



Business Plan

Online poker room business plan for FHP Network B.V., prepared in accordance with Curaçao Gaming Authority (CGA) guidance and requirements for license application.

v1.0

☐ Draft



CGA Business Plan Guidance

The CGA requires all applicants to submit a detailed business plan that demonstrates the viability, integrity, and regulatory readiness of the proposed gaming operation. The plan must cover: corporate structure, beneficial ownership, source of funds, target markets, product offerings, technical infrastructure, AML/CFT measures, responsible gaming commitments, financial projections (3–5 years), and a clear implementation timeline. CGA-approved consultants may draft this document for €5,000.



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1.0

Executive Summary

This Business Plan has been prepared by **FHP Network B.V.**, a company incorporated under the laws of Curaçao, in support of its application for a gaming license issued by the Curaçao Gaming Authority (CGA). FHP Network B.V. proposes to operate an exclusively online poker platform, offering real-money poker games and tournaments to players in permitted jurisdictions worldwide.

The platform will be a dedicated poker room — no casino table games, no slots, no live dealer products, and no sports betting. The sole product offering is online poker across multiple formats including cash games, Sit & Go tournaments, and multi-table tournaments (MTTs). This focused, single-vertical approach allows FHP Network B.V. to deliver a best-in-class player experience with purpose-built technology and a deep understanding of the poker player community.

Key objectives include achieving sustainable player liquidity through strategic network partnerships or proprietary player pools, maintaining full regulatory compliance, implementing robust AML/CFT and responsible gaming controls, and reaching profitability within the first 24 months of operation.

2.0

Company Overview

Legal Entity: FHP Network B.V., a private limited liability company (Besloten Vennootschap) incorporated in Curaçao under the laws of the jurisdiction.

Beneficial Ownership: Full disclosure of all ultimate beneficial owners (UBOs) holding 10% or more of the share capital of FHP Network B.V. has been provided to the CGA in accordance with its requirements. All UBOs have undergone thorough background checks, source-of-wealth investigations, and due diligence screening.

Corporate Structure: FHP Network B.V. operates with a lean, focused management team. The organizational structure includes a Board of Directors, Chief Executive Officer, Compliance Officer, Chief Technology Officer, Head of Finance, Poker Operations Manager, and Customer Support Manager, ensuring clear lines of accountability.

Source of Funds: The company is capitalized through personal investment from the majority owner of FHP Network B.V. Full documentation of the origin of all invested capital — including bank statements and signed investor declarations — has been provided to the CGA as required. As FHP Network B.V. exclusively offers poker, the company's liquidity requirements are limited to covering operational costs such as platform maintenance, payment processing fees, and KYC compliance expenses.

Registered Office: FHP Network B.V. maintains its registered office in Curaçao with appropriate physical presence and operational infrastructure as required under CGA regulations.

3.0 Market Analysis

Target Markets: FHP Network B.V. will target players in jurisdictions where online poker is legally permitted. Geofencing technology and real-time IP-based restrictions will actively block access from all restricted or prohibited jurisdictions. The restricted jurisdiction list will be maintained and reviewed on a monthly basis.

Online Poker Market: Online poker remains one of the most established and loyal verticals in online gaming. The global online poker market is valued in the multi-billion dollar range, with a dedicated and recurring player base. Unlike other gambling verticals, poker is a skill-based game, which creates long-term player retention and competitive community dynamics. The market is driven by major tournament series (WSOP, WPT, EPT), the continued growth of mobile poker, and a resurgent interest from younger player demographics.

Competitive Landscape: The online poker market is served by a small number of dominant networks (PokerStars, GGPoker, iPoker, 888poker, partypoker) alongside a long tail of smaller independent rooms. FHP Network B.V. will differentiate through competitive rake structures, strong promotional calendars, a focused player community, and responsive customer support. The platform is designed to attract recreational and semi-professional players who value fair play, transparent operations, and consistent game variety.

Player Demographics: The primary target demographic is adults aged 21–45 with an interest in competitive

card gaming, strategy, and online competition. Secondary demographics include seasoned poker enthusiasts seeking alternatives to dominant networks.

Restricted Jurisdictions: FHP Network B.V. will comply fully with CGA requirements and international sanctions, maintaining an up-to-date list of restricted jurisdictions. Access from restricted territories will be technically blocked at the platform and payment processing levels.

4.0

Products & Services

FHP Network B.V. operates exclusively as an online poker room. No casino games, no slots, no live dealer products, and no sports betting will be offered on the platform. The product suite is limited to the following poker formats:

Cash Games:

- **Texas Hold'em:** No Limit, Pot Limit, and Fixed Limit formats
- **Pot Limit Omaha 4-Card (PLO4):** Standard and speed/fast-fold tables
- **Pot Limit Omaha 5-Card (PLO5):** Standard and speed/fast-fold tables
- **Omaha Hi/Lo:** Pot Limit and Fixed Limit variants
- **Short Deck Hold'em (6+):** High-action format with a 36-card deck
- **7-Card Stud:** Fixed Limit and Stud Hi/Lo (Eight or Better)
- **Mixed Games:** HORSE, 8-Game, and dealer's choice rotations at applicable stakes
- Stakes ranging from micro stakes through low, mid, and high stakes tables across all game types

Tournaments:

Tournaments are offered across the following game types, each available in the speed formats indicated:

- **Texas Hold'em:** Regular, Turbo, Hyper-Turbo, Deep Stack, and All-In or Fold formats
- **Pot Limit Omaha 4-Card (PLO4):** Regular, Turbo, Hyper-Turbo, Deep Stack, and All-In or Fold formats
- **Pot Limit Omaha 5-Card (PLO5):** Regular, Turbo, Hyper-Turbo, Deep Stack, and All-In or Fold formats
- **Omaha Hi/Lo:** Regular, Turbo, Hyper-Turbo, Deep Stack, and All-In or Fold formats
- **Short Deck Hold'em (6+):** Regular, Turbo, and Hyper-Turbo formats
- **7-Card Stud:** Regular and Turbo formats

Across all game types, tournament structures include Multi-Table Tournaments (MTTs) with guaranteed prize pools (GTDs), Sit & Go (SNG) tournaments (single and multi-table), satellite tournaments feeding into major live and online series, freeroll tournaments for player acquisition, and scheduled flagship series with enhanced guarantees.

Platform Features:

- Multi-table functionality allowing players to play up to 4 tables simultaneously
- Lobby filters by game type, stake, speed, and table size
- Hand history and session statistics for player review
- Player notes and avatar customization
- Integrated cashier with deposit and withdrawal functionality
- Mobile-responsive client supporting iOS and Android

Rake Structure: FHP Network B.V. will apply a competitive rake structure consistent with industry standards. Cash game rake is collected as a percentage of each pot; FHP Network B.V. applies a cash game rake of 3.95% with a defined cap. Tournament rake is collected as a fixed percentage of the buy-in (typically 5%–10%). Rake structures are published transparently in the lobby and in the platform's terms.

Software & Suppliers: The poker platform will be powered by a certified, licensed poker software provider. All RNG certifications from accredited independent testing laboratories (e.g., BMM, eCOGRA, Gaming Labs International) will be obtained and maintained. Software providers must hold valid licenses from recognized regulatory jurisdictions.

Payment Methods: Integration with reputable payment service providers offering credit/debit cards, e-wallets (Skrill, Neteller, etc.), bank transfers, and cryptocurrency where permitted. All PSPs must comply with PCI DSS standards.

5.0 Technical Infrastructure

Hosting & Data Centers: Primary servers hosted in Tier 3+ certified data centers with redundancy, geographic failover, disaster recovery capabilities, and strict physical security. Data center locations comply with CGA technical requirements.

Poker Platform Architecture: The poker server infrastructure is purpose-built for real-time, low-latency multi-player card game operations. The system handles concurrent table management, pot calculation, hand history recording, and tournament management. Peak load capacity is designed to support simultaneous tables in excess of projected demand at launch.

RNG System: A hardware-based or software RNG certified to international standards governs all card shuffling and dealing. RNG certification is maintained with an accredited testing laboratory and renewed as required by CGA technical standards.

Anti-Collusion & Game Integrity: Automated collusion detection software monitors player behavior patterns, hand histories, and chip movement across tables. Flagged accounts are reviewed by the poker operations team. Players confirmed to have colluded will have accounts permanently closed and winnings returned.

Security Architecture: Multi-layered security including TLS encryption, Web Application Firewalls (WAF), DDoS protection, intrusion detection/prevention systems, and annual third-party penetration testing.

Data Protection: Player data encrypted at rest (AES-256) and in transit (TLS 1.2+). Role-based access controls, comprehensive audit logging, and data retention policies in compliance with applicable data protection regulations.

Business Continuity: Documented Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) with defined RTOs and RPOs. Automated backups, tested restoration procedures, and failover infrastructure ensure platform availability.

6.0 Regulatory Compliance Framework

FHP Network B.V. commits to full and ongoing compliance with all CGA regulations applicable to its online poker operations, including:

- National Ordinance on Offshore Games of Hazard (NOOGH) and all successor legislation
- CGA Technical Standards and Operating Conditions for online poker
- Anti-Money Laundering and Counter-Terrorism Financing regulations
- Responsible gaming requirements and player protection standards
- Suspicious activity reporting obligations and regulatory filings
- Annual financial audits by CGA-approved external auditors
- Ongoing internal compliance monitoring and audit functions
- Game integrity and anti-cheating obligations specific to online poker

A dedicated Compliance Officer will be appointed with direct reporting lines to the Board of Directors and the CGA regulator. The Compliance Officer oversees all regulatory matters, staff training, policy implementation, and annual compliance reviews.

7.0 Financial Projections

Revenue Model: FHP Network B.V.'s primary revenue source is rake collected from cash games and tournament fees. Unlike casino operations with house-edge products, poker revenue is entirely derived from player-vs-player activity, creating a sustainable and transparent income model aligned with player volume and activity.

Capital Requirements: Initial capital investment covers CGA licensing fees, poker software licensing, platform customization, marketing launch budget, operational costs for a minimum of 12 months, and player fund segregation requirements.

Revenue Projections (5 Years):

- **Year 1 — Establishment Phase:** Focus on platform launch, building player liquidity, seeding cash game

tables, and launching the initial tournament schedule. The initial capital required to recoup the investment and keep the business operational — excluding marketing — is projected between **\$175,000 and \$279,000**. With the inclusion of the Year 1 marketing budget, total initial investment for the first year may exceed **\$500,000**. Projected revenue for Year 1 is estimated at **\$350,000 to \$795,000**, driven by early adopter acquisition and the initial response to the marketing campaign. Revenue performance within this range is directly correlated to market reception and player acquisition velocity.

- **Year 2 — Growth Phase:** The effects of early-stage marketing campaigns are well-documented to materialize 7–9 months following initial deployment. As those compounding effects take hold, FHP Network B.V. projects a measurable increase in active players per hour across cash game tables and tournament registrations. Year 2 revenue is projected at **\$900,000 to \$1,200,000** — sufficient to cover the initial capital investment, absorb increased operational costs, and fund a substantially expanded marketing budget. The marketing budget for Year 2 is planned to increase by **250–300%** relative to Year 1 expenditure. The strategic basis of Year 2 is to deploy as much capital into marketing as responsibly possible, leveraging the platform's established infrastructure and the proven quality of the poker product. FHP Network B.V. exclusively offers variations of poker, which creates a defined and predictable cost structure with no ambiguity around product scope. This clarity — combined with fixed licensing, software, and compliance expenses — allows for an accurate financial forecast across the first five years of operation. Year 2 establishes the financial foundation and sets the precedent for the accelerated growth phases that follow.
- **Year 3 — Accelerated Growth:** Building on the compounding player acquisition from Year 2's marketing investment, Year 3 is projected to see revenue growth of approximately **379%** over Year 2. Based on a Year 2 midpoint of approximately \$1,050,000, Year 3 projected revenue is estimated at **\$3,303,000 to \$4,657,000**. Player volume per hour is expected to increase materially, supporting a denser and more active lobby across cash game and tournament formats.
- **Year 4 — Market Penetration:** Year 4 is projected to grow between **73% and 85%** over Year 3, reflecting deepened brand recognition, affiliate network maturity, and loyalty program retention. Projected Year 4 revenue is estimated at **\$5,913,000 to \$8,335,000**. At this stage, FHP Network B.V. anticipates consistent flagship tournament series, expanded VIP program tiers, and the potential for white-label licensing or network agreements with third-party operators.
- **Year 5 — Maturity & Sustained Growth:** Year 5 is projected to grow between **52% and 97%** over Year 4, reflecting a maturing but still-expanding player base. Projected Year 5 revenue is estimated at **\$10,317,000 to \$14,544,000**. By this phase, the platform will have achieved full tournament calendar maturity, a well-established affiliate ecosystem, and operational efficiency across all verticals of the poker product suite. Overall player growth from the mid-point of Year 2 through Year 5 is projected to represent an increase of approximately **1,495%** in active players.

FHP Network B.V. bases these projections on its projected marketing budget and deployment strategy, active marketing consulting engagements, Artificial Intelligence (AI) supported marketing analysis and consulting, the technical superiority of the platform software, and the quality and cost-effectiveness of the poker services being offered to the player community. These projections are prepared in good faith for the purposes of the CGA license application and will be reviewed and updated on an annual basis in line with

actual performance and regulatory requirements.

Player Fund Protection: All player funds are held in segregated bank accounts entirely separate from operational funds. Daily reconciliation is performed and reported to the Board and CGA as required. Player funds are never used for operational expenses.

Licensing & Ongoing Costs: Full budget allocation for CGA license fees, annual renewals, software licensing, compliance costs, external audit fees, and all regulatory reporting obligations.

8.0 Organizational Structure

Key Personnel of FHP Network B.V.:

- **Chief Executive Officer (CEO)** — Overall strategic direction, investor relations, and executive decision-making
- **Compliance Officer / MLRO** — Regulatory compliance, AML/CFT program, responsible gaming oversight, suspicious activity reporting
- **Chief Technology Officer (CTO)** — Platform architecture, software vendor management, security infrastructure, RNG oversight
- **Head of Finance** — Financial management, player fund segregation, reporting, budget control
- **Poker Operations Manager** — Tournament scheduling, cash game management, rake structure, game integrity, collusion investigations
- **Customer Support Manager** — Player support, complaints handling, escalation management

All key personnel of FHP Network B.V. must pass CGA personal background checks and satisfy fit-and-proper requirements. CVs, criminal record disclosures, and declarations of interest are submitted as part of the license application and updated as required.

9.0 Risk Management

FHP Network B.V. maintains a comprehensive risk management framework specifically addressing the online poker operating environment:

- **Liquidity Risk:** Insufficient player volume to sustain cash game tables; mitigated by launch promotions, freeroll programs, staggered game opening, and potential network agreements
- **Game Integrity Risk:** Collusion, chip dumping, bot usage, or real-time assistance (RTA) software; mitigated by automated detection systems, hand history analysis, and proactive player investigations
- **Regulatory Risk:** Changes in CGA regulations or jurisdictional restrictions; mitigated by proactive compliance monitoring and legal counsel engagement

- **Operational Risk:** Platform downtime, software failures, or supplier disruptions; mitigated by SLAs, redundant infrastructure, and BCP/DRP procedures
- **Financial Risk:** Rake revenue volatility, currency fluctuations, and payment processing disruptions; mitigated by diversified payment methods and conservative financial planning
- **Cyber Risk:** Data breaches, DDoS attacks, unauthorized account access; mitigated by enterprise security architecture and regular penetration testing
- **Reputational Risk:** Negative player sentiment, unresolved disputes, or regulatory sanctions; mitigated by transparent operations and a robust complaints process

Risk assessments are conducted quarterly. A formal risk register is maintained, reviewed by the Board, and updated following any material operational or regulatory change.

10.0 Responsible Gaming Commitment

FHP Network B.V. is committed to promoting responsible gaming across its poker platform. Poker's skill-based nature does not diminish the potential for problem gambling behavior, and FHP Network B.V. takes its player protection obligations seriously. Key measures include:

- Deposit limits, loss limits, session time limits, and buy-in limits at the account level
- Self-exclusion tools (temporary cooling-off and permanent self-exclusion)
- Reality checks and session duration notifications during active play
- Robust age verification at registration and during ongoing KYC processes
- Staff training on identifying indicators of problem gambling behavior
- Prominent links to recognized support organizations (GamCare, Gamblers Anonymous, BeGambleAware)
- Monitoring of player behavior patterns for early warning signs of harm

The full Responsible Gaming Policy of FHP Network B.V. is available on the platform and is incorporated into these documents by reference.

11.0 AML/CFT Overview

FHP Network B.V. will implement a comprehensive AML/CFT program aligned with CGA requirements, FATF recommendations, and applicable Curaçao national legislation. Online poker rooms present specific AML risks related to chip dumping and structured deposits; the FHP Network B.V. AML program is specifically calibrated to address these risks. Key elements include:

- Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD) procedures for all registrations and high-risk profiles

- Transaction monitoring with poker-specific typologies including chip dumping detection and structured deposit patterns
- Suspicious Activity Reporting (SAR) to competent authorities via the appointed MLRO
- Politically Exposed Persons (PEP) screening at registration and on an ongoing basis
- Sanctions list screening (UN, EU, OFAC, and local lists) in real time
- Record keeping and data retention in accordance with a minimum 5-year retention policy
- Regular AML/CFT training for all staff with access to player accounts or financial data

The full AML Policy and KYC Policy of FHP Network B.V. are available as standalone documents within this compliance library.

12.0 Marketing & Player Acquisition Strategy

FHP Network B.V.'s marketing strategy focuses on attracting a sustainable and loyal player base for its online poker room. Given the competitive nature of the poker vertical, the strategy prioritizes community-building and player retention alongside acquisition.

Marketing Channels:

- Affiliate marketing program targeting established poker media, strategy sites, and content creators
- Freeroll tournaments and no-deposit satellites as acquisition hooks
- Social media presence on platforms relevant to the poker community
- Sponsored content, poker coaching partnerships, and live streaming on Twitch and YouTube
- Email marketing to registered players for tournament announcements and promotions
- Loyalty and VIP program to incentivize long-term player retention

Advertising Standards:

- All marketing materials comply with CGA advertising standards and responsible gaming messaging requirements
- No targeting of minors, vulnerable persons, or individuals on self-exclusion registers
- Responsible gaming messaging displayed prominently in all advertising
- Transparent terms and conditions for all promotions and welcome offers
- No misleading claims regarding skill outcomes, winning probabilities, or guaranteed returns
- Compliance with jurisdiction-specific advertising restrictions and opt-out requirements

Welcome & Ongoing Promotions: FHP Network B.V. will offer a deposit match welcome bonus and regular reload bonuses. All promotional terms (wagering/release requirements, expiry dates, eligible games) are clearly communicated. Anti-bonus abuse measures are implemented at the platform level.

Implementation Timeline

Phase 1 — Pre-License (Months 1–3):

- Submit CGA license application and all supporting documentation for FHP Network B.V.
- Complete personal background checks and fit-and-proper assessments for all key personnel
- Engage CGA-approved auditors, legal counsel, and compliance consultants
- Shortlist and negotiate with poker software providers

Phase 2 — Platform Development (Months 3–6):

- Finalize and execute poker software licensing agreement
- Configure platform: game types, stakes, lobby structure, rake schedule, and tournament calendar
- Implement AML/KYC systems, collusion detection, and payment processing integrations
- Obtain RNG certification from an accredited independent testing laboratory
- Conduct security audits and penetration testing of the poker platform

Phase 3 — Launch Preparation (Months 6–8):

- CGA pre-launch compliance review and technical inspection
- Staff recruitment and training — poker operations, customer support, and compliance
- Closed beta / soft launch with controlled player group and invite-only access
- Activate affiliate program and initial marketing channels

Phase 4 — Public Launch (Month 9+):

- Full public launch of FHP Network B.V. poker platform with marketing campaign activation
- Launch inaugural tournament series with guaranteed prize pools
- Ongoing regulatory reporting and compliance monitoring submitted to CGA
- Quarterly performance reviews, policy updates, and risk register reassessments