

The background of the slide features two vertical stacks of casino chips. The chips are black with white or silver horizontal stripes. The top chip of each stack has a circular pattern of small white dots. The stacks are positioned on the left and right sides of the slide, framing the central text.

Online Casino

FUNPARI

KROMSTEX B.V.

BUSINESS PLAN

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1. EXECUTIVE SUMMARY

1.1. Objectives of the project

The project involves the creation of a company offering online games. Initiator of the project is Kromstex B.V. The website is under construction.

The domain is funpari.com.

The screenshot displays the Safenames International Domain Portal interface. The top navigation bar includes links for Home, WHOIS, Help, Logout, Account, Domain Management, SSL, Search & Order, Support, and Resources. The user's account is identified as OKSANA PONOMARENKO with a security level of 1. The cashpot balance is 0, and there are links for Wire Transfer, Top-Up, and History.

The main content area shows the 'My Domain Names' section, indicating 1 domain name found matching 'FUNPARI.COM'. Below this is a table listing the domain details:

Domain Name	TLD	Account / Sub Account	Registration Term	Registered Date	Renewal Date	Invoice Info
funpari.com	com	OKSANA PONOMARENKO	2 yrs	18.04.2023	18.04.2025	View (1) Invoices

The bottom of the page features a footer with a Site Map, More Resources, and Global Domain Search. The Site Map includes links for Account (Account Profile, Users, Create Sub-account, Manage Sub-accounts, Invoices, Fees), Domain Management (View My Domains, Renewals, Move Domains To A Sub-account, Pending Orders, SSL Certificates), and DNS & Transfers (Modify Nameservers, Edit DNS Records, Web Redirects, Transfer-in, Transfer-out, Pending Transfer-in, Pending Transfer-out). The More Resources section includes Support (Help, Knowledge Base), Direct Contact (Sales Department, Registrations / Transfers Department, Billing Department, Legal Services, Customer Services), and Resources (Domain Name Regulations, WHOIS Lookup, IDN Converter, Legal Documents, About Us). The Global Domain Search section has a search bar and a Find button.

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



Introducing FUNPARI, a pioneering online gaming platform committed to delivering an immersive and responsible gambling experience. We are driven by a passion for innovation, integrity, and excitement in the ever-evolving realm of digital gaming.

Vision:

At FUNPARI, we envision a global gaming community where every participant feels empowered, entertained, and secure. Our goal is to revolutionize the gaming industry by fostering innovation, embracing accountability, and fostering inclusivity for players from all walks of life.

Mission:

Guided by our core principles, FUNPARI is dedicated to:

- **Innovation Hub:** Pushing technological boundaries to deliver cutting-edge games and an unparalleled gaming experience.
- **Responsible Gaming Advocacy:** Promoting responsible gaming through robust player protection measures, educational resources, and collaboration with like-minded organizations.
- **Player-Centric Approach:** Putting our players at the heart of everything we do, providing tailored experiences, prompt customer support, and continuous refinement based on player feedback.
- **Global Integration:** Breaking down geographical barriers to unite players from diverse backgrounds and create a global gaming network.

Goals:

Our goals at FUNPARI are centered around:

- **Excellence in Entertainment:** Ensuring our games offer not only excitement but also social connection, skill enhancement, and unforgettable experiences.
- **Innovation Leadership:** Leading the industry in innovation, setting benchmarks for gaming excellence, and surprising players with fresh and captivating experiences.
- **Community Impact:** Prioritizing a positive impact by supporting charitable endeavors, endorsing local initiatives, and advocating for responsible gaming as part of our corporate social responsibility.
- **Sustainable Growth:** Pursuing sustainable growth by balancing financial success with ethical business practices, environmental stewardship, and a steadfast commitment to player well-being.

1.2. A list of the games

Main types of casino games:

- Type 1 – Games of Chance (RNG-based games such as slots and casino table games)
- Type 2 – Betting (including live betting and virtual-sports betting)
- Type 3 – Live Dealer Games
- Type 4 – Pooled-prize games (such as lotteries and parimutuel)
- Type 5: Promoting peer-to-peer games (such as sport-exchange, bingo and poker)

1.3. UBO Background

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.

PONOMARENKO OKSANA



CONTACT

Pervomaïsk city, Ukraine

+380972170315

ksukha.ponomarenko@gmail.com

SKILLS

- SEO and SEM
- PR and media engagement
- Product development
- Visuals and graphics acuity
- Brand marketing

PROFESSIONAL SUMMARY

Results-focused employee with experience developing motivated, dependable teams. Communicates and delegates effectively to aid timely, quality completion of projects. Sales and marketing leader experienced in managing high performing teams. Focused and determined professional with expertise to promote company message to wide audience. Confident and persuasive communicator in-person and in digital spaces.

EXPERIENCE

FUNPARI.COM | Cyprus

● May 2023 - Present

CEO & Founder

- Proactively identifying, assessing, and managing risks while making decisive decisions to overcome challenges and seize opportunities.
- Driving organizational development efforts to optimize efficiency, effectiveness, and overall operational performance.
- Instilling a culture of innovation and adaptability to drive continuous improvement and organizational resilience.
- Leading by example, fostering a collaborative and inclusive work environment that inspires a high-performance culture and employee engagement.

First Casino UA (online casino) | Kyiv

● June 2018 - November 2020

Affiliate Manager

- Directed marketing staff in planning and executing promotional projects.
- Liaised between company executives and department employees.
- Used sales records, market assessments and seasonal changes to guide special sales activities.
- Analysed and optimised marketing campaigns for increased ROI.
- Generated leads and identified potential new markets.

Favorit Sport (betting company) | Mykolaiv

● March 2014 - June 2018

Betting Shop Cashier

- Used POS systems to process debit and credit card payments.
- Delivered genuine, tailored and delightful service.
- Applied discounts and gift cards through strong systems and corporate knowledge.
- Processed refunds and exchanges, carefully inspecting items before accepting returns.
- Changed tapes and ribbons of cash register machines regularly to produce clear printed receipts.
- Demonstrated strong product knowledge to upsell and assist with customer enquiries.
- Minimised waiting times by processing transactions and resolving queries quickly and efficiently.

JSC Privatbank | Mykolaiv

● November 2010 - March 2014

Bank Manager

- Exhibited high levels of customer service and a sound understanding of retail and business transactions.
- Carried out business development activities by participating in local events and generating referrals.
- Target driven
- Managed relationships with high net worth clients and derived business through these relationships.

JSC Oshchadbank | Mykolaiv, Ukraine

● April 2003 - November 2010

Bank Cashier

- Provided online banking support to older customers requiring tailored IT guidance.
- Paid bills and executed money transfers on clients' behalf.
- Kept accurate records for processed transactions.
- Assisted customers with ad-hoc and unusual requests.
- Informed customers of different options available to meet their needs.

EDUCATION

July 1999

Kyiv National Economic University, Kyiv, Ukraine

LANGUAGE

Ukrainian
Native

Russian
Native

English
Intermediate (B1)

1.4. Indicators of the project

The economic efficiency of the project was confirmed by calculating traditional financial indicators used in project analysis.

The project calculation horizon is 36 months (3 years). The investment period of the project (until the launch of the project) is 3 months (0,3 years). Project working period (from the moment of launch) is 33 months (2,7 years).

Table 1. Indicators of the project

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 average operational receipts per month (NAOR), EUR	31 046
Net profit for the project period, EUR	908 340
Average profitability for the project period (net profit to proceeds	18,61%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	322 138
Average Rate of Return of investments (ARR)	138,23%
Return on investment (ROI)	503%
Profitability index (PI)	2,1
Internal rate of return (IRR)	93,92%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

2. COMPANY MANAGEMENT STRUCTURE

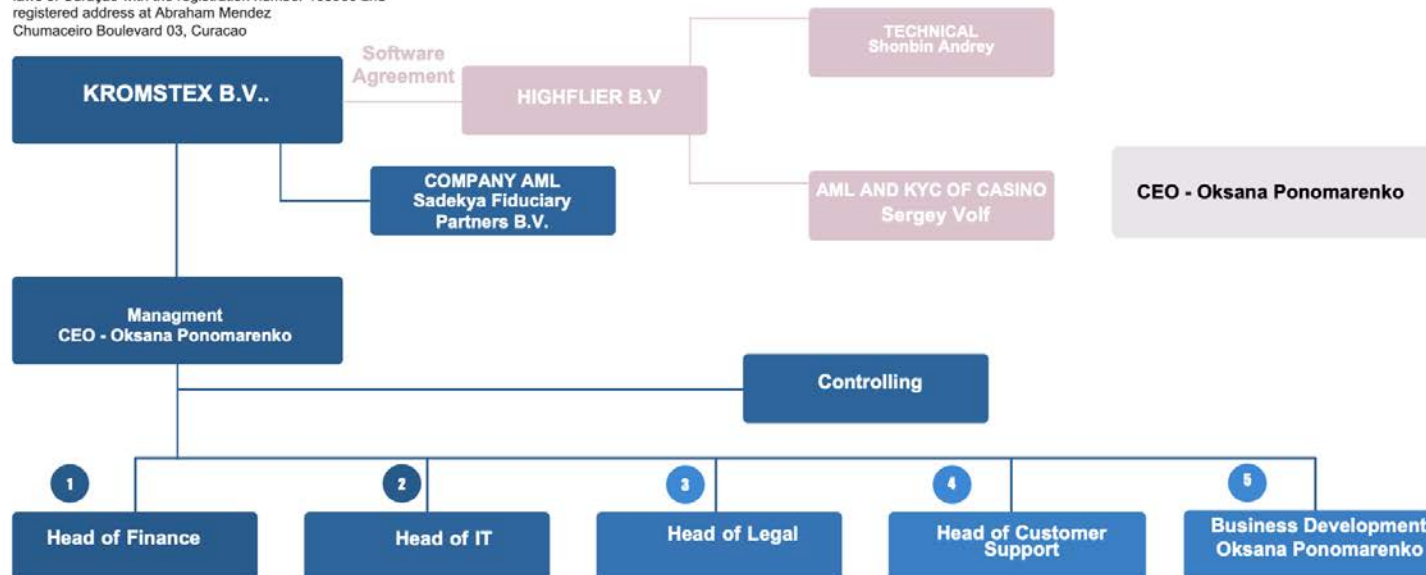
Board Oversight: The Ultimate Beneficial Owner (UBO) serves as the CEO and sole shareholder of the Operator, actively involved in the day-to-day operations of the business.

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.

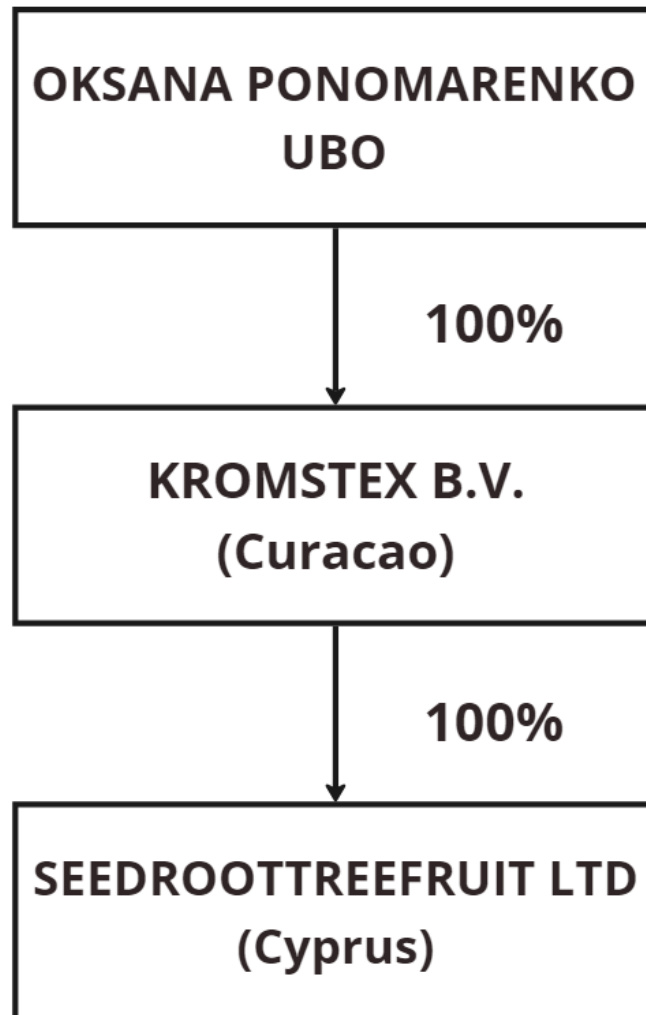
The CEO delegates strategies and decision-making authority directly to departments and functional units. This structure ensures the versatility of decision-making and ensures that no decision is deadlocked. Legal support is provided internally by respective departments and officers. While department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

Company control structure

KROMSTEX B.V., a company incorporated under the laws of Curaçao with the registration number 163966 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curaçao



OWNERSHIP STRUCTURE



miro

3. FINANCIAL SUMMARY

3.1. Financial estimation for the first, second and third year

Table 2. Cash flow for the first year

	Total for 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow INVESTING	- 150 532	- 136 000	-	-	- 14 532	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 136 000	- 136 000	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 632	-	-	-	- 11 632	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 900	-	-	-	- 2 900	-	-	-	-	-	-	-	-
Cash flow OPERATING	- 988 624	- 4 850	-	-	-	- 52 325	- 2 744	1 181	4 404	7 657	11 369	- 29 120	15 493
Proceeds	4 879 841	-	-	-	-	32 813	42 000	48 103	54 256	61 062	68 721	77 371	87 154
Income from clients	4 879 841	-	-	-	-	32 813	42 000	48 103	54 256	61 062	68 721	77 371	87 154
Expenses total	- 3 891 217	- 4 850	-	-	-	- 85 137	- 44 744	- 46 922	- 49 853	- 53 405	- 57 352	- 106 491	- 71 661
Direct costs	- 3 127 141	- 4 850	-	-	-	- 74 004	- 33 611	- 35 789	- 38 185	- 40 820	- 43 719	- 53 358	- 56 866
Advertising costs	- 1 832 080	-	-	-	-	- 37 800	- 21 780	- 23 958	- 26 354	- 28 989	- 31 888	- 35 077	- 38 585
Additional staff costs	- 838 500	-	-	-	-	-	-	-	-	-	-	- 6 450	- 6 450
License fees	- 142 961	- 4 850	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 313 600	-	-	-	-	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800	- 9 800
Indirect costs	- 480 267	-	-	-	-	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 53 133	- 11 133

Accounting	- 117 333	-	-	-	-	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667
Office equipment maintenance	- 101 333	-	-	-	-	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-	-
Office rent	- 33 600	-	-	-	-	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050	- 1 050
Legal support	- 104 000	-	-	-	-	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250	- 3 250
Taxes	- 283 810	-	-	-	-	-	-	-	-	534	- 1 452	- 2 499	-	- 3 662
Profit tax	- 283 810	-	-	-	-	-	-	-	-	534	- 1 452	- 2 499	-	- 3 662
Cash flow FINANCING	- 112 611	140 850	-	-	14 532	52 325	2 744	-	-	663	- 1 802	- 3 101	29 120	- 4 544
Co-investor's investment	239 571	140 850	-	-	14 532	52 325	2 744	-	-	-	-	-	29 120	-
Refunds to co-investor	- 352 182	-	-	-	-	-	-	-	-	663	- 1 802	- 3 101	-	- 4 544
CASH FLOW OF THE PROJECT	725 481	-	-	-	-	-	-	1 181	3 740	5 855	8 268	-	-	10 948
progressive total (cash balance)	725 481	-	-	-	-	-	-	1 181	4 921	10 776	19 044	19 044	29 993	

Table 3. Cash flow for the second year

	Total for 3 years	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 150 532	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 136 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 632	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 900	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	988 624	19 760	25 623	32 641	44 004	27 130	52 136	55 537	52 889	49 412	46 318	8 989	43 538
Proceeds	4 879 841	96 483	108 245	121 910	137 506	147 742	156 497	161 947	166 114	169 807	167 593	169 990	174 143
Income from clients	4 879 841	96 483	108 245	121 910	137 506	147 742	156 497	161 947	166 114	169 807	167 593	169 990	174 143
Expenses total	- 3 891 217	- 76 723	- 82 621	- 89 269	- 93 501	- 120 613	- 104 361	- 106 410	- 113 225	- 120 396	- 121 275	- 161 001	- 130 604
Direct costs	- 3 127 141	- 60 724	- 64 968	- 69 637	- 70 664	- 102 535	- 79 231	- 80 320	- 87 882	- 96 033	- 97 785	- 106 040	- 107 899
Advertising costs	- 1 832 080	- 42 443	- 46 687	- 51 356	- 52 383	- 53 431	- 54 500	- 55 589	- 56 701	- 58 402	- 60 154	- 61 959	- 63 818
Additional staff costs	- 838 500	- 6 450	- 6 450	- 6 450	- 6 450	- 12 900	- 12 900	- 12 900	- 19 350	- 25 800	- 25 800	- 32 250	- 32 250
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 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	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 53 133	- 11 133
Accounting	- 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
Office equipment 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	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office 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 support	- 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
Taxes	- 283 810	- 4 866	- 6 519	- 8 499	- 11 704	- 6 944	- 13 997	- 14 957	- 14 210	- 13 229	- 12 356	- 1 828	- 11 572

Profit tax	-	283 810	-	4 866	-	6 519	-	8 499	-	11 704	-	6 944	-	13 997	-	14 957	-	14 210	-	13 229	-	12 356	-	1 828	-	11 572
Cash flow FINANCING	-	112 611	-	6 038	-	8 090	-	10 546	-	14 523	-	8 617	-	17 369	-	18 560	-	17 633	-	16 416	-	15 333	-	2 268	-	14 360
Co-investor's investment		239 571		-		-		-		-		-		-		-		-		-		-		-		-
Refunds co-investor	to	- 352 182	-	6 038	-	8 090	-	10 546	-	14 523	-	8 617	-	17 369	-	18 560	-	17 633	-	16 416	-	15 333	-	2 268	-	14 360

CASH FLOW OF THE PROJECT		725 481		13 722		17 533		22 095		29 481		18 512		34 766		36 977		35 256		32 996		30 985		6 721		29 178
progressive total (cash balance)		725 481		43 715		61 248		83 343		112 824		131 336		166 102		203 079		238 335		271 331		302 315		309 036		338 214

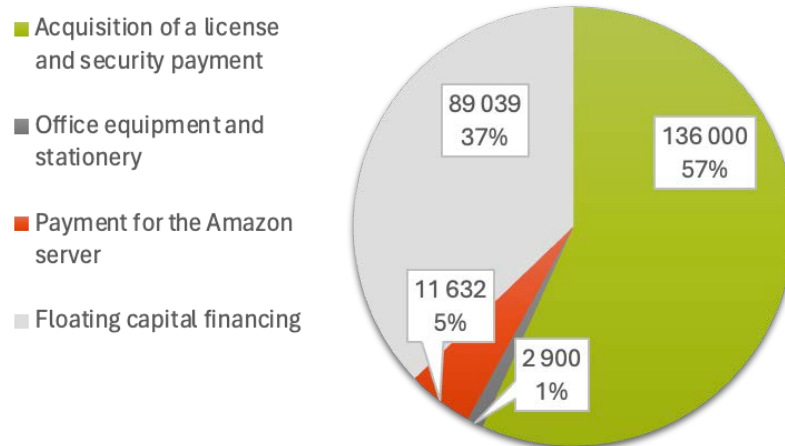
Table 4. Cash flow for the third year

	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 150 532	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 136 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 632	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 900	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	988 624	48 570	47 203	50 400	51 488	30 468	48 858	55 882	57 535	64 317	49 077	23 958	51 829
Proceeds	4 879 841	182 509	189 178	195 307	205 245	204 824	212 697	223 988	234 912	246 032	235 441	245 811	254 443
Income from clients	4 879 841	182 509	189 178	195 307	205 245	204 824	212 697	223 988	234 912	246 032	235 441	245 811	254 443
Expenses total	- 3 891 217	- 133 938	- 141 975	- 144 907	- 153 756	- 174 356	- 163 839	- 168 106	- 177 377	- 181 715	- 186 365	- 221 853	- 202 614
Direct costs	- 3 127 141	- 109 813	- 118 235	- 120 266	- 128 808	- 155 336	- 139 633	- 141 919	- 150 723	- 153 149	- 162 097	- 164 670	- 177 570
Advertising costs	- 1 832 080	- 65 732	- 67 704	- 69 735	- 71 827	- 73 982	- 76 202	- 78 488	- 80 842	- 83 268	- 85 766	- 88 339	- 88 339
Additional staff costs	- 838 500	- 32 250	- 38 700	- 38 700	- 45 150	- 45 150	- 51 600	- 51 600	- 58 050	- 58 050	- 64 500	- 64 500	- 77 400
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 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	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 11 133	- 51 133	- 11 133
Accounting	- 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

3.2. Investment schematic showing type of investments, projected costs, explanation by whom and source of wealth

The need for financial resources for the project is 239,5 thousand EUR.

Diagram 1. Investments structure



It is planned that the financing of this project will be carried out at the expense of the investor and the company's expense.

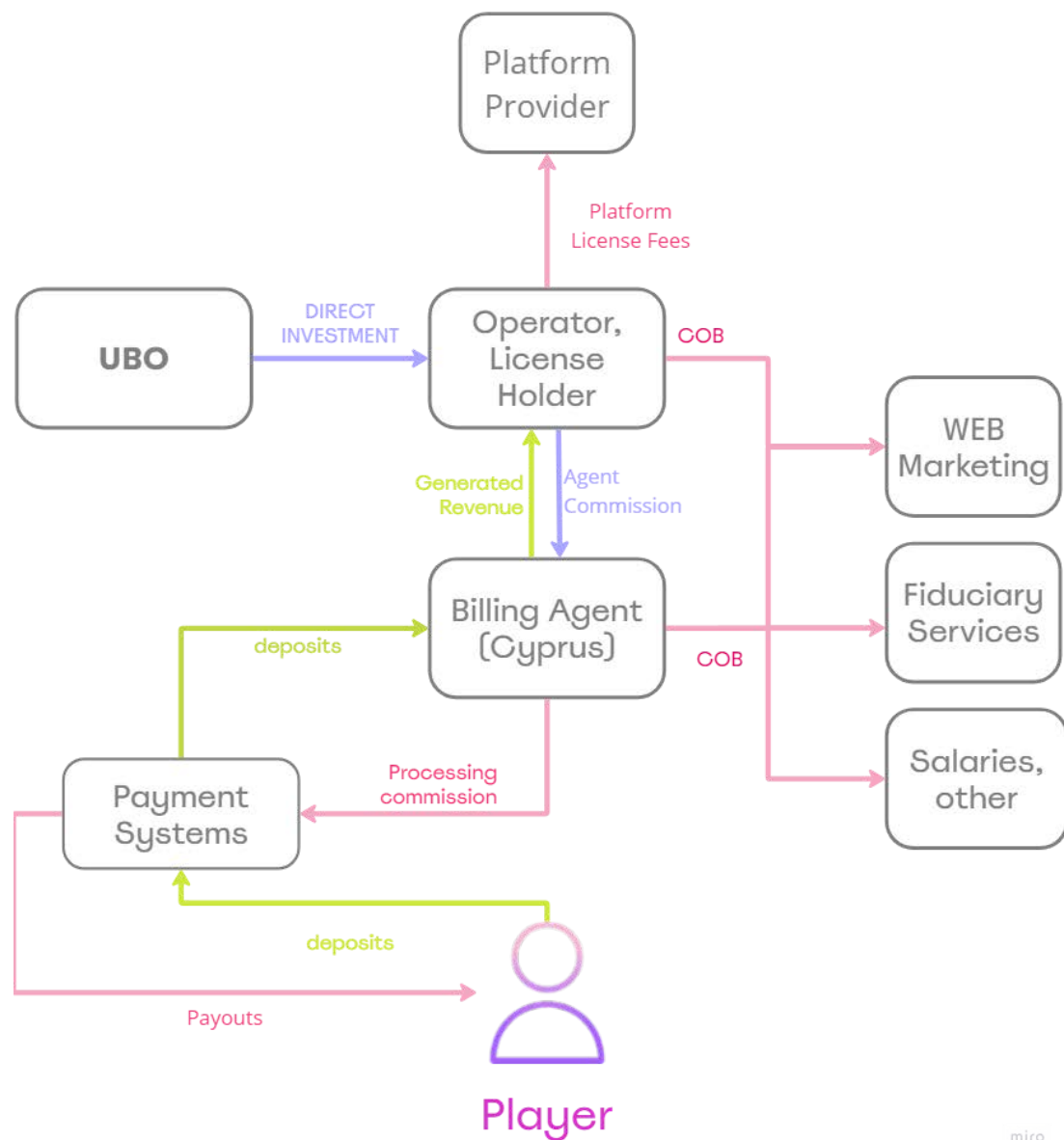
The investor's capital will amount to 239,5 thousand EUR.

The co-investor's funds are reimbursed after the profit is made.

3.3. Flow Of Funds Schematic

The operational costs of the project include license fees paid to the Platform provider, expenses for web marketing, service fees for employees, and legal fees paid to fiduciary service providers.

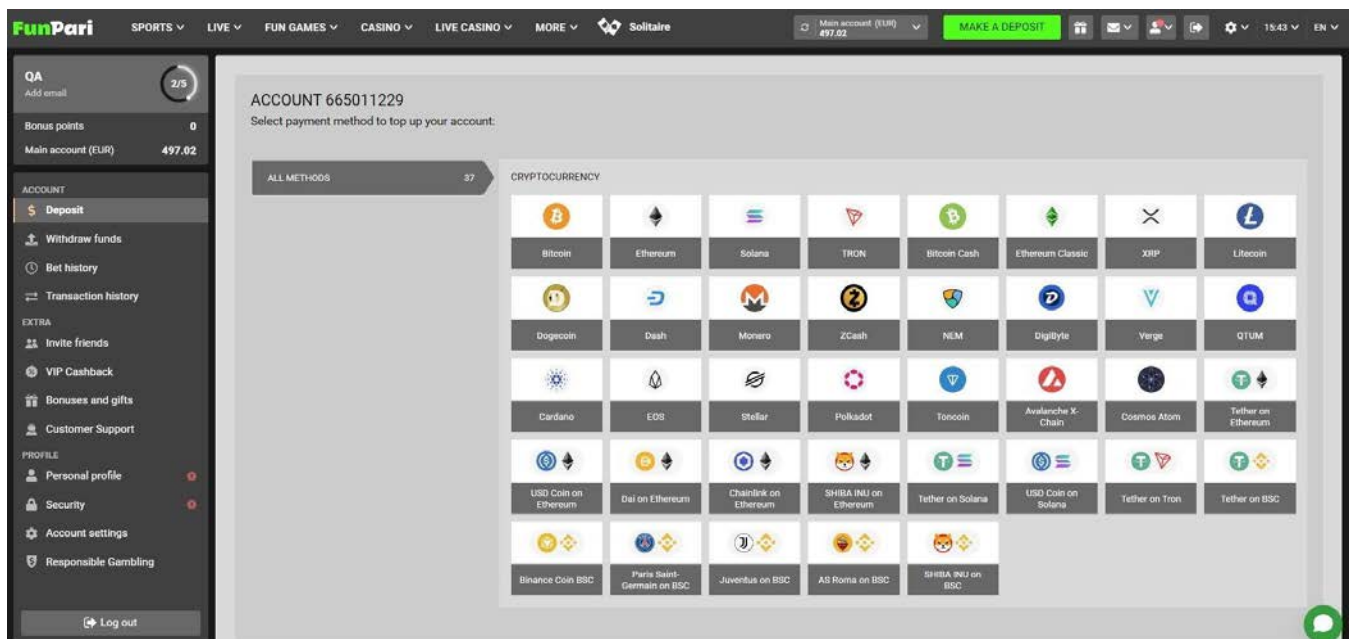
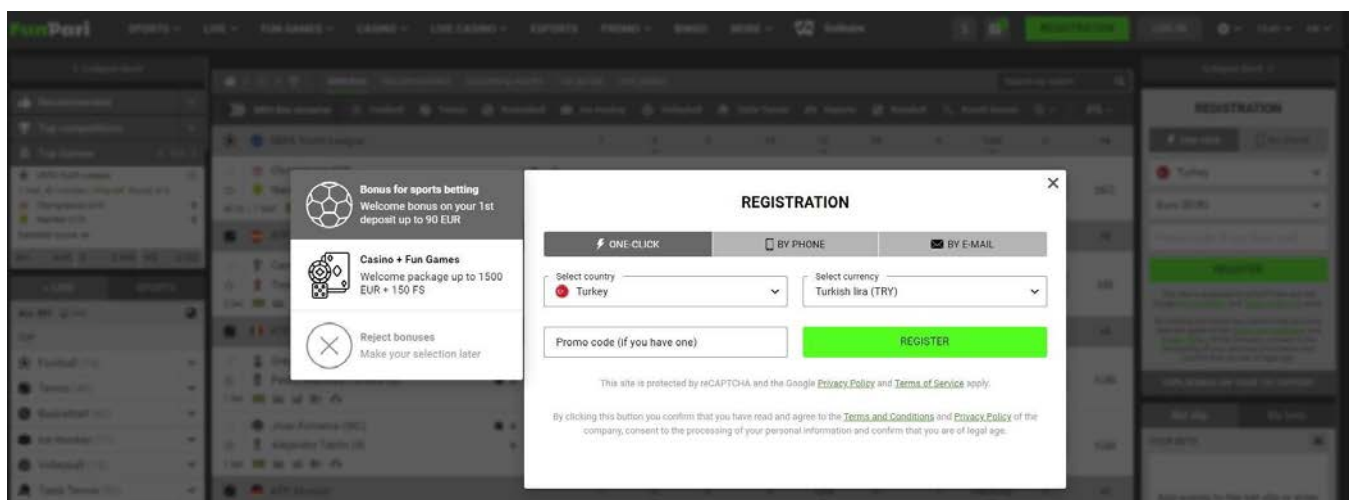
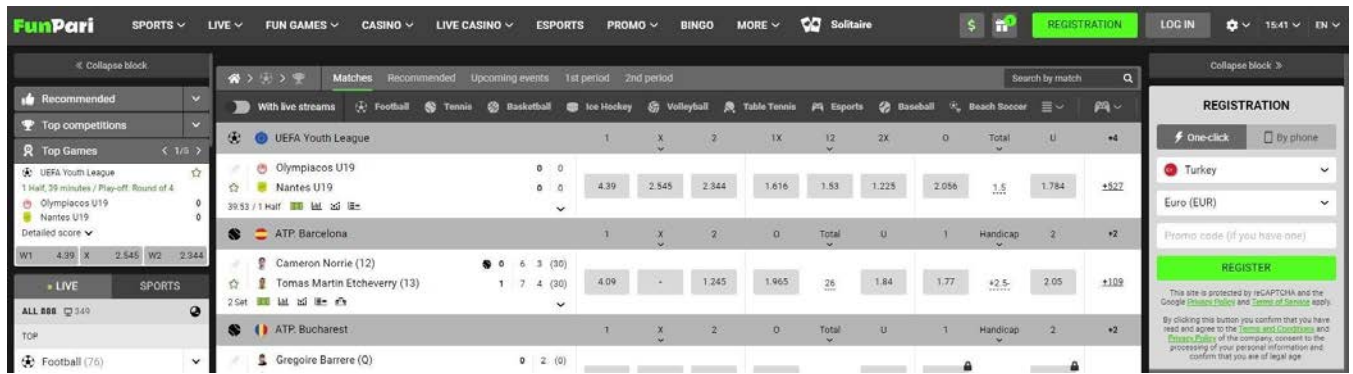
Funds Flow



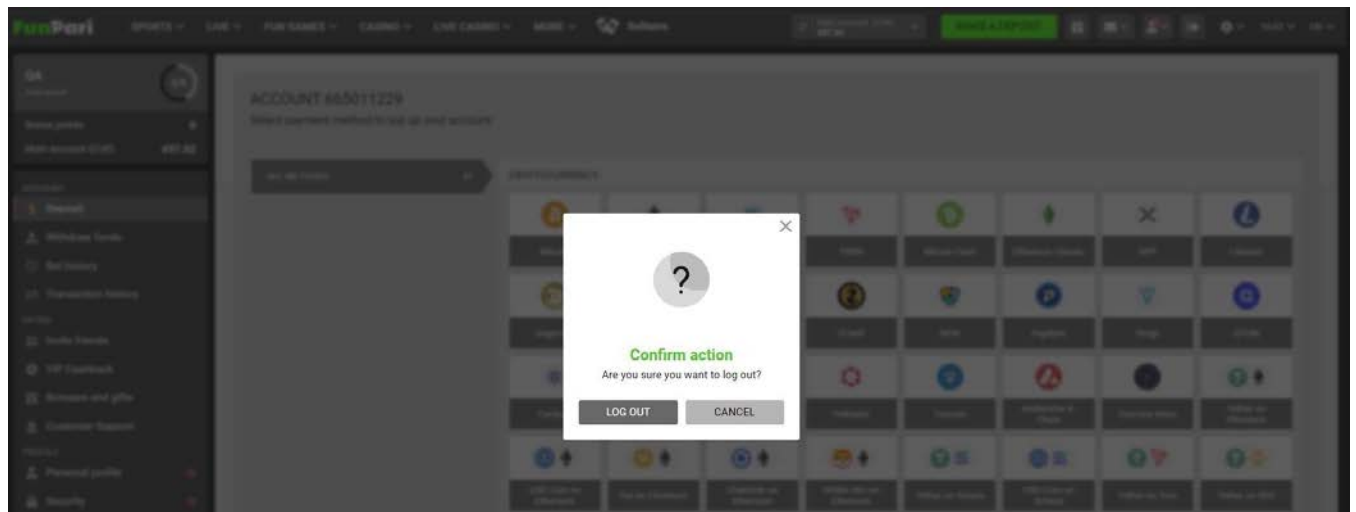
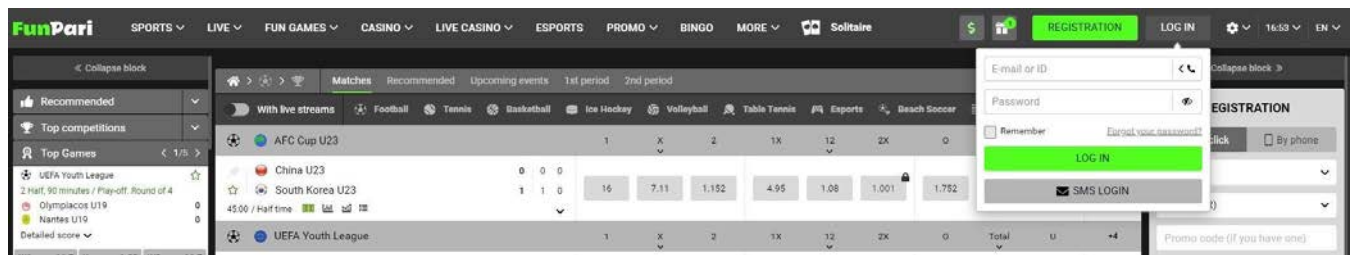
miro

4. PRODUCTS & SERVICES

4.1. Registrations And Opening Of An Account



4.2. Log In And Logout



4.3. Terms And Conditions/ Rules And Procedures

FunPari

SPORTS

LIVE

FUN GAMES

CASINO

LIVE CASINO

ESPORTS

PROMO

BINGO

MORE

Solitaire

\$

REGISTRATION

LOG IN

16:54

EN

About us

Contacts

Terms of Service

Payments

How to place a bet

Cookie Policy

Anti-Money Laundering

KYC Policies

Dispute resolution

Responsible Gambling

Self-exclusion

Fairness & RNG Testing Methods

Privacy & Management of Personal Data

Accounts, Payouts & Bonuses

Betting rules

Risk warning

Terms of Service

Search

SHOW ALL

1. Terms of Service

2. General Terms

3. Types of bets

4. Live Betting

5. Match Results, Dates and Starting Times

6. Rules on sports

7. Available Markets (Outcomes)

8. Extra bets

9. Examples

10. Main sources of information

11. CALCULATION OF «ACCUMULATOR» AND «SYSTEM» BETS

12. Casino

13. GOLDEN RACE

14. GLOBAL BET

1. Terms of Service

Introduction: 1.1. These terms and conditions and the documents referred to below (the "Terms") apply to the use of the current website (the "Website") and its related or connected services (collectively, the "Service"). You should carefully review these Terms as they contain important information concerning your rights and obligations concerning the use of the Website and/or accessing the Service, you, whether you are a guest or a registered user with an account ("Account"), agree to be bound by these Terms, together with any amendments, which may be published from time to time. If you do not accept these Terms, you should refrain from accessing the Service and using the Website. The Service is owned by KROMSTEX B.V. which is incorporated under the laws of Curaçao with company registration No. 163966 at Abraham Mendez Chumaceiro Boulevard 03, Curaçao. This website is licensed and regulated by Curaçao eGaming, license No.1668/JAZ. Funpari's payment operations are processed by a facilitating company SEEDROOTTREEFRUIT LTD incorporated under the laws of Cyprus with company registration number 448602 and its registered address at Voukorestiou, 25 NEPTUNE HOUSE, 1st floor, Flat/Office 11 Zakaki, 3045, Limassol, Cyprus.

The following Betting Rules pertaining to the bookmaker Funpari (hereinafter referred to as the Rules) stipulate the manner of accepting bets, paying winnings and resolving disputes, as well as the specific features of certain bets on certain sports. These Rules shall govern any other relations between the bookmaker Funpari and the customer. These Rules shall apply to betting on the website and at Funpari betting facilities.

Bet	- Is a risk-driven agreement for potential winnings entered into between the customer and the bookmaker under the established Rules, where the fulfillment of such agreement is conditioned by an event whose outcome is yet to be determined. Bets are accepted on the conditions offered by the bookmaker.
Outcome	- Is the result of the event (events) on which the bet was placed.
Customer	- Is an individual placing a bet with the bookmaker on an outcome.
Bet Cancellation	- Is an outcome on which the bet is not settled and winnings are not paid. As per the Rules, in the event of "bet cancellation", an arrangement between the bookmaker and the customer shall be deemed unconcluded and the stake shall be refunded.
Regular Time	- Is the duration of the match subject to the regulations of the relevant sport, including time added by the referee. Regular time does not include extra time, overtime(s), penalty shootouts, etc.

4.4. Obligations As A Player

FunPari

SPORTS

LIVE

FUN GAMES

CASINO

LIVE CASINO

ESPORTS

PROMO

BINGO

MORE

Solitaire

\$

REGISTRATION

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14. GLOBAL BET

2. General Terms

1. Bets may only be placed by individuals who are 18 years of age or the age of majority in their state (if the age of majority is over 18) and agree to the Betting Rules offered by the bookmaker. The customer shall be held liable for violation of this regulation. By registering and playing on the website, you confirm that you do not suffer from a gambling addiction.

2. The following individuals are not allowed to place bets:
Individuals who are under 18 years of age at the time of placement;

Individuals who directly participate in the events being betted on (e.g. sportspeople, coaches, referees, club owners or club management, or other individuals who can influence the outcome of the event), as well as any individuals acting on their behalf or affiliating with them;

Individuals representing other bookmakers;

Individuals who are prohibited from entering into a contract with a bookmaker subject to the effective legislation.

3. The right to access and/or use the Website (including any or all of the products offered through the Website) may be considered illegal in certain countries (including, for example, the USA, the United Kingdom, Cyprus, the Netherlands, etc.). We do not intend for our Website to be used for sports betting, gambling or other purposes by people who reside in countries or jurisdictions in which such types of activity are illegal.

4. The fact that our Website is available in such a country and/or jurisdiction or that it can be displayed in the official language of any of those countries cannot be considered official authorization or legal grounds for using our Website and depositing funds into your account or withdrawing your winnings. The availability of the Website does not mean that it contains any proposals, incitement or invitation to use or subscribe to betting, gambling or any of the other services in any jurisdiction where such activity is illegal.

5. You are responsible for determining whether your accessing and/or use of the Website is compliant with applicable laws in your jurisdiction and you warrant to us that gambling is legal in the territory where you reside. When opening an account and/or using our Website you must make sure that your actions are legal in the territory in which you reside. You also guarantee and agree that you have received legal advice before registering on our Website. If we become aware that you are a resident in a country where the use of our Website is considered illegal, we will have the right to close your account and refund any remaining balance on your account at the moment of its closure (after the deduction of any winnings credited after your most recent deposit was made).

6. The bookmaker shall be entitled to refuse bets from customers who fail to abide by these Rules. The bookmaker reserves the right to refuse to accept a bet of any type from any customer should they violate social standards of conduct and public order.

7. The bookmaker reserves the right to refuse to accept a bet from any individual without giving a reason.

4.5. Payouts

FunPari

SPORTS

LIVE

FUN GAMES

CASINO

LIVE CASINO

ESPORTS

PROMO

BINGO

MORE

Solitaire

\$

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Accounts, Payouts & Bonuses

1. Accounts

2. Deposits and Payouts

3. Bonuses

1. Accounts, Payouts & Bonuses

1. Accounts

1. Each registered customer is allowed to have only one account. Customers are allowed to register only one account per family, address, e-mail address, IP address, credit/debit card, e-wallet or electronic payment method. Persons otherwise associated with a customer will not be allowed to register on the website.

2. No registered customer is allowed to be re-registered as a new customer (under a new name, with a new email address, etc.).

3. In the event of duplicate registration (including registering under a new name), the submission of someone else's, invalid, or forged documents (including those that have been edited by using any kind of software or graphic editor) multiple breaches of the Betting Company's T&C doubts about the identity of the customer or the information they have provided (i.e. address, credit/debit card details, other data) any types of fraud committed either by you or by another person acting in your interests or in collusion with you, including but not limited to:

a) refund or rake fraud

b) your use of a stolen or unverified bank card as a source of funds

c) any actions you have carried out or attempted to carry out which may reasonably be considered illegal in any applicable jurisdiction, which were committed deliberately or with the intention to deceive and/or circumvent constraints set in law regardless of whether this action or attempt ultimately causes loss or damage to your account

when the customer placed the bet, they had information about the result of that event

the customer was able to influence the outcome of an event due to their direct participation in the match (sportspeople, coaches, referees, etc.) or because they acted on behalf of the participants

bets were placed by a group of bettors acting in concert (as a syndicate) in order to exceed the limits set by the bookmaker, as well as colluding with others in order to obtain an unfair advantage through bonus schemes or any other promotions offered by us

the bettor is suspected of using special software or hardware which facilitate automated betting, including but not limited to the use of

4.6. Withdrawing

Withdrawals can be processed using the designated payment methods detailed below: FIAT withdrawals are allowed if the initial deposit was made in FIAT currency, while CRYPTO withdrawals are permitted for deposits made using cryptocurrency.

4.7. A List Of The Games That Will Be Provided

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SPORTS

LIVE

FUN GAMES

CASINO

LIVE CASINO

ESPORTS

PROMO

BINGO

MORE

Solitaire

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REGISTRATION

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SLOTS

LIVE CASINO

PROMOTIONS

Clear filter

search

ALL

Favorites

Popular

Top choice

Poker

Roulette

Blackjack

Baccarat

Sic-B0

Jackpot Game

Speed Games

Game Show

Dragon Tiger

Other

POPULAR

TAO YUAN BACCARAT...

0.5 - 2500 EUR

ROULETTE 1

0.5 - 12000 EUR

VENICE ROULETTE

1 - 1200 EUR

CABARET ROULETTE

0.1 - 600 EUR

500X AUTO ROULETTE

0.1 - 1200 EUR

ALL

TAO YUAN BACCARAT...

0.5 - 2500 EUR

CABARET ROULETTE

0.1 - 600 EUR

ROULETTE 1

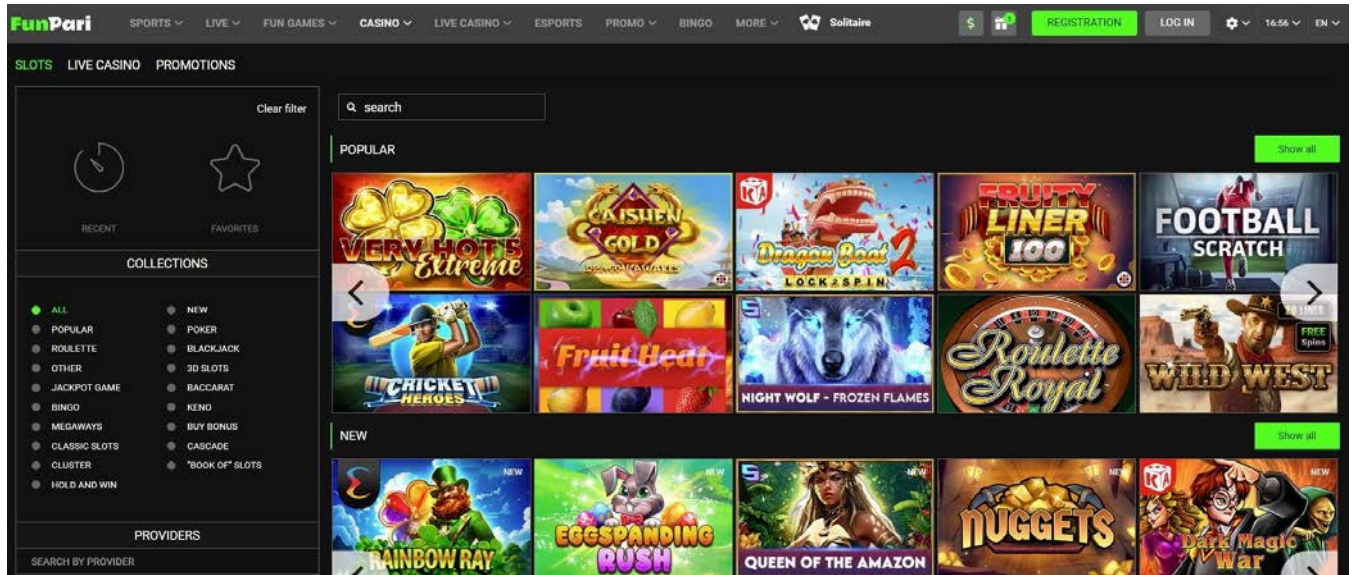
0.5 - 12000 EUR

500X AUTO ROULETTE

0.1 - 1200 EUR

VENICE ROULETTE

1 - 1200 EUR



5. KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1. Platform Description

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 Highflir'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 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.

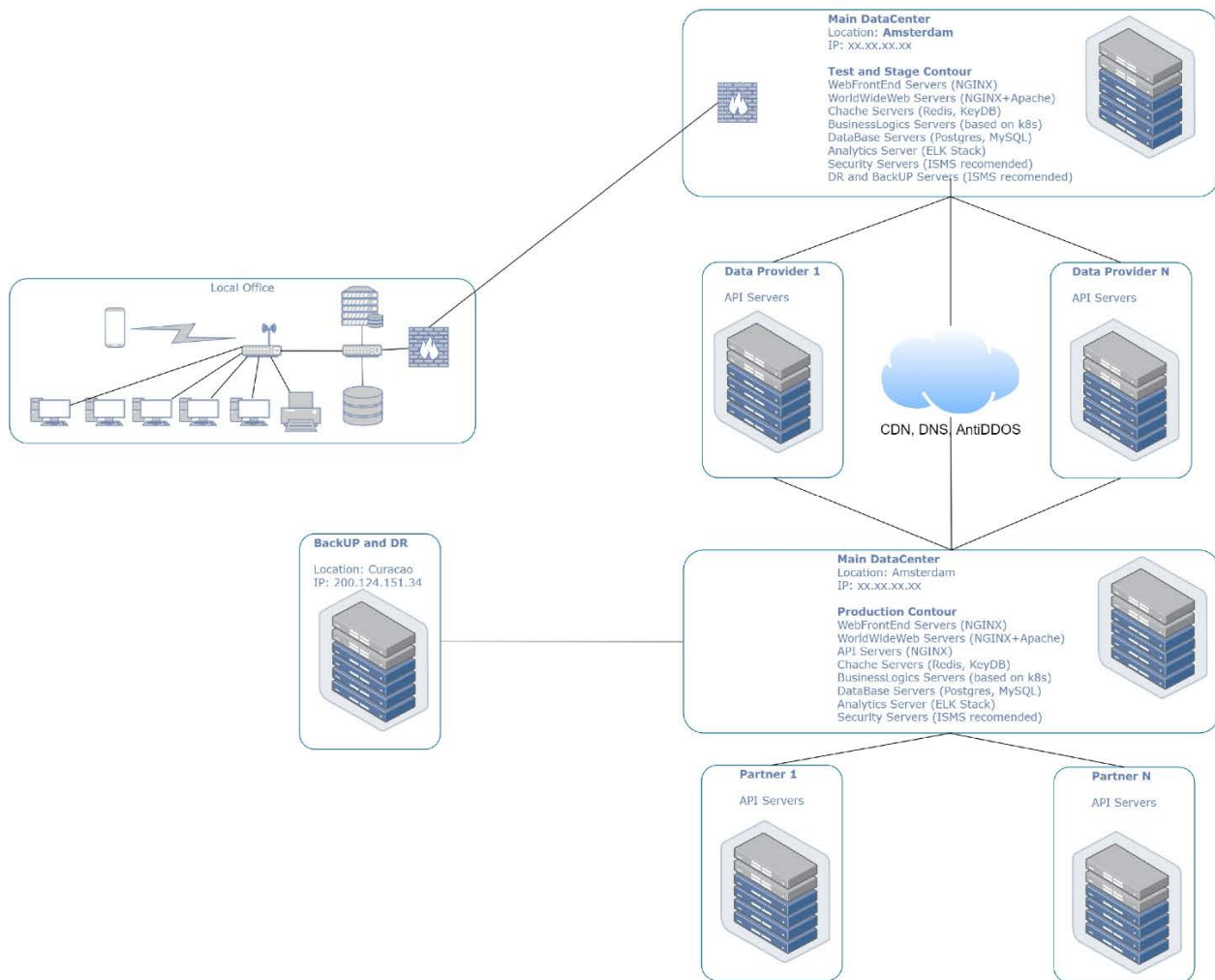
The Platform supports access from the following mobile platforms:

- 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 support 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.



5.2. Payment Service Providers

Withdrawals can be made using the payment methods specified below, as follows: FIAT - provided that the deposit was made in FIAT and CRYPTO - provided that the deposit was made in cryptocurrency.

Payment service provider (at the connection/planning stage): Payment.Center, Fatpay, iSettle, Flexify, Getapays, Monnify.



FLEXIFY



Likewise, 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.

5.3. Legal And Corporate Providers

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.

6. RISK EVALUATION AND MANAGEMENT

Each department meticulously oversees its designated set of risks on a daily basis.

6.1. Risk Auditing

Internal audits, led by the Audit Committee comprising the Head of IT, Head of Legal, and Head of Finance, are conducted annually across all risk domains. Additionally, external audits are conducted every three years to ensure an impartial evaluation of business and financial operations. Regular audits are also performed on the platform, its software providers, infrastructure, and financial position. A comprehensive risk register is meticulously maintained and reviewed quarterly by the Audit Committee, enhancing daily interdepartmental communication. Moreover, mandatory financial audits are conducted annually for all entities within the organizational framework

6.2. Risk Overview

Legal Landscape Oversight (Supervised by: Head of Legal): Given the dynamic nature of online gambling laws, it is crucial to remain vigilant at all times. We regularly disseminate updates on legal changes across departments, ensuring all staff members are well-informed about the evolving legal landscape in online gambling. Our legal department works closely with other units, including compliance and operations, to ensure a comprehensive understanding of legal obligations and facilitate smooth implementation processes. We maintain transparent communication channels with regulatory agencies and industry groups to underscore our commitment to adhering to legal standards in online gambling.

- **Legal Compliance and Licensing:** Establishing and operating an online casino necessitates obtaining licenses from pertinent regulatory authorities across different jurisdictions. Regulatory requirements may differ significantly between jurisdictions, and non-compliance with licensing obligations can lead to hefty fines, legal ramifications, or even the cessation of operations.
Risk moderation: the Operator is currently operating under the Curacao eGaming license No. 1668/JAZ and applying for a new GCB license.
- **Data Security and Privacy Regulations:** Online casinos handle and oversee vast volumes of sensitive customer data. Adhering to data protection regulations like the EU's General Data Protection Regulation (GDPR) is imperative to evade penalties and uphold customer trust.
Risk moderation: Collect and process only the minimum amount of personal data required for delivering gambling services, ensuring that data is not retained longer than necessary. Establish and implement a data breach response plan to promptly address and mitigate the consequences of data breaches, including protocols for notifying affected individuals and relevant supervisory authorities within specified timeframes. Integrate privacy by design and default principles into the development of new products, features, or services, embedding privacy considerations into the design and development process from the outset.
- **Advertising and Marketing Limitations:** Numerous jurisdictions impose strict regulations on the advertising and marketing of online gambling services to protect vulnerable populations, such as minors and individuals grappling with gambling addictions. Non-compliance with advertising standards can result in regulatory penalties and public scrutiny.
Risk moderation: Regularly monitor advertising and marketing efforts to ensure

alignment with applicable laws, regulations, and industry standards governing gambling advertising. Clearly communicate all terms, conditions, restrictions, or limitations associated with promotions, bonuses, or other marketing offers to prevent consumer misunderstandings and potential regulatory consequences. Thoroughly assess third-party advertising partners, agencies, or affiliates to verify their adherence to advertising and marketing regulations and dedication to responsible advertising practices.

- **Regulatory Changes:** The regulatory landscape surrounding online casinos is in a constant state of flux, with new laws, regulations, and enforcement measures being introduced regularly. Operators must maintain a vigilant stance regarding regulatory developments and adapt their practices accordingly to mitigate compliance risks.
- **Risk moderation:** Conduct thorough assessments to evaluate the potential impact of new regulations on the casino's operations, financial performance, and risk profile. Identify areas of compliance risk and develop proactive strategies to mitigate them. Implement flexible compliance strategies capable of quickly adapting to evolving regulatory requirements. This may involve creating modular compliance solutions, utilizing technology for automation and efficiency, and fostering a culture of continuous improvement and innovation. Additionally, offer regular training and education to employees on emerging regulations, compliance mandates, and best practices for maintaining regulatory standards. Empower staff members to recognize and appropriately respond to regulatory changes within their roles.

Regulatory Risk Management Oversight (Supervised by: Compliance Officer):

Regulatory risks associated with Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance are paramount considerations for businesses, especially in sectors like finance and gambling. The organization's AML&KYC department is tasked with ensuring adherence to relevant laws and regulations aimed at preventing money laundering and terrorist financing. This department establishes robust policies and procedures to verify customer identities, monitor transactions for suspicious activities, and promptly report any irregularities to authorities. Non-compliance with AML&KYC regulations can result in severe penalties, including fines, reputational damage, and potential criminal charges. Therefore, strict adherence to these regulations is crucial to mitigate regulatory risks and uphold the organization's integrity and reputation. The AML&KYC department plays a pivotal role in overseeing compliance efforts, conducting risk assessments, and implementing necessary controls to minimize the organization's exposure to regulatory risks. Additionally, ongoing training and educational initiatives ensure employees stay aligned with evolving AML&KYC requirements and best practices. In sum, effective management of regulatory risks linked to AML&KYC compliance demands a proactive and comprehensive approach, with the AML&KYC department serving as a cornerstone in the organization's compliance framework.

- **Compliance with Anti-Money Laundering (AML) Regulations:** Online casinos must uphold stringent compliance measures to prevent money laundering, terrorist financing, and other illicit activities. Insufficient implementation of Anti-Money Laundering (AML) controls can lead to regulatory penalties, reputation damage, and legal ramifications.
Risk moderation: Create a thorough Anti-Money Laundering (AML) policy detailing procedures for customer due diligence, transaction monitoring, and reporting suspicious activities. Ensure this policy aligns with regulatory requirements and industry standards. Conduct routine training and awareness programs for casino staff to educate them on AML regulations, recognize red flags signaling suspicious behavior, and clarify their roles in preventing money laundering and terrorist financing activities.
- **Infrastructure Risks Oversight (Supervised by: Head of IT):** The technical department oversees infrastructure maintenance, platform integration, cybersecurity, and data security. Their primary responsibility is to ensure regular upkeep of infrastructure to minimize downtime and mitigate risks related to hardware or software failures. They prioritize implementing and updating cybersecurity protocols and technologies to protect against cyber threats like hacking, data breaches, and malware attacks. Continuous monitoring for security threats and prompt incident response are fundamental to minimize risks and mitigate the impact of cybersecurity breaches. The

technical team conducts regular audits and security assessments to identify vulnerabilities and weaknesses in the infrastructure, enabling proactive risk management measures.

- **Data Security:** Unauthorized access to customer information, encompassing personal details and financial data, poses significant risks such as identity theft, fraud, and potential legal ramifications.
- **Risk moderation:** Implement a comprehensive cybersecurity framework featuring multiple layers of protection, integrating firewalls, intrusion detection systems, and encryption mechanisms. Ensure regular updates of software and security patches to promptly address vulnerabilities and fortify defenses against evolving threat

Financial Risks Oversight (Supervised by: Head of Finance): Financial risks are an inherent aspect of every business operation, demanding meticulous management to ensure sustainability and advancement. In this regard, the Head of Finance assumes a pivotal role, tasked with identifying, assessing, and mitigating these risks. They spearhead the implementation of robust financial controls, monitor cash flow, and optimize capital allocation to minimize exposure to such risks. Furthermore, they foster close collaboration with other departments to formulate and execute financial strategies in line with organizational objectives. Through proactive risk management measures and strategic planning, the Head of Finance endeavors to safeguard the company's financial well-being and augment shareholder value. Regular financial analysis and reporting serve as crucial tools for identifying emerging risks and opportunities, enabling timely adjustments to financial strategies.

- **Taxation:** Taxation policies concerning online gambling vary widely across jurisdictions and can significantly impact the profitability of iGaming operators. Alterations in tax laws or unforeseen tax liabilities can present substantial financial risks to casino operators.
- **Risk moderation:** Consult with tax professionals, accountants, and legal specialists well-versed in international taxation to ensure adherence to local tax laws and regulations. Utilize tax treaties and agreements between nations to alleviate double taxation and optimize tax planning approaches. These treaties may offer provisions for tax credits, exemptions, or reduced tax rates for cross-border transactions. Maintain precise financial records, robust accounting systems, and accurate tax filings to comply with local tax laws and regulations in every jurisdiction where the casino operates. This encompasses timely submission of tax returns, tax payments, and adherence to reporting obligation.

Litigation Risks Oversight (Supervised by: Client Service): Customer service practices entail inherent risks that must be managed effectively to prevent potential litigation stemming from regulatory non-compliance. Aligning customer service protocols with relevant laws and regulations is crucial in mitigating these risks. To achieve this, Customer Service develops clear communication policies aimed at managing customer expectations and minimizing misunderstandings and legal disputes. Thorough documentation of customer interactions and resolutions is imperative to mitigate litigation risks, providing evidence of adherence to service standards and facilitating amicable dispute resolution. Customer Service continually evaluates and enhances its procedures based on feedback and performance metrics to address recurring issues and minimize the risk of customer dissatisfaction leading to litigation. Fostering a culture of transparency and accountability within the customer service team is essential for building trust with customers and reducing the likelihood of disputes arising from perceived unfairness or ambiguity. Clear escalation protocols are established to ensure prompt resolution of unresolved customer issues by the appropriate management levels, thereby preventing grievances from escalating into potential litigation.

- **Promotion of Responsible Gaming:** Regulatory authorities often require casino operators to actively promote responsible gambling and take measures to prevent problem gambling behaviors. Failure to comply with these regulations can lead to regulatory penalties and harm the reputation of the operator.

Risk Moderation: Incorporate self-exclusion tools allowing players to voluntarily exclude themselves from gambling activities for a specified duration. Ensure these tools are easily accessible on the casino's website and gaming platforms. Provide players with the ability to set personalized deposit limits and timeouts on their accounts to manage their gambling habits and prevent excessive play. These limits should be

adjustable and enforceable to ensure compliance. Utilize data analytics and monitoring tools to identify players showing signs of potential gambling issues, such as patterns in the frequency and amount of wagers. Implement appropriate interventions and support resources for these players as needed.

6.3. Risk Of Potential Capital Loss

During the initial phase, financial obligations may include registration fees, rent, and expenses for office equipment. In the event of the online casino ceasing operations, whether due to internal factors or valid reasons, the security deposit is refunded to the casino owners. However, it's imperative to refrain from using this amount during the casino's operation and reserve it exclusively as a jackpot-winning deposit to effectively mitigate potential losses.

Risk Mitigation: With a collective experience of 18 years in the online casino industry among the founders and co-owners, along with the experienced guidance of the project mentor, the project is strategically positioned to minimize risks associated with market entry to the highest extent possible.

7. POLICIES AND PROCEDURES

7.1. Know Your Customer

The Know Your Customer (KYC) policy encompasses procedures and guidelines crafted to authenticate and validate clients' identities. Its primary goal is to deter financial crimes such as money laundering, terrorist financing, and fraud by ensuring that casinos possess accurate information about their customers and financial transactions. Adhering to KYC protocols enables casinos to build trust, meet regulatory standards, and mitigate risks associated with illicit activities within the financial system.

7.2. Anti-Money Laundering

The primary objective of the Anti-Money Laundering (AML) policy is to prevent the covert origins of funds acquired through criminal activities. AML policies and procedures are designed to identify and prevent money laundering, terrorist financing, and other illicit financial activities within financial institutions.

7.3. Data Privacy

The aim of the Data Privacy Policy is to delineate procedures governing the collection, use, retention, and security of individuals' personal data within an organization. Its objective is to ensure compliance with data protection laws, protect the privacy rights of customers and employees, and foster trust among stakeholders. By establishing clear guidelines and protocols for handling sensitive data, the policy seeks to reduce the risk of data breaches, unauthorized access, and misuse of personal information, thereby enhancing transparency and accountability in data management practices.

7.4. Responsible Gaming

The objective of the Responsible Gaming Policy is to encourage balanced and conscientious gambling behaviors while mitigating the risks linked with excessive or problematic gambling. It delineates strategies and principles aimed at shielding players from the adverse effects of gambling addiction, such as financial hardships, mental health challenges, and social repercussions. By offering self-exclusion options, imposing limits on gambling activities, and extending assistance to those in need, the policy endeavors to establish a responsible and sustainable gambling environment, prioritizing player well-being and upholding the integrity of the gaming industry.

7.5. Terms Of Use

The Terms of Use policy for an online casino delineates the guidelines, rules, and conditions that users must adhere to while utilizing the platform. It encompasses various topics such as user obligations, account management, payment processes, dispute resolution, and compliance with relevant laws and regulations. By consenting to these terms, users acknowledge their understanding of the regulations governing their interactions with the casino, fostering transparency, fairness, and adherence to legal standards throughout their gaming endeavors.

7.6. Self-Exclusion

This section offers comprehensive details on the voluntary self-exclusion process, allowing individuals to opt out of gambling activities on the platform for a specified duration. Such exclusions aim to help individuals control their gambling behavior or address addiction issues.

7.7. Dispute Resolution

Here, accessible procedures and mechanisms for resolving conflicts or disputes between the casino and its users are outlined. It typically includes steps for escalation and resolution.

7.8. Fairness & RNG Testing Methods

This segment assesses the fairness of the casino's games, confirming their randomness and impartiality. It often emphasizes the use of Random Number Generators (RNGs) and the methodologies employed to verify and validate their fairness.

7.9. Accounts, Payouts & Bonuses

This portion discusses overseeing accounts, payout options, and the terms associated with bonuses, including wagering requirements and limitations.

7.10. Betting Rules

This section outlines precise rules and regulations governing betting activities on the platform. It covers game-specific guidelines, maximum and minimum wagering limits, and any additional terms relevant to various types of bets.

7.11. Internal Policies

The Human Resources Policy encompasses recruitment, onboarding, performance evaluation, staff development, diversity, disciplinary actions, and termination procedures. The Financial Policy delineates budget allocation, expenditure oversight, financial statement preparation, auditing, procurement practices, and adherence to accounting standards. The Communication and Social Media Policy outlines internal and external communication protocols, email usage guidelines, social media directives, media interactions, and branding guidelines. The Information Security Policy focuses on safeguarding sensitive data, including data handling procedures, cybersecurity measures, password management, and strategies for preventing data breaches. Internal Policies complement external ones, undergoing periodic review and updates, while the latter undergo continual adaptation, modification, and discontinuation as necessary.

7.12.

The development and implementation of these policies reflect our commitment to maintaining long-term operations, particularly considering the substantial initial investment. Our objective is to sustain operations for at least three years under the GCB license, with renewal dependent on achieving investment returns and meeting key performance indicators as outlined in our financial projections.

7.13.

Utilizing a diverse array of internal and external resources, our project capitalizes on a wide range of expertise. The Ultimate Beneficial Owner (UBO) contributes invaluable insights in both the gambling and IT domains, serving as an exemplary overseer. Essential departments such as Legal, IT, Human Resources, and Finance boast substantial experience in sustainably managing large-scale gambling ventures. Additionally, collaboration with jurisdictions like Curacao, Cyprus, and others presents opportunities to engage with advisors, specialists, and independent auditors.

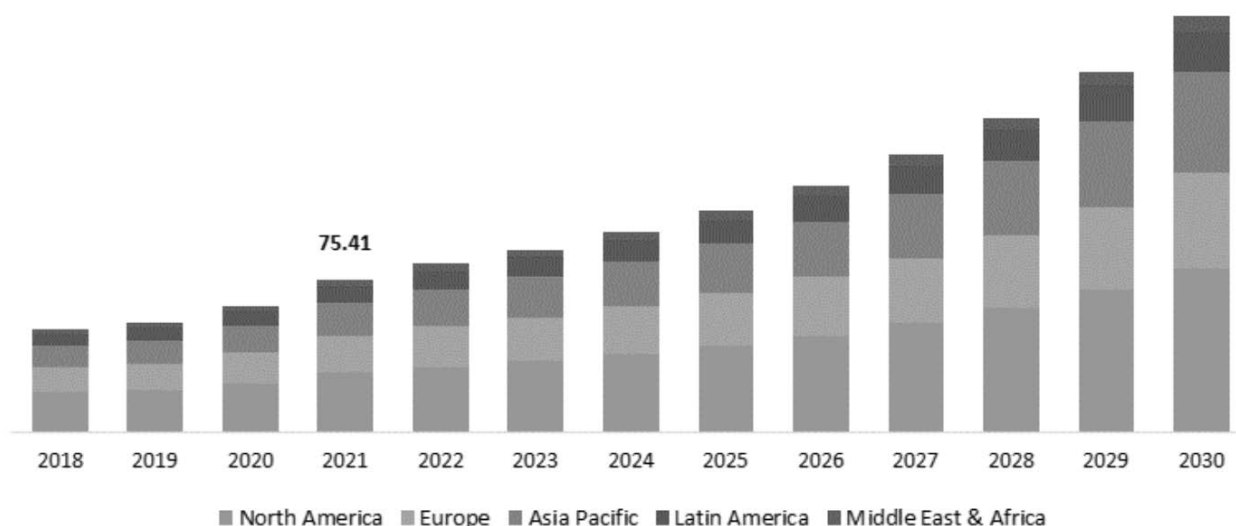
Furthermore, the Gaming Control Board (GCB) supports operators by offering guidance and assistance in policy formulation. This collaborative effort ensures that operators can customize their policies to meet regulatory requirements and industry standards effectively. By leveraging the knowledge and resources of the GCB, operators can establish resilient and efficient policies that foster compliance and integrity within the gambling industry. Moreover, the GCB provides ongoing support and updates to help operators adapt their policies to evolving regulations and emerging challenges, empowering them to maintain a robust framework for responsible gambling practices.

8. ONLINE GAMBLING MARKET OVERVIEW

8.1. Turnover and market size

The global online gambling market was valued at USD 75.41 billion in 2021 and is expected to grow at a CAGR of 12.0% during the forecast period. Online gambling is betting on sports games, casinos, and others over the internet. It enables the consumers to gamble from their comfort zone. The growing popularity of virtual wagering, along with the implementation of the freemium model in online gambling, is anticipated to drive the growth of the industry.

Diagram 2. Online gambling market size, by region, 2018-2030, \$ billion



The primary factor driving the industry growth include increasing adoption of smartphones, easy access to digital betting platforms, and increasing internet penetration, among others. For instance, according to AGA (American Gaming Association), there are over 2,800 active betting sites as of 2018. The rise of virtual payment gateways and the increasing use of digital currency globally are expected to drive the growth of the overall industry. Operators of various digital platforms are creating a wide range of promotions and tournaments that quickly gain the interests of the new audience, presenting huge growth opportunities to the online gambling market.

The COVID-19 pandemic has had a positive impact on the online gambling market. More and more consumers are inclined towards various virtual platforms to bridge their financial and social crises during lockdowns. According to research by Lund University, on account of the stringent shutdown of all sports & other events due to lockdown, consumers are gaining interest in virtual betting. Furthermore, as various gambling establishments closed due to lockdown, the majority of them moved to a digital platform. These factors positively impacted the growth of the online gambling market during the pandemic spread.

2021 has become a successful year for online casinos around the world due to the pandemic and selfisolation. In many countries the revenue of the entire gambling market has grown by a third - at least in relation to the previous 2020. This indicates the robustness and promise of this business model.

Over the past few years 85 countries around the world have legalized online gambling. Online betting and betting in slot machines and other gambling games together account for 70% of the income of all Internet gambling.

Gambling on the global network is very popular due to the wide variety of offers and comfortable gaming process without any restrictions.

Research firm Juniper has calculated that online gambling betting turnover will reach \$ 950 billion by 2024 and will continue to grow, Yogonet reports.

According to Juniper research, gambling is increasingly moving to the online environment. Moreover, the greatest activity is shown by mobile applications. The share of bets made using mobile phones is constantly growing.

The authors of the study also noted that, despite the general trend towards the regulation of national gambling markets, a few countries are moving towards the prohibition of gambling via the Internet and mobile applications.

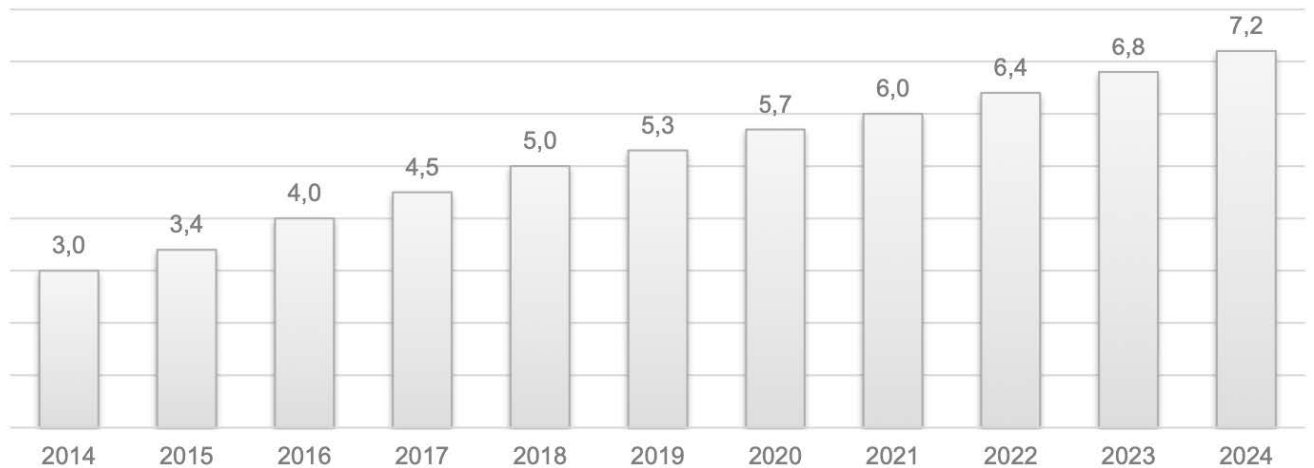
The global online gambling market already accounts for 13% of the total global legal gambling market and this figure is constantly growing.

About 85 countries have allowed online gambling.

Gross Gaming Revenue is a financial indicator that determines the gross revenues of a gambling establishment. The GGR parameter allows you to track the dynamics of the behavior of gambling players around the world.

BV1sion presented an overview of the online casino market in 2019, including the GGR market predictions. In 2019, GGR was \$ 5.3 billion (up from \$ 5 billion in 2018). It is predicted that GGR will grow further and will reach \$ 5.7 billion in 2024, and \$ 7.2 billion in 2025.

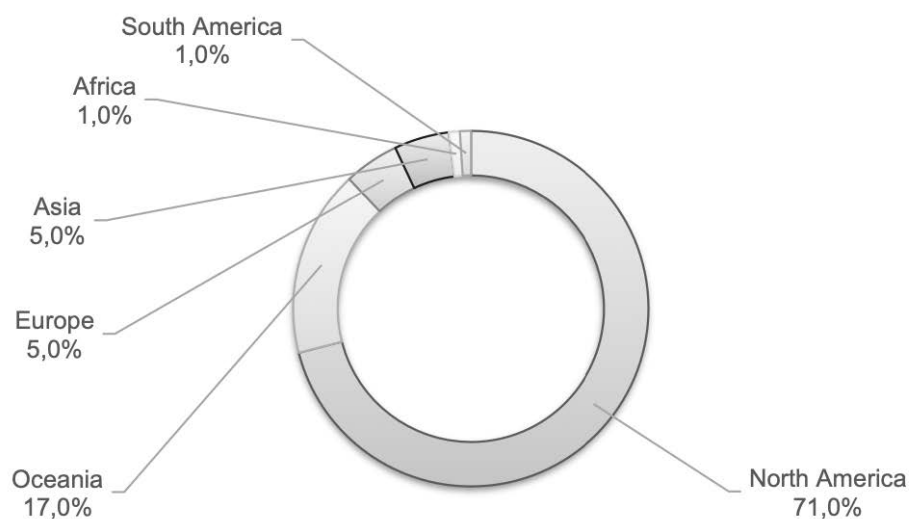
Diagram 3. Forecast of Gross Gaming Revenue, \$ billion



In terms of geographic division, North America continues to dominate the online casino industry, representing 71% of the total market.

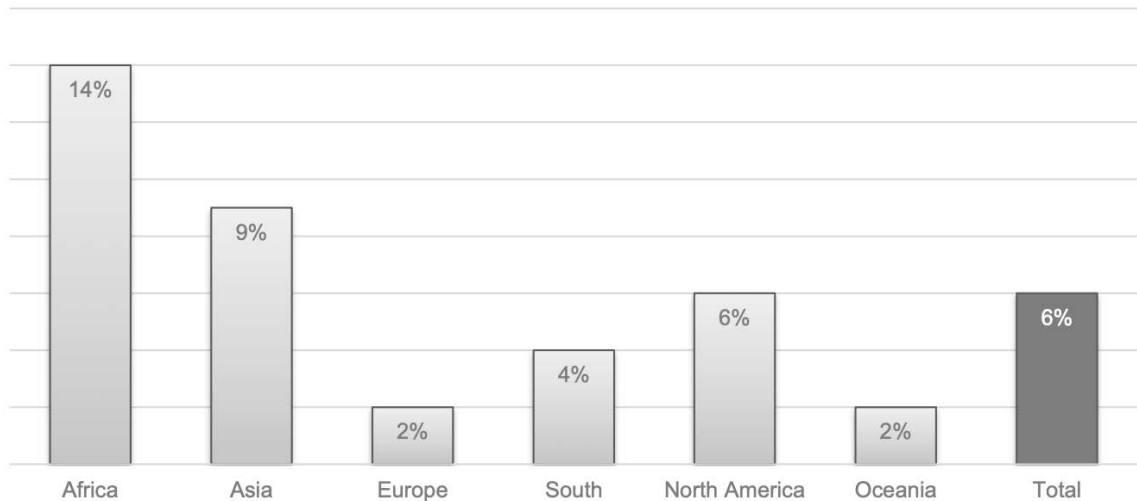
At the same time, Oceania (Fiji, New Zealand, Polynesia, New Guinea, etc.) also has a strong presence with 17% of the global GGR in 2019, significantly ahead of Asia and Europe with 5%.

Diagram 4. Regional structure of gross income of the gambling business in 2021



Africa posted the fastest growth rate in 2021 at 14% YoY, while Europe experienced very modest growth.

Diagram 5. Growth in gross income by region in 2021

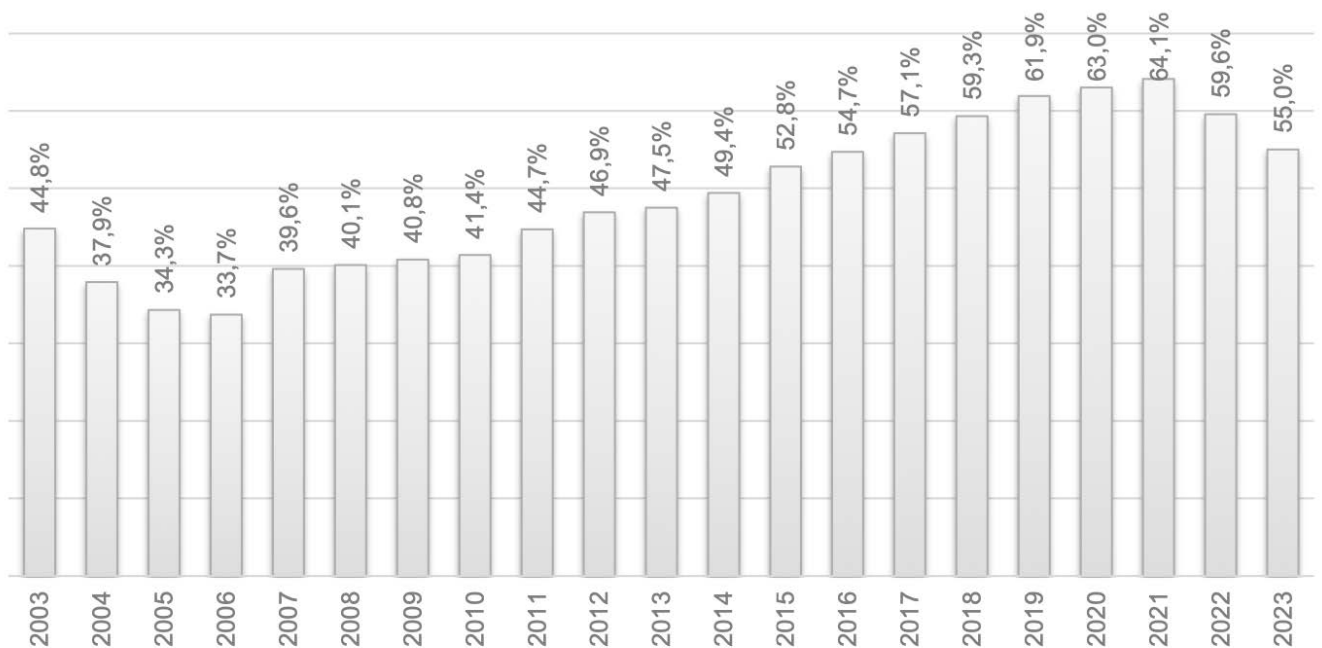


The European Union is the largest regulated market in the industry. For comparison, players from Iran are only restricted in about 30% of casinos.

The European Commission reports that today the online gambling industry is worth \$ 14.7 billion and continues to grow. Online casino gambling is the fastest growing gambling segment in the European Union with an annual growth rate of 15%.

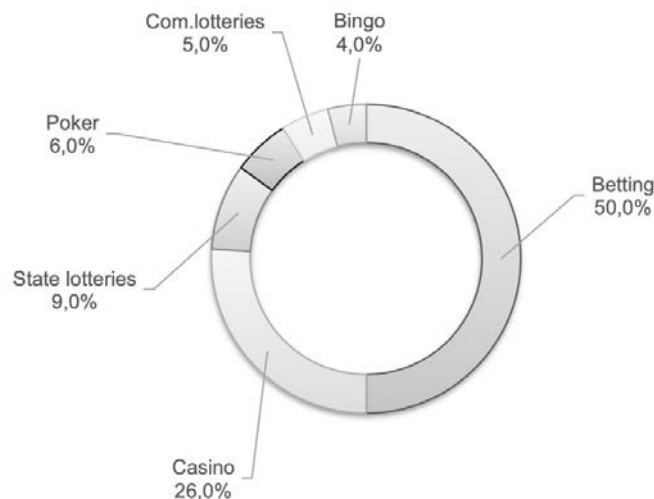
There was also talk about simplifying the rules. Last year, the European Commission said: "Operators of online gambling operating in the European Union are forced to obtain licenses in several countries, which require licensing. But a more general approach would be better for them. More compliance requirements create unnecessary infrastructure duplication and costs, which adds unnecessary administrative burdens for regulators."

Diagram 6. The share of the "white market" in online gambling revenue worldwide



Since 2003, the market has grown by an average of 23% annually. The dominant elements were betting, casino and poker. Online gaming is becoming more and more popular, and its progress is driven by factors such as the spread of the Internet, the emergence of new markets and new groups of players.

Diagram 7. Online gambling income by game type



8.2. New groups of players

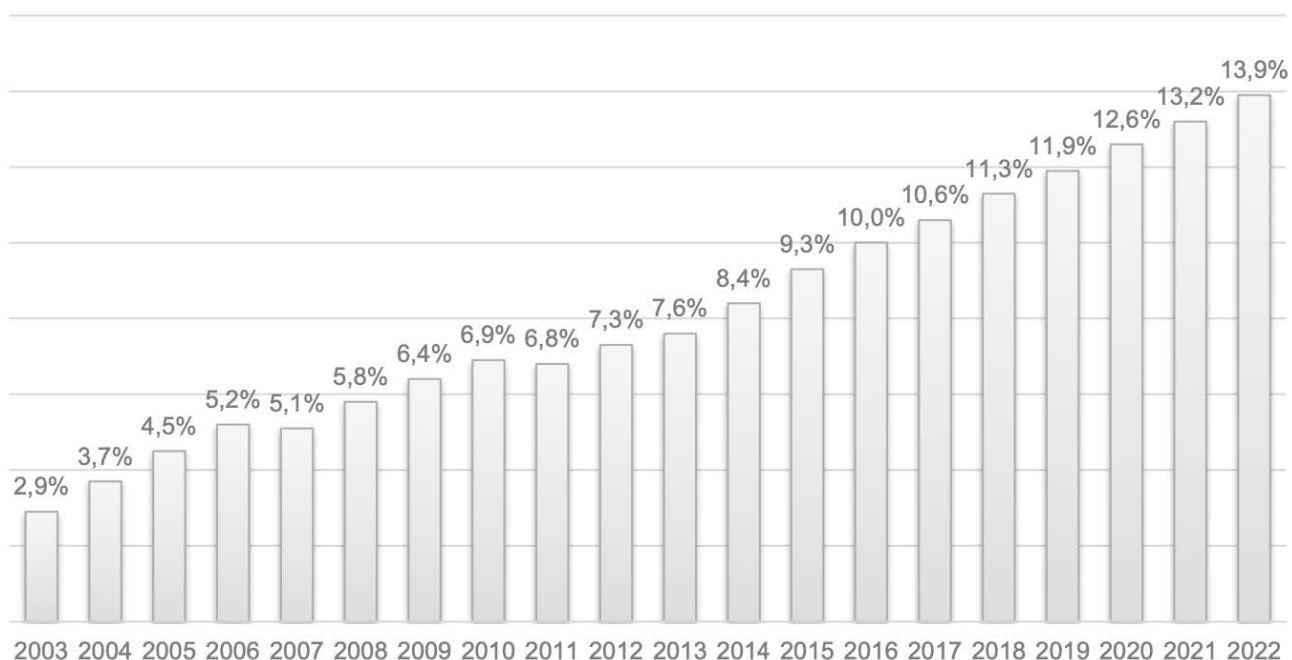
Since 2004, the number of female Internet users aged 18 to 74 has increased by more than 80%, and men by 60%. Online gambling attracted mostly young men, but now it is becoming more popular among women and older people.

Different types of players have different preferences and reasons to play. Most people do it for fun, others do it to win money, and some do it to relax. Whatever the reason, operators and developers should keep an eye on player preferences. Age differences between players are also increasing as the Internet continues to spread in society. The image of the average male player between the ages of 25 and 35 is becoming increasingly blurred.

According to a study by GP Bullhound, 43% of all online gamblers in 2019 were women. Their favorite segment is still bingo, but they play in different directions. Research shows that the play behavior of men and women is different. Women tend to play longer and bet lower, while men do it more often and bet more, but the games are shorter.

Bingo is becoming more and more popular because the game offers the opportunity to relax in a social society.

Diagram 8. Share of online gambling income from total gambling income in the world

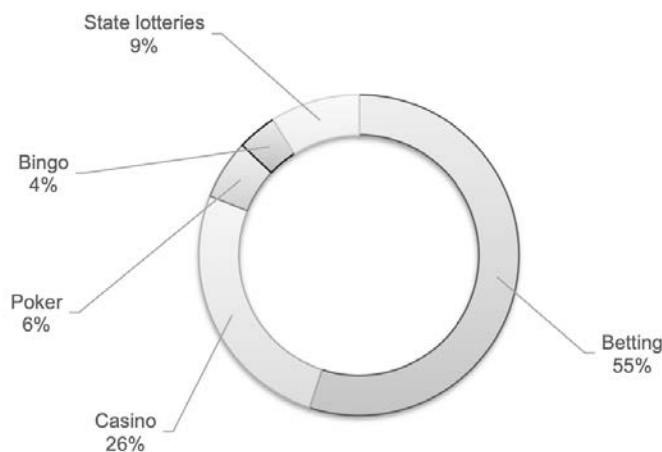


It is important to note that most of the popular forms of remote gambling today are traditional casino games, betting and poker variations. The popularity of different types of online gambling depends on gender. The bingo industry is expected to have the highest growth rates as more women are interested in the iGaming industry and bingo.

Nevertheless, online gambling is still more popular among men. Young men are especially prone to gambling. Women enjoy playing just as much, but they choose simpler games like lotteries and slots.

The difference can be explained by the socialization of the roles of men and women. Betting, casino games and skill games are traditionally associated with male audiences, while women are more accustomed to playing, having fun, rather than getting an adrenaline rush.

Diagram 9. Online gaming revenue by type, 2021



8.3. Current trends in online casinos

Due to the pandemic and self-isolation in many countries, 2021 has become a very successful year for online casinos around the world: there is an increase in the revenue of the entire online gambling market in the world by a third compared to the previous period last year. And during the crisis of 2008, it practically had no effect on the wallet of online casino customers. This indicates the robustness of this business model.

New technologies are having a profound impact on the gaming market. Active development is predicted for mobile gambling, and only the best new products will withstand competition, which means that users will notice an improvement in the quality of mobile gambling.

All technical changes, including those related to the speed of mobile data transmission, will not be particularly noticeable to end users, they will take place, so to speak, in the background. But the qualitative and specific changes will be on the face.

The main surprise will be virtual reality in online gambling. Thanks to the development of Microsoft HoloLens, HTC Vive and Playstation VR, video slots and other online games will become more spectacular and amazing than ever before soon.

Virtual reality technology

New advances in VR technology make it possible to faithfully reproduce the emotions and physiological sensations experienced by a person in a real casino. With the help of virtual reality glasses, anyone who wishes today can walk through the hall of a masterfully recreated gambling establishment, talk to the dealer and place bets at any gaming table.

Such giants of the gaming market as Microgaming, Novomatic, NetEnt, Lucky VR, Topgame Technology and others are working in the direction of the development of virtual reality games.

Back in the winter of last year, at the international conference ICE Totally Gaming, Microgaming presented an impressive stand, where the virtual roulette game was demonstrated. The software used has clearly shown that virtual reality is achievable, and a great future awaits it in the gambling industry.

The company NetEnt is actively studying VR technologies. Visitors to exhibitions dedicated to online gambling have already repeatedly experienced the Jack and the Bean Tree slot machine. The amazingly realistic journey was appreciated by both players and competitors.

Talking about their achievements in the field of virtual reality, Novomatic representatives note the main advantages of realistic online games: full immersion in the gameplay; incredible emotions, even brighter than in real life; the ability to use the resource in any convenient place where there is an Internet connection; exciting and varied plots.

Novomatic is one of the pioneers in the implementation of VR technology in online gambling, which has many new developments.

Recently, the idea of the possibility of integrating virtual gameplay into social networks has been repeatedly expressed. Most likely, such an idea will soon be implemented.

Social games combined with slot machines

Online gambling in a social format is gaining popularity. We recently reviewed the new Castle Builder 2 slot from Microgaming, which evolves gameplay through advances in spinning reels and placing bets.

The advantage of social gambling is that it is much more dynamic and addictive than a traditional slot machine. Such games allow you to choose a playable character and follow different paths depending on the character of the hero. In addition, the characters are invited to develop: to accumulate experience, skills and achievements, and due to this, get more favorable conditions for the game. The role of the reel slot machine is that the winning combinations not only bring money, but also the resources necessary to continue in the game.

Currently, slot machines with social game capabilities are in great demand, so many developers are working on their creation. In the second half of 2021, several fresh new products were released.

Progressive Poker Jackpot with a live dealer

Slot machines with a progressive jackpot are chosen by many gamblers, as this is a chance to win a large cash prize. Now this technology is smoothly spreading to poker. Evolution Gaming has already introduced the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em!

The initial size of the jackpot is 1,000,000 euros, but since it is cumulative, the amount increases in proportion to the activity of the players. Evolution Gaming Product Director Todd Haushalter noted that the jackpot could grow to an incredible € 30,000,000! Playing poker with such a prize at stake is much more fun. The game also has a second level jackpot with lower fixed payments.

Other developers of live online casino games are also considering introducing an attractive progressive jackpot for players.

Live-games

Live dealer games have become very popular in the past year. And this is just the beginning of their successful development. It is expected to further popularize live games in conjunction with VR technology. The developers plan to create even more realistic games with improved functionality and open new studios for broadcasting games in real time.

Skill games

Most modern players rely not only on luck, but also on their own skills. This inspired many providers to develop platforms containing strategy games. They need to apply certain skills, which is very attractive for players. This promises immense popularity for skill games soon.

Gamification

This concept implies the use of game dynamics and game thinking to attract an audience to the process and solutions to marketing problems. Gamification will no doubt become a new trend in gambling and promises new missions, competitions, bonus programs and rewards to attract gamblers.

Entertainment content

Online casino operators strive to keep users on their resource in every possible way. Now, in addition to chats, special sections with useful non-game content will be used for this: movies, TV series, music videos and TV shows. In addition, plot details of many slots will appear in online casinos.

Big data

Another trend of the current year will be Big Data technology. It provides the collection and storage of a huge amount of information and is indispensable for the progressive online gambling industry. Thanks to the ability to analyze and sort a large amount of data, games will effectively adapt to the interests and needs of the target audience.

Mergers and acquisitions

According to experts' forecasts, the development of the gambling market is so rapid that by 2024 its volume will exceed \$ 60 billion. So, in 2024, gambling companies will expand and increase their capital.

Individual slots

Creation of slots for individual orders will also be included in the top online casino services. The development of unique slots will allow operators to gain a competitive advantage in the market and maximize brand awareness.

Cryptocurrencies

Cryptocurrencies are famous for such significant advantages as anonymity, convenience, minimum fees and the absence of prohibitions from legislation. Thanks to this, they will become one of the most popular means of payment in the field of Internet gambling. In addition to bitcoin, the following currencies will gain popularity: litecoin, dogecoin, ethereum, ripple, monero, zcash and others.

Currently, the use of cryptocurrencies by customers is alarming, since they are associated with illegal, i.e. gray financial market. At the first stage, it is not recommended to use settlements with clients in cryptocurrency.

Security issues in online gambling

New technologies imply the search for new ways to solve security issues. Moreover, DDoS attacks have become more frequent lately. In the past year, they have done a lot of damage to online bookmaker sites. As it turned out, even large operators with close attention to security issues, such as Britain's William Hill, are not immune from hacker provocations. Last fall, the services of this operator were unstable, and with 5 million revenue a day, the losses will be rightly called significant.

In 2019, a significant proportion of gambling operators' investments were directed towards security.

8.4. Market Forecasts

Research company Juniper calculated that betting turnover in the online gambling segment will reach \$ 950 billion by 2024 and will continue to grow even before the pandemic, according to Yogonet.

According to Juniper research, gambling is increasingly moving to the online environment. Moreover, the greatest activity is shown by mobile applications. The share of bets made via mobile phones is constantly growing.

The authors of the study also noted that, despite the general trend towards the regulation of national gambling markets, a few countries are moving towards a complete ban on gambling via the Internet and mobile applications.

The global online gambling market already accounts for more than 13% of the total global legal gambling market and this figure is constantly growing.

Niche revenue is expected to reach \$ 65 billion by 2024, and the niche itself will undergo a series of changes and reforms depending on the market.

The Asian market is the largest in the world in terms of volume, and every year the demand for gambling is only growing. 2021 showed softening in the field of law - more and more countries are legalizing online betting and even casinos. This trend has moved into 2024, which opens new perspectives for the industry.

In Africa, the online gambling market is now at the stage of rapid development and growth. The main problem is that currently, in most countries of the continent, casino activities are not regulated in any way (but they are not prohibited at the legislative level either). Therefore, it will take time to fully unleash the potential of this market.

8.5. Online Gambling in Africa

Gamblers and experts say many punters see Africa's growing sports betting industry as a source of regular income, and a possible path out of poverty.

But critics warn its rise is underpinned by widespread poverty, unemployment and poor or non-existent regulation.

Continent-wide data on sports betting is not readily available, though snapshots from different countries show its growing popularity.

Online gaming platforms have enjoyed recent growth, driven by widening adoption of mobile payments and pandemic-era demand for digital entertainment.

A South African government survey from 2017, the most recent on gambling, found that sports betting grew 14% per year from 2008 to 2016, even as the number of South Africans who gambled fell from 57% to a third of the country's adult population.

Today, online sports betting makes up 45% of the South African gambling market, “a starkly different picture to just 10 years ago when casinos held 80% of market share,” said the National Gambling Board.

Sibongile Simelane-Quntana, executive director of the South African Responsible Gambling Foundation, said that her group has seen “significant growth” in online sports betting in the aftermath of pandemic-related lockdowns.

Funding for her group, which comes from gambling houses, “has increased by 50% from where it was before the lockdown,” she said.

African gamblers often count on winnings to fund daily needs.

A government survey found that respondents who saw gambling as a good source of income fell by half from 2019 to 2021, from 22.7% to 11.2%.

8.6. Online gambling in Asia Pacific

Gambling over cards was a known thing, but until the day cell phones came into the picture, the world was just a click away. The process of betting on sports activities or casinos on the internet is referred to as online gambling.

At present, the Asia-Pacific region is gaining hold of online gambling. After the pandemic hit the entire global market, online gambling has become a new trend. Technological advancements have changed the dynamics of Asia-Pacific online gambling market dynamics. Earlier, limited only to brick-and-mortar casinos, the internet has given immense growth to online gambling in Asia-Pacific.

According to the market overview 2024-2028, the Asia-Pacific online gambling market size reached USD 19.5 billion in 2024, and IMARC Group expects the market to reach USD 37.5 billion by 2028, along with a growth rate of (CAGR) of 11.39% during this period. The data collected so far cited by The Guardian says the UK is the largest online gambling market in the world. It surpasses even the United States.

Factors affecting online gaming can be:

- Mobile internet is the biggest factor contributing to the growth of the European companies' gambling sector.
- Online networks are providing legalized platforms for gambling. Cricket in India is an excellent example of it, as the future of this segment is very strong in the market.
- Also, cashless transactions, customizable budgets, and electronic devices are primary factors to hike up the online gambling market.

Thus, as per the reports, sports betting covers the majority of the total market share in the Asia-Pacific online gambling market. Mobile dominates when it comes to devices for online gambling. Again, the key regions in the online gambling market are China, India, Japan, South Korea, Indonesia, and others. Online gaming is one of the fastest emerging sectors in India too. With Covid lockdowns imposed in the different regions of the country, this sector has seen robust growth. China remains the dominating country in the Asia-Pacific online gambling market.

8.7. Risks factors of online gambling

Online gambling possesses a unique set of risks. Combined with the challenges of the COVID-19 crisis, online gambling can be especially tempting and destructive for those with gambling problems. Why? Here are 6 risk factors of online gambling:

- Easy access. In just a few clicks or taps, gamblers can access games and betting opportunities right from their devices.
- Isolated playing. While gambling in casinos allows people to socialize, online gambling is often done alone. And for those with a gambling problem, it may be easy to conceal how often and where they're playing.
- Unlimited play time. Gambling sites are open 24/7, giving people the chance to play night and day.
- Seemingly unlimited money to bet. Using a credit card enables fast bets and losses. In casinos, money is exchanged or loaded onto registered loyalty cards. But credit cards require no loading or reloading, making it easier to lose track of money spent. Significant losses can negatively impact credit scores as well.
- Unregulated websites. Fraudulent or unregulated gambling sites may take advantage of players and can be hard to track down and take action against if problems occur.
- Cybersecurity issues. Because sites can be unregulated, personal data, including credit card and banking account numbers, may be vulnerable and accessible to hackers or scammers. Additionally, contact information may be shared with third-party partners to promote gambling sites and offers.

9. INVESTMENT PLAN

9.1. Volume and structure of investments

The total investment required for the project is 239,9 thousand EUR.

The funds raised under the project are planned to be distributed in the following areas of financing:

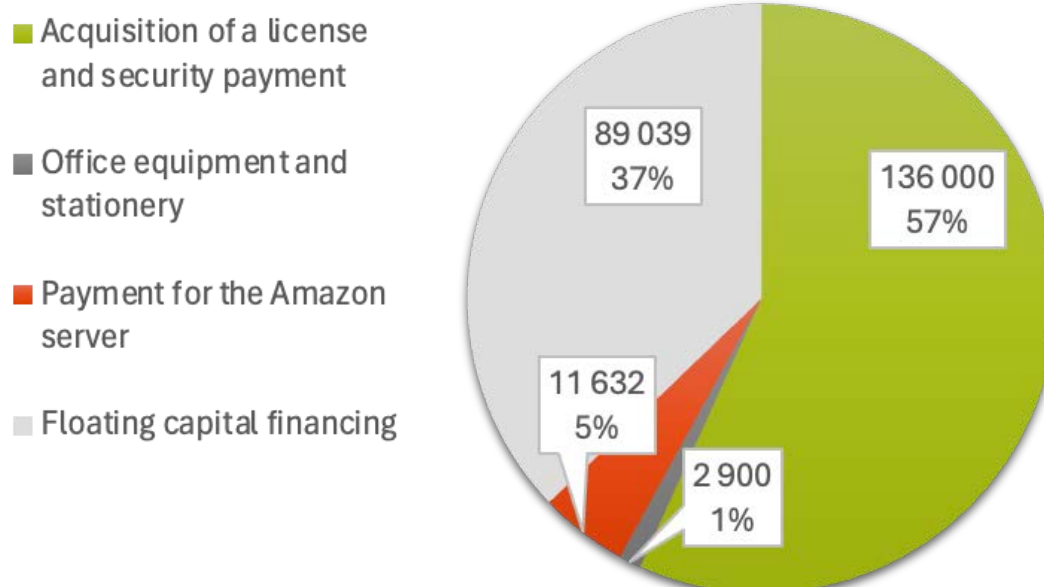
- acquisition of the platform core (back office);
- floating capital financing.

Table 5. Investment budget, EUR

№	Name	Value
1	Acquisition of a license and security payment	136 000
2	Payment for the Amazon server	11 632
3	Office equipment and stationery	2 900
4	Floating capital financing	89 039
Invested capital total (actual need for cash)		239 571

The largest share in investment costs is floating capital financing (about 57%).

Diagram 10. Structure of the investment budget



9.2. Project Milestones and Implementation of Investments Schedule

The duration of the investment period (before the launch of the project) is 0,3 years.

A phased work schedule with a financing schedule is presented in the table below.

Table 6. Financial plan, EUR

		Total for 3 years	Apr-24	Jul-24	Aug-24	Sep-24	Feb-25
1	Acquisition of a license and security payment	136 000	136 000	-	-	-	-
2	Payment for the Amazon server	11 632	-	11 632	-	-	-
3	Office equipment and stationery	2 900	-	2 900	-	-	-
4	Floating capital financing	89 039	4 850	-	52 325	2 744	29 120
	Investment total excl. floating capital	150 532	136 000	14 532	-	-	-
	Invested capital total (actual need for cash)	239 571	140 850	14 532	52 325	2 744	29 120

10. INCOME PLAN

10.1. Volume of income

The total amount of proceeds for the project period (3 years) will amount to 4 879,8 thousand EUR.

An aggregate plan for generating income and financing direct costs is presented in the table below.

Diagram 11. Dynamics of Sales Proceeds in Euros

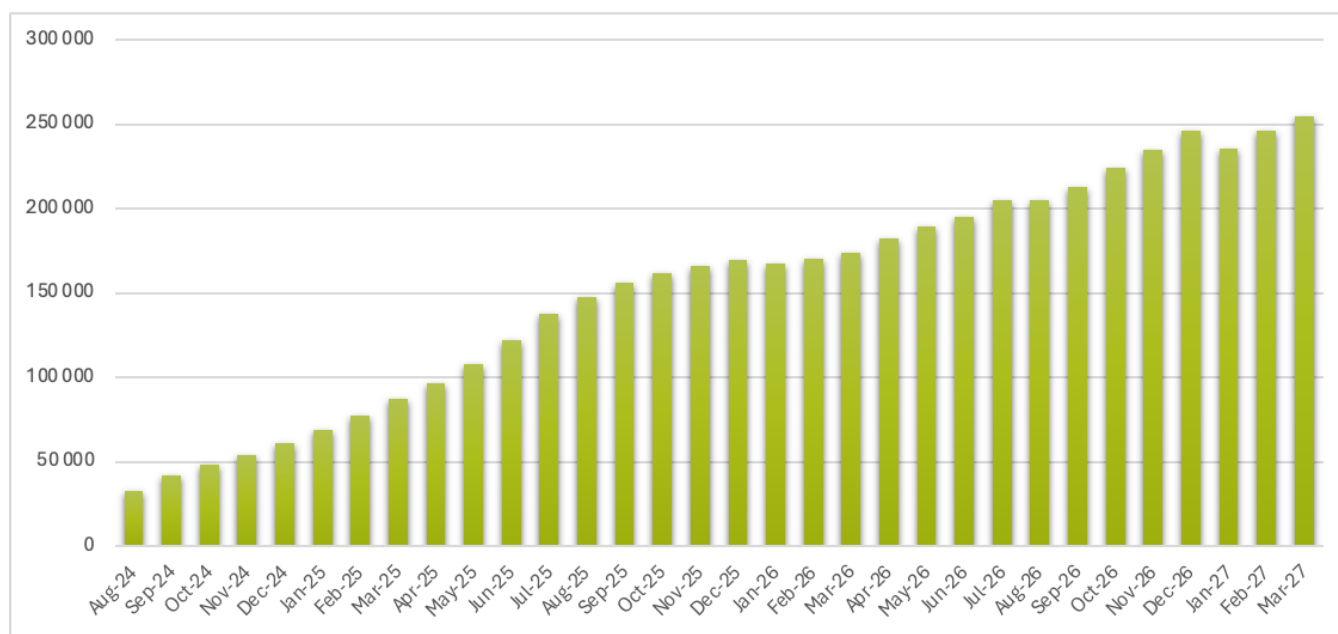


Table 7. Income and direct cost plan, EUR

Physical indicators	Unit	Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Total number of clients	ppl	111 539	5 445	34 274	55 004	16 816
Number of new clients	ppl	72 656	4 579	22 818	34 535	10 724
Number of current clients	ppl	38 883	867	11 456	20 468	6 092

Proceeds		4 879 841	238 234	1 499 496	2 406 416	735 695
Income from clients	43,75	4 879 841	238 234	1 499 496	2 406 416	735 695

Direct costs		3 207 425	239 803	896 044	1 559 714	511 863
Advertising costs	24	1 832 080	138 881	577 043	853 713	262 443
Additional staff costs	1 290	838 500	0	122 550	509 550	206 400
Salary		313 600	49 000	117 600	117 600	29 400
License fees		142 961	39 378	48 745	48 745	6 093
Depreciation	60 m	80 284	12 544	30 106	30 106	7 527

Indirect costs		480 267	55 667	175 600	175 600	73 400
Accounting		117 333	18 333	44 000	44 000	11 000
Office equipment maintenance		101 333	15 833	38 000	38 000	9 500
Hosting		124 000	0	42 000	42 000	40 000
Office rent		33 600	5 250	12 600	12 600	3 150
Legal support		104 000	16 250	39 000	39 000	9 750

11. MARKETING PLAN

11.1. Executive Synopsis:

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.

11.2. Target Audience:

- Demographics: Primary focus on adults aged 18 and older, with a keen eye on the 22-60 age demographic.
- Geographics: Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan.
- Geoblock: USA, France, The Netherlands, The Dutch Caribbean Island: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.
- Psychographics: Attracting tech-savvy enthusiasts, gaming aficionados, and those valuing a commitment to responsible gaming principles.

11.3. Marketing Strategies:

a. 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.

b. 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.

c. 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.

d. 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.

11.4. Sales Expedition:

a. Launch Excitement:

- Unleash captivating launch promotions and exclusive bonuses to enrapture early adopters.
- Employ strategically timed limited-time offers to instill urgency and anticipation.

b. 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.

c. 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.

d. 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.

11.5. Evaluation Metrics:

- Continuously monitor pivotal metrics, including customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.
- Undertake periodic reviews and agile adjustments based on performance analytics.

12. EXPENDITURES OF THE PROJECT

12.1. Fixed costs

Salary

According to the staffing table, the total estimated number of personnel is 6 people with a standard workload with an average salary of 1960 EUR per month.

The total payroll will amount to 9,8 thousand EUR per month.

It is planned to pay for the work of all employees of the company on a time-based basis. At the same time, in the future, it is planned to develop a system of financial incentives (bonuses, bonuses, etc.).

Table 8. Staffing table and salaries, EUR

No	Position	Number of people	Salary	Total per month
1	Director	1	2 300	2 300
2	Site developer	1	1 800	1 800
3	Designer	1	1 650	1 650
4	Advertising specialist	1	1 650	1 650
5	Employee	2	1 200	2 400
	Total	6		9 800

5 additional staff are employed for every 6000 new clients. The cost of additional personnel is shown in variable costs.

12.2. Variable costs

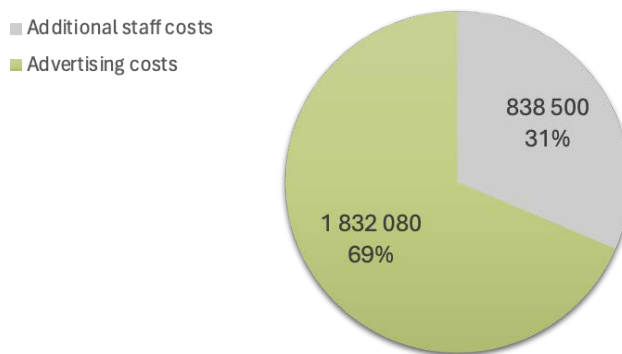
Direct production costs

A complete list of current variable costs is presented in the table below.

Table 9. Variable costs, EUR

No	Item of expense	Per unit, total	Calculation base
1	Advertising costs	24	for 1 client
2	Additional staff costs	1 290	for 1 person

Diagram 12. Structure of variable costs (to the total volume of variable costs)

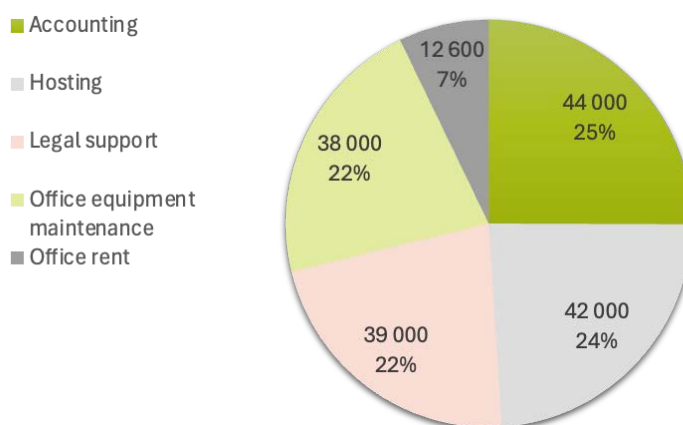


12.3. Fixed costs

Table 10. Fixed costs, euro

No	Item of expense	Total per year
1	Accounting	44 000
2	Office equipment maintenance	38 000
3	Hosting	42 000
3	Office rent	12 600
4	Legal support	39 000
	Total	175 600

Diagram 13. The structure of fixed costs



13. FINANCIAL PLAN

13.1. Conditions for attracting investment resources

Financial resource requirements and financing structure

The need for financial resources for the project is 239,5 thousand EUR.

It is planned that the financing of this project will be carried out at the expense of the investor and the company's expense.

13.2. Indicators of the cash flow plan

Operating activities

Positive cash flows from operating activities are generated by sales proceeds. Negative cash flows are the company's operating costs.

The amount of proceeds for the period of the project reaches 4 879,8 thousand EUR.

Negative cash flow reaches 3 891,2 thousand EUR and consists of the following main components:

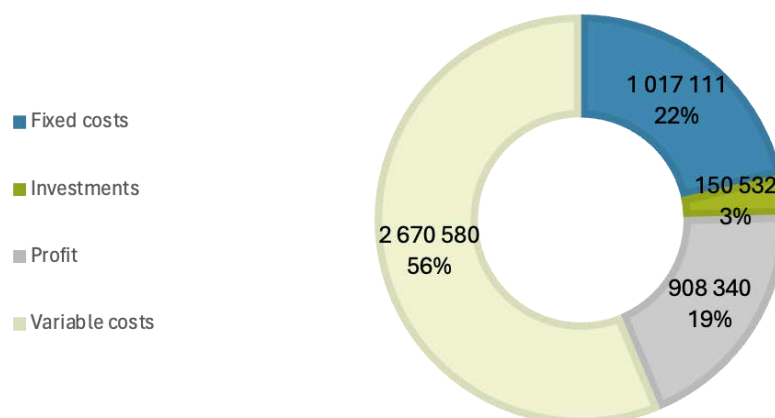
- variable costs - Advertising costs 24 for 1 client; Additional staff costs 1290 for 1 person
- fixed costs - 175,6 thousand EUR per year.

Financial activities

The financial flow consists of receipts of own and credit funds for financing the project, as well as their subsequent reimbursement.

Thus, the financial balance is zero.

Diagram 14. Distribution Structure of Sales Proceeds to Costs and Profit



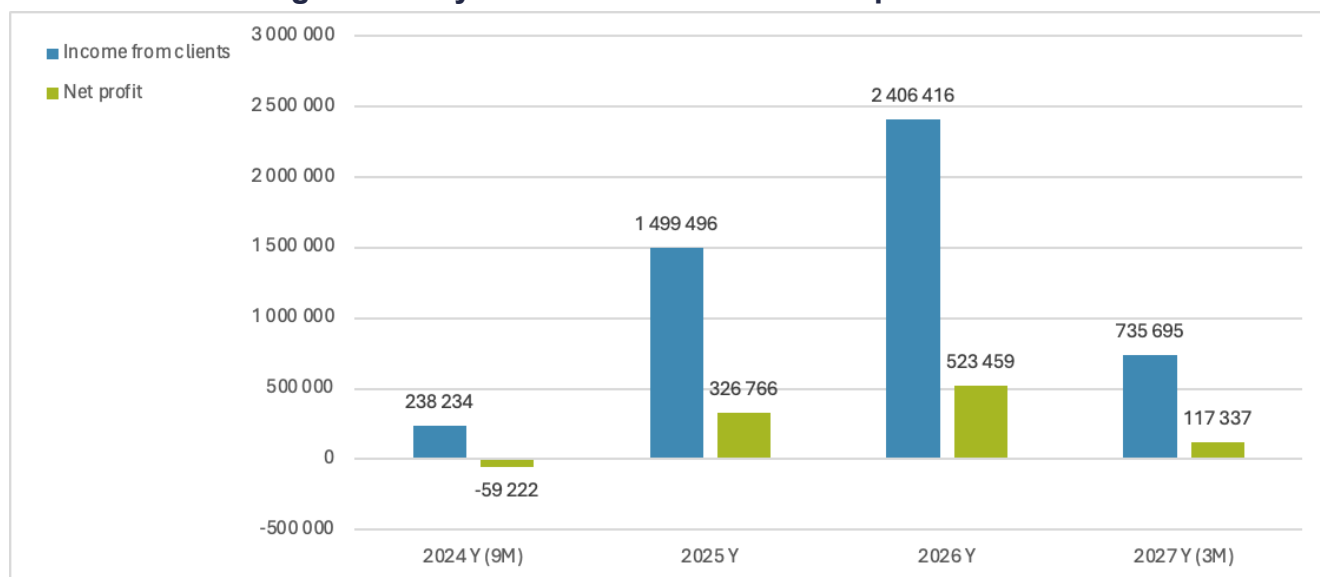
13.3. Indicators of Profit and Loss Plan

The amount of proceeds for the project period will amount to 4 879,8 thousand EUR. The total volume of direct costs will reach 3 127,1 thousand EUR.

Fixed costs for the project period will be 526,8 thousand EUR.

The volume of net profit, taking into account the write-off of the entire amount of investment costs (through depreciation), will reach 908,3 thousand EUR.

Diagram 15. Dynamics of income and net profit in Euros



13.4. Project Financial Performance

The project calculation horizon is 36 months (3 years). The investment period of the project (until the launch of the project) is 3 months (0,3 years). The working period of the project (from the launch) is 33 months (2,7 years).

To calculate the financial indicators of the project, taking into account the nature of the project, a discount rate of was adopted.

In total, for the entire period of the project implementation, 4 879,8 thousand EUR of sales proceeds will be received.

Net profit upon completion of the project will amount to 908,3 thousand EUR.

Table 11. Financial and investment indicators of the project

Name of the index	Value of the index
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Calculation period of the project, year	3
Laid-down capital (LDC), EUR	150 532
Sum of proceeds (SP), EUR	4 879 841
Net average operational receipts per month (NAOR), EUR	31 046
Net profit for the project period, EUR	908 340
Average profitability for the project period (net profit to proceeds	18,61%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	322 138
Average Rate of Return of investments (ARR)	138,23%
Return on investment (ROI)	503%
Profitability index (PI)	2,1
Internal rate of return (IRR)	93,92%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

14. SENSITIVITY ANALYSIS

14.1. SWOT analysis

Table 12. SWOT analysis

Strengths	Weaknesses
• 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	• 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	Threats
• Growing popularity of mobile gambling • Constant emergence of new technologies • Global trend towards legalizing online casinos	• 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