

BUSINESS PLAN NEW ORIGIN B.V.

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BUSINESS OBJECTIVE

New Origin B.V. is a company dedicated to offering a wide range of online gambling products, specifically targeting markets in Hispanic America. Our focus is on providing a diverse selection of casino and sports betting products to cater to the interests of various players, excluding restricted countries.

At New Origin B.V., we prioritize understanding the unique needs of each customer by maintaining control over our technical and customer support staff. This enables us to deliver exceptional service and foster genuine, honest, and reliable relationships with our clients and partners.

Our key priorities include:

Creating a competitive edge by offering the most favorable and superior conditions compared to other betting companies.

Providing a high-quality service experience that exceeds customer expectations.

Offering top-notch support to ensure our clients receive assistance whenever needed.

Staying up to date with the latest trends in the market and delivering the newest and most desirable games.

To execute our business plan, New Origin B.V. will operate the **ohmywin.com** website. This platform will offer a comprehensive online casino gaming experience, including slots and live casino games. Additionally, we will provide a diverse range of sports betting options, covering various sports sectors and offering a wide variety of betting opportunities.

SERVICES

The operator provides a portfolio of licensed online gaming services targeting adult players (18+) in Spanish-speaking markets. The offering includes:

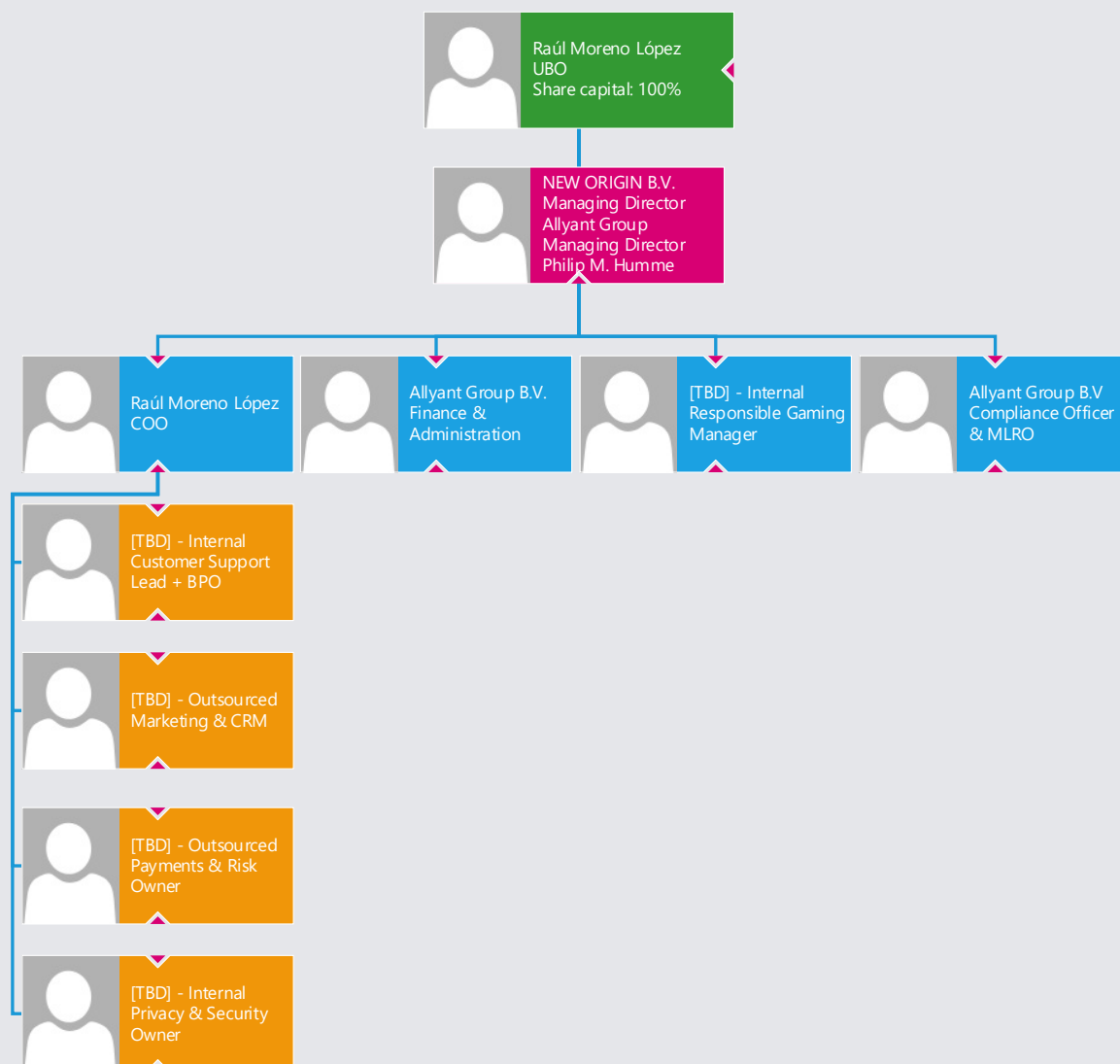
- **Slots:** A wide selection of certified video slot machines from leading providers, accessible 24/7.
- **Live Casino:** Real-time streaming games such as roulette and blackjack, operated by certified live dealers in regulated studios.

- **Sportsbook:** Pre-match and live betting on international sporting events, with dynamic odds and player-friendly features.
- **Bonuses & Promotions:** Periodic campaigns aimed at player acquisition, retention, and reactivation, fully aligned with local regulations on responsible marketing.

All services are delivered exclusively online via the operator's secure gaming platform. The platform is optimized for mobile and desktop devices, and supports multiple payment methods, responsible gaming tools, and real-time KYC/AML checks.

Players must undergo full identity verification before any withdrawal is permitted, and services are not accessible until age and location controls are passed. The platform includes embedded player protection tools (cool-off periods, self-exclusion, deposit limits, etc.) to ensure responsible play at all stages of the user journey.

CORPORATE STRUCTURE, DIRECTORS AND SHAREHOLDERS



Ownership. New Origin B.V. is wholly owned by **Raúl Moreno López**, who holds 100% of the share capital and serves as Ultimate Beneficial Owner (UBO). Mr. Moreno López, a resident of Spain (passport **PAU086661**), brings more than **15 years** of experience across land-based and online gaming in Spanish-speaking markets, including leadership of both social and real-money operations. His background spans game planning, licensing processes, commercial strategy and hands-on operational management.

Directors and day-to-day management. To ensure effective governance and professional execution from launch, **Allyant Group B.V.** is appointed as **Managing Director (MD)**, represented by **Mr. Philip M. Humme**, who is responsible for the day-to-day management of the company, regulatory liaison, and delivery of the strategy approved by the Board/UBO. Mr. Moreno López serves as **Chief Operating Officer (COO)** with responsibility for operations, key

performance indicators and vendor coordination. In addition, the COO acts as **Platform Owner**, overseeing GiG and payment providers (PSPs), validating releases, tracking SLAs and escalating incidents to vendors when required. The **Board/UBO** sets strategy, appoints and supervises key function holders, and ensures that Compliance and Responsible Gaming are resourced and independent.

Organizational model (lean, with specialist providers). New Origin B.V. operates a focused structure that combines core internal roles with reputable third-party providers, ensuring substance, clear accountabilities and efficient scaling:

- **Compliance Officer & MLRO – outsourced via Allyant;** the named natural person will be submitted prior to go-live. This role leads the AML/CFT/CFP program (policies, training, KYC/CDD/EDD, sanctions/PEP screening, transaction monitoring and STR/SAR filings). **Reporting lines:** functional to the MD and an **independent line** to the Board/UBO. The CO/MLRO holds no operational duties (no conflicts with UBO/CEO/CFO/COO/Marketing/Tech/CS).
- **Responsible Gaming (RG) Manager – internal** and independent from Marketing/Commercial; functionally aligned with Compliance. Owns RG policy and training, coordinates tools (limits, time-outs, self-exclusions, affordability), and provides quarterly dashboards to Management plus an **annual effectiveness report** to the Board.
- **Customer Support (CS) – 24/7** coverage in **Spanish and English** from Year 1, led by an internal CS Lead and complemented by a **BPO** for nights/weekends and demand peaks. Scripts and sensitive communications are pre-approved by Compliance and RG.
- **Marketing & CRM – external lead/agency.** All campaigns, creatives, affiliate communications and bonus terms require **prior Compliance approval**; the COO provides **final business sign-off** on budget and scheduling.
- **Payments & Risk (governance function) –** daily payment operations (reconciliation T+1, chargebacks/disputes, fraud tuning and acceptance monitoring) are **outsourced under SLAs**. An internal **Payments & Risk Owner** (~0.2 FTE, reporting to the COO) sets thresholds, approves exceptions/refunds above limits, validates PSP/APM onboarding and reviews performance dashboards. The payment **aggregator/gateway executes** the routing and provides reporting, while Payments & Risk defines the rules and controls.
- **Finance & Administration – outsourced to Allyant** (bookkeeping, monthly closes, statutory reporting, integration of payment reconciliations and audit trails), supported by an **internal follow-up owner** to ensure timely approvals and sign-offs.

- **Technology & Security governance** – the COO, as **Platform Owner**, manages vendor governance for GiG/PSPs, release/change control and SLA performance. Configuration changes and privileged access follow least-privilege principles and are logged and retained.
- **Privacy & Security Owner (internal)** – oversees access control, retention and incident response. The company does **not** target EU residents; therefore a DPO is **not** appointed. Data protection follows Curaçao requirements and industry best practices.

GENERAL CONTROLS & DUTIES

The company maintains distinct lines of responsibility and clear reporting to ensure substance and control:

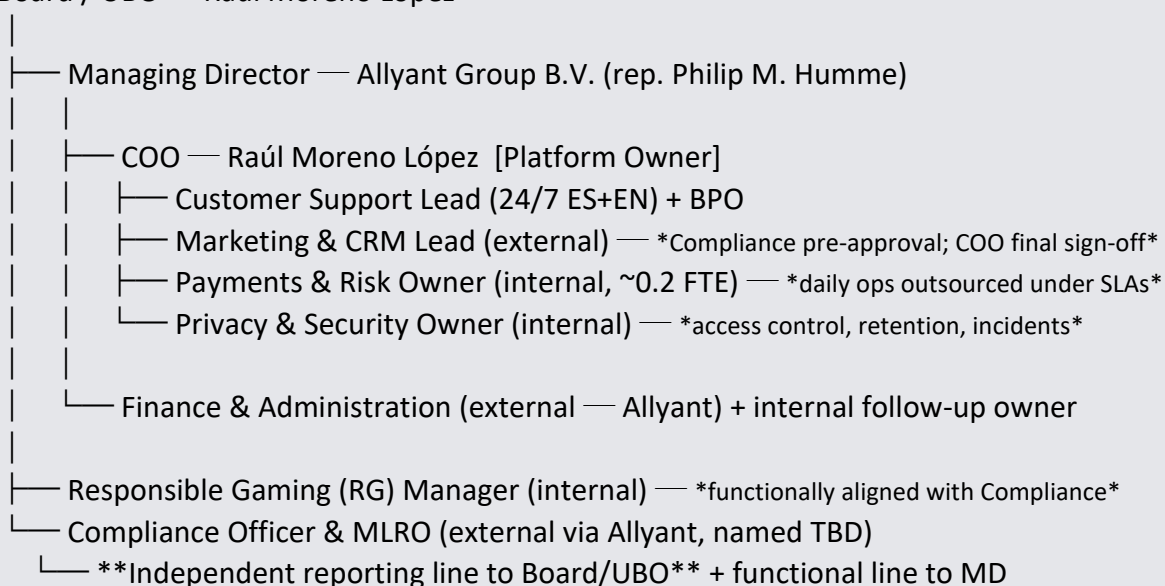
- **Age restrictions & KYC.** Access to gaming services is strictly limited to **18+**. Robust identity verification is applied, with risk-based **CDD/EDD** and ongoing monitoring.
- **Risk-based AML/CFT/CFP.** Senior management and all staff adopt a **risk-based approach** overseen by the Compliance Officer/MLRO. An AML Manual defines policies and procedures for risk assessment, transaction monitoring, escalation and record-keeping; risk assessments are reviewed regularly to remain effective.
- **Responsible Gaming governance.** RG policy, tools, case management and training are operated independently of commercial pressures, with periodic reporting to Management and **annual** reporting to the Board.
- **Marketing controls.** Compliance and RG **pre-approve** all marketing/affiliate materials and promotions before publication; campaign logs and approvals are retained.
- **Payments & fraud controls.** Four-eyes approval applies to high-risk actions (e.g., refunds above thresholds, whitelist changes). Reconciliations are completed T+1, and disputes/chargebacks are handled to defined SLAs; AML suspicions are escalated to the MLRO within set timeframes.
- **Complaints & ADR.** Internal complaint handling follows policy and legal timelines. An **ADR provider [TBD – CGA-certified]** will be appointed promptly once the CGA publishes its authorized list; ADR decisions up to **€10,000** are binding on the operator.
- **Records & audit trails.** Operational, compliance and technical logs (including access and configuration changes, RG interactions, complaints/ADR and payments) are retained for at least **five years**.
- **Outsourcing accountability.** Where functions are outsourced (Compliance/MLRO, CS BPO, Marketing/CRM lead, Payment's operations, Finance/Admin), New Origin B.V.

remains **fully responsible**. Contracts include scope, independence safeguards, SLAs/KPIs, data-protection clauses, breach/termination terms and audit rights.

Corporate Structure — Executive Summary (at a glance):

1) Reporting Tree (independent lines marked):

Board / UBO — Raúl Moreno López



2) Key Roles — status, reporting, and scope:

Role	Status	Primary Reporting	Independent Line	Core Scope
UBO / Board	Internal	—	—	Strategy, appointments, oversight of independence & resources
Managing Director (Allyant / Philip M. Humme)	External (designated natural person)	Board/UBO	—	Day-to-day management, regulatory liaison, execution of strategy
COO (R. Moreno)	Internal	MD	—	Operations & KPIs; Platform Owner (GiG/PSPs governance, releases, SLAs, incident escalation)

Role	Status	Primary Reporting	Independent Line	Core Scope
Compliance Officer & MLRO [TBD]	External (Allyant)	MD (functional)	Board/UBO	AML/CFT/CFP program, KYC/CDD/EDD, sanctions/PEP screening, monitoring, STR/SAR
Responsible Gaming Manager (RG)	Internal	Compliance (functional)	Board (annual report)	RG policy & training; limits/time-outs/self-exclusions/affordability; case management; dashboards
Finance & Administration	External (Allyant)	MD/COO	—	Bookkeeping, monthly closes, statutory reporting; integrates payment reconciliations & audit trails
Marketing & CRM Lead	External	COO	—	Acquisition & retention; always after Compliance/RG pre-approval of materials
Customer Support Lead + BPO	Mixed	COO	—	24/7 support in Spanish & English ; scripts & sensitive replies pre-approved by Compliance/RG
Payments & Risk Owner	Internal (~0.2 FTE)	COO	—	Thresholds/rules, high-value refunds (four-eyes), PSP/APM onboarding, KPIs; daily ops outsourced
Privacy & Security Owner	Internal	COO	—	Least-privilege access, retention (≥5 years), incident response; vendor security governance

3) Approval Flows (CGA-critical):

- **Marketing / Affiliates: Compliance & RG pre-approval** → **COO final business sign-off** → publication (all approvals logged ≥ 5 years).
- **Payments / High-value refunds & whitelists:** Provider proposal → **Payments & Risk Owner** validates → **four-eyes control** (Owner + COO/Finance) → execution.
- **AML Suspicion (KYT/monitoring):** Ops/provider escalates → **MLRO** assesses → **STR/SAR** if warranted; records retained ≥ 5 years.
- **Complaints** → **ADR:** CS logs and resolves internally (per policy) → if unresolved within timelines, refer to **ADR [TBD – CGA-certified]** (binding ≤ **€10,000**).

4) Independence & Segregation Rules:

- **Compliance/MLRO:** no operational roles; **independent line to the Board/UBO**; full, unrestricted access to systems and logs.
- **Responsible Gaming:** independent from Marketing/Commercial; functionally aligned with Compliance; **annual effectiveness report** to the Board.
- **Four-eyes principle** on high-risk actions (e.g., high-value refunds, whitelist changes, critical config).
- **Outsourcing accountability:** where functions are outsourced (Compliance/MLRO, CS BPO, Marketing/CRM lead, Payments ops, Finance/Admin), **New Origin B.V. remains fully responsible**. Contracts include scope, independence safeguards, SLAs/KPIs, data-protection clauses, breach/termination terms, and audit rights.
- **Records & audit trails:** operational, compliance, and technical logs (access/config changes, RG interactions, complaints/ADR, payments) retained for **≥ 5 years**.

This structure provides clear accountability, preserves the **independence of Compliance and RG**, and ensures each function has the **substance, expertise and controls** required for effective and compliant operations.

COMMERCIAL STRATEGY

MARKETING PLAN

To begin with, our strategy in selected Hispanic America countries, like Chile, involves collaborating with influential individuals on YouTube. These influencers will showcase our platform, create videos of their gameplay, and provide explanations to attract potential users. Additionally, we intend to leverage SEO services, affiliate marketing, and PPC services to increase our visibility. Furthermore, we will utilize email promotions and mobile marketing techniques to target and engage customers, capitalizing on the growing user base.

Based on the user activity logs from Hispanic America countries, including Chile, we will gradually expand our marketing efforts to include India and Southeast Asian countries. By analyzing the behavior of users from these regions, we will identify opportunities to penetrate these markets effectively.

In line with our expansion plans, we will broaden our user base by introducing alternative cryptocurrencies as additional payment methods, expanding beyond BTC and Ethereum. This will enable us to cater to a wider range of users and accommodate their preferred payment options.

PROBLEM WORTH SOLVING

The substantial profit margins observed in the online betting industry indicate a promising opportunity for the expansion of such services. While there are no prominent regional operators currently established as industry leaders, the largest and most renowned platforms are predominantly located in Europe. As a smaller operator, our strategy entails commencing operations in specific Hispanic America countries where we possess extensive knowledge. We will gradually broaden our market presence while focusing on providing services in languages spoken by our targeted Hispanic America user base. Additionally, we will continuously offer captivating games that resonate with their preferences and diligently expand the range of convenient payment options available to them.

OUR SOLUTION

Drawing upon our expertise in managing and promoting casinos, we intend to capitalize on the influence of reputable individuals who have a strong presence in the targeted region. In addition, we aim to engage communities centered around live casino and sports betting to attract users effectively. To ensure compliance and adherence to legal requirements, we will implement geo-blocks in specific regions, including Australia, Belgium, the Dutch Caribbean, the Netherlands, the United States, France, North Korea, Spain, Syria, Israel, and Iran. Our marketing efforts will be focused solely on the countries we have strategically targeted, aligning with our objective to actively engage with these specific markets.

OUR ADVANTAGES

Our team is composed of experienced professionals, each contributing unique strengths to the operation and growth of New Origin.

Leading our operations is a Chilean Director of Operations, who will be responsible for managing day-to-day activities and spearheading the company's expansion in our initial target market. She has successfully fulfilled this role for several years in other online gaming platforms, bringing a strategic and practical approach to our launch and early-stage growth.

Our Service Planner brings over 15 years of industry experience, having worked as both a creator and analyst within the gaming sector. His deep understanding of product development and user engagement ensures a well-rounded and appealing offering for our users.

The Client Developer comes with a strong background in the land-based gaming sector. His insight into player behavior and motivations is rooted in the belief that there is a real person behind every user, which helps us design intuitive, player-focused experiences.

Our Marketer, although relatively new to the iGaming sector, has a proven track record in both traditional and digital marketing. With experience working for major multinational companies, he brings a data-driven and brand-oriented mindset to our promotional strategies.

For the technological infrastructure—including platform, game providers, and payment solutions—we have partnered with some of the most reputable companies in the market. This ensures a smooth, secure, and enjoyable user experience from day one.

FINANCIAL

Currency: EUR • **Horizon:** 3 years • **Launch:** Q4 2025 • **Opening Cash:** €100,000 (Shareholder Loan)

Introduction

The financial forecast of the company is based on a careful analysis of our product offering, target markets, and projected user acquisition strategy. We have combined historical benchmarks from comparable operators with conservative assumptions for Year 1, gradually scaling marketing and operational intensity as the platform gains traction.

The company will be financed initially through a **shareholder loan** provided by the majority shareholder and UBO, **Raúl Moreno López**, amounting to **€100,000**.

This structure ensures robust liquidity during the launch and early growth phases, allowing the company to focus on player acquisition and operational excellence without cash flow constraints.

Initial Investment Breakdown

Overview. The Company is funded at launch with a €100,000 shareholder loan.

The terms of this financing are:

- **Amount:** €100,000
- **Structure:** Shareholder loan
- **Term:** 36 months
- **Grace period:** up to 36 months (no repayment during the first three years)

Funds are allocated to complete regulatory and technical setup, cover first-month operating outlays as budgeted, and preserve liquidity for payment-provider reserves and early working-capital needs.

Allocation (committed pre-launch and deployed in the first month):

Category	Purpose & basis	Amount
First-month operating outlays (per first-month P&L)	Personnel	€17,500.00
	Technology & Platform	€9,281.22
	Curaçao Gaming License	€22,100.00
	Customer Support	€1,920.25
	External/Consulting	€3,000.00
	Marketing	€10,000.00
	Payment commissions	€3,556.02
	Other	€320.04
PSP float & rolling reserve	Pre-funds for withdrawals, settlement lags and dispute coverage with payment providers.	€12,000.00
Working-capital buffer	Contingency for timing gaps (collections vs. payouts), early chargebacks and vendor cut-offs during ramp-up.	€20,322.46
Total		€100,000.00

Deployment timeline.

- Pre-launch: Regulatory filings and technical onboarding committed and scheduled for go-live; included within the lines above.
- First month of operations: The loan funds €67,677.54 of operating cash needs, places the PSP float (€12k), and retains a buffer (€20,322.46) for liquidity management.

Cash-management note. The PSP float and buffer are monitored weekly. If actual reserves or withdrawal volumes increase, a portion of the buffer will be reallocated to PSP float; if they are lower than expected, surplus cash will support user acquisition in the following month or remain as working capital.

Result. All first-month costs are funded, setup milestones remain on schedule, and sufficient liquidity is preserved to manage settlement cycles—supporting a controlled ramp into the Year-1 plan.

Forecast Overview

We expect to launch in **Q4 2025**. Our strategy is to remain cautious in Year 1, testing player reception and retention, followed by a stronger marketing push in Years 2 and 3. This phased approach supports sustainable growth in revenues, user base, and profitability.

EUR	Year 1	Year 2	Year 3
GGR Total	€567,180	€788,880	€1,119,810
Total Expenses	€471,302	€613,525	€843,560
Net Profit	€95,877	€175,355	€276,249
Net Margin	16.9%	22.2%	24.7%
Closing Cash	€195,877	€366,190	€559,420

Revenue Detail (GGR)

Revenue is expected to derive equally from two verticals:

- **Casino (Slots, Live)** – 50% of GGR
- **Sportsbook** – 50% of GGR

	Year 1	Year 2	Year 3
<i>Casino – GGR</i>	€283,590	€394,440	€559,905
<i>Sportsbook – GGR</i>	€283,590	€394,440	€559,905
Total GGR	€567,180	€788,880	€1,119,810

Player KPIs:

- Active players (cumulative): **1,247** (Y1) • **1,312** (Y2) • **2,315** (Y3)
- Average GGR per player: **€455** (Y1) • **€601** (Y2) • **€484** (Y3)

Expenses Breakdown**Operating Expenses (OPEX):**

Category	Year 1	Year 2	Year 3
<i>Staff</i>	€120,000	€210,000	€265,000
<i>Technology & Platform</i>	€82,241	€114,388	€164,481
<i>Licensing & Regulation</i>	€61,700	€61,700	€61,700
<i>Customer Support</i>	€17,015	€23,666	€34,030
<i>External Services & Consulting</i>	€36,000	€36,000	€48,000
<i>Other</i>	€2,836	€3,944	€5,672
Total OPEX	€319,792	€449,698	€578,883

Marketing:

Category	Year 1	Year 2	Year 3
• Affiliates	€54,000	€54,000	€90,746
• Digital Advertising (PPC/SEO/Display)	€30,000	€30,000	€50,414
• Bonuses & Promotions	€24,000	€24,000	€40,332
• Content	€8,400	€8,400	€14,116
• Brand & Sponsorships	€3,600	€3,600	€6,050
Total Marketing	€120,000	€120,000	€201,658

Financial / Payment Processing:

Category	Year 1	Year 2	Year 3
Payment Commissions	€31,510	€43,827	€63,019
Debt & Interest	€0	€0	€0

P&L Totals:

	Year 1	Year 2	Year 3
Total Expenses	€471,302	€613,525	€843,560
Net Profit	€95,877	€175,355	€276,249

RATIOS & PERFORMANCE INDICATORS

OPEX/GGR: **56.4% → 51.7%**

Marketing/GGR: **21.2% → 18.0%**

Payment fees/GGR: steady at **5.6%**

Net margin: improves from **16.9% (Y1) to 24.7% (Y3)**

ROI: increases from **20.3% to 32.7%**

CONCLUSIONS

The forecast highlights a **consistent growth trajectory** with sound financial logic underpinning both revenue and expense projections:

- **Revenue Growth:** The increase in revenues is justified by the company's progressive market entry strategy. Year 1 is conservative, as the platform will use its initial months to test product-market fit, refine acquisition funnels, and build brand awareness. From Year 2 onwards, stronger marketing investment and positive user feedback will accelerate player acquisition, leading to higher GGR.
- **Operating Expenses:** As a newly established company, expenses will grow in line with operational needs. Staff costs rise organically each year, reflecting the strategic decision to strengthen the workforce gradually in customer support, compliance, and technical operations. This ensures product quality and regulatory adherence while avoiding premature overstaffing.
- **Marketing Investment:** The forecasted marketing spend is consistent with the company's life cycle. In Year 1, spend is kept conservative to validate acquisition channels. From Year 2 onwards, as conversion data improves and retention stabilizes, the company will increase spend strategically, leveraging affiliates and performance marketing to scale cost-effectively.
- **Technology & Platform Costs:** These increase proportionally to revenues, since higher transaction volumes drive higher platform fees. This is aligned with scalable SaaS models typical of the iGaming industry.
- **Profitability and Margins:** Net margin improves year over year (16.9% → 24.7%), reflecting economies of scale, more efficient marketing spend per active player, and controlled overhead growth. The ROI growth trajectory (20.3% → 32.7%) demonstrates the increasing efficiency of capital deployment.
- **Liquidity:** Thanks to the shareholder loan with a 36-month grace period, the business is secured with sufficient liquidity during its crucial early years, avoiding cash flow strain and enabling reinvestment in growth.

In summary, the financial model presents a balanced approach: conservative at launch, scaling progressively, with justified expense increases tied directly to business growth milestones. This ensures the company not only reaches profitability in its first year but also strengthens its long-term sustainability and competitiveness in the market.

TECHNOLOGY, SOFTWARE & PROVIDERS

SOFTWARE AND PAYMENT ARCHITECTURE

The games/services that will be provided will be mainly Sports betting, slots & live casino. These will be provided through the platform/software provider Gaming Innovation Group (GiG). To stay competitive in this fast-growing era and to reach end users who prefer using Crypto Currency like (BTC, ETH etc) as a means of payment we have chosen to adopt on-line payments methods (safe and secured).

3RD PARTY PROVIDERS

- Platform:
 - GiG Software CoreX
- Games:
 - Alea
- Betting:
 - GiG Software SportX
- Payments:
 - Merchant Connect
- Affiliate:
 - Netrefer
- Age Verification:
 - Agechecked
- EMS Platform:
 - Sendgrid
- LifeChat:
 - Zendesk