

Gamba Business Plan

Overview

Founded in early 2024, Gamba gained spotlight in the market as an innovative online gambling platform utilizing the vast tools available from the Crypto Market to ensure a unique and seamless gaming experience. Up to date, Gamba has been operating under its so considered 'beta' version, utilizing an Anjouan License. The founder's plan was to build a solid product, capable of scaling. Part of this scaling plan included obtaining a more reputable license (such as Curaçao) and additional C-Level employees to run a successful enterprise. In addition to this, the founder will be unleashing some of its shares to raise funds to successfully execute his scaling plan after obtaining the new License.

Management Structure

The Management team consists of the following people and key roles:

- **Pawel Krzyspiak, CEO (Chief Executive Officer) and COO (Chief Operating Officer):** Sets the overall vision and strategy; makes major business decisions and represents the company publicly.
Runs daily operations, coordinates departments and ensures smooth execution of business processes.
- **Daniel Mukhamadeliyev, CTO (Chief Technology Officer):** Oversees the product development, tech stack, platform development, IT infrastructure and cybersecurity.
- **Alex Lo, CFO (Chief Financial Officer):** Manages the casino's finances; budgeting, financial planning, reporting and ensuring profitability.
- **Frederico Perez, Compliance Officer:** Ensures the casino follows all legal, regulatory and licensing requirements, including anti-money laundering (AML) rules and the overlooking the Responsible Gaming (RG) Policy and implementation thereof. Compliance Officer will act independently from management to ensure the above is enforced.

Business Forecast and Intended Strategy

As an already profitable and most importantly, reputable brand, the new company will focus solely on maintaining and improving this reputation by giving the same level of service that customers are accustomed to, whilst implementing stricter measures to ensure responsible gaming.

Long term strategy includes more aggressive marketing campaigns into emerging markets however, company will hold steady for now whilst both itself and its customers get accustomed to new requirements set forth by the new Licensor.

Although growth is the main goal, company feels that this goal should be accomplished at a steady pace whilst remaining compliant to laws and guidelines set forth by its regulators.

As annex to this Business Plan you will find a financial forecast.

Key Supplier and Material Dependencies

- Software is Proprietary but not yet TradeMark Registered. This will happen done in the coming months.
- Software Provider; Evolution, Hacksaw, Softswiss. Currenty many games obtained through various aggregators, however, once new license is obtained, company can negotiate with various providers and getting games directly for better rates. Full list will be provided to CGA and updated on regular basis
- Own Games, Gamba Originals: currently operating using provably fair, until such time CGA appoints approved RNG Providers in addition to further guidelines as to limitations of Provably Fair Method.
- Payment Processing: TBD
- Banking: Xace, Valyuz
- Risk Management: Seon, Chainanalysis, and internal proprietary tools and checks)
- Web hosting: Amazon Web Services
- CDN: Cloudfare
- E-mail hosting: Google

Risk Evaluation and management

The casino adopts a structured risk assessment framework compliant with Curaçao Gaming Authority requirements and international best practices.

Key Risk Areas Includes but not limited to;

- Non-compliance with CGA license obligations, AML/CFT laws,
- System downtime, player fraud, bonus abuse,
- Breaches affecting player data or funds,
- Misreporting, insolvency, delayed payouts,
- Brand reputation damage from player complaints or regulatory sanctions.

Assessment Approach

Risks are evaluated on likelihood and potential impact. Business units perform weekly self-assessments for the first Quarter of operations, Bi-weekly assessment for the second quarter, Monthly assessment for the third quarter and Bi-Monthly after that.

New risks (e.g., tech integrations, new markets) are added as they arise.

The Business maintains preventive and detective controls across all business and operational functions including but not limited to;

- Enhanced due diligence and ongoing monitoring,
- Real-time transaction flagging and SAR filing,
- Encryption, firewalls, secure coding practices and ISO-aligned IT policies,
- Multi-step player verification (Risk Based approach),
- Withdrawal velocity checks and limits on bonus payouts,
- Segregated player funds
- RNG certification and regular software testing

Audit

Internal Audit will be Conducted bi-annually to assess the effectiveness of internal controls and covers areas such as:

- Payment system integrity
- Compliance with AML/KYC obligations
- Bonus system fraud detection
- Player complaints handling

Findings are reported to the Management of the Company.

External Audit (Future plans)

- Annual financial audits by a **licensed accounting firm**.
- Objective: Confirm financial integrity, player fund segregation, and compliance with local regulations.
- May include:
 - Financial statement audits
 - System and organizational controls (SOC) reporting
 - Regulatory compliance verification, as required by the CGA.

Alignment with Curaçao Licensing Expectations

This risk management framework is designed to meet the guidelines provided by the Curaçao Gaming Authority and AML/CFT applicable laws. It demonstrates a robust governance model, ensuring transparency, integrity and effective control over all regulated activities.

KPIs and Policies

Besides all keywords that are obvious for the gambling industry, In summary, Short term KPI would be to retain users whilst remaining compliant to all requirements set forth by new License, this to increase overall reputation.

Longterm, maintain same level of Service and trust, on a much larger scale.

To make all the above possible, company will need strict policies and guidelines, which will be provided during the application process.