
Business Plan

Company

Hemera Global Group N.V.

Hoogstraat 18, Willemstad,
Curaçao

April 1, 2024

Executive Summary	5
Chapter 1	7
Company Overview	7
Mission.....	7
Vision	7
Goals and Objectives.....	7
Business Philosophy	8
Ownership.....	8
Start-up Overview.....	9
Chapter 2	10
Product and Services	10
<i>Market leverages.....</i>	<i>10</i>
Sportsbook	10
Betting Types	13
Live betting.....	14
Games	16
Responsible Gaming.....	18
Player Security	18
Game Security.....	18
Chapter 3	19
Market Analysis	19
<i>Product Launch and Market Capture.....</i>	<i>19</i>
Market Analysis	19
Product User-generated products are becoming an increasingly integral part of the global gambling landscape, in many cases offering customers much better odds, more transparency, and an experience that feels intuitively fairer.	29
Features and Benefits.....	29
Customers.....	31
Competition.....	35
Niche	36

Chapter 4	36
Strategy and Implementation	36
<i>How to Enter the Market.....</i>	<i>36</i>
Positioning.....	38
Competitive Edge	38
Marketing Strategy	39
Advertising	40
Promotional Budget	42
Chapter 5	43
Operations Plan	43
Operations	43
Legal Environment	43
Personnel	43
Partners	44
Chapter 6	45
Management & Organisation	45
<i>Online Gambling Experience.....</i>	<i>45</i>
Professional and Advisory Support.....	46
Chapter 7	47
Financial Plan.....	47
<i>3 Year Projections</i>	<i>47</i>
Projected Cash Flow.....	50
Break-Even Analysis	51
Sensitivity Analysis.....	52
Customer Support and Customer Complaints Handling.....	52
Data Protection and Privacy Policy.....	53
1. Player Protection.....	53
2. Responsible Gaming	53
Registration checks and Know Your Customer procedures.....	54
Anti-Money Laundering.....	56

APPENDICES	58
• APPENDIX A – Terms & Conditions	58
• APPENDIX B – Game Rules	58
• APPENDIX C – Financial Projections	58
• APPENDIX D – Sensitivity Analysis	58
• APPENDIX E – Advertising and Media Policy	58
• APPENDIX F – Age Verification Policy	58
• APPENDIX G – Anti-Bribery and Corruption Policy.....	58
• APPENDIX H – Anti-Money Laundering & Countering the Financing of Terrorism Policy	58
• APPENDIX I – Business Continuity Plan.....	58
• APPENDIX J – Client Segregation of Funds Policy	58
• APPENDIX K – Code of Business Conduct	58
• APPENDIX L – Complaints Handling Policy.....	58
• APPENDIX M – Customer Due Diligence Policy	58
• APPENDIX N – General Data Protection Regulation Policy.....	58
• APPENDIX O – Fraud Prevention Policy	58
• APPENDIX P – Money Laundering/Terrorist Financing Business Risk Assessment	58
• APPENDIX Q – Privacy Policy	58
• APPENDIX R – Reporting Suspicious Activity Policy.....	58
• APPENDIX S – Responsible Gambling Policy.....	58
• APPENDIX T – Risk Matrix/Register	58
• APPENDIX U – Technology Risk Assessment Policy	58
• APPENDIX V – Third Party Supplier Engagements and Due Diligence Policy	58
• APPENDIX W – Whistleblowing Policy	58

Executive Summary

Hemera Global Group N.V. (“**PlaySQR**” or the “**Company**”) is a Curacao entity incorporated on 24/09/2020 in order to apply for an iGaming Curacao Licence (“the “**Licence**”). Hemera Global Group is a premier operator that falls under the brand PlaySQR.com, who will provide first-class entertainment across Sports Betting, Slots and Live Casino to Asia, Latin America and MENA specifically India, Brazil, Thailand and Vietnam (the “**Target Markets**”) for the first year of operation.

The Company is passionate about matching technology with a superior mobile customer experience, to deliver an innovative product to the gaming industry. As part of PlaySQR’s business plan and inception strategy, the Company intends to obtain a Licence to offer a sports led website through its customised Sportsbook product provided by RWB Solutions Limited and also a wide range of casino games supplied by the leading casino suppliers in the industry.

One of Hemera Global Group’s objectives is to ensure that every player has the ultimate experience while playing on www.PlaySQR.com. Players will be able to place wagers on a large number of different game types including slots, virtual table games, live-dealer and sport betting options. This broad range of games will be a significant draw factor to players and PlaySQR expects a great deal of cross-selling between different products, maximising profits and improving player retention.

Whilst the Company does consider itself as a start-up, it will make use of the considerable connections and experience in the online gambling space, that its founder and management team will bring to the table. Proposed revenue streams are based on direct B2C sales as the Company is focusing its immediate attention on its own B2C operations to grow the brand and build a reliable and stand out Sportsbook product with a proven track record.

In order to drive traffic towards the website, Hemera Global Group will undertake marketing efforts across an array of digital marketing channels such as Paid and Search Advertising, Affiliate Marketing, SMM, Influencers, Sponsorships and ASO Advertising. An attractive affiliate program will also be available for those who wish to earn commission on attracting players. The key market advantages are customer-tailored products, AI-driven CRM and CMS tools, and 24x7 superior customer service.

Hemera Global Group believes PlaySQR.com will be profitable and successful for several reasons: the proven performance of the gaming platform software; the development of affiliations and partnerships with major software and services providers of sports odds, stats and data analytics services from the gaming market; the usability of tools; the ability of gaming software to significantly increase customer revenues while enhancing their ability to enhance customer service, improve retention and provide customers with peace of mind.

Hemera Global Group will develop local product propositions matching the requirements of the players in the Target Markets, respectively offering their local languages, local customer service and regional payment solutions. The product will include special sportsbook views

in a European and Asian layout, where odds are displayed in regional formats (Malay, Decimal, Fractions, US odds).

Company Overview

Mission

The mission of PlaySQR is to create and provide outstanding online gambling products and services, aspiring to merge innovation with great customer experience.

We create the greatest mobile gaming experience, with safer gambling at the core of our culture. Our global team who shares a vested interest in the successful deployment of PlaySQR/RegalSQ products and services for the online gambling industry. These talented persons include marketing and digital media experts, gambling specialists, sports betting analytics and traders, online gambling compliance managers and business operations gurus, software developers and third-party solution providers.

Vision

Becoming the best global entertainment service provider. Creating safe player environment and markets that are accessible to players and providers.

Goals and Objectives

As a start-up it will aim to establish a profitable line of business with scalable ROI. PlaySQR aims to grow faster than the market in a profitable and sustainable way in order to provide the best returns possible in the long term.

To that end its activities should focus upon:

- Sharing sports betting information and best practices
- Discovering novel and innovative practices and technologies
- Leveraging its services to match great customer experience through innovating and advanced third-party product integrations
- Providing entertainment to its customers

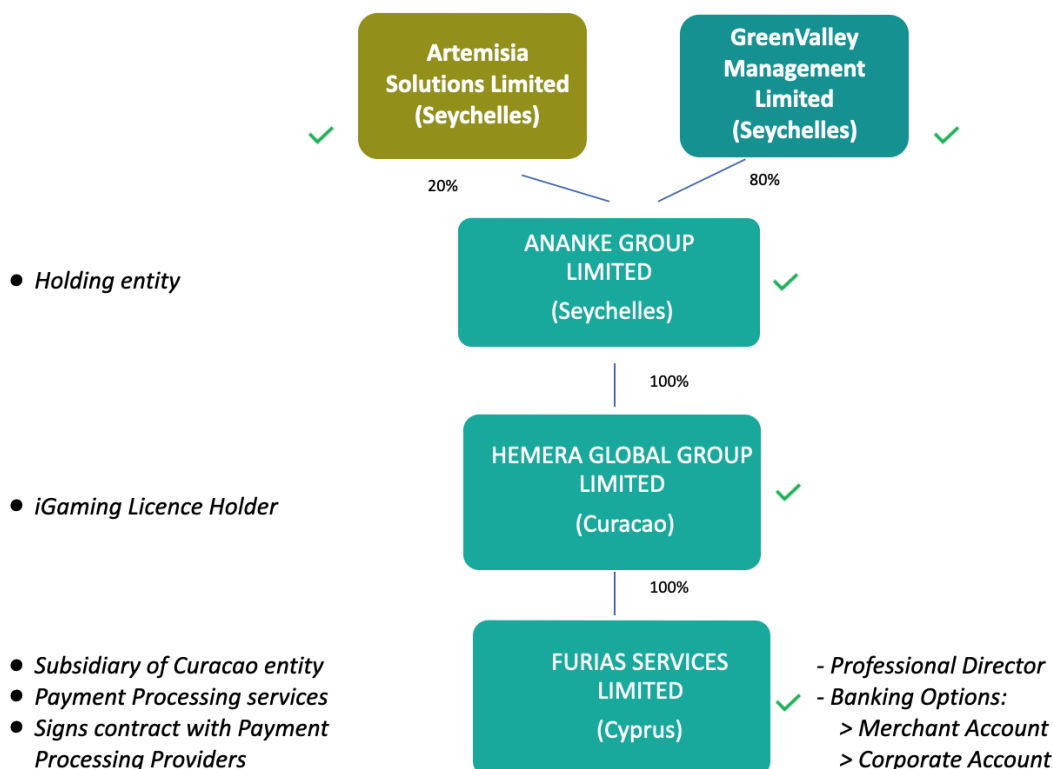
Business Philosophy

PlaySQR business concept is to invest in and manage fast growing companies operating in the online gaming industry.

Ownership

PlaySQR is a privately-held Curacao entity with office in 9 Abraham de Veerstraat, Willemstad, Curaçao with Company Registration number: 155287, holding an online gambling licence Curacao Licence No.: 365/JAZ - Sub-licence GLH-OCCHKTW0710142020. The main beneficiary owner is Ananke Group Limited (100%). Future 3 year plan involves a release of minority stock to be set aside for outside directors which will include legal, marketing and retail resources and expertise.

The company has setup a subsidiary Furius Services Limited, registered at Kalymnou 1, Q Merito Building, Floor 2, Larnaca 6037, Cyprus with company number: HE 416157. The purpose of the subsidiary is to provide payment processing services to PlaySQR/RegalSQ with regards to operations.



Start-up Overview

As outlined, our start-up costs come to \$500,000. These requirements include expenses for the cost of data, white-label software and licensing fees, and first month's salaries. Additional large start-up items include marketing and branding consulting services and costs for the initially outsourced server hosting. Information systems will eventually be brought in-house, dependent upon future development needs and cost analysis. Other usual start-up costs include legal, stationary, and expenses associated with opening our first office. We are in the process of confirming the sourcing of \$100,000 from the company founder and key executives. Based on ongoing discussions, there is also a potential for the sharing of expenses with partners and affiliate organisations.

Based on market research and data, we project that the company will be profitable in its first year. By the end of the third year, investors will receive the return of their investment.

The tables below show the details of our start-up requirements and funding sources. Short-term assets to be purchased include office furniture, servers, phones, and other overheads.

Chapter 2

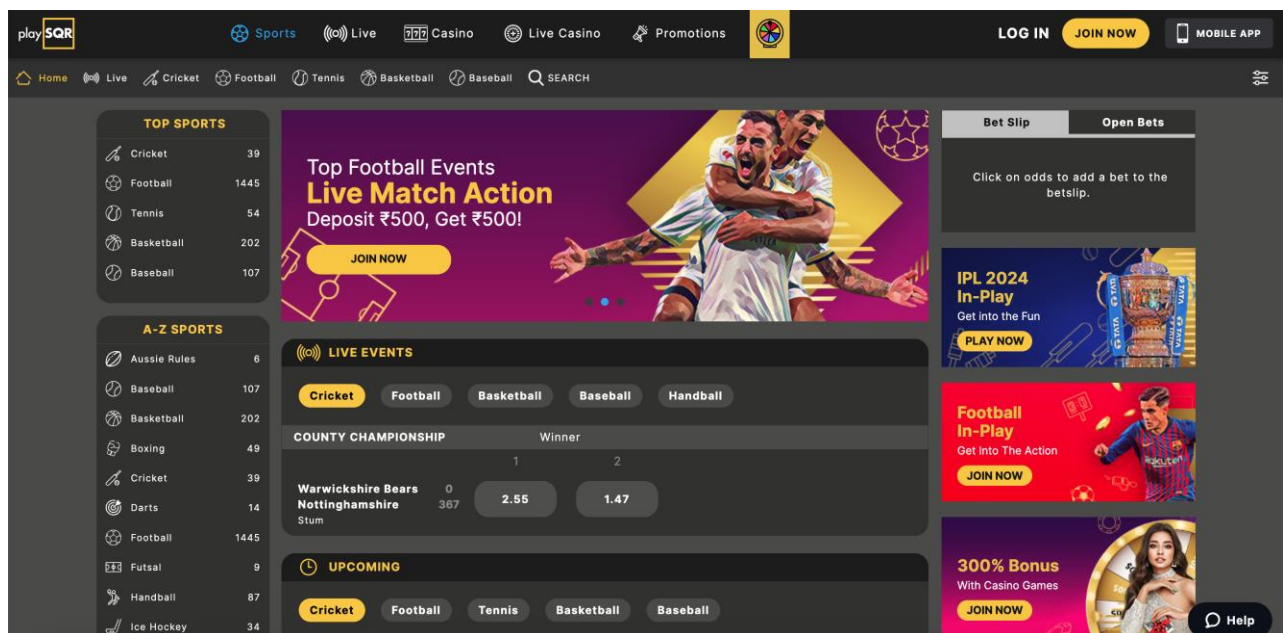
Product and Services

Market leverages

The company is using its combined market knowledge and experience to offer the most popular and relevant sports betting and digital casino products to the Target Markets. These include a comprehensive array of Sportsbook, RNG and Live Casino products provided via a fully customizable solution.

Sportsbook

Hemera Global Group will focus on a sports-led strategy, where recreational and more advanced players are welcomed. The product is mobile friendly which offers competitive odds to other bookmakers operating in the target markets and for some sports, the Company will provide propositions close to sports betting exchanges.



Hemera Global Group will offer more than 50 sports on PlaySQR.com, these will include Football, Tennis, Basketball and Cricket. Betting types will range from Singles, to Handicaps to Multiples and Odds formats come in decimals, American, Hong Kong, Malay and Indonesia; users can also customise the display to their personal preference.



Hemera Global Group has a superb live betting platform for those who enjoy betting live on football leagues such as the Premiership, Bundesliga, Seria A, La Liga, UEFA Europa League, UEFA Champions League and many more international football events. Based on players preferences the Company will also offer not only the traditional match result (1X2), Asian handicaps and over under goal totals but also on diverse range of deep markets.



Where PlaySQR football in-play bets really excelled is in terms of individual player markets. Not only players can bet on both match result and team performance markets, but they can also bet in play on first goalscorer, anytime goalscorer, next goalscorer, and last goalscorer. Of these the most popular is typically the next goalscorer market. It certainly adds to the drama when watching a match live. This abundance of markets will allow our players to get the full betting experience of both pre-match and in-play wagering.

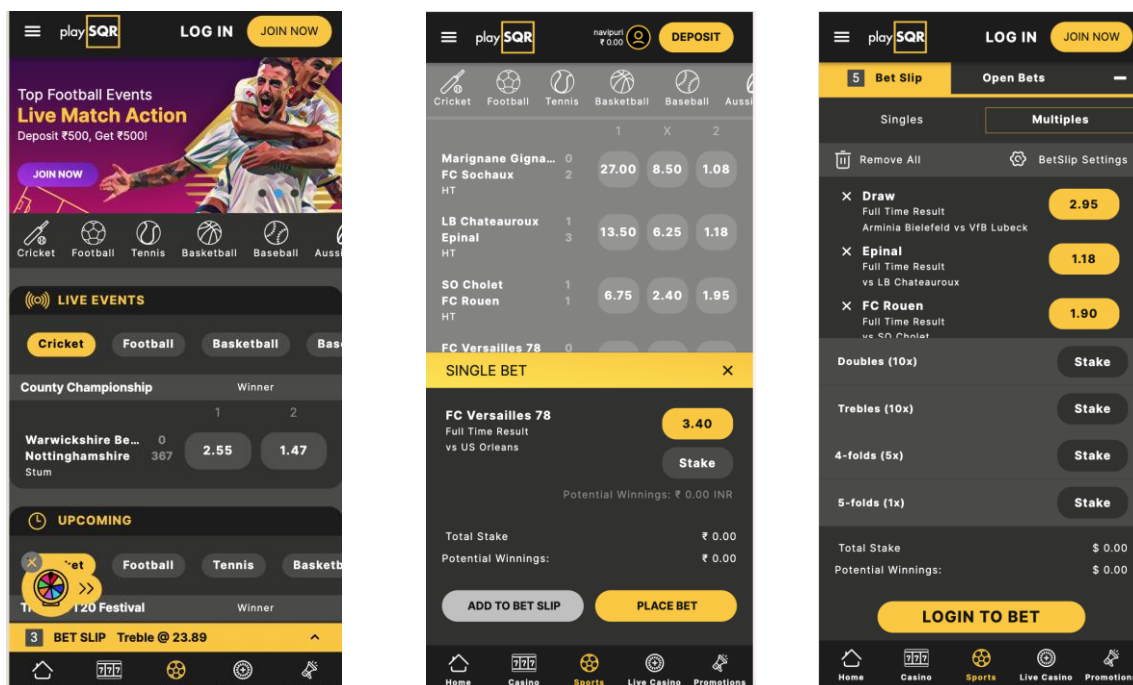
Another big differentiator will be our focus on horse racing markets both in-play and pre-play by customers can enjoy top-shelf antepost prices on major events all year round. Popular racing futures include the Melbourne Cup, the Cox Plate and the Golden Slipper; the Grand National and the Cheltenham Festival races in the UK; the Breeders Cup and Triple Crown meets in the USA; and L'Arc de Triomphe in France.

On tennis, our sportsbook extends beyond major ATP / WTA tennis tournaments such as the US Open, Wimbledon, French Open and Australian Open Grand Slams and will also cover smaller regional tennis tournaments. We also intend to provide other sports selection and diverse markets on American sports leagues such as MLB, NFL, NHL, NBA and NCAA.

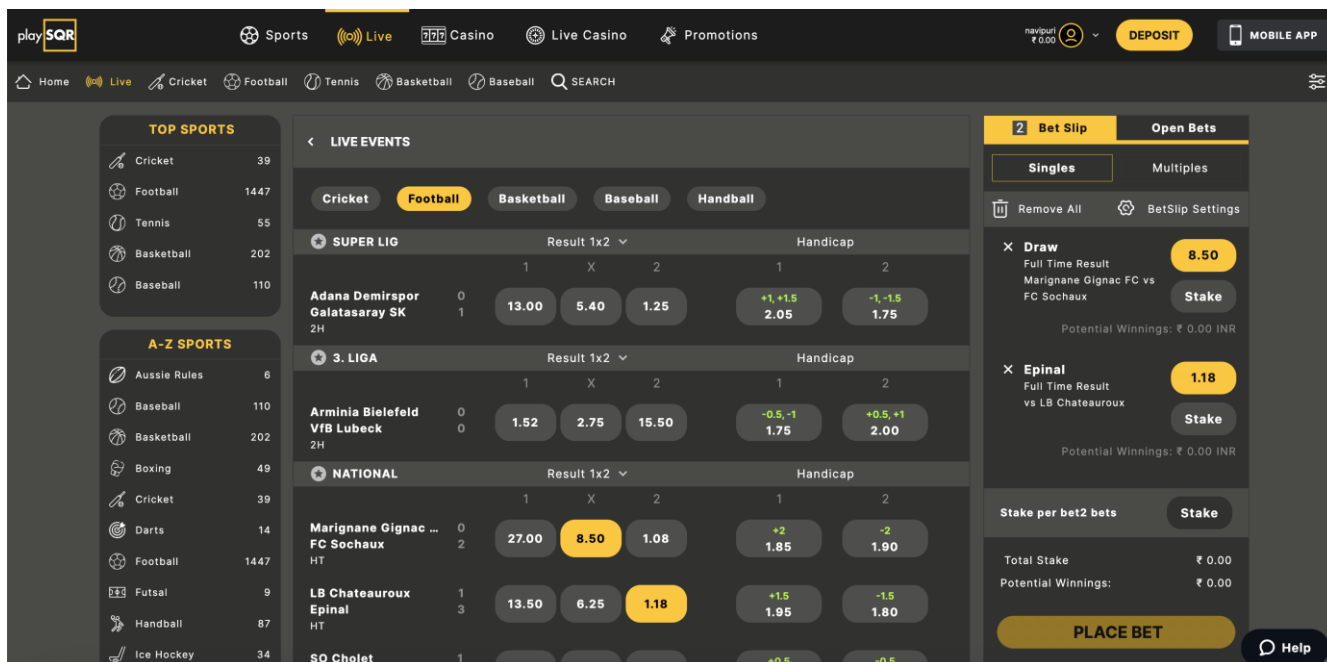
Betting Types

Single bets: Customers place one bet on one market of one specific event. The customers' possible winnings are calculated by multiplying the stake and the odds of the chosen betting option.

Multiple bets: Customers can play several betting options as a combined bet. The odds of all included bets are multiplied. Multi bets enable players to achieve higher winnings but contain an accordingly higher risk. Currently multi bets can be placed including up to 10 picks. Every bet can be combined, some bets can only be placed as multi bets in combination with specific other bets, others cannot be combined at all, certain bets can only be concluded as a part of multi bets.

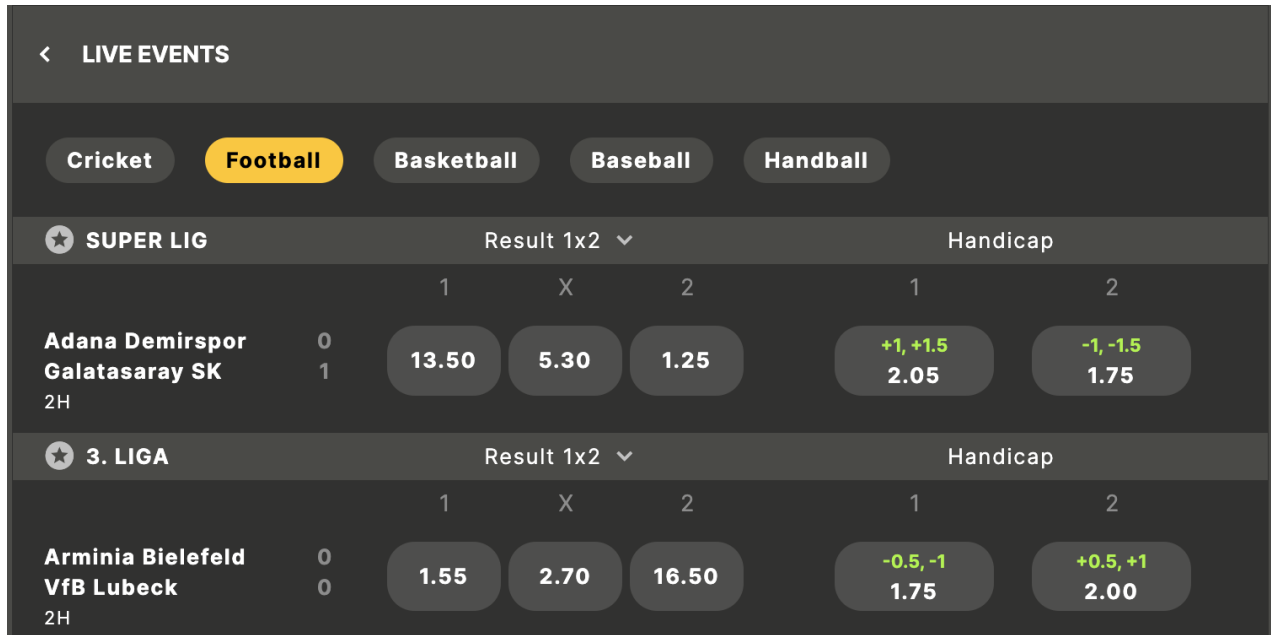


In the example above the customer can easily navigate from sport to specific even, and click on single or multiple selection to pick preferred bet option. User needs to be logged in and with available balance to place minimum bet.



Live betting

Players can make selections on markets available for live betting by selecting first a country and specific league. The interface is split into individual flexible panel interface which enable



the users to add and remove panels as needed.

Central panel section displays complete list of available markets for the specific event. Specific information on individual markets is displayed on separate tab sections. Last column displays additional available markets for that specific event (i.e.

FOOTBALL / SUPER LIG

Adana Demirspor

0 - 1

Galatasaray SK

2H

AllMainSpecials

Search

Full Time Result

Adana Demirspor

Draw

Galatasaray SK

14.00

5.30

1.22

Asian Handicap (0:1)

Adana Demirspor

Galatasaray SK

+0.5, +1

3.40

-0.5, -1

1.30

+1

2.80

-1

1.42

+1, +1.5

2.05

-1, -1.5

1.75

+1.5

1.75

-1.5

2.05

example: 26 more markets available).

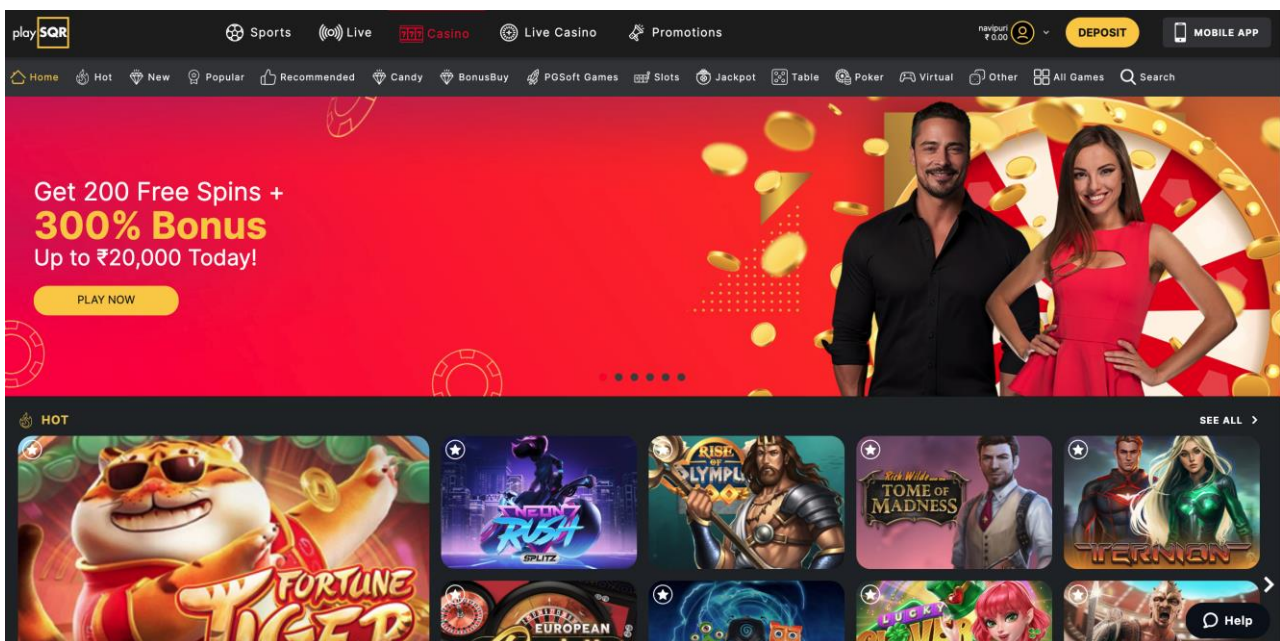
Live betting is covering diverse range of sports (football, horse racing, basketball, tennis, and others) hence our players will be able to explore flexible betting types as per individual sports.

User can track results in real-time on the top panel, while odds for individual markets are flashing with green / red indicator to display real-time changes in the dynamics of the odds. Users get real-time immersive experience to place bets on their favourite sports and markets.

Games

PlaySQR will offer over 3,500 casino games via its instant play online and mobile. The Casino product has all that is needed to satisfy every type of casino player. Players can enjoy classic casino games like Blackjack, Roulette, Poker and explore a range of slot games with various paylines, bet limits and bonus features.

The Casino product is available in multiple languages and players can enjoy daily promo-

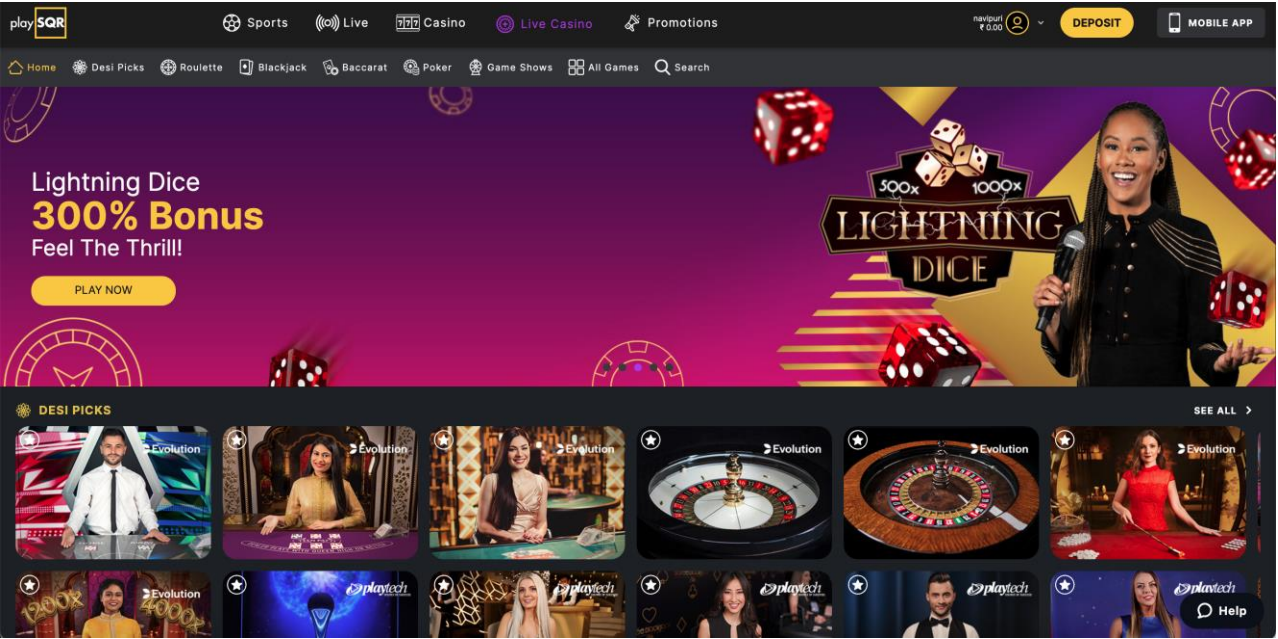


tions and competitions, free spins and weekly tournaments.

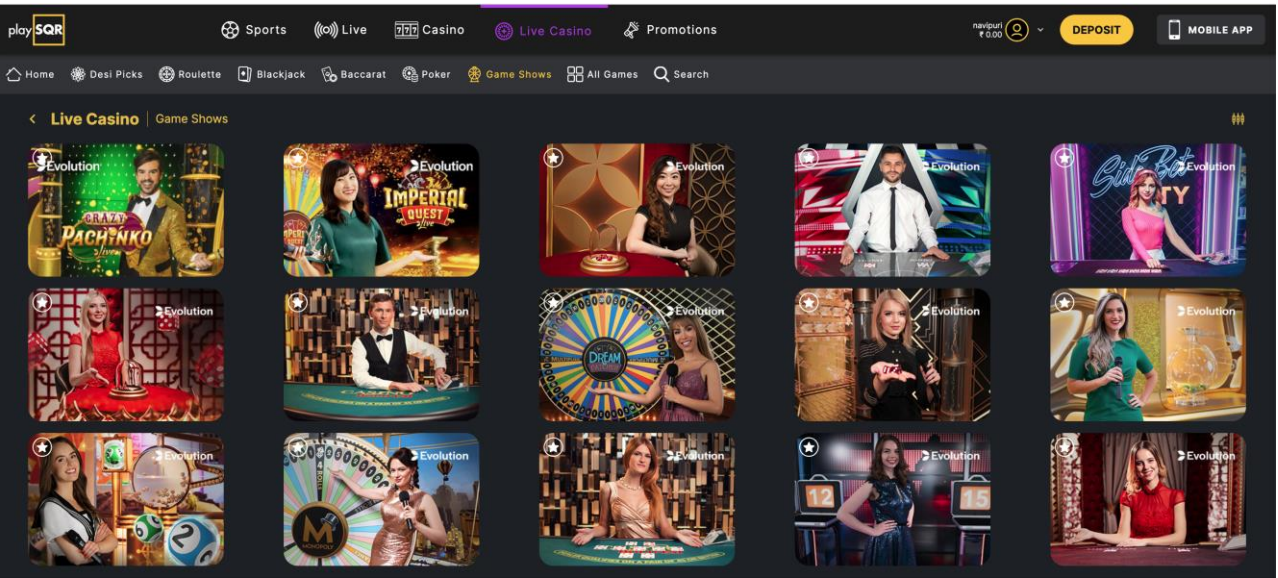
A variety of Live Casino games will also be available from third-party casino providers such as Ezugi, Evolution Gaming, PragmaticPlay, where they can interact with dealers and select camera views from the comfort of their home or mobile.

Live Casino Page Layout

We also enable players to play popular Game Shows with Live Dealers such as Dream Catcher, Mega Ball, Funky Time, Gonzo’s Treasure Map, Imperial Quest, Monopoly and many more. Another popular offering are our virtual games, where a virtual simulation based on real sports such as football, tennis, golf, horse racing, hound racing and moto



racing provides multiple event options to place bets on future outcome of these events.



Mobile View / Casino & Live Casino Home Pages

We also plan to launch in the future real money and play for fun online poker services via in-browser gaming as well as proprietary software for Windows and Mac. Our plans are to offer regular daily, weekly and annual Single Table and Multi Table Tournaments with guaranteed prize pools, and special one-off Single Table and Multi Table Tournaments with prizes ranging from cash to live event packages. Our product offering will target both iOS and Android end-users.

Responsible

Gaming

PlaySQR is passionate about bringing exciting and challenging offers within a safe and secure environment. We take responsibility for our product line-up.

We want to provide the world's safest and most innovative gaming platform for adults. By means of a fair and responsible product line-up, every user can play within their financial means and receive the best possible service. PlaySQR commits itself to integrity, fairness and reliability. It is therefore clear that PlaySQR should do its best to avoid and reduce the problems which can arise from participation in games of chance, particularly through excessive play. At the same time it is important to respect the rights of those who take part in games of chance to a reasonable extent as a means of entertainment.

Responsible Gaming at PlaySQR is based on three pillars:

1. Security of the player,
2. Security of the game and
3. Protection against gaming addiction.

Player Security

We take responsibility for the security of our players. Protection of players is based on guidelines stipulated by the EGBA (European Gaming and Betting Association), exclusion of minors from the product line-up and the protection of privacy, which involves responsible dealings with data and payment processing. Fairness and the random nature of the products offered are monitored closely by independent authorities. Marketing communication is also geared towards player protection: a fair gaming line-up only promises what it can deliver.

Game Security

We take responsibility for the security of our gaming line-up in two ways: first of all, we protect our users against mistakes such as inadvertent placement of bets by means of

"gameful usability". In addition, online monitoring at PlaySQR as well as the experience of our bookmakers ensures protection against fraud, AML and game manipulation.

Chapter 3

Market Analysis

Product Launch and Market Capture

PlaySQR intends to enter the market for providing sports betting product and services to South Asia, North European and LATAM markets. The sections below discuss our analysis of the environment, the target market, our competitors, and the company.

The environment is well suited for PlaySQR while the market for gambling globally becomes more fragmented and M&A are surging, there are certain regions where the factors of the local economy and technology development provide an opportunity for PlaySQR to establish a presence in the business arena before the next growth period.

Market

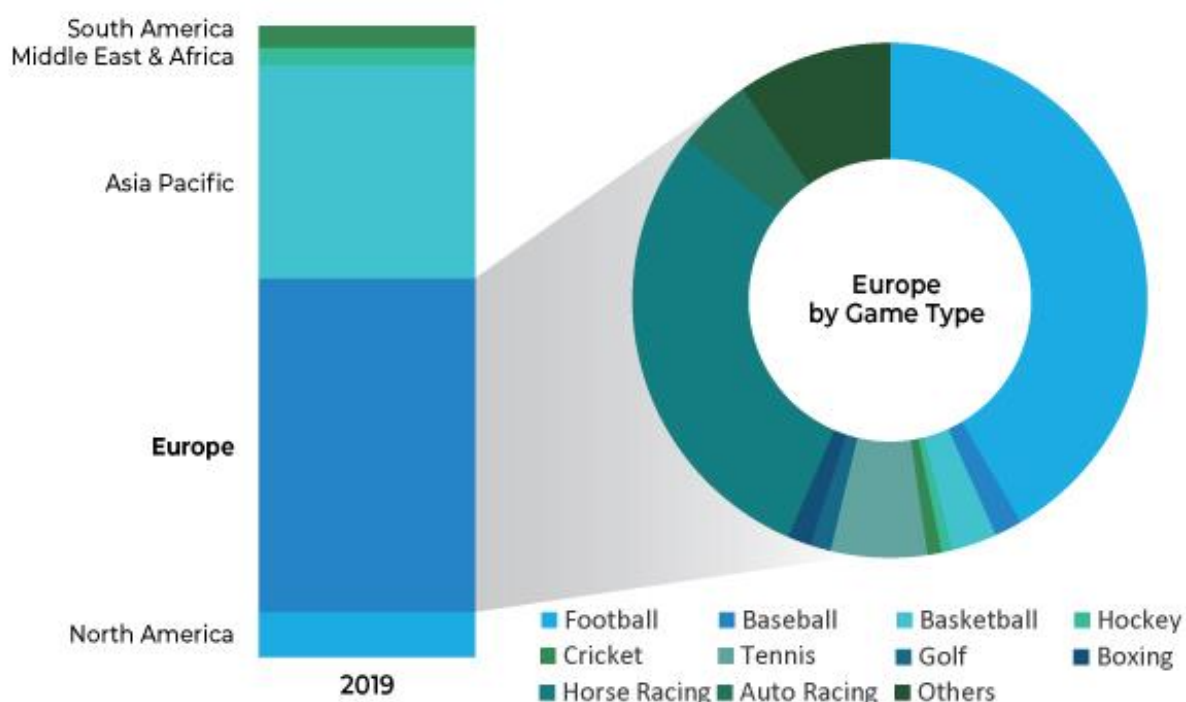
Analysis

The total global online gaming market, according to market research company H2 Gambling Capital, which also includes unregulated markets, was estimated to be worth \$109bn in 2023. Over the past twelve years the market grew at 13% CAGR and growth from 2022 to 2023 was 15%. This market is set to grow exponentially, with the report labelling betting as the fastest growing gambling segment. It also revealed that betting's growth rate is double that of the gambling industry as a whole over the next five years, growing at 6.3%.

Casino is set to grow at 3.0%, gaming machines to decline by 0.3%, bingo and other games to grow by 4.1% and lotteries to grow by 2.3%. This means the gambling market as a whole will grow by 2.7%.

By 2025, turnover is set to reach \$767bn, while revenue is projected at \$136bn. With digital revolution transforming the world every second, the sports betting market is likely to grow dynamically in the future. This market currently holds around 70% of the global gambling revenue, which is more than any other sectors inclusive of lotteries, casinos, and poker, among other forms of gambling. Various games are popular for betting around the world, but European football has been attracting the greatest betting revenue, which is closely followed by baseball. The increasing popularity of virtual sports betting is one of the major factors likely to support the market for sports betting over the forecast time period. The technological developments have also transformed the process of conducting sports betting. On the other hand, the strict regulations led down by various governments of different countries across the world might hamper the development of the sports betting market on a global scale in the future.

Global Sports Betting Market: Europe by Game Type, 2019



Transparency
Market Research

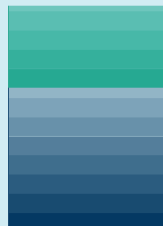
Global Gross Gaming Revenue* 2018 – 2023 (€Bn)

36%
Online
64%
Retail



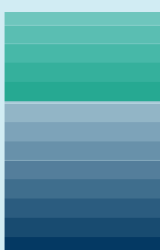
62.0
2018

36.5%
Online
63.5%
Retail



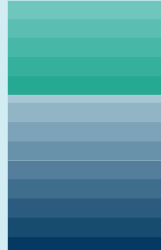
64.6
2019

37%
Online
63%
Retail



69.5
2020

37%
Online
63%
Retail



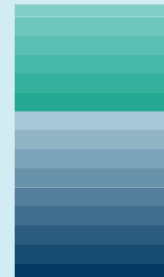
72.6
2021

37.9%
Online
62.1%
Retail



77.2
2022

39%
Online
61%
Retail



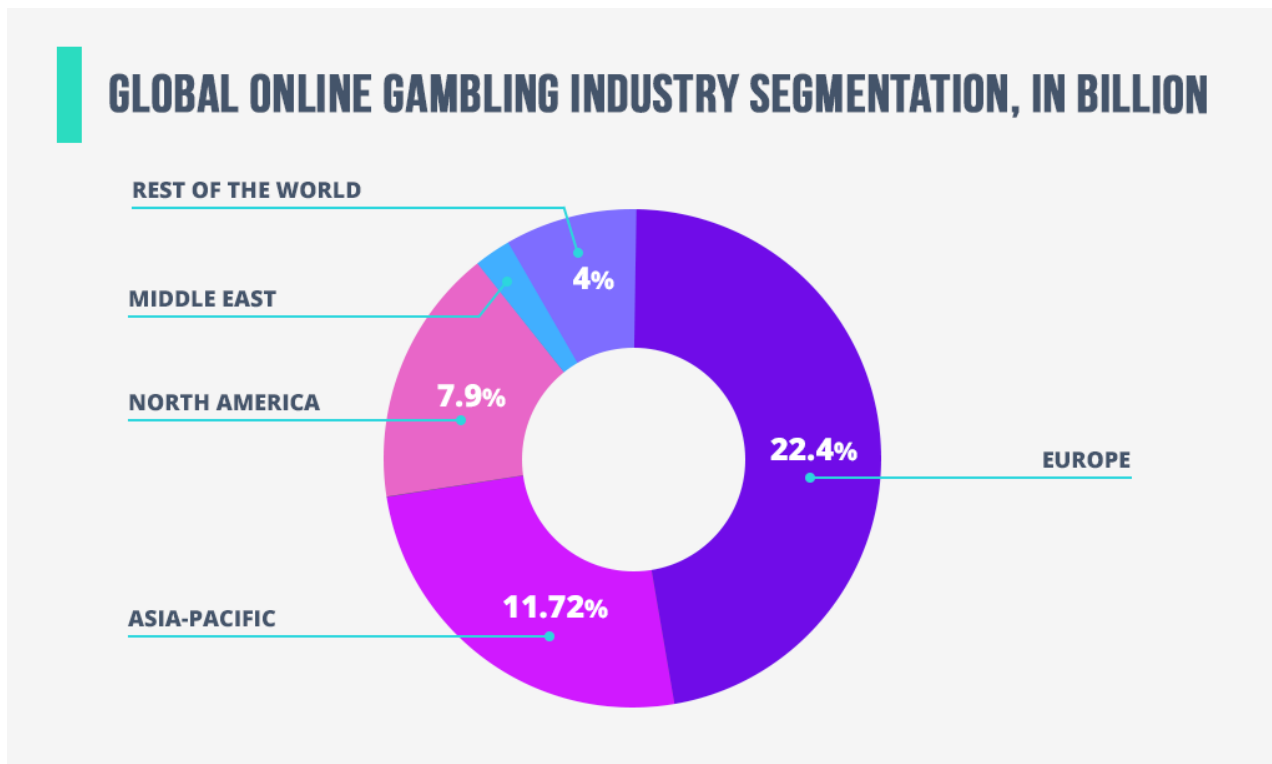
79.4
2023

Source: H2 Gambling Capital

* Please note: this graph contains data relating to both regulated and unregulated online sports betting.

The high internet penetration and increasing use of mobile phones among individuals for playing online games from their homes and public places are driving the market demand. In addition, factors such as easy access to online gambling, legalization & cultural approval,

corporate sponsorships, and celebrity endorsements are also contributing to the market growth. The growing availability of cost-effective mobile applications across the globe is further expected to fuel market growth.



The internet has become a global platform for communication and enables merchants to offer their services in the digital market space. Trends also suggest that the consumption of services in the global virtual market has increased by 28% annually since the last decade. With the growing use of the internet, the growth rate of online casinos has increased significantly. The growing awareness of latest technologies and increasing disposable income of individuals are expected to propel the market growth.

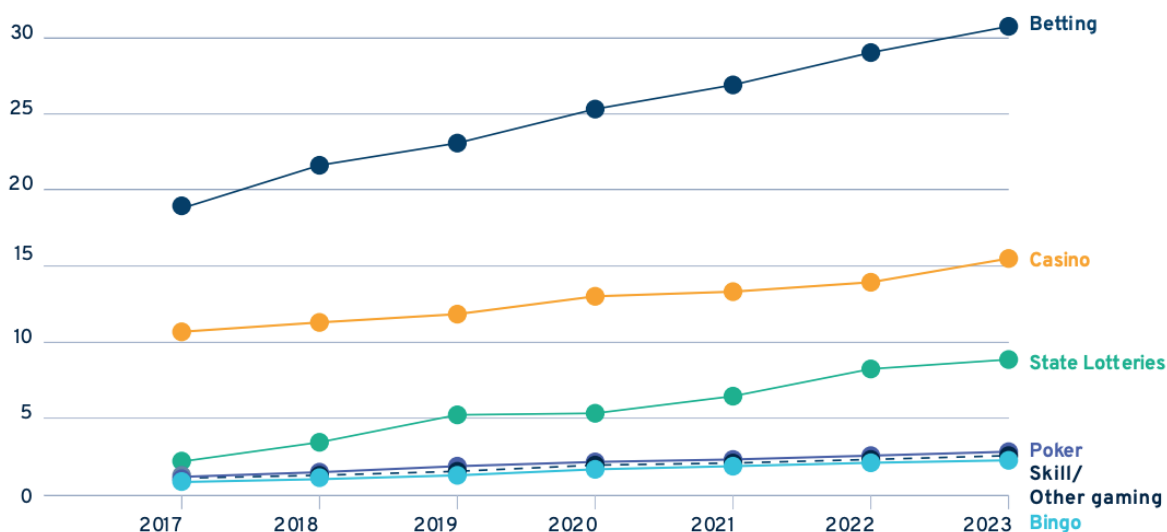
Developments in the online space are parallel to the annual growth of internet casinos. These developments are made to achieve the desired credibility in the gambling zone. Therefore, online casinos are focusing on investing in information solutions that offer continuous support to gamblers, ensure the credibility of the operations, and prevent illegal affairs. Numerous online casinos are offering a free play version of some of their games, which is creating growth opportunities for the market.

Online gambling can be considered as a global activity both in terms of technological and organizational viewpoints. From a technological point of view, online gambling operates via the Internet. However, in an organization, it works on multiple server points existing across the globe. For instance, on a global scale, more than 80 jurisdictions control some form of gambling; however, they are grouped in only a few places.

Numerous countries are legalizing online gambling since it offers a high rate of employment and helps in revenue generation. For instance, in India, online gambling has been made legal in Sikkim and Goa. In addition, participation in online gambling allows players to experience gambling activities in real-time through internet services. The growing number of sports followers across the globe has fueled the demand for sports betting. Majority bets are placed on boxing, baseball, football, and hockey sports, which is, in turn, driving the online gambling market growth.

The increased development of new technologies such as virtual reality and blockchain is also driving the growth of the online gambling industry. This may be attributed to the fact that several companies are now integrating the blockchain technology into their online gambling business. This helps them ensure transparency in gambling activities and offer enhanced user experience. In addition, blockchain-based gambling platforms are completely

**Global Online Gross Gaming Revenue
by Product Vertical (€Bn)**



Source: H2 Gambling Capital

decentralized and free of third-party influence.

The overall online gambling and betting market is normally segmented on the basis of types, platform, device used or geographic regions. On the basis of types, the market is segmented into online casino games (bingo, slots, roulette, keno etc.), card games (poker, blackjack, baccarat etc.), online sports betting, fantasy sports, lotteries and social gaming. In 2015, sports betting held the largest portion of the global online gambling industry with a market share of 48 percent. Online lotteries held around 10% of the global online gambling revenues. Based on the type of platform, the market is segmented into web-based online

gambling/betting and downloadable online gambling/betting. Based on the type of the device used by player, the market is divided into desktop and mobile segments. The desktop segment includes PCs and laptops. This segment accounted for the majority market share during 2016 and will continue to be the largest segment in terms of shares. Online gambling is legalized in more than 80 countries across the world. On the basis of geographic regions, the market is classified into Europe, Asia and Middle East, USA and the rest of the world.

Geographically, Asia Pacific is leading the global online gambling market driven by increasing population across the demographics, and newly developing markets such as India, Singapore, Thailand and Indonesia due to internet penetration. Europe and North America held the first and second largest market value shares respectively. Other developing markets in countries such as Brazil and Argentina are going to drive the market for South America

GLOBAL ONLINE GAMBLING MARKET SEGMENTATION
on the basis of geographic regions (2015)

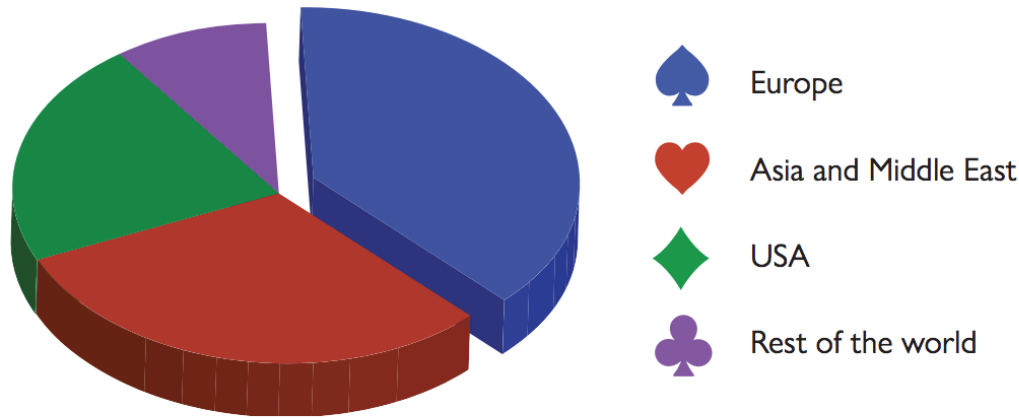
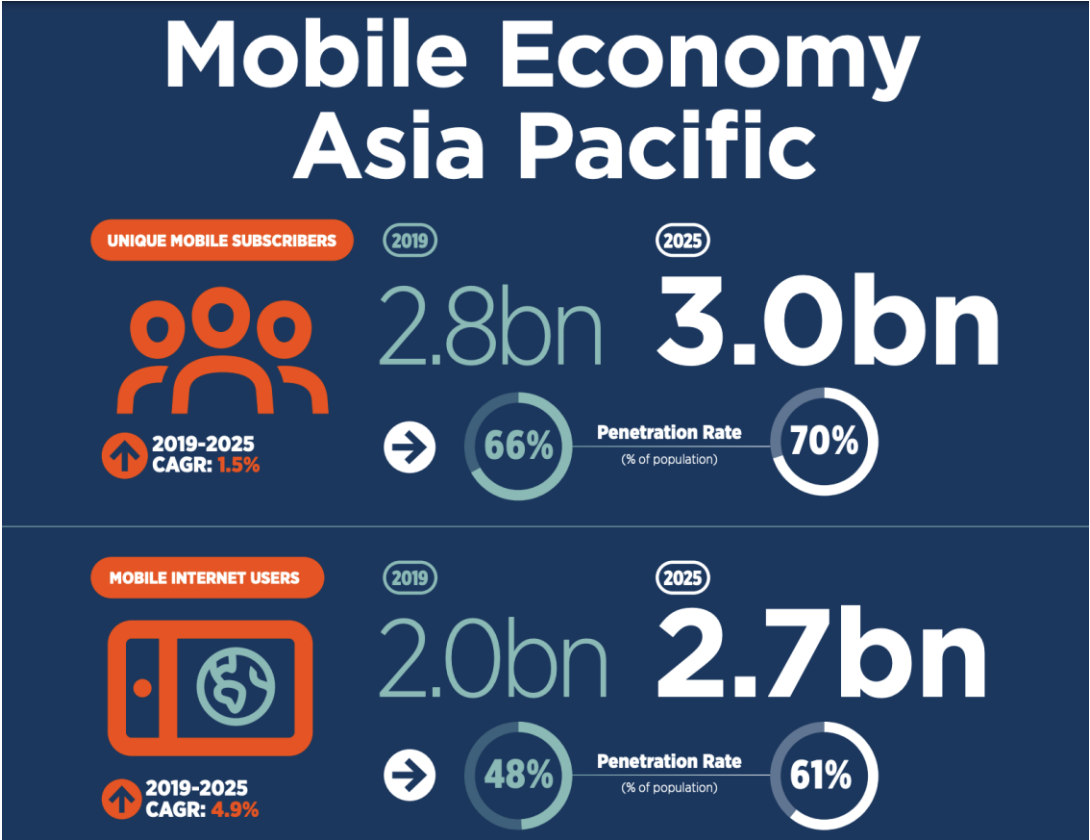


Figure 2. Online gambling market segmentation on the basis of geographic regions

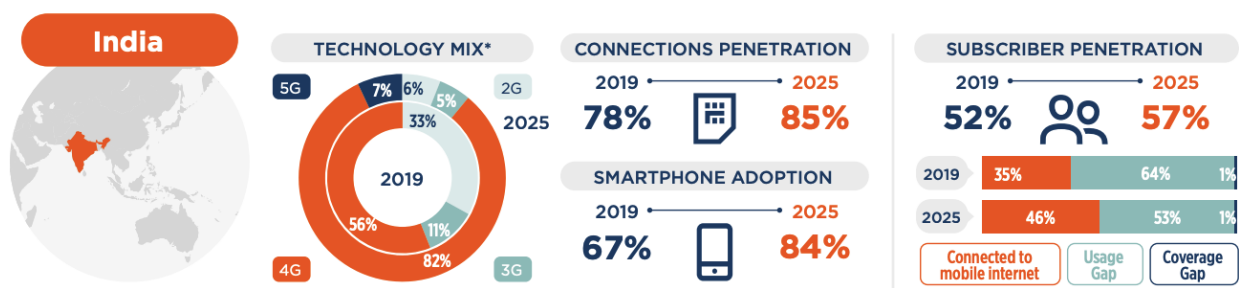
which is the second fastest growing markets globally.

This trend is driven by growth in smartphone and tablet penetration, increased device capability and the confidence of users. Asia Pacific has been the biggest contributor to global subscriber growth in recent years and still has room for growth. As of the end of 2017, there

were 2.7 billion unique mobile subscribers in Asia Pacific, accounting for two thirds of the re-



gion s population. More than half the world s mobile subscribers live in

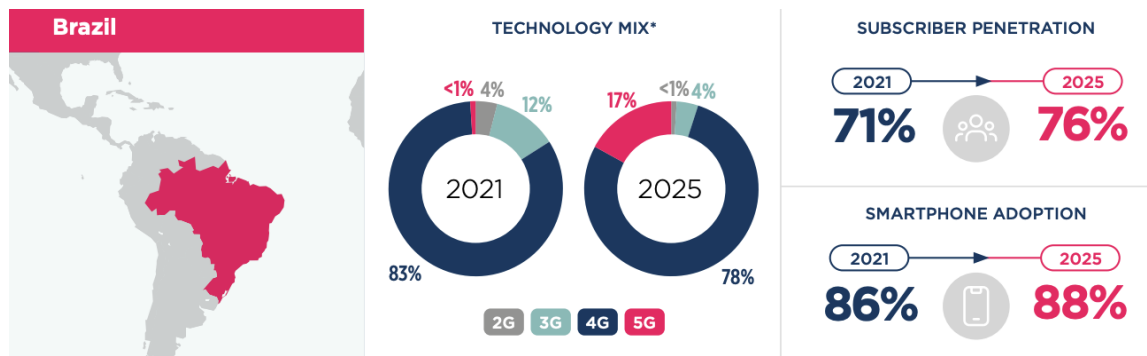


While top-line growth is slowing, Asia Pacific will still account for around half of new subscribers globally by 2025: by this time, we forecast 266 million new subscribers to be connected across the region, bringing the total to just over 3 billion (70% of the population).

Asia Pacific is rapidly migrating to higher speed mobile networks, with mobile broadband (3G and above) becoming the dominant technology by the end of 2016. 4G is the primary driver of this shift, overtaking 2G to become the leading mobile technology by share of total connections in 2017. The region is home to some of the world's most advanced markets in terms of 4G adoption, such as South Korea, Japan and Australia. However, emerging markets (including India, Bangladesh and Indonesia) will be the key drivers of 4G growth over the next few years. Across the region as a whole, 4G is expected to surpass 50% of connections by 2019 and will then dominate to 2025.

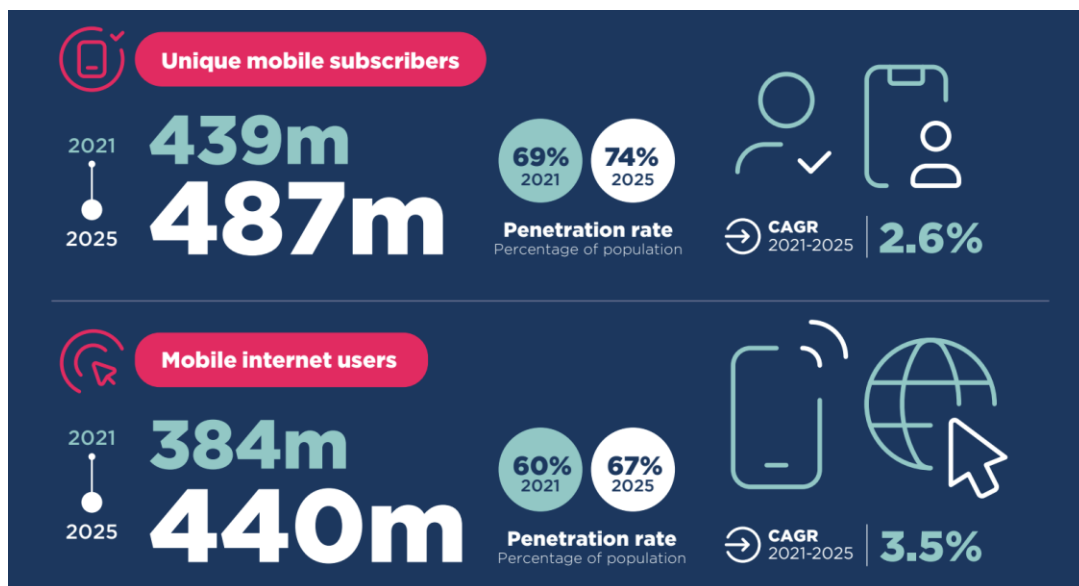
By 2025, 71% of the world's population will be mobile subscribers (aka unique mobile users). Developing countries like India, China, Pakistan, Indonesia, Bangladesh, as well as Sub-Saharan Africa and Latin America, will account for this growth. Globally the unique mobile user penetration will see a slight rise to 71% of population in 2025 from 66% in 2017. The highest growth of 8% will be in Sub-Saharan Africa followed by 6% in the MENA and Asia Pacific and Latam regions. North America, CIS and Europe are comparatively low in growth with an average of 2%.

Consumers in Latin America are increasingly adopting a variety of digital lifestyle services. Rising smartphone adoption is a big driver, with nearly 4 in 5 mobile connections, on average, now based on smartphones. Online gaming in particular has witnessed strong growth in the region; the Newzoo Global Games Market Report for 2021 ranked the region as the fastest growing in the world, albeit from a lower base relative to Asia Pacific, Europe and the US, with a 5.1% year-on-year growth in revenue, which was estimated at \$7.2 billion. Mobile devices have offered gamers the flexibility to access gameplay at any time and in any place. In a 2020 study, over two thirds of respondents reported spending more than 40 minutes per day playing mobile games.



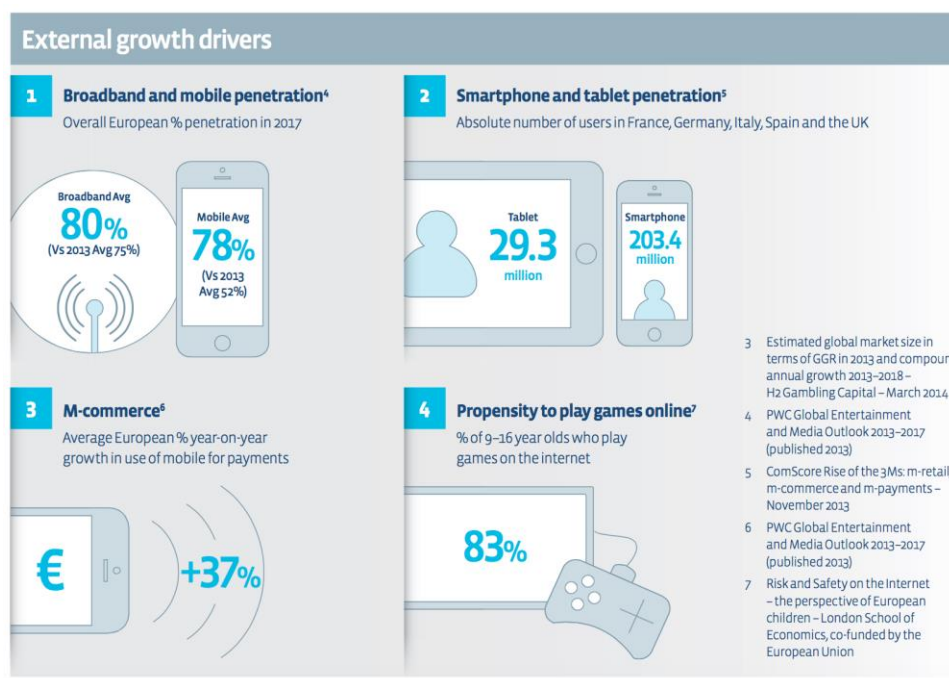
Betting still accounts for the vast majority of mobile gambling gross win at over 75%, although this is expected to change as both gaming and lottery products are increasingly developed specifically for new remote devices with enhanced capabilities during the period to 2018. Another key driver for online gaming growth has been increased mobile penetration rates and H2GC estimates that global mobile usage for online gaming will rise from c 41%

in 2018 to over 50% by 2022.



On basis of the type mobile gambling is divided into five sub-segments, casino, betting (mainly on sports), poker, lottery, and online bingo. Mobile casinos are the virtual version of traditional casinos, which are also known as internet casinos. In the mobile casino games, players have access to large number of games such as roulette, blackjack, pachinko, baccarat, and many others. Mobile casinos generally offer odds and payback percentages that are a bit higher than land-based casinos. Some mobile casinos claim higher payback percentages for slot machine games, and some publish payout percentage audits on their websites.

Hence the biggest external factors affecting the industry growth can be summarised in the



graphic below:

The global unregulated betting sector is believed to be many times larger than the regulated sector, although without clear and verifiable financial reporting or official oversight it is of course difficult to provide any precise or directly comparable data with the regulated market. The dominant interests lie in Asia and Latin America, where the proper regulation and enforcement of betting within those jurisdictions would clearly place the Asian region as the preeminent licensed betting market in the world.

Whilst betting is a global activity, it should nevertheless be noted that there are important regional, cultural and historical market factors that determine the exact kind of betting products, be it provided by regulated or unregulated operators, which best meet regional consumer demands.

Product platforms and the types of bets offered therefore vary depending on regional identities and the products offered by Asia-based operators (regulated or unregulated) may not always fully meet the demands and expectations of European consumers, for example.

The main barriers of entry we face in entering the online sports betting market are:

- **High capital costs** - investment in gaming platform, licensing and technical infrastructure are the highest overheads
- **High web development costs** - developing proprietary gaming platform could be a costly venture, and hence we have approached this challenge by developing our own sports betting platform, which we intend to customise in the future

- **High marketing costs** - acquisition and retention of end-customers for the gaming industry start from \$150, hence efficient marketing operations and optimisation of campaigns is vital for the profitability of the business
- **Brand recognition** - A brand is the “soul” of our company. It’s the tone of voice we use to communicate with our customers, the set of expectations that arises when someone hears our name. With the right plan for brand recognition, we can establish trust, build brand affinity, and make sure that our voice is resonating with our players. We will invest in building a modern, dynamic and approachable sports betting brand that speaks to its players openly.
- **Training and skills** - Our team consists of online gaming experts, business development managers and digital marketing gurus with long-term experience in the industry. We know what our customers will value and how to best communicate our unique USPs to them.
- **Unique technology** - our unique USP lies with the offer that we are different from your traditional bookmaker. We utilise the beautiful feasibility of live sports tournaments where customers lie at the heart of the operations. We do not make the odds or create markets on which customers can bet, we allow our customers to make the choice. Our customers can select how much to bet, on what market and when to bet - all on their preferred channel - mobile or desktop.

Product

User-generated products are becoming an increasingly integral part of the global gambling landscape, in many cases offering customers much better odds, more transparency, and an experience that feels intuitively fairer.

Features and Benefits

PlaySQR major products and services are sportsbook and casino games. We will cover both pre-match and in-play betting.

In-Play Betting:

- In-Play is betting that takes place after an event has started and up to its conclusion. Obvious examples are a football or cricket match or a horse race. In Play betting gives players the ultimate thrill as they can choose from hundreds of different bet types on various sports while the events develop. It means players are in complete control of their bets at the time they want to make them — and give them the best opportunities to back the odds that are right for the players.

What Are the Main Advantages of In-Play to the Punter?

The first is that In-Play betting allows you to assess what's going on before placing your bet. All the research and reading of stats in the world can only get you so far and sometimes it's preferable to just watch the action for a bit before deciding who your money is on.

The second is that In-Play betting allows you to trade your position and if you get it right, will allow you to achieve a green book, where you win on all outcomes, or at least don't lose on any. For example, if you've backed Manchester United to beat Chelsea and United go a goal up, you may decide you want to lay off your stake at a shorter price, just to be sure.

Pre-Game Betting:

- Pre-Game is betting that takes place before an event has started. Obvious examples are a football, where you are betting for outcome of the game - correct score, number of yellow cards, corners, winner, etc.

What Are the Main Advantages of Pre-Match to the Punter?

Pre-Match betting allows you to put your predictions in advance and not to be worried to place bets on time. Most of the traditional bookies offer this type of betting, and usually apply restrictions to the user bets based on their profile. With PlaySQR, customers can place their bets and only wait if their bets will be matched by the opposite site. They can amend the stake or odds at anytime before the game kicks-off.

Difference between Pre-Match and In-Play Betting

In-Play betting is effectively an evolution of normal betting but it takes place during live sporting events. Most of the markets — such as goalscorers, match results and points totals — remain active during In Play betting.

But the ultimate difference between normal betting and In Play betting is that the latter's odds can change quickly during the action. And this means players can change their mind on bets during sports events, switching to back different teams, players or outcomes.

For example, punter can put a pre-match bet on Manchester United to beat Liverpool in the FA Cup. Those odds will likely be very small and once the bet is placed, player is stuck with the odds. Should Liverpool score early, United's In Play odds will rise — but a player will have missed out on that.

What In-Play betting — or live sports betting — lets you do is choose the moment you want to make that bet. Of course, it's for you to decide when to place the bet, knowing that the odds will likely go up or down, depending on how events unfold during the match.

Customers

Online sports gambling involves both In-play betting (i.e., bets made on real time propositions about outcomes within a sporting event) and Pre-match odds betting (i.e., bets made on the outcomes of sporting events or games). Respectively the complexity of the offered products and their features creates an interesting profile for the targeted customers. Moreover, the Company will split customers by level of play into Low Value, Mid-Value, High-Value and VIP customers.

PlaySQR envisage a 70% male demographic, resulting in 30% female. Players will range from 20 years of age to 55, all of which will be located in jurisdictions such as MENA (Emirates, Egypt), Asia (Thailand, Vietnam, Japan, India), LATAM (Brazil, Columbia, Peru, Argentina).

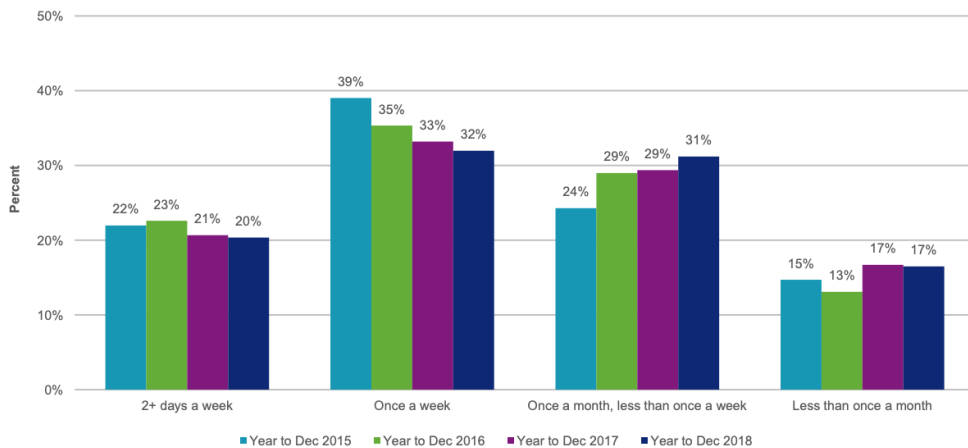
The Company intends to diversify its focus on several major customer groups as per region, where it will address VIPs in MENA, generation Z in Asia and regular punters in LATAM. The strategies and product prioritisation will reflect this approach and enable PlaySQR to more efficiently use its resources to achieve optimum results in each of these regions.

Each customer group, constructs what is called a demographic profile, which in PlaySQR's case consists of:

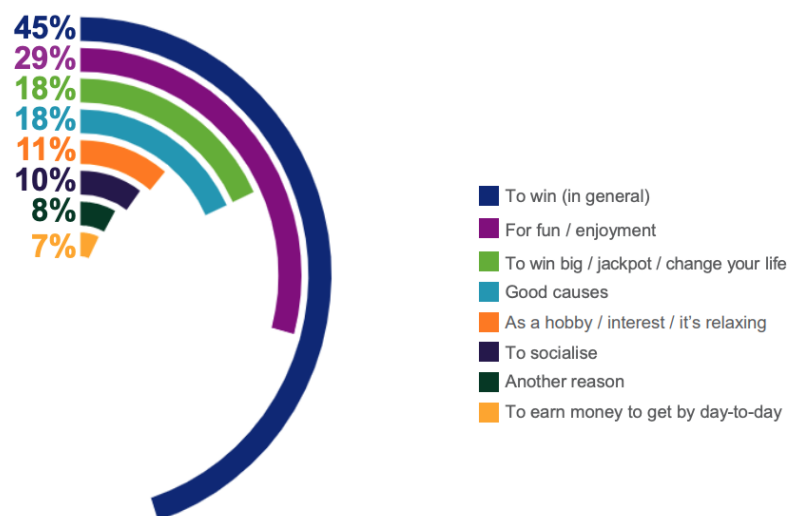
- Age: 21+ > 45+
- Gender: 50% male, 50% female
- Location: South-East Asia, LATAM
- Social class and occupation: not-applicable
- Education: Primary School minimum
- IT knowledge: basic computer and mobile literacy
- Internet: access to WI-FI / broadband connection

Customer profile:

- young, tech savvy, early technology adopters interested in sports and betting
- offline sports betting punters
- available access to high-speed internet
- available access to mobile internet
- frequent users of e-wallets: Skrill / Neteller



Another significant factor is their motivation to engage with our product, and the main factors we are interested in attracted are winning and having fun. This will mean that we bring the players with the right balance of responsible gambling and interest in entertainment and quality time.



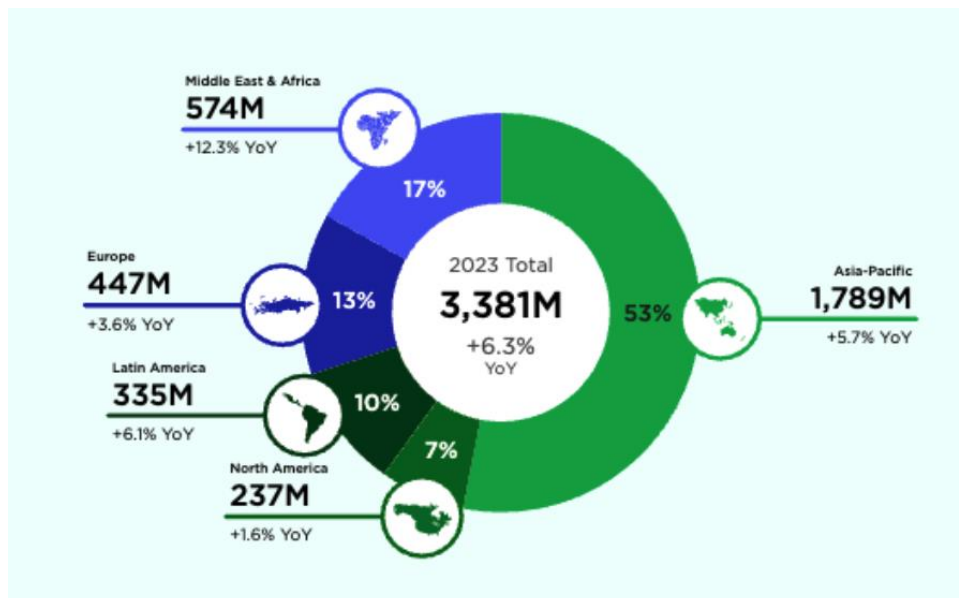
However, in our case we are reaching out not to the typical internet gambling customers, but rather approaching gamers, millennials and generation Z. Despite negative stereotypes that millennials were lazy, entitled, completely engulfed by their phones, they've become one of the most interesting and diverse segments on the marketing map, also ushering in a new era of mental and physical health and wellbeing, adopted, to an extent, by Generation Z.

Generation Z is a whole new complex generation of Tik-Tok fanatics, embracing Fortnite and VSCO culture, who are generally unaware of a time when the internet didn't exist. Millennials have nothing on Generation Z in terms of screen-time, and this dynamic and liberal group also tend to enjoy generating their own content. They buy into nostalgia marketing, in a way that's somewhat paradoxical. After all, Gen Z weren't old enough to fully experience 90s culture. And yet, they've brought it back in a big way - embracing everything from 90s fashion and music to idolising icons from that period.

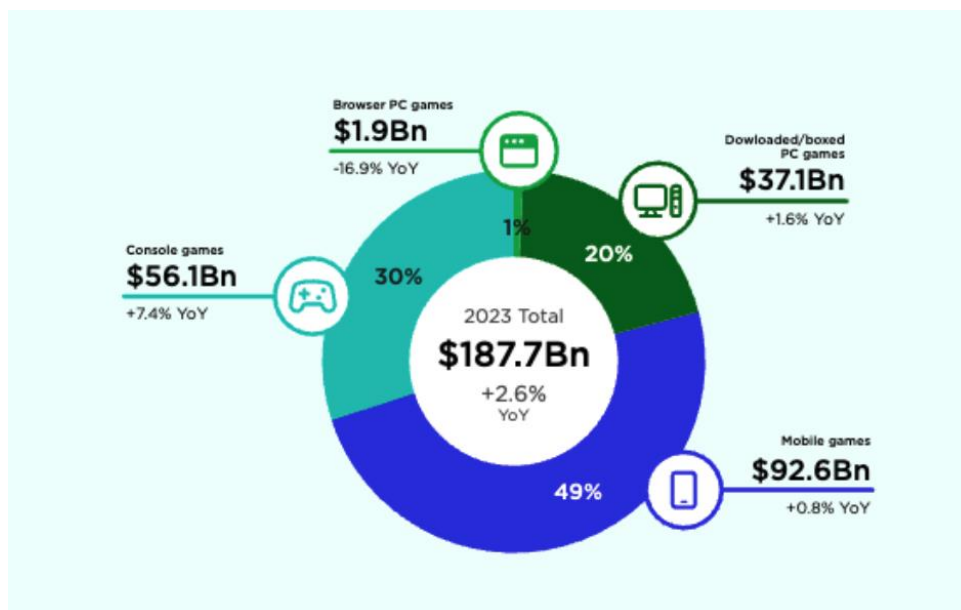
With smartphone-enabled digital payment services becoming increasingly popular around the world, the traditional landscape of the consumer payments market is changing more rapidly than ever. These customers are driving this global change and outlines the steps merchants should take to engage and retain this valuable audience.

No longer limited to carrying cash or credit cards, the prevalence of mobile apps and mobile wallets such as Apple Pay, Android Pay, PayPal, Visa Checkout, WeChat Pay, and Alipay has caused a change in the way that many consumers think about making purchases. The two groups sitting at the forefront of this recent shift are gamers and Millennials. These consumers are not only using mobile digital payments on a regular basis but are also showing a growing preference for these options over traditional behaviors. The generation that grew up on video games enjoys a challenge; they're both task and game-oriented and so too should the marketing aimed towards them. Additionally, they're social media savvy and enjoy posting their success and triumphs online. Casinos with a robust social gaming platform are aptly positioned to reach and market to this demographic and – as an added bonus – generate revenue through the sale of virtual currency.

2023 Global players per region



2023 Global Games Market



Mobile gaming (smartphone and tablet), meanwhile, remains the largest segment in 2019, growing +10.2% year on year to \$68.5 billion—45% of the global games market. Of this, \$54.9 billion will come from smartphone games. Although mobile is indeed still the world's fastest-growing games market segment, growth is slowing in mature markets such as North America, Western Europe, and Japan. Emerging markets, including Southeast Asia, India, and Middle East & North Africa, will contribute most to the segment's growth. However, a range of other factors are also contributors, including more cross-platform titles, more smartphone users, and improvements to both mobile hardware and mobile Internet infrastructure, including the rollout of 5G networks.

Based on the conducted market research, PlaySQR/RegalSQ platform will aim to address most of the targeted audience interest. We will provide multi-channel communication, entice both social engagement and individual customisation with rewards and personal recognition. We will aim to re-engage lapsed and dormant users through intelligent, data-driven interactions. By using detailed customer profiles to engage them with odds and offers that are likely to appeal to them we will strive to increase wallet share and improve their lifetime value.

Competition

Our competition are both the traditional sports betting bookmakers and the sports betting exchanges. The traditional bookmakers provide similar product and services, while the sports betting exchanges are offering similar product features.

We consider as our major competitors:

- Traditional operators: Bet365, Betway, Bwin.Party, William Hill, Unibet, 1xbet, PariMatch, BC.Game
- Casino operators: Vera&John, BGO, LeoVegas, Mr.Green

Competitors Analysis

Who We Pitch Against



	What they stand for	Product	Strengths	Weaknesses	Our Advantages
bet365	World's leading online gambling site	Complete portfolio	- Fast payments - Live streaming - Cashout feature - Betbuilder features - Great Inplay console	- Average marketing strategy - Lack of local partners	- Local payment solution - Betting limits proposition
PINNACLE	Winners are welcome	Complete portfolio	- High Betting limits - Great odds offers - Lowest commission among sportsbooks - No 1 choice for professional bettors - Ideal for arbitrage betting	- Poor MV / LV promotions - Lack of good VIP service	- Similar no commission policy - Similar high betting limits - Local payment solutions - Better VIP program & service
betway	Betway isn't a destination, it's a journey.	Complete portfolio	- Good Live Betting Console - Cricknet offering - Generous poker / casino offers - Fast & easy to use Sports pages	- Bad CR service - Poor promotions	- Better Customer Service - Better odds proposition - Better VIP propositions
1XBET	The best odds globally	Complete portfolio	98%+ Live Betting on major football events - Multi Live streaming 140+ payment methods 500+ extra bets	- Bad customer services - Bad VIP service - Lack of experience	- Diverse markets - Betting Limit proposition - Local payment solution

Our product and services are superior to the traditional bookmaker sportsbook products, and similar but with a better commercial propositions for the sports betting exchanges.

Sign-up bonuses incur an inevitable cost to a bookmaker, which many mitigate with complicated and restrictive terms and conditions. We prefer to build what we might spend on sign-up incentives directly into our odds, which is clearer for bettors to see and provides a much greater long-term benefit.

Some bookmakers choose to limit the accounts of their winning accounts or close them all together. Most of the bookmakers that takes this route are faced with a constantly high churn-rate of players and the inevitable customer dissatisfaction. As with many other online industries, peer review is becoming increasingly important to betting, underlined by the proliferation of odds comparisons and sites, and encouraging bettor education. We will aspire to establish our brand as a place where punters:

- Know they are getting the best possible value.
- Know they can bet at their required limits.
- Know that no matter how profitable they become, they are treated the same.

The unique products fill a substantial void and will enable PlaySQR.com to establish itself as the pre-eminent value solution provider in the market. While potential competitors have focused on providing costing information to the underwriting and claims operations within the gambling industry, there are currently no web-based exchange applications available in the LATAM and South-East market. In addition, our competitors do not have the ability to combine personal contents coverage data and document storage and retrieval services.

Niche

Our model works on volume, not customer profiling. We need high volumes of balanced bets to enable us to offer such low margins, and are confident enough in our traders' abilities to know that so long as volume is high enough, our business is viable.

This model means that we seek volume without concern as to whether that comes from winning players or not, so it's the perfect place for people who don't want to be limited. As we say on our promotions page, winners really are welcome.

In contrast to this proposition, our competitors are bookmakers that profile and restrict the winnings of their customers. Hence we hold a unique USP which will make us stand out from the crowd.

Chapter 4

Strategy and Implementation

How to Enter the Market

The key element of successfully entering a new region is choosing the best market entry strategy. The first step of entering a new market is conducting market research. This includes assessing the current market situation, its size and trends, how strong the competition is and what are the laws and regulations that you will need to comply with. Based on

the overview of the market, we identified that our strongest growth strategy will be introducing superior product and expanding in new geographic territories - Asia Pacific and LATAM.



We will develop local product propositions matching the requirements of the players in these regions, respectively offering local language versions, customer service in local languages (English, Thai, Vietnamese, Japanese, Portuguese Brazilian, Chinese) and regional payment solutions. Our product will include special sportsbook views in European and Asian layout, where odds are display in regional formats (Malay, Decimal, Fractions, US odds).

Revenue growth strategy will rely on delivering premium customer service and investing in loyalty schemes, which will enable us to keep customers for longer and get them more engaged with our product. Our AI-driven customer communication for both player acquisition and retention, niche / targeted customer acquisition channels with optimised ROI, and multi-platform service, will extend the lifetime value of our players and help us optimise costs.

Despite the strong competition, we believe PlaySQR proposition will stand as a compelling new entrant. We will compete on competitive odds propositions and supreme customer service in comparison to the traditional bookmakers. We will offer real governance benefits, as maintaining market integrity will always be in the interest of the users as a whole.

Continued innovation both from existing players in the market and from new entrants such as financial services firms, will allow us to bolster margins and to build and hold on to a market share in geo-regions. Our services will give shrewd punters ever more freedom and flexibility to place bets.

Positioning

We believe that product features such as price reductions and discounts, high bonus payouts, new betting features and markets, reduced betting price charges, introducing variety of sports will help us establish our brand and customer acknowledgement.

We will position our products and services as the quality and innovation leader by emphasising our superior mobile-first, gamified integrated functionality and flexibility. Our enhanced engineering and technical leadership will allow PlaySQR to market our high performance and state-of-the-art capabilities to a broad range of customers, service providers and partners.

We will also position ourselves as providing highly customised offers to customers, and will be highly flexible and responsive in adapting our propositions to the needs of the marketplace. Being a younger, smaller and more customer-focused company than our competitors, we will have the advantage of being an industry innovator.

Competitive Edge

PlaySQR will be a profitable and successful company for several reasons: the proven performance of the gaming platform software; the development of affiliations and partnerships with major software and services providers of sports odds, stats and data analytics services from the gaming market; the usability of our tools; the ability of our gaming software to significantly increase customer revenues while enhancing their ability to enhance customer service, improve retention and provide their customers with peace of mind.

PlaySQR's unique products fill a substantial void and will enable PlaySQR to establish itself as the pre-eminent value solution provider in the market. While potential competitors have focused on providing costing information to the underwriting and claims operations within the gambling industry, there are currently no web-based exchange applications available in the LATAM and South-East market. In addition, our competitors do not have the ability to combine personal contents coverage data and document storage and retrieval services.

PlaySQR will be able to expand and protect its market share through establishing third party software partnerships with incumbent regional players. PlaySQR's sales and affiliate strategy will be further enhanced with the development of alliances with the major sports betting industry service providers and consulting firms.

Marketing Strategy

PlaySQR marketing strategy centres on engaging directly with players. We are digitally-led company, and our focus is on planning implementation and optimisation of digital strategies. Social media is central to the company's marketing strategy, particularly when it comes to improving customer loyalty.

We use RACE Planning system for our KPIs.

1. REACH. Reach involves building awareness of our brand, its products and services on other websites and in offline media in order to build traffic by driving visits to different web presences like our main website, microsites or social media pages. It involves maximising reach over time to create multiple interactions using different paid, owned and earned media touchpoints.
2. ACT. Act is short for Interact. It's a separate stage since encouraging interactions on websites and in social media to generate leads is a big challenge for online marketers. It's about persuading site visitors or prospects take the next step, the next Action on their journey when they initially reach your site or social network presence. For many types of businesses, especially, Business-to-Business, this means generating leads, but it may mean finding out more about a company or its products, searching to find a product or reading a blog post. We define these actions as top-level goals of the funnel in analytics. Google Analytics Goals are included such as "Viewed product", "Funded Account", "Registered as member" or "Registered Customer". Act is also about encouraging participation. This can be sharing of content via social media or customer reviews.
3. CONVERT. This is conversion to funded account. It involves getting our audience to take that vital next step which turns them into paying customers.
4. ENGAGE. This is long-term engagement that is, developing a long-term relationship with first-time punters to build players loyalty as repeat play using communications on our site, social presence, email and direct interactions to boost customer lifetime value. We measure it by repeat actions such as repeat bets and sharing content through social media. We also measure percentage of active customers (or email subscribers) and customer satisfaction and recommendation using other bookmakers.

Our key channels for acquisitions are:

- Display Advertising & Paid Search / PPC
- Mobile Display Advertising

- In-app Advertising
- SEO / SOA
- Affiliate Networks
- Social Media & Vlogging (YouTube, Facebook, Instagram. Snapchat)
- Inbound / Outbound Marketing



Advertising

PlaySQR will use a variety of digital channels & tactics to achieve its business objectives. To raise brand awareness & improve customer services, we will use social media marketing tactics.

Digital ads will represent over 50% of our ad budget and will to address full-funnel marketing concerns. Social media and conversational marketing are the other two streams which will play significant part in our acquisition strategy. Influencer marketing is growing in importance – for both B2B and B2C. Word-of-mouth and digital PR continue to provide opportunities for business growth. These areas tend to be under-invested in by businesses and present unique opportunities. We will use brand ambassadors and social media influencers to establish our brand voice and distinct market proposition.

We will focus on a combination of Search Engine Marketing, Google+ & email marketing, offline and online affiliate management and direct customer acquisition through direct referral program. Our business objectives & audiences will be served by a pick n mix approach, test effectiveness & monitor results which will utilise the following channels:

- Display Advertising
- Pay-Per-Click Advertising (PPC)
- Online Public Relations
- Search Engine Optimisation (SEO)
- Affiliate Marketing
- Social Media Marketing
- Email Marketing
- Viral Content Campaigns
- Conversion Rate Optimisation (CRO)
- Blogging
- Twitter advertising
- Facebook advertising
- Blogger outreach
- Mobile marketing

We will also use crucial KPIs and leading indicators to type performance to our costs and

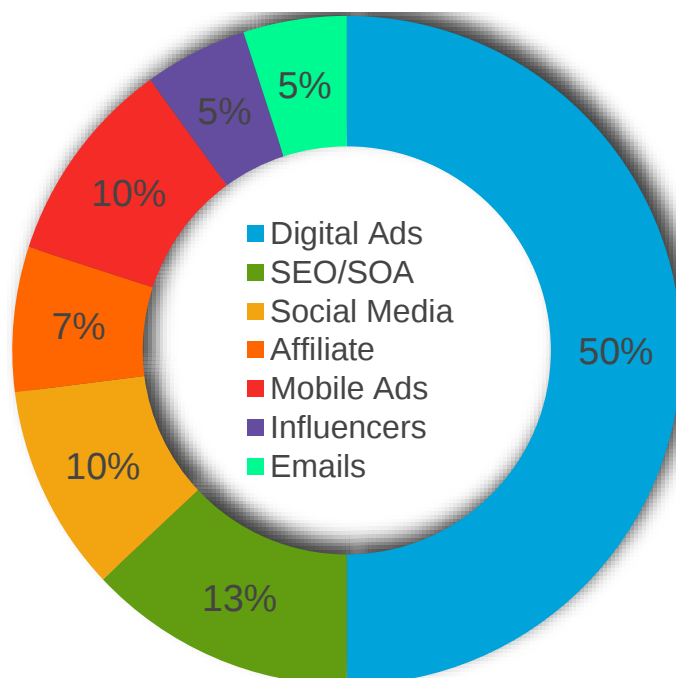
	Leading Indicator	Tertiary KPI	Secondary KPI	Primary KPI
Social	Followers	Engagement	Site visits	Conversions
SEO	Impressions	Site visits	Conversions	Revenue
PPC	Impressions	Click Through Rate	Conversions	Cost per Acquisition
Email	Delivery Rate	Open Rate	Click Through Rate	Conversion rate
Referrals	Referrals gained	Site visits	Conversions	Revenue
Content	Content views/visits	Bounce Rate	Content shares	Conversions

calculate our campaigns ROI:

Promotional Budget

PlaySQR plans to start with a soft-launch and increase aggressive acquisition with wider channels of acquisitions in the next 6 months. The initial budget will be \$100,000 for the first 6 months and will increase two times over the next months. Marketing spend is a percentage of our revenues, and it will fluctuate from 20% in the early product launch stages to 15% in the later market entry stage. We also plan to allocate 8% of generated revenues to our retention marketing budget and set aside funds for bonuses and promotion campaigns.

In terms of distribution between the various channels, we will give priority to digital marketing with 50%, followed by search engine, social media and mobile marketing.



Operations Plan

Operations

PlaySQR operations will be split between Cyprus and the Philippines. We will hold our main operations such as technical team, business operations, customer support, technical development, and marketing in the Philippines. Payment processing will be managed via Cyprus.

Legal Environment

- Licensing requirements - the online gambling business is regulated and monitored, hence in order to comply with the international regulations and to facilitate our business operations we will apply for a Curacao remote gambling licence.
- Health, workplace, or environmental regulations - all regulations related to health, work and environment protection will be adhered to as per the business location
- Insurance coverage - business activities will be covered with an insurance
- Trademarks, copyrights, or patents - we will registered PlaySQR as a trademark for the regions in which we will operate. We will also acquire SSL wide card certificate in order to protect the security of the website.

Personnel

PlaySQR will start with a small team of 30, and will gradually scale in accordance with the requirements of the business:

- Number of employees: 30+
- Type of labor: online gambling, IT and e-commerce experienced professionals
- Quality of existing staff: existing staff holds over 7 years each of experience in the gaming industry
- Pay structure: salary + bonus
- Training methods and requirements: all team members will cover a robust training program in order to be knowledgeable of all online gaming regulatory and compliance developments and best practices
- Schedules and written procedures: we hold internal policies and procedures for Policy on Betting During Work Hours, Responsible Gambling, KYC procedures, Fraud and Integrity, Compliance

Partners

PlaySQR key partners are software development, sports betting solutions providers among which are:

- Sportsradar (<https://www.sportradar.com>)
- Microsoft Azure (<https://azure.microsoft.com>)
- SoftSwiss (<https://www.softswiss.com>)
- Affilka (<https://affilka.com>)
- PragmaticPlay (<https://www.pragmaticplay.com>)
- Evolution (<https://www.evolution.com>)
- RWB (<https://rwbinter.com>)

Management & Organisation

Online Gambling Experience

The business day-to-day basis will be run by the CEO/COO, will be in charge of all business operations Technology, Product and Operations, Commercial, Legal Affairs, Finance and Human Resources. The CEO/COO - Milena Dimitrova comes with over 8 years of experience in executive positions in the mobile gaming industry and holds a vast knowledge in the business operations areas.



Main organisation chart:

Title	Count	Salary	Hiring cost	Fully-loaded cost	FTE overhead	Total Cost
COO/ CEO	1	\$80,000	0%	\$80,000	0.2	\$96,000
Head of Marketing & BizDev	1	\$60,000	0%	\$60,000	0.2	\$72,000
Head of Acquisitions	1	\$60,000	0%	\$60,000	0.2	\$72,000
Head of Retentions /CRM	1	\$50,000	0%	\$50,000	0.2	\$60,000
VIP Manager	1	\$40,000	0%	\$40,000	0.2	\$48,000
Marketing Regions A/B	1	\$40,000	0%	\$40,000	0.2	\$48,000
Marketing Regions C/D	1	\$40,000	0%	\$70,000	0.2	\$84,000
Design	2	\$30,000	15%	\$34,500	0.2	\$82,800
Operations	2	\$30,000	15%	\$70,000	0.2	\$168,000
Customer Support/Outbound	4	\$30,000	15%	\$34,500	0.2	\$165,600
Development	2	\$40,000	0%	\$40,000	0.2	\$96,000
Business Intelligence/Data	1	\$40,000	0%	\$40,000	0.2	\$48,000
Payroll	18	\$540,000		\$619,000		\$1,040,400

The team will pay the following salary schemes for the year 1:

Technology will be lead by our CTO - Bernard Cheah. And Product Operations will be led by Michael Gerenia. Finances and Human Resource will be managed by Bryan Wu. While Commercial and Legal Affairs will be managed by Ms. Milena Dimitrova. The startup is currently recruiting the team where the experience criteria are set at minimum 7 years in the online gambling industry.

Professional and Advisory Support

- Attorney: PELECANOS & PELECANOU, Cyprus
- Accountant: PELECANOS & PELECANOU

Chapter 7

Financial Plan

3 Year Projections

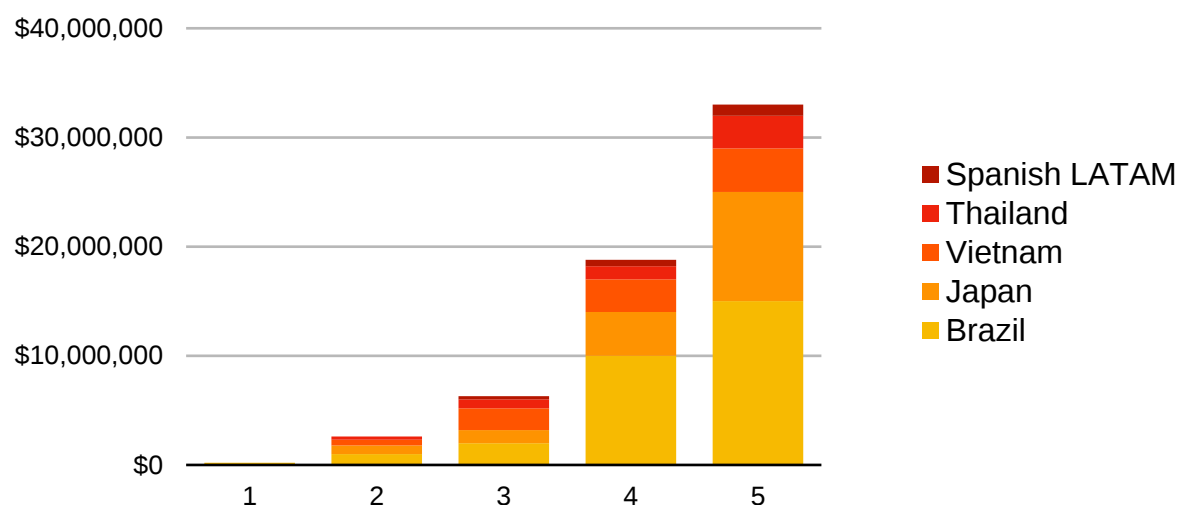
The financial plan consists of a 3 yrs financial projections attached in Appendix A.

Together they constitute a reasonable estimate of PlaySQR/RegalSQ's financial future. Our assumptions are based on:

CPA numbers for acquisition:

- Country A: \$80
- Country B: \$250
- Country C: \$300
- LATAM agent: \$50
- APAC agent: \$30
- Average: \$180

Gradual increasing marketing spend over the years, corresponding to the business strategy of PlaySQR, with 15% retention spend:



Marketing Spend	
% of revenue Y1	20%
% of revenue Y2	20%
% of revenue Y3	15%
% of revenue Y4	15%
% of revenue Y5	15%

Marketing spend will consist of both acquisition and retention costs.

Projected Cash Flow

Projected acquisitions have been presented as acquisitions, split into four different client categories : Low Value, Medium Value, High Value, and VIP customers. The revenues reflect the acquisitions based on the projected marketing spend for acquisitions and retention and respective churn rate over 36 months period.

The 36-month period will be mainly focused around setting up the business, launching the product and gradually building a database of customers. Hence the fluctuations in the cash-flow will be affected by several due payments around the licence fee for the online gambling licence from Curacao, and corporate setup fee for a business setup in Curacao and the Philipinnes. We will also plan to make a one-off payment to the gaming platform provider to settle the white-label solution, followed by monthly maintenance fee for the provider IT support and web development services.

Cash flow will be affected by the gradual build up of stable customer database, which based on the customer profile will bring average value per category.

Cashflow for 36 months:

Break-Even Analysis

PlaySQR/RegalSQ expects to become profitable in its second year of operation by growing aggressively its customer database and improving its business operations bottom line.

Sensitivity Analysis

Shareholder funds will fund the first-year investment and costs, to include: website improvement and launch of mobile apps, establishment of additional banking and merchant services facilities.

Customer Support and Customer Complaints Handling

Helpdesk and Customer Services

On launch PlaySQR will use an in-house helpdesk/customer service provided by RWB Smart. The cost of the service is provided in the financial statements of this business plan. On launch The RWB Smart team will consist of 15 – 20 people.

A 24-hour customer service support will be available 7 days a week via E-mail, Telephone and Live Help Chat. All correspondence is logged and made available to supervisors to assure quality control.

Services will include:

Customer Support: Skilled customer service representatives will assist customers with their enquiries in real time and with utmost professionalism. The customer support team will have experience in handling billing, product support, status updates and other functions related to customer service.

Technical Support: Skilled technicians will be available to provide technical support for the internet based services, although this will be through Neso meaning RWB Smart will be trained to divert technical queries accordingly.

Customer loyalty and retention strategies: The support team will initiate a real time dialogue with registered customers and may offer incentives and promotions to VIPs and valued customers.

Complaints Handling: The service will include the maintenance of a database that will contain the following information:

- each inquiry is date-stamped
- each inquiry includes the player's submission (if available) or a summary of it
- the resolution of the inquiry is recorded.

The access to that database will be provided to the executive officers of the company and its operation manager.

Payments: Support the facilitation of withdrawals and refunds.

Trading: Supporting the Sportsbook product

Data Protection and Privacy Policy

As part of the PlaySQR's Account Opening process, the company will ask customers to provide it with certain personal information, including a name, postal address, e-mail address and password as well as to certify that a customer is not underage. It will use that personal information to confirm various financial transactions, to send events and news information and to provide customer support services. The name the customer registers with must be real. In addition, it is very important to ensure that information provided by a customer is valid, since it will be used in the course of validating financial transactions and the other aforementioned purposes.

PlaySQR undertakes substantial efforts to protect the confidentiality of the identity, preferences and other information it has collected about individual customers and will not knowingly allow access to this information to anyone outside of the organisation, other than to the Player or to personnel of other companies related to or affiliated with PlaySQR and to third party service providers who use personal information to provide services in respect of the PlaySQR gambling services.

All recipients of personal information shall be bound by applicable data protection laws to keep personal information private at no less a level than that by which PlaySQR is bound. PlaySQR makes a substantial investment in its server, database, backup, firewall and encryption technologies to protect the collected information.

The Company's Data Protection Policy and Privacy Policy can be found in Appendices K & L respectively.

1. Player Protection

PlaySQR will safeguard player deposits and ensure customers receive their true and fair winnings. This will be ensured through a player protection client account operated by XXXXXXXX the account will hold funds in excess of 100% of the total player balances at all times.

2. Responsible Gaming

Online gaming is fun, exciting, entertaining and can also be lucrative. At the same time online gaming can also be addictive. PlaySQR works actively to prevent problems related to gaming.

Players that lose control over their gaming, risk not only their financial situation it can also affect the family with adverse consequences. Players must therefore be made well aware of the risks of online gaming.

PlaySQR will provide links on all its website pages to:

- [Gambleaware.co.uk](https://gambleaware.co.uk)
- [Gamcare.org.uk](https://gamcare.org.uk)

PlaySQR's software suppliers incorporate features that make it possible for the gaming operator to allow end-users to limit their play by setting a betting limit or by disabling certain features (such as autoplay). It is also possible to program the system so that a certain period of time must expire between gaming sessions.

PlaySQR strives to minimize the damage and problems that can arise as a result of gaming addiction by developing responsible gaming and training programs for gaming company employees and by offering help line services and personal advice services.

Users will also have the ability to:

- Choose not to receive marketing emails from PlaySQR.com by changing your preferences in their account settings
- Players can modify their betting activities or set a maximum betting limit in their account settings
- Players can self-limit their participation or exclude themselves from play via a request made to help@playsqr.com or in their account settings. The request will be treated as high priority.

Further details are provided in the Terms and Conditions attached at **Appendix A**.

Terms and Conditions

Full details on the Terms and Conditions relating to the site can be found in the attached Appendix A.

Registration checks and Know Your Customer procedures

The following rules and policies apply to PlaySQR's activities in accordance with the company's Anti-Money Laundering (AML) and Know Your Customer (KYC) procedures.

- PlaySQR does not allow online gaming or the depositing of funds for that purpose unless the intended participant has registered with the company through the registration page and has created an account with the company and confirmed their acceptance of the website terms and conditions.
- No player under the age of 18 is able to register with PlaySQR. A record of attempts of under 18 registrations is maintained for on-going screening purposes.
- Known problem gamblers will be excluded from registration as will gamblers who have previously been excluded from the site. Gamblers wishing to re-register with the website will be required to send an email to the customer services team to request that their account be reactivated. Such requests will be reviewed on a case by case basis.
- Records will be maintained by the company of all current, attempted and past registrations.
- Upon completion of all required registration fields and confirmation of acceptance of the terms and conditions, an email will be sent to the registered user at the email address provided. Registration will not take place if any fields are not completed.
- To activate their account, the player will be required to log-in to the company website using the link provided, upon successful input of their password the account will be activated.
- Monies cannot be deposited with the company and free units cannot be allocated to the account until it has been activated, as above.
- When registering with the company, the account will not be opened unless the requested identity details are completed in full. Duplicate accounts will not be allowed and checks will be made at the time of registration.
- Fictitious names will not be allowed. Fictitious names will be identified at the time funds are deposited to the account and the account terminated.
- In certain cases, highlighted by the company's risk assessment, PlaySQR may consider that a participant poses a higher risk. In these circumstances, enhanced due diligence will be requested and collected by the customer support team and provided to the MLRO. Participants who pose an additional risk will be marked in the back-office system and a report of their transactions will be made available to the MLRO.

A participant who poses higher risk may be:

- A head of state, head of government, minister or deputy or assistant minister;
- A senior government official;
- A member of parliament;
- A senior politician;
- An important political party official;
- A senior judicial official;
- A member of a court of auditors or the board of a central bank;
- An ambassador, charge d'affaires or other high-ranking officer in a diplomatic service;

- A high-ranking officer in an armed force;
- A senior member of an administrative, management or supervisory body of a State-owned enterprise; and
- A senior official of an international entity or organisation;
- Any family members of a person mentioned above, including a spouse or equivalent, child or the spouse or partner of a child, brother or sister (including a half-brother or half-sister), parent, parent-in-law, grandparent or a grandchild.

Based on the risk assessment, and on each individual case, the MLRO will decide whether and in what form additional due diligence is required. Additional due diligence may include:

- World-Check is an independent online database containing names and details of individuals and businesses that may be considered a heightened risk to PlaySQR. Examples of individuals featured on the World-Check database include Politically Exposed Persons (PEPs), prominent public figures or persons known or suspected to be involved in financial crime
- Consideration by the MLRO as to whether additional aspects of the participant's identity should be verified - perhaps through the certification/notarisation of identity and address verification, securing of bank references, etc.
- Consideration by the MLRO as to whether information is required on the source of funds and the source of wealth/background of the participant

The full policy and procedures are included in the AML/CFT Policy in Appendix H.

Anti-Money Laundering

Bryan Wu will be appointed as MLRO. PlaySQR will provide the MLRO (Directors, the Operations Manager and the key account personnel) with full access to all back office systems and reporting.

Full details of the company's AML/CFT Policy in Appendix H.

The services provided by the MLRO will include but not be limited to the following:

Compliance Framework

- Providing a structured set of guidelines that detail the organisation's processes for maintaining accordance with established regulations, specifications and legislation

AML Training

- Provision of Anti Money Laundering and Prevention of Terrorism training. Initial face to face training provided followed up by annual online refresher course
- Provision of Anti-fraud training. Assistance with implementation of fraud scoring surrounding PEPs and sanctions checks, geo-location checks, blacklist databases and 3D secure arrangements

- Provision of Anti-bribery training specific to Isle of Man Anti-bribery legislation

Jurisdictional monitoring

- Monitoring regulatory updates in all jurisdictions to ensure a comprehensive overview of provision of gambling facilities within each jurisdiction

Monthly internal reporting

- Monthly reporting which includes the following information in order to assist with regulatory compliance (as applicable):
 - o Licences
 - o Risk Summary
 - o Player Registrations
 - o Active Players by Jurisdiction
 - o IT systems
 - o Software Providers
 - o RNG Games Utilised
 - o Responsible Gaming Information
 - o Player Protection
 - o Advertising
 - o Compliance
 - o Complaints
 - o Operations
 - o Business Partners
 - o Key Officials and Beneficial Owners
 - o Statutory/Transactions
 - o Invoices and Credit Arrangements
 - o Taxes and Statutory Payments
 - o Notes for Directors

APPENDICES

- APPENDIX A – Terms & Conditions
- APPENDIX B – Game Rules
- APPENDIX C – Financial Projections
- APPENDIX D – Sensitivity Analysis
- APPENDIX E – Advertising and Media Policy
- APPENDIX F – Age Verification Policy
- APPENDIX G – Anti-Bribery and Corruption Policy
- APPENDIX H – Anti-Money Laundering & Countering the Financing of Terrorism Policy
- APPENDIX I – Business Continuity Plan
- APPENDIX J – Client Segregation of Funds Policy
- APPENDIX K – Code of Business Conduct
- APPENDIX L – Complaints Handling Policy
- APPENDIX M – Customer Due Diligence Policy
- APPENDIX N – General Data Protection Regulation Policy
- APPENDIX O – Fraud Prevention Policy
- APPENDIX P – Money Laundering/Terrorist Financing Business Risk Assessment
- APPENDIX Q – Privacy Policy
- APPENDIX R – Reporting Suspicious Activity Policy
- APPENDIX S – Responsible Gambling Policy
- APPENDIX T – Risk Matrix/Register
- APPENDIX U – Technology Risk Assessment Policy
- APPENDIX V – Third Party Supplier Engagements and Due Diligence Policy
- APPENDIX W – Whistleblowing Policy