

BUSINESS PLAN

Funpari.com Online Casino

The screenshot displays the FunPari website interface. At the top, there's a navigation bar with links for SPORTS, LIVE, FUN GAMES, MORE, and a Crash game icon. A green 'REGISTRATION' button and a 'LOG IN' link are visible. The main banner features a 'WELCOME PACKAGE UP TO 1500 EUR + 150 FS' offer with a 'FIND OUT MORE' button. Below the banner, a 'Matches' section lists various sports events with odds. The right sidebar contains a 'REGISTRATION' form with options for 'One-click' or 'By phone', a country selector (Kyrgyzstan), a currency selector (US dollar (USD)), and a 'REGISTER' button. Below the registration form, there's a '100% BONUS ON YOUR 1ST DEPOSIT' offer and a 'Bet slip' section. At the bottom of the sidebar, there's a 'Save/load events' button and a 'FunPari MOBILE' app download button.

Match	1	X	2	+4
ATP. Kitzbühel				
Jaume Antoni Munar Clar	0	3	1 (0)	
Yannick Hanfmann	1	6	3 (0)	5.55 - 1.152 +99
2 Set / Round of 32				
Nicolas Moreno De Alboran (WC)	0	5	(40)	
Andrea Collarini (Q)	0	3	(40)	1.18 - 5.05 +110
1 Set / Round of 32				
Australia. Victoria Premier League 1				
Kingston City	0	0		
Bulleen Lions	1	1		6.08 4.05 1.52 +387
31:03 / 1 Half / Round 23				
WTA. Iasi				
Gergana Topalova (Q)	0	1	0 (0)	
Selena Janicijevic (Q)	1	6	1 (0)	8.01 - 1.085 +79
2 Set / Round of 32				
Marie Benoit (Q)	0	0	(0)	

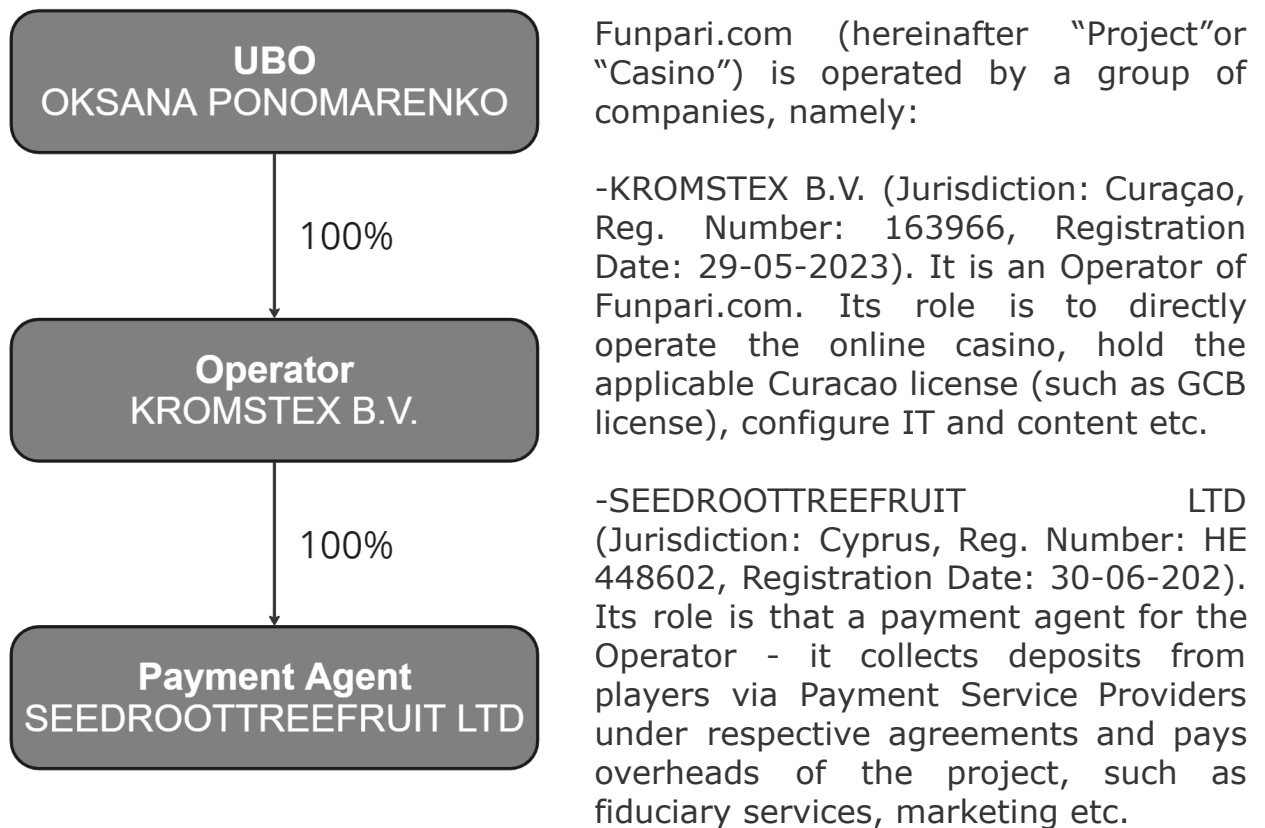
KROMSTEX B.V.
2024

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1. Overview of the business products and services

1.A. Ownership Structure and Key Constituents



The Project is led by the CEO, Founder and UBO of the project: OKSANA PONOMARENKO (Ukraine).

1.B. UBO and CEO - OKSANA PONOMARENKO

Oksana Ponomarenko brings a wealth of experience to her role as CEO & Founder of FUNPARI.COM since May 2023. She proactively identifies, assesses, and manages risks, driving organizational development initiatives for enhanced efficiency and effectiveness. Her leadership fosters innovation and adaptability, nurturing a high-performance culture and employee engagement. Prior to this, she served as Affiliate Manager at First Casino UA, overseeing marketing projects and optimizing campaigns for increased ROI. Her experience also includes roles as a Betting Shop Cashier at Favorit Sport, Bank Manager at SC Privatbank, and Bank Cashier at JSC Oshchadbank, where she demonstrated strong customer service, business acumen, and target-driven performance.

Leveraging her tenure as the CEO & Founder of FUNPARI.COM, Oksana holds profound insights across all project aspects, providing her with a distinct advantage in guiding the company towards success in her current role as CEO & Founder.

1.C. Operator and License Holder - KROMSTEX B.V.

Based in Curacao, KROMSTEX B.V. is a b2c licence holder No. 1668/JAZ under Curacao eGaming.

Commencing in 2024, our operations will fall under the regulatory oversight of the Gaming Control Board (GCB). Presently, we are in the process of seeking the necessary government license to operate in compliance with this authority.

1.D. Payment Agent - SEEDROOTTREEFRUIT LTD

A Cyprus company acting as a payment agent for the operator accepting payments through payment service providers (PSPs).

1.E. Project - funpari.com

1.E.0. Mission

- Pushing technological boundaries to deliver cutting-edge games and an unparalleled gaming experience. Leading the industry in innovation, setting benchmarks for gaming excellence, and surprising players with fresh and captivating experiences.
- Promoting responsible gaming through robust player protection measures, educational resources, and collaboration with like-minded organizations.
- Putting our players at the heart of everything we do, providing tailored experiences, prompt customer support, and continuous refinement based on player feedback.
- Prioritizing a positive impact by supporting charitable endeavors, endorsing local initiatives, and advocating for responsible gaming as part of our corporate social responsibility. Ensuring our games offer not only excitement but also social connection, skill enhancement, and unforgettable experiences.
- Pursuing sustainable growth by balancing financial success with ethical business practices, environmental stewardship, and a steadfast commitment to player well-being.

1.E.1. Product Offer

- Games of Chance (RNG-based games such as slots and casino table games)
- Betting (including live betting and virtual-sports betting)
- Live Dealer Games
- Peer-to-peer games (such as sport-exchange, bingo and poker)

1.E.2. SWOT Analysis

Strengths

Significant experience of the project managers and team members in the field of communications and casino management

High quality service

Strict policy against any type of fraud, which protects players from any potential troubles during the game

Wide range of games

Weaknesses

Competitors can quickly offer similar products or services
Limited pricing flexibility
Not available in all countries
Online content requires high internet speed
Lack of a clearly formulated long-term strategy (due to the nature of the business)

Opportunities

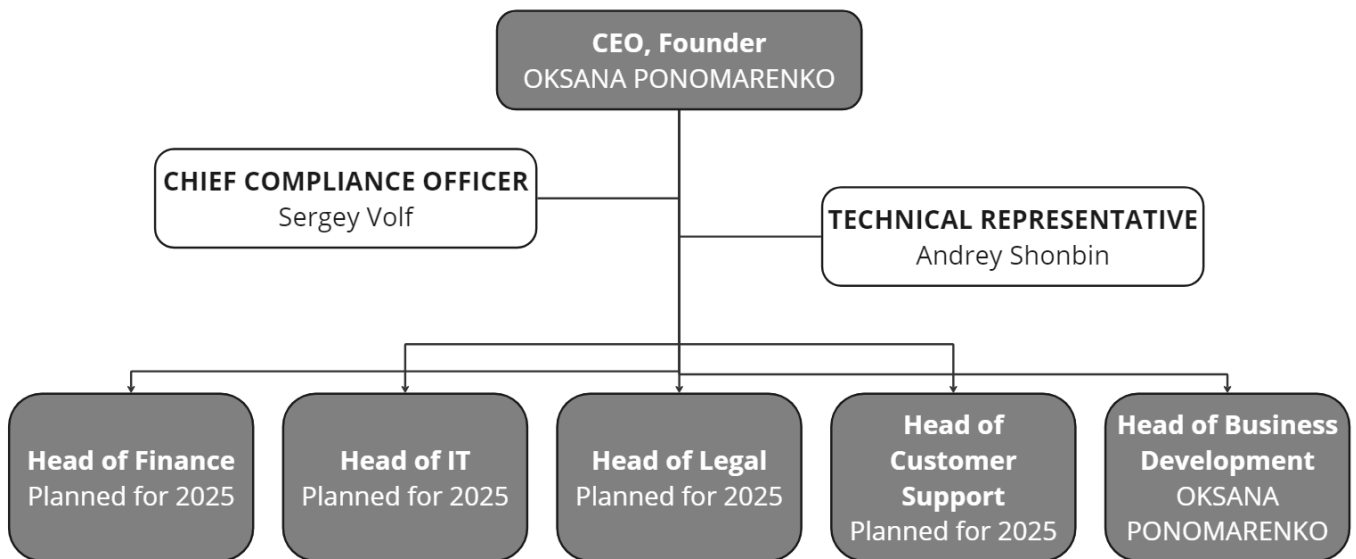
Growing popularity of mobile gambling
Constant emergence of new technologies
Global trend towards legalizing online casinos

Threats

Instability of the political environment
High competition
Impossibility of local placement of equipment and/or bans on the use of international services in some countries
Decrease in disposable income of the population against the backdrop of economic recession

2. Corporate management

2.A. Management Organogram and Commercial Roles



The Ultimate Beneficial Owner (UBO) serves as the CEO and sole shareholder of the Operator, actively involved in the day-to-day operations of the business.

The CEO is responsible for addressing marketing issues, defining the company's growth trajectory across diverse sectors, overseeing the integration of payment solutions, and expanding the brand into various geographical regions. Key company executives, along with the CEO, may be invited to participate in board meetings.

The CEO delegates strategies and decision-making authority directly to departments and functional units. This structure ensures the versatility of decision-making and ensures that no decision is deadlocked. Legal support is provided internally by respective departments and officers. While department heads make most decisions, final approval rests with the CEO.

Department heads report Directly to the UBO and are to be hired in 2025.

The CEO also bears business development functions.

2.B. Compliance Officer and other Non-Commercial Roles

Chief Compliance Officer (CCO) - Sergey Volf - does not have any commercial duties in the project, his role is purely to ensure compliance.

Being outsourced from the project's platform provider, the CCO is a proactive and detail-oriented professional with extensive experience in compliance, specializing in the iGaming sector.

Throughout their career, the CCO has demonstrated strong organizational skills and a keen ability to manage multiple projects simultaneously, ensuring timely and efficient completion while exceeding client expectations.

One of the CCO's key strengths lies in effective coordination and management of projects, where they actively engage with clients, regulatory

authorities, and internal stakeholders to ensure that all project requirements are met with precision and professionalism. Their dedication to delivering results that exceed expectations and forging lasting partnerships built on trust and integrity underscores their commitment to excellence and client satisfaction.

In addition to hands-on experience, the CCO continually seeks to enhance his knowledge and skills through ongoing education and training. His passion for excellence drives them to stay abreast of the latest developments in compliance regulations and best practices, enabling them to provide informed guidance and support.

For the sake of business continuity, the platform provider has also allocated a Technical Representative Andrey Shonbin to the Project.

Andrey Shonbin is an accomplished IT professional with a robust background in supporting and managing IT platforms. With extensive experience in troubleshooting, customer support, and system maintenance, he has consistently demonstrated his ability to ensure seamless platform operations and user satisfaction.

Throughout their career, the Technical Representative has excelled in providing comprehensive technical support to clients, addressing a wide range of issues related to software, hardware, and network configurations. minimizing downtime and enhancing user experience.

3.Business forecasts for 3 years

Below you can see projections for the financial years 2024-2027

3.A. Business projection Y2024 (APR-DEC)

	Total 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
Month of operation		1	2	3	4	5	6	7	8	9
Days per month		30	31	30	31	31	30	31	30	31
INVESTMENT	- 150 532	- 136 000	-	-	- 14 532	-	-	-	-	-
License and Security	- 136 000	- 136 000	-	-	-	-	-	-	-	-
Servers	- 11 632	-	-	-	- 11 632	-	-	-	-	-
Office supplies	- 2 900	-	-	-	- 2 900	-	-	-	-	-
OPERATING	988 624	- 4 850	-	-	-	- 52 325	- 2 744	1 181	4 404	7 657
Total Income	4 879 841	-	-	-	-	32 813	42 000	48 103	54 256	61 062
Income from clients	4 879 841	-	-	-	-	32 813	42 000	48 103	54 256	61 062
Total Costs	- 3 891 217	- 4 850	-	-	-	- 85 137	- 44 744	- 46 922	- 49 853	- 53 405
Direct costs	- 3 127 141	- 4 850	-	-	-	- 74 004	- 33 611	- 35 789	- 38 185	- 40 820
Marketing	- 1 832 080	-	-	-	-	- 37 800	- 21 780	- 23 958	- 26 354	- 28 989
Staff Augmentation	- 838 500	-	-	-	-	-	-	-	-	-
License fees	- 142 961	- 4 850	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031
Salaries	- 313 600	-	-	-	-	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800
Indirect costs	- 480 267	-	-	-	-	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133
Accounting	- 117 333	-	-	-	-	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667

	Total 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
Month of operation		1	2	3	4	5	6	7	8	9
Services										
Depreciation and Maintenance	- 101 333	-	-	-	-	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Hosting Service	- 124 000	-	-	-	-	-	-	-	-	-
Rent	- 33 600	-	-	-	-	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050
Legal Fees	- 104 000	-	-	-	-	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250
Taxation	- 283 810	-	-	-	-	-	-	-	-534	- 1 452
Profit tax	- 283 810	-	-	-	-	-	-	-	-534	- 1 452

3.B. Business projection Y2025

	Total 3 years	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25
Month of operation		10	11	12	13	14	15	16	17	18	19	20	21
Days per month		31	28	31	30	31	30	31	31	30	31	30	31
INVESTMENT	- 150 532	-	-	-	-	-	-	-	-	-	-	-	-
License and Security	- 136 000	-	-	-	-	-	-	-	-	-	-	-	-
Servers	- 11 632	-	-	-	-	-	-	-	-	-	-	-	-
Office supplies	- 2 900	-	-	-	-	-	-	-	-	-	-	-	-
OPERATING	988 624	11 369	- 29 120	15 493	19 760	25 623	32 641	44 004	27 130	52 136	55 537	52 889	49 412
Total Income	4 879 841	68 721	77 371	87 154	96 483	108 245	121 910	137 506	147 742	156 497	161 947	166 114	169 807
Income from clients	4 879 841	68 721	77 371	87 154	96 483	108 245	121 910	137 506	147 742	156 497	161 947	166 114	169 807
Total Costs	- 3 891 217	- 57 352	- 106 491	- 71 661	- 76 723	- 82 621	- 89 269	- 93 501	- 120 613	- 104 361	- 106 410	- 113 225	- 120 396
Direct costs	- 3 127 141	- 43 719	- 53 358	- 56 866	- 60 724	- 64 968	- 69 637	- 70 664	- 102 535	- 79 231	- 80 320	- 87 882	- 96 033
Marketing	- 1 832 080	- 31 888	- 35 077	- 38 585	- 42 443	- 46 687	- 51 356	- 52 383	- 53 431	- 54 500	- 55 589	- 56 701	- 58 402
Staff Augmentation	- 838 500	-	- 6 450	- 6 450	- 6 450	- 6 450	- 6 450	- 6 450	- 12 900	- 12 900	- 12 900	- 19 350	- 25 800
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031
Salaries	- 313 600	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800
Indirect costs	- 480 267	- 11 133	- 53 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133
Accounting Services	- 117 333	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667
Depreciation and	- 101 333	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167

	Total 3 years	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25
Month of operation		10	11	12	13	14	15	16	17	18	19	20	21
Maintenance													
Hosting Service	- 124 000	-	- 42 000	-	-	-	-	-	-	-	-	-	-
Rent	- 33 600	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050
Legal Fees	- 104 000	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250
Taxation	- 283 810	- 2 499	-	- 3 662	- 4 866	- 6 519	- 8 499	- 11 704	- 6 944	- 13 997	- 14 957	- 14 210	- 13 229
Profit tax	- 283 810	- 2 499	-	- 3 662	- 4 866	- 6 519	- 8 499	- 11 704	- 6 944	- 13 997	- 14 957	- 14 210	- 13 229

3.C. Business projection Y2026

	Total 3 years	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26
Month of operation		22	23	24	25	26	27	28	29	30	31	32	33
Days per month		31	28	31	30	31	30	31	31	30	31	30	31
INVESTMENT	- 150 532	-	-	-	-	-	-	-	-	-	-	-	-
License and Security	- 136 000	-	-	-	-	-	-	-	-	-	-	-	-
Servers	- 11 632	-	-	-	-	-	-	-	-	-	-	-	-
Office supplies	- 2 900	-	-	-	-	-	-	-	-	-	-	-	-
OPERATING	988 624	46 318	8 989	43 538	48 570	47 203	50 400	51 488	30 468	48 858	55 882	57 535	64 317
Total Income	4 879 841	167 593	169 990	174 143	182 509	189 178	195 307	205 245	204 824	212 697	223 988	234 912	246 032
Income from clients	4 879 841	167 593	169 990	174 143	182 509	189 178	195 307	205 245	204 824	212 697	223 988	234 912	246 032
Total Costs	- 3 891 217	- 121 275	- 161 001	- 130 604	- 133 938	- 141 975	- 144 907	- 153 756	- 174 356	- 163 839	- 168 106	- 177 377	- 181 715
Direct costs	- 3 127 141	- 97 785	- 106 040	- 107 899	- 109 813	- 118 235	- 120 266	- 128 808	- 155 336	- 139 633	- 141 919	- 150 723	- 153 149
Marketing	- 1 832 080	- 60 154	- 61 959	- 63 818	- 65 732	- 67 704	- 69 735	- 71 827	- 73 982	- 76 202	- 78 488	- 80 842	- 83 268
Staff Augmentation	- 838 500	- 25 800	- 32 250	- 32 250	- 32 250	- 38 700	- 38 700	- 45 150	- 45 150	- 51 600	- 51 600	- 58 050	- 58 050
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031
Salaries	- 313 600	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800
Indirect costs	- 480 267	- 11 133	- 53 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133
Accounting Services	- 117 333	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667

	Total 3 years	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26
Month of operation		22	23	24	25	26	27	28	29	30	31	32	33
Depreciation and Maintenance	- 101 333	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Hosting Service	- 124 000	-	- 42 000	-	-	-	-	-	-	-	-	-	-
Rent	- 33 600	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050
Legal Fees	- 104 000	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250
Taxation	- 283 810	- 12 356	- 1 828	- 11 572	- 12 992	- 12 606	- 13 508	- 13 815	- 7 886	- 13 073	- 15 054	- 15 520	- 17 433
Profit tax	- 283 810	- 12 356	- 1 828	- 11 572	- 12 992	- 12 606	- 13 508	- 13 815	- 7 886	- 13 073	- 15 054	- 15 520	- 17 433

3.D. Business projection Y2027 (Q1)

	Total 3 years	Jan-27	Feb-27	Mar-27
Month of operation		34	35	36
Days per month		31	28	31
INVESTMENT	- 150 532	-	-	-
License and Security	- 136 000	-	-	-
Servers	- 11 632	-	-	-
Office supplies	- 2 900	-	-	-
OPERATING	988 624	49 077	23 958	51 829
Total Income	4 879 841	235 441	245 811	254 443
Income from clients	4 879 841	235 441	245 811	254 443
Total Costs	- 3 891 217	- 186 365	- 221 853	- 202 614
Direct costs	- 3 127 141	- 162 097	- 164 670	- 177 570
Marketing	- 1 832 080	- 85 766	- 88 339	- 88 339
Staff Augmentation	- 838 500	- 64 500	- 64 500	- 77 400
License fees	- 142 961	- 2 031	- 2 031	- 2 031
Salaries	- 313 600	- 9 800	- 9 800	- 9 800
Indirect costs	- 480 267	- 11 133	- 51 133	- 11 133
Accounting Services	- 117 333	- 3 667	- 3 667	- 3 667
Depreciation and Maintenance	- 101 333	- 3 167	- 3 167	- 3 167
Hosting Service	- 124 000	-	- 40 000	-
Rent	- 33 600	- 1 050	- 1 050	- 1 050
Legal Fees	- 104 000	- 3 250	- 3 250	- 3 250
Taxation	- 283 810	- 13 134	- 6 050	- 13 911
Profit tax	- 283 810	- 13 134	- 6 050	- 13 911

4.Source of Financing

4.A. Laid Down Capital

The structure of the Project's financing is very straightforward. Primarily the financing comes from the UBO's own funds which she sources independently of the Project. The laid-down capital is estimated at EUR 90 000 and will further be expanded from the UBO's own funds as necessary - as her wealth is constantly increasing and will cover the cost of setup within the projected period.

4.B. Profit and Dividends Distribution

As the industry landscape may be quite changeable, profit is not planned to be distributed to the shareholder (UBO), but rather reinvested in the project to both develop it further and to protect from any cash shortages or crediting.

4.C. External Funding

This tool of ensuring continuity is also on the table. The company is ready to take up short-term credit liabilities to cover any immediate need for cash as the need arises, however it will not have any impact on the Project's balance sheet, ownership structure or amount to a significant percentage of finance. No additional shares are to be issued, no other shareholders are to be engaged - to avoid the ownership and decision-making collisions.

4.D. Operating Profit as the KPI

The Project is most and foremost a commercial enterprise which measures its success by its Operating profit (OP). The Project is designed to stay in the market long-term, so the Below is the short representation of the indicators which the Project needs to achieve within a mid-term limit:

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	150 532
Sum of proceeds (SP), EUR	4 879 841
Net profit for the project period, EUR	908 340
Profitability index (PI)	2,1

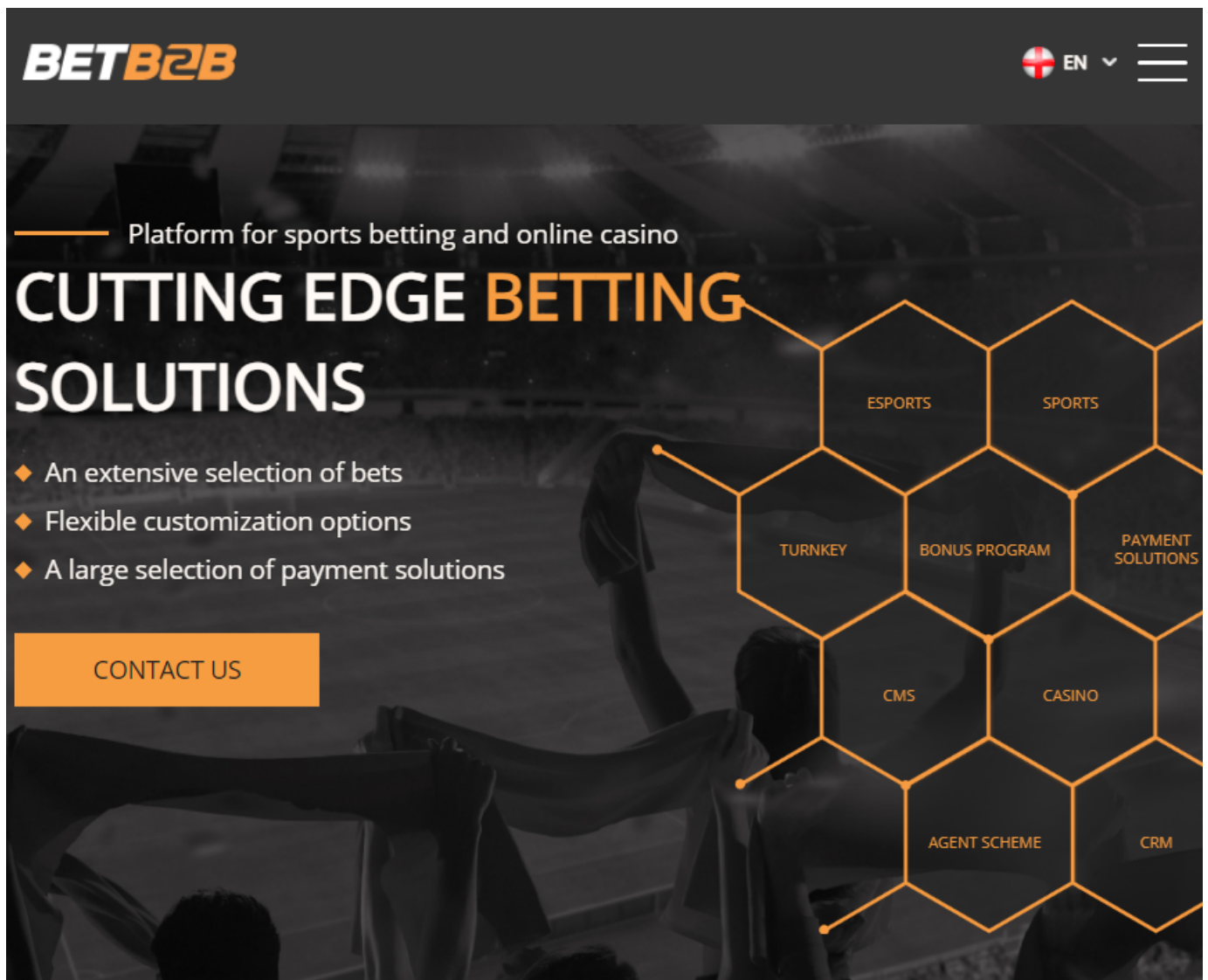
Given the volatile legal landscape of the industry, the Project is planned to make use of the GCB license for at least 5 years running and more - as long as the business shows average industry-wide returns.

5. Suppliers and Infrastructure

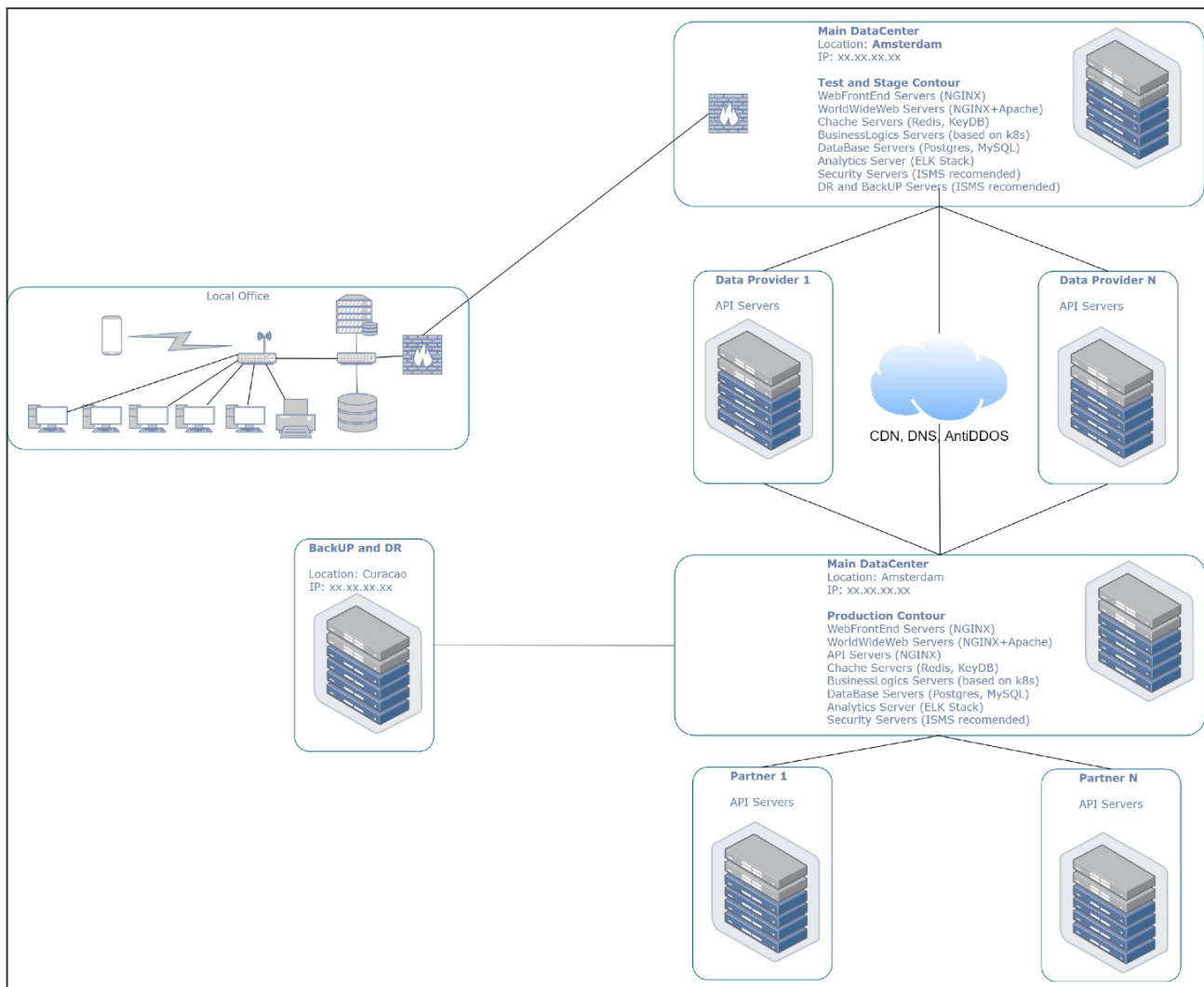
5.A. Platform Provider - BetB2B

The only material dependency is essentially the IT platform the Operator uses to operate the casino.

The Project is built on the IT platform provided by a renowned b2b software distributor Highflyer B.V. dba [BetB2B](#) - holder of a b2b gambling license in Curacao (GC sublicense), Anjouan, Tobique and pending application with the Curacao GCB.



Bet-b2b provides an outstanding solution for b2c operators such as ourselves, with robust IT infrastructure and a wide range of certified content. Below is the infrastructure schematic.



The above image is subject to copyright, strictly confidential to Highflir B.V. Please see Schedule A for a more detailed platform description.

The developers are represented by such prominent names as Thunderspin, Ibet.Games, Rich88, Concept Gaming, Cq9 Limited Arrow's Edge, Ds Virtual Gaming, etc. The list is subject to updates as per the Platform Provider.

All providers pass a rigorous compliance check, including RNG certification checks (examples below).

Certification Report.	Spribe OU Game Audit Report - Aviator	
Report Identification	SPR-UK-191115-01-GC-R2	
Certification Laboratory		Gaming Associates Europe Ltd 178 Merton High Street London SW19 1AY United Kingdom Company No. 9663955 www.gamingassociates.eu
Supervisor Signature	Binh Phu, Testing Manager 	
UKAS ISO/IEC 17025 Accreditation No: 9263		
Accredited to ISO/IEC 17025:2005		

														
Evoplay Entertainment B.V.														
Random Number Generator Assessment														
We have independently evaluated the Random Number Generator ("RNG") used by Play Evo Games Limited as detailed in the table below. The approach of the assessment followed the guidelines provided by the IAGR multi-jurisdictional framework and included an evaluation of the RNG, Marsaglia's Diehard Battery of Tests and Scaled Output Based Testing where recognised statistical and mathematical tests were performed. These included tests for probability, randomness and uniformity where the acceptance criteria is a pass at a 5% level of significance.														
<table><tr><td>Software Provider:</td><td>Evoplay Entertainment B.V.</td></tr><tr><td>Software Provider Address:</td><td>Dr. M.J. Hugenholtzweg Heelsumstraat, E-Commerce Park Vredenberg, Curaçao</td></tr><tr><td>Product Name:</td><td>Linux Random Number Generator</td></tr><tr><td>Operating System:</td><td>Linux 3.16</td></tr><tr><td>File Version:</td><td>3.16.0-4-amd64</td></tr><tr><td>Test Entity:</td><td>eCOGRA</td></tr><tr><td>Test Entity Address:</td><td>2nd Floor Berkeley Square House, Berkeley Square, London, W1J 6BD, United Kingdom</td></tr></table>	Software Provider:	Evoplay Entertainment B.V.	Software Provider Address:	Dr. M.J. Hugenholtzweg Heelsumstraat, E-Commerce Park Vredenberg, Curaçao	Product Name:	Linux Random Number Generator	Operating System:	Linux 3.16	File Version:	3.16.0-4-amd64	Test Entity:	eCOGRA	Test Entity Address:	2nd Floor Berkeley Square House, Berkeley Square, London, W1J 6BD, United Kingdom
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5.B. Other Suppliers

An online casino requires a joint effort of several teams. We have several service providers who we rely upon to ensure a smooth operation on a continuous basis. However, given the competitiveness of the IT market and all underlying solutions necessary to keep an online casino running smoothly, these do not constitute a material dependency. The casino operation relies on the following services and their respective providers:

Marketing Agencies

Unlike brick-and-mortar establishments, online casinos rely heavily on their online presence, which means that the Project has to engage in SEO, SMM and other forms of advanced online presence promotion to develop the client base in a sustainable manner.

Payment Service Providers (PSPs)

Payment.Center, Fatpay, iSettle, Flexify, Getapays, Monnify

FLEXIFY

FaT Pay

monnify

Banks

SatchelPay, Kaiserex, JetonBank, Bilderlings



SatchelPay

Kaiserex
www.kaiserex.com

Jetonbank®

Rigorous compliance protocols in banking services effectively reduce the likelihood of service interruptions. Simultaneously, utilizing 2 to 3 banks concurrently provides a safeguard against inherent banking risks. Expanding our banking relationships enhances our negotiation leverage for favorable

terms and strengthens the resilience of our financial structure. This proactive approach bolsters us against potential disruptions and reinforces our financial infrastructure. Through strategic diversification of our banking alliances, we optimize our risk management strategies, promoting stability and sustainability in our financial operations.

Corporate and Fiduciary Service Providers (CSPs)

In the legal and corporate service provider sector, numerous seasoned professionals boast extensive experience in the gambling industry. These experts play a crucial role in aiding us to comply with regulatory, payment, and banking requirements, thereby ensuring comprehensive compliance. At the same time, no CSP represents a critical dependency, as the modern legal and corporate system allows for a smooth switch between CSPs.

Our most trusted partner and representative in Curacao since the inception of the business in 2023 is Sadekya Fiduciary Partners.



6.Risk Evaluation And Management

6.A. Customer Risk

Customer risk refers to the risk of money laundering (ML) and terrorist financing (TF) that arises from maintaining relationships with specific individuals. Assessing the risk posed by a natural person typically involves evaluating their economic activity and/or source of wealth. Categories of customers whose activities may indicate a higher risk include:

- Customers with multiple sources of income
- Customers with irregular income streams
- Politically Exposed Persons (PEPs)
- High spenders (as their money may be derived from illegal activities)
- Disproportionate spenders (whose spending is inconsistent with the casino's information about their known income or assets)
- Casual customers, such as locals or tourists, particularly when their spending patterns change
- Individuals who improperly use third parties, as criminals may use others to gamble, buy chips, or cash out on their behalf to avoid Customer Due Diligence (CDD) measures
- Customers with multiple casino player rating accounts, which can hinder the casino's ability to track their gambling activities
- Unknown customers redeeming large amounts of chips
- Junket operators, who monitor player activity, issue credit, and collect credit

A player with a single, regular source of income poses a lower risk of ML/TF compared to a player with multiple sources of income or irregular income streams.

6.B. Geographical Risk

Geographical risk refers to the risk posed to the casino based on the player's geographical location and the source of wealth in the business relationship. Factors such as the player's nationality, residence, and place of birth must be considered, as these can indicate heightened geographical risk. High-risk countries include those with weak AML/CFT systems, significant levels of corruption, international sanctions related to terrorism or weapons proliferation, and known terrorist organization operations.

To assess geographical risk, casinos should refer to various information sources provided by reputable organizations such as the FATF and well-known non-governmental bodies. Key sources include:

- Countries on the FATF list of High-Risk Jurisdictions subject to a Call for Action
- Countries on the FATF list of Jurisdictions under Increased Monitoring
- Countries mentioned in the CFATF Public Statement
- Countries identified as Jurisdictions of Concern or Primary Concern in the U.S. Department of State's annual International Narcotics Control Strategy Report (INCSR)
- Countries on the European Commission's list of third countries with strategic deficiencies in their AML/CFT regime

- Countries sanctioned by the OFAC
- Countries identified by credible sources as providing funding or support for terrorist activities or hosting terrorist organizations
- Countries on the Corruption Perception Index compiled by Transparency International

The idea is to have a list of countries considered high risk and those considered low risk.

6.C. Product, Service and Transaction Risk

Some products or services are inherently riskier than others and thus more attractive to criminals. These include gaming products or services that allow customers to influence the outcome of a game, either individually or in collusion with others. Additionally, certain payment methods accepted by casinos present higher risks of money laundering (ML) and terrorist financing (TF) and should be treated as high-risk factors. These include:

- Proceeds of Crime: Money transferred from illegal activities such as check fraud, credit/debit card fraud, narcotics trafficking, and theft from employers.
- Cash: Land-based casinos (or physical establishments of online casinos) are often used to exchange large amounts of illicit proceeds in small denominations for larger ones.
- Anonymous Payment Methods: Such as prepaid cards and virtual assets.
- Use of Casino Accounts: These accounts should only be used for gambling purposes, not for depositing and withdrawing funds without significant play.
- Specific Games: Games like roulette and craps that involve even bets.
- Peer-to-Peer Gaming
- Third-Party Accounts: Use of accounts or cards issued in the name of third parties.
- Fund Transfers: Moving funds from one gaming account to another.
- Financial Services: Services such as credit/marker, currency exchange, and check cashing.
- Multiple Casino Accounts: Internet operators may own and control multiple websites.
- Changes to Financial Institution Accounts: Using these changes to fund casino accounts.
- Identity Fraud: Using stolen details of financial institution accounts on websites or using stolen identities to open accounts, which are then used on gambling websites.
- Cash to Fund Prepaid Cards: This poses similar risks as using cash directly.
- Games Involving Multiple Operators: Such as poker on platforms shared by multiple operators.
- Electronic Wallets (e-wallets): Not all e-wallets are licensed in reputable countries, and many accept cash deposits. Some e-wallets only accept money from financial institution accounts, and financial statements may only record the payment to the e-wallet, not the transaction to the casino. This can be exploited by dishonest customers to disguise their gambling activities.

6.D. Distribution Channels Risk

The channels through which a casino establishes a business relationship or conducts transactions can significantly impact the risk profile of that relationship or transaction:

Anonymity: Channels that allow for anonymity increase the risk of money laundering (ML) and terrorist financing (TF) if no measures are implemented to mitigate this risk.

Non-Face-to-Face Interactions: While non-face-to-face interactions are no longer automatically considered high risk, they should still be regarded as high-risk factors unless the casino uses technological measures and controls to address the increased risk of identity fraud or impersonation in these situations.

Third-Party Involvement: The involvement of third parties in the interactions between the customer and the casino also increases the risk. This is particularly true when these third parties are not subject to any AML/CFT obligations.

6.E. Risk Mitigation

6.E.0. AML/CFT

The risks above are essentially covered by following the guidelines as recommended by the GCB and AML/CFT authorities of the EU, namely [Regulations for the combating of Money Laundering, the Financing of Terrorism and Proliferation of weapons of mass destruction.](#)

The project aims to be fully compliant by September 1st, 2024.

The key take-out of these regulations is that the project uses the Risk-based Approach in managing its clients. In practice it means that the project will:

- collect and verify all material information pertaining to the player (full name; permanent residential address; date of birth; place of birth; nationality; identity number) from reliable sources like documents issued by governments, banks, state monopolies etc.
- check the customer against PEP, sanctions and other factors;
- carry out a risk assessment based on the steps above;
- perform enhanced due diligence as necessary (SOW, SOW, social media, impostor, geo-location, etc.).

Ongoing DD and transaction monitoring, reporting, record keeping, auditing etc. also is regulated by the project's AML/CFT Policy.

6.E.1. Player Protection

Another risk mitigation concern is related to the protection of the players themselves. These protection measures are stated in the respective policies, terms and conditions, self-exclusion rules and other documents accessible to anyone on every page of the website. They not only provide a safe and fair environment for the players, but also negate the risk of litigation from complaints and prosecution from authorities.

The Compliance Officer is in charge of formulating compliant internal and external policies and enforcing them.

FUNPARI	BETTING	GAMES	STATISTICS
Terms of Service	Sports	Casino	Statistics
Responsible Gambling	Multi-LIVE	Fun Games	Results
Self-exclusion	Live	Live Casino	
Dispute resolution	Toto		
Anti-Money Laundering			
Fairness & RNG Testing Methods			
KYC Policies			
Privacy & Management of Personal Data			
Accounts, Payouts & Bonuses			
Betting rules			
Risk warning			
About us			
Affiliate Program			
Contacts			



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7.Business Development and Marketing

Fairpari.com designed for individuals aged 18 and above who seek a captivating and responsible gaming experience. This holistic marketing plan outlines comprehensive strategies to instill brand resonance, captivate the target audience, and drive sales through innovative and ethically-driven initiatives.

7.A. Target Audience

Demographics: Residents of Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan, with focus on adults aged 21 and older

Central Asia



Geographics: Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan.

Geoblock: USA, France, The Netherlands, The Dutch Caribbean Island: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.

7.B. Marketing Strategies

Brand Elevation:

Craft a compelling brand narrative underscoring QuantumPlay Connect's

commitment to reshaping the gaming landscape through innovation, excitement, and an unwavering foundation in responsible gaming.

Position QuantumPlay Connect as a nexus for groundbreaking technology, diverse gaming experiences, and a thriving global gaming community.

Digital Realm Mastery:

Elevate the website for an intuitive user experience, ensuring seamless navigation across diverse platforms.

Harness the full potential of social media platforms for targeted advertising, captivating content distribution, and community-building initiatives.

Content Odyssey:

Develop a content strategy featuring engaging blog posts, interactive tutorials, and exclusive insights from developers to foster a sense of community and sustained player engagement.

Foster partnerships with gaming influencers and content creators to amplify QuantumPlay Connect's reach and impact.

Responsible Gaming Advocacy:

Infuse responsible gaming messages seamlessly within marketing materials and gaming interfaces.

Integrate features such as session duration reminders, spending limits, and voluntary self-exclusion tools to empower players.

7.C. Sales Pitch

Strategic Alliances:

Cultivate strategic alliances with gaming affiliates, influencers, and synergistic brands to amplify visibility and attract a broader audience.

Launch an enticing affiliate program to motivate third-party promotion.

Data-Driven Refinement:

Leverage analytics tools to derive insights into player behavior, preferences, and the efficacy of various acquisition channels.

Propel data-driven optimizations in marketing strategies, targeting precision, and overall user experience.

Customer Harmony:

Implement an agile Customer Relationship Management (CRM) system to personalize communications, promotions, and offers based on individual player preferences.

Utilize targeted email marketing campaigns for personalized promotions and real-time updates.

Schedule A. BetB2B Platform Description¹

HIGHFLIER B.V., a company registered under the laws of Curacao under registration number 149996 ("HIGHFLIER") has developed the bet-b2b Platform ("Platform") - a software solution for betting companies with 24/7 stream of data and technical support. The Platform provides betting website operators with a reliable software solution designed to deliver high performance and security. Built on advanced technologies, it offers a diverse range of features, including real-time data updates, support for multiple types of bets, huge selection of sports and flexible customization options.

1. Platform specifications

1.1. General specifications

1.1.1. The Platform's structure

The functional structure of the Platform includes the following modules:

- a) the option to register as a customer
- b) the option to log in and reset the password
- c) the option to make deposits and withdrawals
- d) the option to place bets
- e) the option to view betting history
- f) the option to view deposit history
- g) the option to receive bonuses
- h) the option to view bonus history
- i) the option to contact the customer support team
- j) the option to self-exclude
- k) the option to place limits on deposits
- l) deployment of two-factor authentication
- m) deployment of secret phrase authentication
- n) databases and tables of real events containing established statistics or dynamic odds
- o) service for obtaining odds on events through an API
- p) service for tracking customer money – records of deposits, bets, and withdrawals
- q) service for integrating the Platform with the payment services of other third-party providers through an API
- r) service for notifying customers about a future event, changes, adverts, and marketing for promotions by email, text message and pop-up message on mobile devices
- s) tool for protecting and restricting access and assigning competences to Highfliier's employees (BackOffice) and displaying an employee's level of access in their profile
- t) profiles for the technical service departments of remote operating units (B2C) including the department structure, information about the SLA and the serviced business units of the operator or affiliates
- u) technical support service including the systems for logging in, registration, and recording and resolving questions and problems from service contractors when using email services or live communication
- v) display of short messages to customers (primarily the status of their

¹ Confidential to Highfliier B.V., copying and distributing is strictly prohibited

account and customer legal compliance)

- w) the option for customers to put forward and discuss customer ideas to improve the platform's services and install new services, and the option to introduce ratings
 - x) document management – files received from customers – loading files and exchanging them with colleagues securely, tagging, the option to add comments and information about users that downloaded files, version control
 - y) cookie service – storage and sharing of useful links to various online resources, customer recommendations and content on the basis of information accumulated about a customer, improvement and suggestions for customers to make using the platform easier and more efficient
 - z) responsible gaming service – a service for customers to set up their own limits and self-exclude with the option to customize these to suit the different requirements of the various jurisdictions
 - aa) Anti-fraud and AML service – the option to connect third-party resources through an API from government bodies in different jurisdictions to verify customers when they register and if they engage in suspicious activity
 - bb) service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals
 - cc) voting service – the opportunity for customers to vote for the operator's various marketing or informational promotions posted and sent to customers through the Platform's services
 - dd) service for issuing ratings – mechanisms for determining the activity and popularity of Platform users and creation of reports on VIP customers
- Compatibility with related platforms

The Platform is compatible with third-party betting platforms and individual slots, casino, corporate back-office portal sufficient for general navigation and information research, a payment system aggregator, and a customer support module.

The Platform also supports:

- a) marketing modules from third parties
- b) integration with the business solutions including CMS, CRM, and BackOffice
- c) integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- d) integration with additional structures providing prior verification services on customers, KYC, AML, fraud prevention, and PEP lists to help the operator decide whether to accept certain users
- e) provision of API for several modules
- f) integration with system managing access to information resources for providing the betting odds.
- g) integration with AWS and other data storage services that have security certificates and are located within the EU.

Ergonomic features

It is possible to modify the Platform's interface according to the developed and agreed designs.

The Platform supports access from the following mobile platforms:

- a) iOS
- b) Android
- c) Windows

The Platform supports adaptive web design (or an adaptive user interface) capable of carrying out W3C CSS3 requests with a changing proportion grid and also supports flexible changes to image proportions.

Platform Risk Management

Our robust disaster preparedness strategy and resilient infrastructure effectively mitigate risks associated with platform deployment. Adhering strictly to rigorous protocols for data backup and recovery, we employ redundant server systems to minimize service interruptions and data loss. Regular testing and refinement of our disaster plan, crucial for addressing evolving threats and technological advancements, ensure its effectiveness. Collaboration with cybersecurity specialists and regulatory authorities provides invaluable insights, ensuring our platform remains at the forefront of disaster preparedness for online casino platforms, safeguarding operations, and maintaining customer confidence.