



spin better

BUSINESS PLAN





Company Description

Sprout Group B.V. presents Spinbetter, a premier online gambling platform catering to a diverse global audience since 2019. With a comprehensive selection of over 4,000 games, Spinbetter offers unparalleled gaming experiences in slots, card games, roulettes, live games, and more. Our mission is to provide a diverse range of high-quality games, coupled with top-notch customer service, all within a secure gaming environment. We're dedicated to expanding our reach while maintaining a steadfast commitment to quality and integrity.

Our platform boasts an extensive game library, user-friendly interface, 24/7 customer support, mobile compatibility, and swift payment processing. We're constantly striving to enhance our platform and stay ahead of the competition. While we're eager to grow and expand into new markets, we're equally focused on fostering responsible gambling practices and promoting a safe gaming environment.

Moreover, we acknowledge the diverse legal frameworks in different jurisdictions, and we're proceeding with caution. Consequently, we won't be conducting operations in specific markets, including Aruba, Austria, Bonaire, Curacao, France, the Netherlands, Australia, the UK, Spain, Saba, Statia, St. Martin, the USA, and any other jurisdiction where gambling is deemed illegal or contravenes the licensing conditions of Gaming Curacao. Our target market is adult players aged 18 and above, who are seeking immersive and enjoyable online gambling experiences.





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Marketing plan



Our marketing strategy revolves around reaching our target demographic of adult players aged 18 and above while adhering to legal and regulatory guidelines. We employ various sales and marketing strategies, including digital marketing channels such as social media, search engine optimization (SEO), and targeted advertising. Additionally, we leverage affiliate partnerships to expand our reach and attract new players through referral programs. Content marketing plays a crucial role in engaging our audience, with informative content such as game reviews and industry insights. Furthermore, we utilize email marketing to communicate promotions, bonuses, and updates to our player base, ensuring they remain informed and engaged.



Our business strategy encompasses growth plans, market share strategies, and financial/marketing plans aimed at solidifying Spinbetter's position in the online gambling industry. We are focused on expanding into new markets while consolidating our presence in existing ones through strategic partnerships and targeted marketing efforts. Continuous enhancement of our platform with new features, games, and technological innovations is paramount to staying ahead of the competition and meeting the evolving needs of our players. Additionally, we differentiate Spinbetter from competitors by emphasizing our unique features, exceptional customer service, and commitment to responsible gambling. Our financial and marketing plans prioritize allocating resources towards initiatives with proven returns on investment while monitoring key performance indicators to optimize effectiveness and budget allocation.



RECOGNIZING THE IMPORTANCE OF COMPLIANCE WITH AML (ANTI-MONEY LAUNDERING) REGULATIONS, WE ARE IMPLEMENTING A STANDARDIZED PROCESS FOR ALL NEW PLAYERS. TO CREATE AN ACCOUNT, PLAYERS WILL NEED TO COMPLETE A REGISTRATION FORM, WHICH CONSISTS OF FOUR STRAIGHTFORWARD STEPS. THE FORM REQUIRES ESSENTIAL INFORMATION, INCLUDING:

1. COUNTRY OF RESIDENCE
2. EMAIL ADDRESS
3. PASSWORD
4. PASSWORD CONFIRMATION
5. FIRST NAME
6. LAST NAME
7. GENDER
8. NICKNAME
9. DATE OF BIRTH
10. ADDRESS
11. PHONE NUMBER

DURING THIS PROCESS, THE FORM UNDERGOES AUTOMATIC CHECKS AGAINST OUR RESTRICTED COUNTRY LIST AND AGE AVAILABILITY TO ENSURE COMPLIANCE. THIS STEP IS CRUCIAL IN MAINTAINING THE INTEGRITY OF OUR PLATFORM AND ADHERING TO REGULATORY REQUIREMENTS.

Personal profile

Fill in the empty fields to take advantage of the enhanced features of the website.

Fill in profile

38%

Account

Account number

Password

Registration date

Contacts

Phone

Email

Personal info

Surname

Document issue date

First name

Country
Myanmar (Burma)

Date of birth

Region

Place of birth

City

Type of document
National identity card

Permanent registered address

Document number

SAVE

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

Platform features



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OUR GAMING LIBRARY INCLUDES A WIDE VARIETY OF
POPULAR GAMES, INCLUDING BUT NOT LIMITED TO:

- | | |
|--------------|------------------|
| 1. SLOTS | 6. KENO |
| 2. BLACKJACK | 7. SCRATCH GAMES |
| 3. ROULETTE | 8. LOTTERIES |
| 4. POKER: | 9. BINGO |
| 5. BACCARAT | 10. LIVE GAMES |

PROVIDED GAMES

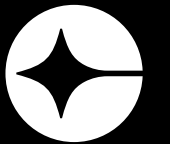
Suppliers and Dependencies

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COOPERATION WITH GAME PROVIDERS
TO MAKE THE GAMES MENTIONED
AVAILABLE ON OUR WEBSITE, WE ARE
COLLABORATING WITH THE FOLLOWING
GAMING PROVIDERS:

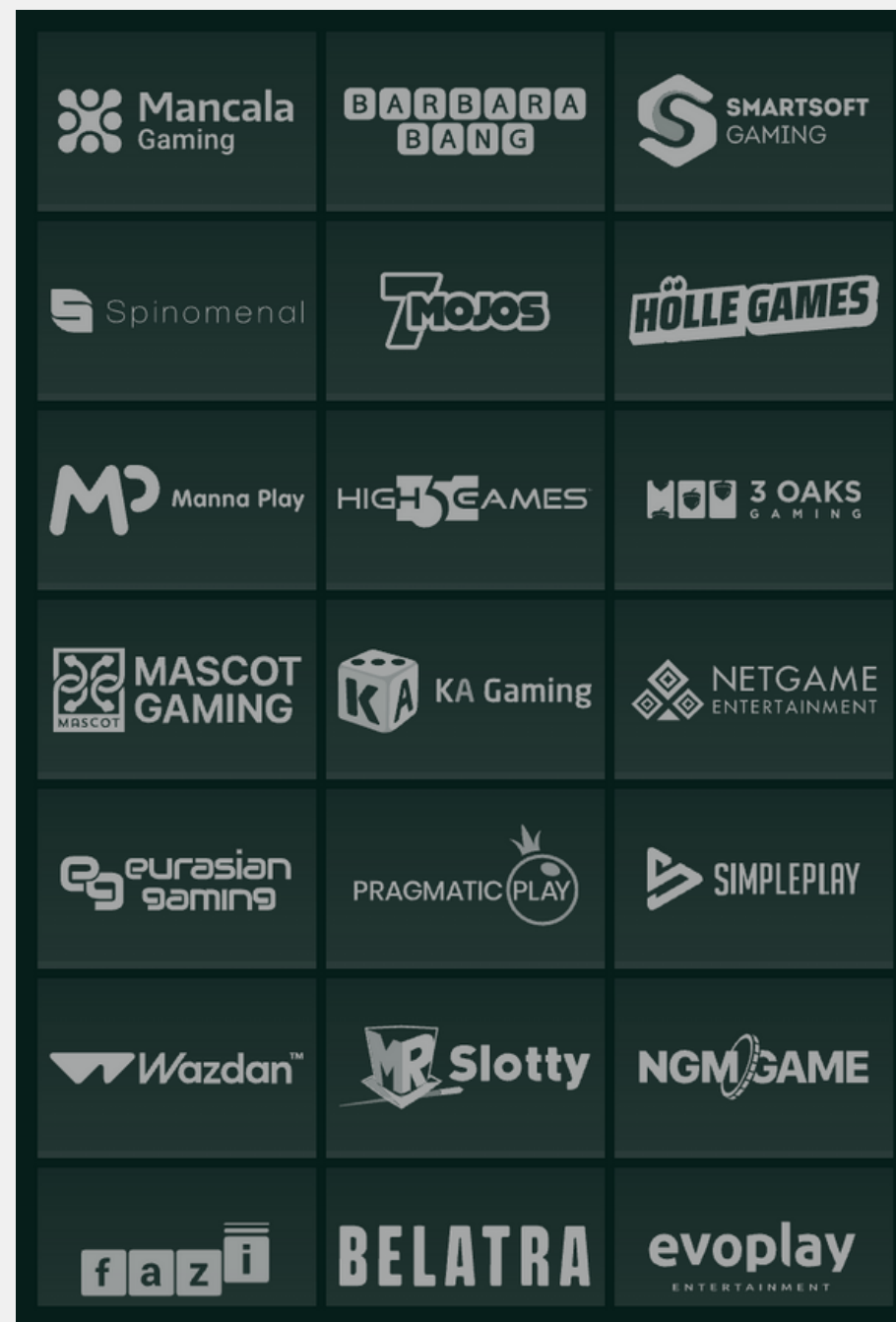
- ISOFTBET
- PLAY'N GO
- PLAYSON
- RED RAKE
- RED TIGER
- 2 BY 2 GAMING
- ELK STUDIOS
- PUSH GAMING
- HABANERO
- KALAMBA GAMES
- RABCAT
- FOXIUM
- BIG TIME GAMING
- NOLIMIT CITY
- THUNDERKICK
- GAMEART
- PARIPLAY
- BGAMING
- RIVAL
- GENII
- IRON DOG STUDIO
- TOM HORN GAMING
- SPINOMENAL
- BLUEPRINT GAMING
- REALISTIC GAMES
- WAZDAN
- PLATIPUS
- VIVO GAMING
- LUCKY STREAK, ETC.



Cooperation with Payment Service Providers

- QIWI WALLET
- APPLE PAY
- SOFORT BANKING
- ECOPAYZ
- NETELLER
- SKRILL
- VISA
- MASTERCARD
- TRUSTLY
- MUCHBETTER
- MULTIBANCO
- ASTROPAY
- MAESTRO
- PAYSAFECARD
- NEOSURF
- DIRECT BANK TRANSFER
- DEBIT CARD
- BITCOIN
- PERFECT MONEY
- PRZELEWY24
- ETHEREUM
- LITECOIN
- BITCOIN CASH
- POLI
- REVOLUT
- SOFORT
- INTERAC
- RAPID TRANSFER
- MIR
- CARDANO
- JETON
- RIPPLE
- PIASTRIX
- MB WAY
- FLEXEPIN
- EZEEWALLET
- CASHTOCODE
- MIFINITY
- BINANCE
- DOGECOIN
- DASH
- CASHLIB
- TETHER
- E-VOUCHER
- ALFA-BANK
- PAYVIAPHONE
- PAYDO
- PAYZ
- PIX
- UZCARD
- FASTER PAYMENTS SYSTEM (SBP)

Game providers



Payment Service Providers



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Operational Plan



OUR OPERATIONAL PLAN ENCOMPASSES VARIOUS ASPECTS, INCLUDING OUR PAYMENT PLATFORM AND FINANCIAL PROCESSES. WE ENSURE SMOOTH PAYMENT PROCESSING THROUGH ESTABLISHED PAYMENT PROCESSORS AND BILLING AGENTS, PRIORITIZING EFFICIENCY AND SECURITY IN ALL TRANSACTIONS.

FINANCIAL PROJECTIONS: 3-YEAR FORECASTS FOR TARGETS AND CASH FLOW.

BASED ON OUR MARKET ANALYSIS AND GROWTH PROJECTIONS, WE ANTICIPATE THE FOLLOWING REVENUE FORECASTS AND CASH FLOW ESTIMATES OVER THE NEXT THREE YEARS:

- YEAR 1: €500,000
- YEAR 2: €1,200,000
- YEAR 3: €2,500,000

PROFIT AND LOSS / CASH FLOW:



Year	Total Revenue	Marketing Expenses	IT Expenses	PSP Expenses	Salaries	Total Expenses	Net Profit
1	€700,000	€150,000	€75,000	€25,000	€250,000	€500,000	€200,000
2	€1,600,000	€300,000	€150,000	€50,000	€300,000	€800,000	€800,000
3	€2,700,000	€400,000	€220,000	€80,000	€400,000	€1,100,000	€1,600,000

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Risk Management

Description of risk assessment, mitigation, audits, and oversight



01

We conduct rigorous risk assessments to identify, analyze, and prioritize potential threats to our business goals, operations, and reputation. This involves evaluating regulatory compliance, cybersecurity, operations, market, competition, and geopolitical factors. Using quantitative and qualitative methods, scenario analysis, and risk mapping, we gain a clear view of our risk landscape. This helps us anticipate challenges, develop effective mitigation strategies, and contingency plans.

02

We proactively mitigate risks by tailoring strategies to their severity. For cybersecurity, we invest in robust infrastructure, encryption, and employee training. For compliance, we maintain frameworks, monitor regulations, and engage with authorities. We diversify revenue, implement crisis management, and ensure business continuity to address financial and operational risks.

03

Regular audits and oversight are key to our risk management. We conduct internal audits, external audits, and independent reviews to assess our processes, controls, and governance. Internal audits are independent and report to the Board. External audits are by reputable firms. Governance includes oversight bodies like the Audit Committee and Risk Management Committee, ensuring compliance and monitoring risk exposure. This promotes accountability, transparency, and ethical behavior. Our proactive approach aims to enhance resilience, protect stakeholders, and sustain long-term value creation. We're committed to improving risk management practices and fostering a culture of risk awareness and innovation.



Legal and Governance: Board details, decision- making, reserved matters, legal support, and ESG policy

OUR BOARD OF DIRECTORS COMPRISES SEASONED PROFESSIONALS FROM GAMING, FINANCE, LEGAL, AND TECHNOLOGY SECTORS, ENSURING DIVERSE EXPERTISE FOR STRATEGIC OVERSIGHT. OUR IN-HOUSE LEGAL TEAM HANDLES COMPLIANCE, CONTRACT DRAFTING, RISK MANAGEMENT, AND LEGAL REPRESENTATION. EXTERNAL LEGAL COUNSEL IS ENGAGED FOR SPECIALIZED ADVICE AND REPRESENTATION WHEN NEEDED.

WE ADHERE TO A STRUCTURED DECISION-MAKING PROCESS THAT PRIORITIZES TRANSPARENCY, ACCOUNTABILITY, AND ALIGNMENT WITH OUR CORPORATE OBJECTIVES. MAJOR STRATEGIC DECISIONS ARE DELIBERATED UPON BY THE BOARD OF DIRECTORS, WITH INPUT FROM SENIOR MANAGEMENT AND RELEVANT STAKEHOLDERS. THIS COLLABORATIVE APPROACH ENSURES THAT DECISIONS ARE WELL-INFORMED, PRUDENT, AND ALIGNED WITH OUR LONG-TERM VISION.

OUR COMMITMENT TO ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG) PRINCIPLES IS REFLECTED IN OUR CORPORATE POLICIES AND PRACTICES. WE HAVE DEVELOPED A COMPREHENSIVE ESG POLICY THAT OUTLINES OUR COMMITMENT TO ENVIRONMENTAL SUSTAINABILITY, SOCIAL RESPONSIBILITY, AND ETHICAL GOVERNANCE. THIS INCLUDES INITIATIVES TO REDUCE OUR ENVIRONMENTAL FOOTPRINT, PROMOTE DIVERSITY AND INCLUSION, SUPPORT COMMUNITY DEVELOPMENT PROJECTS, AND UPHOLD HIGH STANDARDS OF ETHICAL CONDUCT AND CORPORATE GOVERNANCE.





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KPIs and Objectives



EXAMPLES OF KEY PERFORMANCE INDICATORS (KPIs) INCLUDE:

- Player Acquisition and Retention.
- Revenue Growth.
- Customer Satisfaction and Feedback
- Operational Efficiency
- Compliance and Regulatory Adherence

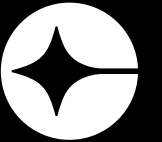


LONG-TERM BUSINESS GOALS:

- Market Expansion
- Product Innovation and Differentiation.
- Sustainable Growth and Profitability.
- Customer-Centric Approach.

Policies and Procedures: Internal/external handling, timelines, board commitment, and qualifications.

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Internal Handling:

Internally, our policies cover employee conduct, performance expectations, and professional development. Protocols for conflict resolution and disciplinary actions are established to address workplace issues promptly and fairly. Employee training programs are prioritized to equip team members with the necessary skills to excel in their roles.



External Handling:

Externally, stringent protocols ensure transparency, integrity, and compliance with legal and ethical standards in engagements with customers, suppliers, and regulatory authorities. Clear communication channels and escalation procedures are in place to address customer inquiries and feedback promptly.

Timelines:

Our policies outline specific timelines, milestones, and deliverables for projects, enabling efficient resource allocation and progress tracking. Flexibility is built-in to accommodate unforeseen challenges or changes in priorities.

Qualifications:

Rigorous standards for qualifications and credentials ensure that employees are suitably qualified for their roles. Ongoing professional development opportunities support employee growth and advancement within the organization.

Board Commitment:

Board members are expected to actively participate in strategic discussions and provide oversight of management. Diversity and inclusion in board composition are prioritized to ensure robust decision-making.

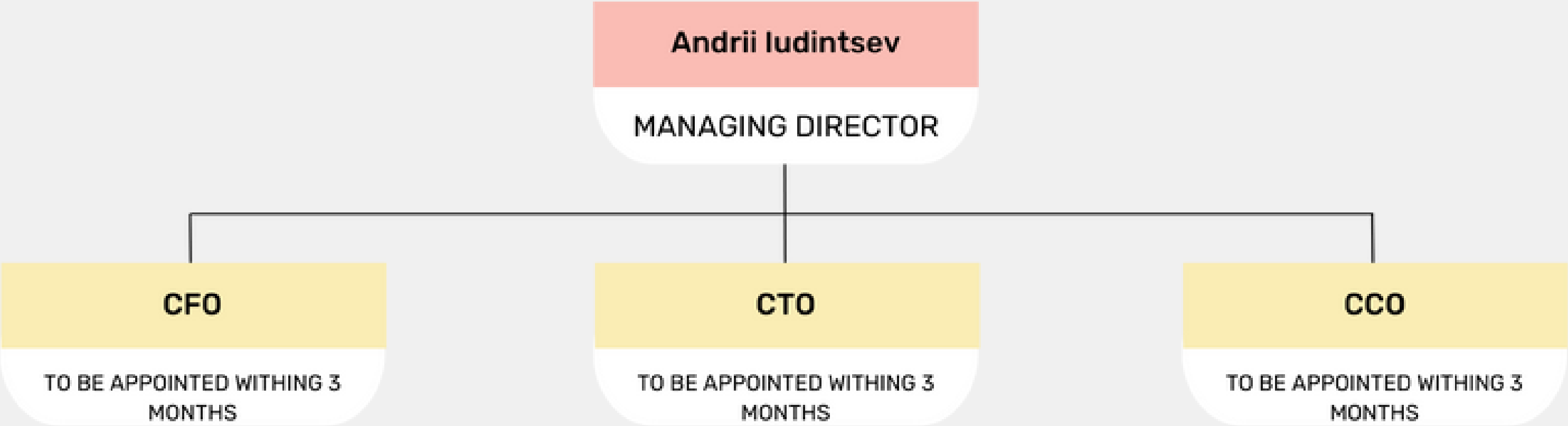
Management & Organization, etc.



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ORGANIZATION CHART



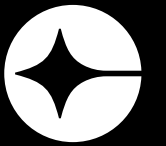
Chief Compliance Officer (CCO):

- **Developing Compliance Policies:** Creating and implementing compliance policies and procedures to mitigate legal and regulatory risks.
- **Regulatory Compliance:** Monitoring changes in laws and regulations affecting the online gambling industry and ensuring the company's compliance.
- **Risk Assessment:** Conducting risk assessments to identify potential compliance risks and developing strategies to mitigate them.
- **Training and Education:** Providing training and educational programs to employees on compliance matters, including anti-money laundering (AML) and know-your-customer (KYC) procedures.
- **Internal Investigations:** Investigating potential compliance breaches, violations, or unethical behavior within the organization and taking appropriate action.
- **Reporting:** Reporting regularly to the executive team and the board of directors on compliance activities, risks, and issues.

Chief Technology Officer (CTO):

- **Technology Strategy:** Developing and implementing the company's technology strategy to support business objectives and drive innovation.
- **Infrastructure Management:** Managing the company's IT infrastructure, including networks, servers, and systems, to ensure reliability, security, and scalability.
- **Product Development:** Leading the development and deployment of new products and features, working closely with product managers and developers.
- **Cybersecurity:** Implementing measures to protect the company's data, systems, and customers from cyber threats and security breaches.
- **Technology Partnerships:** Identifying and managing relationships with technology vendors, partners, and suppliers to support the company's technological needs.
- **Emerging Technologies:** Staying abreast of emerging technologies and trends in the online gambling industry and evaluating their potential impact on Spinbetter's operations and competitive positioning.

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Chief Financial Officer (CFO):

- **Financial Planning and Analysis:** Developing financial plans, forecasts, and budgets to support the company's strategic objectives.
- **Financial Reporting:** Ensuring accurate and timely financial reporting in accordance with accounting standards and regulatory requirements.
- **Capital Management:** Managing the company's capital structure, cash flow, and liquidity to optimize financial performance and support growth initiatives.
- **Risk Management:** Identifying financial risks and implementing strategies to mitigate them, such as currency risk management and hedging strategies.
- **Investor Relations:** Managing relationships with investors, analysts, and stakeholders, and providing transparency and communication on financial performance and strategy.
- **Compliance:** Working closely with the CCO to ensure compliance with financial regulations, tax laws, and internal financial controls.