquisitions (To be hired)

Financial & Administration (Supported by BetConstruct)

- o Accountant
- o Payroll

Keep On Entertainment N.V. will lead a team of 5-10 employees until the operation grows. BetConstruct has committed to assist with financial administration.

3 Financial Forecast

3.1 Year 1 (In-Progress March 2024)

This financial forecast for Year 1 assumes operations beginning in November 2024, spanning over 8 months until June 2025. The projections are built on realistic assumptions, historical data from similar operations, and expected growth metrics.

3.1.1 Assumptions

- **Initial Capital:**

- o The shareholders (Derviş Gürtekin, Mustafa Güney, Tuncay Yusuf, Ayça Gürtekin) will invest a total of **€309,300**. No external funding or credit lines are involved.

- **Player Registration & Deposits:**

- o **Number of Players:** The casino expects to register **5,000 players** in November 2024, growing at an estimated **30% month-on-month** through June 2025, reaching a projected **31,375 players** by June 2025.
- o **Depositors:** On average, **8%** of new registrations will become depositing players.
- o **Player Deposits:** Each player is expected to deposit an average of **\$100**.

- **Churn Rate:** We anticipate a **50% churn rate**, meaning half of the previous month's depositors will return to deposit again.
- **Player Withdrawals:** Withdrawals will average **45%** of the total deposits.
- **Operational Costs:**
 - **Monthly Licensing Fee:** Calculated as **30% of Gross Gaming Revenue (GGR)** based on net deposits.
 - **Salaries:** Includes Customer Support, Risk & Compliance, and other essential departments. Initially, operational salary expenses will start low and double after the first 6 months as operations expand.
 - **Gateway Processing Fee:** **2.5%** processing fee on total deposits and withdrawals.
 - **Affiliate Commissions:** **20% of net deposits** will be paid to affiliate partners.
 - **Marketing:** Starting in **Month 6**, the company will spend **€20,000** on programmatic ads and other marketing campaigns, increasing **20% month-on-month** from that point onward.

3.1.2 Financial Projections for Year 1 (November 2024 to June 2025)

Month	New Players	Depositors	Total Deposits	Withdrawals (45%)	Net Deposits	GGR (30%)	Affiliate Commissions (20%)	Salaries	Marketing & Affiliate Costs
November 2024	5,000	400	\$40,000	\$18,000	\$22,000	\$6,600	\$4,400	€20,618	€5,000
December 2024	6,500	520	\$52,000	\$23,400	\$28,600	\$8,580	\$5,720	€20,618	€5,000
January 2025	8,450	676	\$67,600	\$30,420	\$37,180	\$11,154	\$7,436	€20,618	€5,000
February 2025	10,985	879	\$87,900	\$39,555	\$48,345	\$14,504	\$9,669	€20,618	€5,000
March 2025	14,281	1,143	\$114,300	\$51,435	\$62,865	\$18,860	\$12,573	€41,236	€5,000
April 2025	18,565	1,485	\$148,500	\$66,825	\$81,675	\$24,503	\$16,335	€41,236	€20,000
May 2025	24,135	1,931	\$193,100	\$86,895	\$106,205	\$31,862	\$21,241	€41,236	€24,000
June 2025	31,375	2,510	\$251,000	\$112,950	\$138,050	\$41,415	\$27,610	€41,236	€28,800

- **Total Deposits:** \$954,400
- **Total Net Deposits:** \$525,150
- **Gross Gaming Revenue (GGR):** \$157,478
- **Affiliate Commissions:** \$104,984
- **Salaries:** €246,414
- **Marketing & Affiliate Costs:** €97,800

3.2 3 Year Projections

The below financial forecast shows projections for the first 3 years of operation. These figures are based on the already operational Keeponwin casino and previous iGaming operations.

3.2.1 Assumptions

- **Player Growth:** Player registrations are expected to grow by **50% YOY**, with a steady **30% monthly increase** in Year 1.
- **Cost Increases:** Salaries and other operational costs are expected to increase by **25% YOY**.
- **Net Deposits:** Projected to increase by **50% YOY**.
- **Server and Maintenance Costs:** A **50% YOY growth** is anticipated to account for increasing infrastructure needs as the player base grows.

3.2.2 Three-Year Financial Projections

Year	Net Deposits	Affiliate Commissions (20%)	Salaries	Marketing & Ads	Net Profit
2025 (Year 1)	\$525,150	\$104,984	€246,414	€97,800	\$75,952
2026 (Year 2)	\$787,725	\$157,545	€307,500	€135,000	\$187,680
2027 (Year 3)	\$1,181,588	\$236,318	€384,375	€175,000	\$385,895

Conclusion for Year 1-3 Financial Projections

The financial projections indicate that **Keeponwin** will break even by the end of Year 1 and become significantly profitable in Year 2, driven by a growing player base and optimized marketing efforts. The three-year outlook is positive, with steady revenue growth and a well-managed cost structure supporting long-term profitability.

4 Customer Acquisition and Marketing

4.1 Affiliates

For **Keeponwin**, the affiliate marketing strategy is the **primary customer acquisition channel** in Year 1. Affiliates will play a key role in driving new player registrations, ensuring cost-efficient acquisition, and growing the platform's user base. Our affiliate network is designed to reach targeted demographics across multiple regions, including **Finland, Luxembourg, Bulgaria, India, and Canada**. This aligns with the company's objective of expanding into diverse and high-growth international markets.

4.1.1 Tiered Affiliate Structure

We plan to onboard affiliates in a **tiered system** to maximize engagement and value. Affiliates will be segmented into **Tier 1, 2, and 3** based on their traffic, industry reputation, and regional relevance.

- **Tier 1 Affiliates** will be compensated with a **blended model** that includes:
 - **Listing Fee:** A one-time payment to secure premium affiliate placements.
 - **Cost-per-Acquisition (CPA):** A commission paid for every new depositing player they refer.
 - **Revenue Share (RS):** A percentage of the net revenue generated by players referred by the affiliate.
- **Tier 2 Affiliates** will operate under a **CPA + Revenue Share** model.
- **Tier 3 Affiliates** will be offered only **Revenue Share** agreements to incentivize long-term partnerships.

4.1.2 Affiliate Network Growth

In the first six months, Keeponwin plans to integrate **over 60 affiliate partners**, each contributing to the acquisition of new players. By leveraging our existing relationships and offering competitive commission rates, we aim to secure partnerships with **top-tier affiliates** in key markets.

4.1.3 Geo-Targeted Campaigns

Affiliate programs will be geo-locked to focus on **high-potential regions** such as:

- **Europe:** Finland, Luxembourg, Bulgaria.
- **Asia:** India, including emerging markets in LATAM and Canada.

Affiliates will be provided with **localized marketing materials** to ensure the effectiveness of their campaigns. Our marketing team will monitor affiliate performance closely, making adjustments to contracts and commission rates as necessary to ensure optimal results.

4.2 Additional Marketing Channels

Although the affiliate program will be the primary driver of player acquisition, **Keeponwin** will also invest in **additional marketing efforts** from **Month 7** onwards.

4.2.1 Social Media Marketing

We will begin non-paid campaigns on popular social media platforms such as **Facebook, Instagram, and TikTok** during the first few months of operation. These efforts will be focused on generating organic traffic and building brand awareness in target markets.

4.2.2 Paid Advertising

From **Month 7**, we will initiate paid advertising campaigns on platforms like **Google Ads** and **programmatic advertising networks**. Our initial budget of **€20,000** will be increased by **20% monthly**, allowing us to scale campaigns effectively and measure their return on investment (ROI).

4.2.3 Influencer and Sponsorship Marketing

Keeponwin will also explore influencer partnerships, targeting **athletes**, **esports streamers**, and other popular figures who align with our target demographic. These partnerships will provide additional exposure to our brand and increase player engagement. By leveraging influencer relationships, we aim to build **brand trust and loyalty** among new users.

4.3 Conversion Optimization

In addition to customer acquisition efforts, Keeponwin will implement **conversion rate optimization (CRO)** techniques. By analyzing user behavior data and performing A/B testing on our platform, we will refine our registration and deposit processes, ensuring that more site visitors convert into active players. Tailored offers and personalized promotions will also be deployed to encourage **repeat deposits** and extend the **customer lifetime value (CLV)**.

5 Key Suppliers and Dependencies - Technology and Payment Platforms

5.1 Platform Infrastructure

Keeponwin relies on cutting-edge technology infrastructure to ensure a seamless and secure gaming experience for its users. The platform is designed to handle a large volume of traffic, provide real-time gaming services, and deliver an immersive experience across multiple devices.

5.1.1 Technology Provider

Keeponwin's iGaming platform is powered by a **proprietary gaming technology stack**, fully customizable to meet the unique demands of the online betting market. This infrastructure enables:

- **Real-time data analytics** for player behavior, betting odds, and game performance.
- **Scalability** to handle thousands of concurrent users without compromising on performance.
- **Multi-language support**: The platform is available in several languages, including English, Turkish, Finnish, German, and Spanish, catering to global markets.

The technology architecture is highly modular, allowing Keeponwin to easily integrate new games, expand to additional jurisdictions, and customize features based on market needs.

5.1.2 Hosting & Security

- The platform is hosted on a **secure cloud-based infrastructure**, ensuring maximum uptime and minimal latency for players around the world.
- **SSL encryption, DDoS protection, and advanced firewalls** are employed to protect the platform from cyber threats and ensure the safety of user data.
- The system undergoes regular **third-party security audits** to maintain compliance with international standards for data protection and online gaming.
-

5.2 Payment Service Providers

Keeponwin partners with multiple payment service providers (PSPs) to offer seamless deposit and withdrawal experiences for its users across various regions.

5.2.1 Integrated Payment Solutions

- Keeponwin supports a wide range of **FIAT currencies** and **cryptocurrency payments**, allowing players to deposit and withdraw funds using their preferred methods.
- The system is designed to accommodate multiple **PSPs**, ensuring efficient handling of both **e-wallets, credit/debit cards, and bank transfers**.

5.2.2 Payment Processing and Fees

- Payment gateways are integrated to offer **real-time transaction processing** with a competitive processing fee of **2.5%** on both deposits and withdrawals.

- **KYC (Know Your Customer)** checks are performed by both the platform and PSPs to ensure compliance with anti-money laundering (AML) regulations and to safeguard player security.

5.2.3 Supported Payment Methods

- **Credit and Debit Cards:** Visa, MasterCard, and regional alternatives.
- **E-Wallets:** Skrill, Neteller, and others popular in Keeponwin's target markets.
- **Cryptocurrencies:** Bitcoin, Ethereum, and other major cryptocurrencies, offering players more flexibility and faster transactions.

The goal is to provide players with **multiple reliable payment options**, which improve conversion rates and minimize user friction during the deposit and withdrawal processes.

5.3 Key Dependencies

Keeponwin's operations are dependent on its partnerships with reliable technology providers, hosting services, and PSPs. The continued success of these relationships is crucial for ensuring:

- **Platform stability** and the ability to scale as the business grows.
- **Compliance with international financial regulations**, particularly in the management of cross-border payments and AML/KYC processes.

6 Risk Evaluation and Management

Risk Statement

Date: 27/09/2024

Introduction:

This **Risk Tolerance Statement** outlines the principles and guidelines that shape Keeponwin's approach to risk. It is a guiding document for decision-making, risk management strategies, and our commitment to responsible gambling. Our focus is on operating with integrity, managing financial and operational risks, and promoting player welfare.

1. Core Values:

We are committed to upholding the highest standards in the iGaming industry, with our core values as the foundation:

- **Integrity:** Conducting business with honesty, fairness, and transparency.
- **Player Welfare:** Ensuring the well-being of our players by promoting responsible gambling practices and implementing appropriate safety measures.
- **Compliance:** Adhering to all regulatory requirements and maintaining the highest level of compliance.

2. Risk Identification:

Operating in the iGaming industry involves a variety of risks, both financial and operational. Keeponwin identifies and evaluates risks in the following categories:

- **Financial Risks:** Including cash flow volatility, potential for revenue fluctuations, and liquidity concerns.
- **Operational Risks:** Related to platform stability, technological failures, and security vulnerabilities.
- **Regulatory Risks:** Compliance with gaming regulations, changes in laws, and anti-money laundering (AML) requirements.
- **Market Risks:** Including competition, market saturation, and evolving consumer behavior.

We recognize the importance of understanding and mitigating these risks to ensure the stability of our operations.

3. Risk Appetite:

Keeponwin's risk appetite is defined by a commitment to:

- **Financial Stability:** Ensuring the financial sustainability of the business while maintaining liquidity.

- **Regulatory Compliance:** Adhering to all legal requirements in the jurisdictions where we operate.
- **Responsible Gambling:** Promoting player safety by offering tools to mitigate gambling-related harm.

4. Responsible Gambling:

At Keeponwin, we understand the potential social impact of our services. As a result, we are committed to minimizing harm by:

- **Providing Information:** Offering clear and accurate information about the risks associated with gambling.
- **Player Tools:** Implementing tools such as **self-exclusion**, **deposit limits**, and links to support services for players in need.
- **Monitoring Behavior:** Using data analytics to track and respond to signs of problem gambling.

5. Regulatory Compliance:

Compliance is a core principle at Keeponwin. We are committed to:

- **Monitoring Legal Changes:** Ensuring that our operations adapt to changes in the regulatory landscape.
- **AML and KYC:** Implementing rigorous anti-money laundering (AML) and know your customer (KYC) procedures to prevent fraudulent activities.

6. Continuous Improvement:

We continuously assess and improve our risk management processes. This includes:

- **Risk Assessments:** Conducting regular assessments to identify potential new risks.
- **Scenario Planning:** Engaging in strategic planning to anticipate and mitigate future risks.
- **Industry Learning:** Adopting best practices from the gaming industry to enhance risk management.

7. Communication:

Effective communication is vital to our risk management approach. We maintain open channels of communication with:

- **Players:** Ensuring they understand our responsible gambling tools and services.
- **Regulators:** Keeping a transparent and proactive dialogue with gaming authorities.
- **Employees:** Ensuring that risk management practices are communicated across the organization.

8. Review and Update:

This **Risk Tolerance Statement** will be reviewed periodically to ensure that it reflects the evolving business environment and regulatory landscape. Any necessary updates will be made to maintain its relevance.

Keeponwin Entertainment N.V.

Sign:

By:

Date: 27/09/2024

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7 Legal and Governance Framework

Date: 27/09/2024

Introduction:

This document outlines the legal and governance framework for **Keeponwin Entertainment N.V.**, hereinafter referred to as "the Company." This framework is designed to ensure compliance with relevant laws and regulations, effective oversight, and responsible decision-making within the Company.

Oversight Committee:

The Board of Directors will also function as an **Oversight Committee** of Keeponwin Entertainment N.V. is responsible for providing oversight and strategic direction to the Company. The committee ensures that the Company's senior management operates in accordance with its stated objectives, legal requirements, and ethical standards.

Oversight Committee and Interaction with Senior Management:

The Oversight Committee consists of individuals with diverse backgrounds and expertise relevant to the operations of an online casino and sports betting company. These members are selected based on their industry experience, integrity, and ability to contribute to the Company's success. The current composition of the committee includes:

- **Derviş Gürtekin - Chief Executive Officer - CEO**
- **Mustafa Güney - Chief Operating Officer - COO**
- **Tuncay Yusuf - Chief Technology Officer - CTO**
- **Ayca Gürtekin - Chief Financial Officer - CFO**

The Oversight Committee interacts regularly with senior management to review performance, discuss strategic initiatives, and address any challenges. While the committee provides guidance, day-to-day decision-making authority rests with senior management.

Reserved Matters:

Certain decisions are reserved for the Oversight Committee or the ultimate beneficial owners (UBOs). These matters include, but are not limited to:

- **Approval of annual budgets and financial plans**
- **Appointment and removal of senior executives**
- **Significant strategic initiatives**, including mergers, acquisitions, or divestitures
- **Material transactions** and contracts that impact the Company's financial standing

- **Ensuring compliance** with regulatory requirements in Curacao and other jurisdictions.

Deadlock Resolution:

In the event of a deadlock on critical decisions, mechanisms for resolution are outlined in the Company's articles of association or shareholders' agreement. Options include:

- **Mediation**
- **Arbitration**
- Other dispute resolution methods agreed upon by the parties involved.

Legal Support and Advice:

Keeponwin retains external legal counsel to provide guidance on regulatory compliance, contractual matters, and other legal concerns. Legal advisors work closely with senior management and the Oversight Committee to ensure the Company operates in accordance with the law, particularly Curacao's gaming regulations.

Attendance at Oversight Committee Meetings:

Key executives, such as the CEO, COO, CFO and CTO, are typically invited to attend Oversight Committee meetings to provide updates and insights into strategic, operational, and compliance matters. External advisors or consultants may also attend as necessary to support discussions on specialized topics.

Environmental, Social, and Governance (ESG) Policy:

Keeponwin is committed to integrating environmental, social, and governance (ESG) considerations into its business practices. The Company's commitment to ESG includes:

- **Responsible gambling practices**, ensuring player protection and providing tools like self-exclusion and deposit limits.
- **Fostering a diverse and inclusive workplace**, promoting equal opportunities.
- **Minimizing environmental impact** by using sustainable practices in its operations.
- **Maintaining high ethical standards** in all business activities.

Conclusion:

This legal and governance framework establishes the necessary structure and processes for effective oversight and responsible decision-making within **Keeponwin Entertainment N.V.** By adhering to these principles, the Company aims to uphold its reputation, mitigate risks, and ensure long-term success in the competitive online gaming industry.

8 Target KPIs and Business Objectives

Keeponwin Entertainment N.V. measures success and tracks its long-term business objectives through a combination of financial metrics, customer satisfaction indicators, regulatory compliance, and sustainability goals. The following are the key performance indicators (KPIs) used to assess business success and ensure progress toward achieving the company's long-term goals:

8.1 Revenue and Profitability

Financial performance is a critical measure of success for **Keeponwin**. The key financial metrics include:

- **Gross Gaming Revenue (GGR):** Tracks the total money wagered by players before deductions like bonuses or player winnings.
- **Net Gaming Revenue (NGR):** Measures the company's actual earnings after player payouts and operational costs.
- **Profitability Margins:** Monitors the company's ability to generate profits relative to operational costs.
- **Return on Investment (ROI):** Helps evaluate the efficiency of investments, particularly in marketing and technology.

These metrics allow the company to gauge the effectiveness of its marketing strategies, retention efforts, and overall business performance over time.

8.2 Customer Acquisition and Retention

Success in the iGaming space relies heavily on both attracting new customers and retaining existing ones. The company measures customer success through:

- **Player Acquisition Cost (PAC):** The average cost of acquiring a new customer, including marketing and affiliate costs.
- **Customer Lifetime Value (CLV):** The total revenue a company expects to earn from a customer throughout their engagement with the platform.
- **Churn Rate:** The percentage of players who leave the platform over a specific period.
- **Customer Satisfaction Scores:** Derived from surveys and feedback, these scores provide insights into how well the company is meeting customer expectations.

A high customer retention rate and increasing levels of player engagement are indicators of successful long-term strategy implementation.

8.3 Regulatory Compliance

Compliance with the relevant laws and regulations is crucial for the long-term viability of **Keeponwin**. The company monitors regulatory compliance through:

- **Absence of Regulatory Violations:** Success is demonstrated by avoiding breaches of Curacao's gaming laws and other jurisdictions' regulations.
- **Successful Audits or Inspections:** A clean track record from audits and inspections reinforces the company's commitment to regulatory adherence.
- **Relationships with Regulatory Authorities:** Positive working relationships with regulators and industry bodies help the company remain compliant and maintain its license.

8.4 Responsible Gambling Practices

Keeponwin takes its responsibility to promote responsible gambling seriously. Success in this area is measured through:

- **Adoption of Responsible Gambling Policies:** Implementing measures such as player self-exclusion and deposit limits.
- **Self-Exclusion Program:** Offering players the ability to exclude themselves from the platform for specific periods.
- **Support Services for Problem Gamblers:** Ensuring that players have access to resources for gambling addiction, such as counseling services and support groups.

Regularly monitoring the prevalence of problem gambling among users and evaluating the effectiveness of harm minimization measures are key to Keeponwin's responsible gaming strategy.

8.5 Brand Reputation and Trust

Building and maintaining a strong brand reputation is essential for long-term success in the iGaming sector. The company measures brand reputation through:

- **Customer Feedback:** Direct feedback from players about their experience on the platform.
- **Online Reviews and Social Media Sentiment:** Tracking user reviews and social media mentions to assess brand perception.
- **Industry Recognition:** Gaining accolades or awards from industry bodies or peers.

Maintaining high levels of transparency, customer satisfaction, and integrity in business practices are key drivers of brand trust.

8.6 Sustainability and Corporate Social Responsibility (CSR)

Sustainability and CSR initiatives are fundamental to Keeponwin's long-term success. The company tracks its CSR efforts through:

- **Carbon Footprint Reduction:** Implementing environmentally friendly practices, such as energy-efficient operations and waste reduction.

- **Community Engagement:** Supporting local communities through charitable contributions and employee engagement programs.
- **Ethical Business Practices:** Adhering to high standards of business ethics in all operations.

By focusing on CSR, Keeponwin strengthens its brand reputation and contributes positively to society.

Conclusion

By tracking and analyzing these key performance indicators, **Keeponwin Entertainment N.V.** can assess its progress toward long-term objectives and ensure continued success in the competitive online gaming landscape.

9 Policies and Procedures

Keeponwin Entertainment N.V. will ensure continuous adherence to regulatory rules and obligations. Specifically, the company has developed the following key documents internally, overseen by the **Chief Compliance Officer (CCO)**, which are provided to all users of the platform:

Document / Webpage Links:

- **Terms of Service:** Outlines the rules and guidelines that players must agree to when using the Keeponwin platform.
- **Privacy Policy:** Describes how Keeponwin collects, uses, and protects user data in compliance with data protection regulations.
- **Self-Exclusion:** Provides players with the option to voluntarily exclude themselves from the platform for a specific period to promote responsible gambling.
- **Anti-Money Laundering (AML):** Ensures compliance with international AML laws by monitoring transactions and reporting suspicious activities.
- **Responsible Gambling:** Promotes tools and resources aimed at preventing gambling-related harm, including setting limits and offering support services.

Keeponwin also obtains **independent legal and regulatory advice** before entering new markets to ensure compliance with local laws. The appointed **local Curacao director** at Starkeast B.V. provides relevant administrative and management information to ensure that both **Keeponwin Entertainment N.V. (Curacao)** and **Keeponwin Limited (Cyprus)** are in good standing with local and international regulatory requirements.