

Gamba Business Plan

Overview and Proprietary IP

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 with full proprietary rights of the Brand under it's 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.

On the next page you will find the financial forecast.

GMB Entertainment Financial Projection (Months 1–36)

Month	FTDs	Active Customers	Retained Customers	NGR (Low)	NGR (High)	Costs	Profit (Low)	Profit (High)
Month 1	20000.0	300	240	75687.0	80068.0	58000	17687.0	22068.0
Month 2	20000.0	350	280	78650.0	82064.0	58150	20500.0	23914.0
Month 3	20000.0	400	320	80686.0	84061.0	58300	22386.0	25761.0
Month 4	20000.0	450	360	82642.0	86058.0	58450	24192.0	27608.0
Month 5	20000.0	500	400	83651.0	88054.0	58600	25051.0	29454.0
Month 6	20000.0	550	440	85614.0	90051.0	58750	26864.0	31301.0
Month 7	20000.0	600	480	87686.0	92047.0	58900	28786.0	33147.0
Month 8	20000.0	650	520	90637.0	94044.0	59050	31587.0	34994.0
Month 9	20000.0	700	560	93601.0	96041.0	59200	34401.0	36841.0
Month 10	20000.0	750	600	94607.0	98037.0	59350	35257.0	38687.0
Month 11	20000.0	800	640	95662.0	100034.0	59500	36162.0	40534.0
Month 12	20000.0	850	680	97333.0	102030.0	59650	37683.0	42380.0
Month 13	21000.0	900	720	75989.75	80388.27	59800	16189.75	20588.27
Month 14	21000.0	950	760	78964.6	82392.26	59950	19014.6	22442.26
Month 15	21000.0	1000	800	81008.74	84397.24	60100	20908.74	24297.24
Month 16	21000.0	1050	840	82972.57	86402.23	60250	22722.57	26152.23
Month 17	21000.0	1100	880	83985.6	88406.22	60400	23585.6	28006.22
Month 18	21000.0	1150	920	85956.46	90411.2	60550	25406.46	29861.2
Month 19	21000.0	1200	960	88036.74	92415.19	60700	27336.74	31715.19
Month 20	21000.0	1250	1000	90999.55	94420.18	60850	30149.55	33570.18
Month 21	21000.0	1300	1040	93975.4	96425.16	61000	32975.4	35425.16

Month	FTDs	Active Customers	Retained Customers	NGR (Low)	NGR (High)	Costs	Profit (Low)	Profit (High)
Month 22	21000.0	1350	1080	94985.43	98429.15	61150	33835.43	37279.15
Month 23	21000.0	1400	1120	96044.65	100434.14	61300	34744.65	39134.14
Month 24	21000.0	1450	1160	97722.33	102438.12	61450	36272.33	40988.12
Month 25	22050.0	1500	1200	76293.71	80709.83	61600	14693.71	19109.83
Month 26	22050.0	1550	1240	79280.46	82721.83	61750	17530.46	20971.83
Month 27	22050.0	1600	1280	81332.78	84734.83	61900	19432.78	22834.83
Month 28	22050.0	1650	1320	83304.46	86747.84	62050	21254.46	24697.84
Month 29	22050.0	1700	1360	84321.55	88759.84	62200	22121.55	26559.84
Month 30	22050.0	1750	1400	86300.28	90772.85	62350	23950.28	28422.85
Month 31	22050.0	1800	1440	88388.89	92784.85	62500	25888.89	30284.85
Month 32	22050.0	1850	1480	91363.55	94797.86	62650	28713.55	32147.86
Month 33	22050.0	1900	1520	94351.31	96810.86	62800	31551.31	34010.86
Month 34	22050.0	1950	1560	95365.37	98822.86	62950	32415.37	35872.86
Month 35	22050.0	2000	1600	96428.83	100835.87	63100	33328.83	37735.87
Month 36	22050.0	2050	1640	98113.22	102847.87	63250	34863.22	39597.87

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. Currently 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.

Excluded territories.

Although not all mentioned jurisdiction has been geo-blocked yet, company will restrict users from signing up from restricted jurisdictions, including but not limited to following countries

- Afghanistan
- Aland Islands
- American Samoa
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Barbados
- Belize
- Benin

- Bhutan
- Bonaire (including Sint Eustatius and Saba)
- Bouvet Island
- British Indian Ocean Territory
- Burundi
- Cape Verde
- Central African Republic
- Chad
- Cocos (Keeling) Islands
- Cook Islands
- Comoros
- Congo, Democratic Republic of
- Congo, Republic of
- Crimea
- Cuba
- Curacao
- Djibouti
- Donbas
- Equatorial Guinea
- Eritrea
- Fiji
- French Guyana
- French Polynesia
- French Southern Territories
- Gabon
- Gambia

- Grenada
- 40. • Guadeloupe
- Guam
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Holy See (Vatican City State)
- Iran
- Iraq
- Ivory Coast (Côte d'Ivoire)
- Kherson
- Kiribati
- Kosovo
- Kyrgyzstan
- Lao People's Democratic Republic
- Lebanon
- Liberia
- Libya
- Macao
- Malawi
- Mali
- Marshall Islands
- Martinique
- Mauritania

- Mayotte
- Micronesia, Federated States of
- Montserrat
- Myanmar
- Nauru
- Netherlands
- New Caledonia
- Niger
- Niue
- Norfolk Island
- North Korea
- Northern Mariana Islands
- Palau
- Palestinian Territory
- Papua New Guinea
- Pitcairn
- Puerto Rico
- 41. • Rwanda
- Saint Barthelemy
- Saint Helena
- Saint Kitts and Nevis
- Saint Lucia
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Sao Tome E Principe

- Seychelles
- Sint Maarten
- Sierra Leone
- Solomon Islands
- Somalia
- South Georgia and the South Sandwich Islands
- Sudan (North and South)
- Suriname
- Svalbard and Jan Mayen
- Syria
- Tajikistan
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- United States of America
- United States Minor Outlying Islands
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Venezuela
- Wallis and Futuna
- Western Sahara

- Western Samoa
- Yemen
- Zaporizhzhia
- Zimbabwe