

ONLINE CASINO

ROLSBET.COM

Business plan

Numereto B.V.

RolsBet

TABLE OF CONTENTS

EXECUTIVE SUMMARY.....	3
COMPANY MANAGEMENT STRUCTURE.....	9
FINANCIAL SUMMARY.....	11
PRODUCT & SERVICES.....	19
KEY SUPPLIERS, MATERIAL DEPENDENCIES.....	23
RISK EVALUATION AND MANAGEMENT.....	28
POLICIES AND PROCEDURES.....	36
MARKET ANALYSIS.....	40
ONLINE CASINO LAUNCHING RISKS.....	55
FINANCIAL PLAN.....	58

1. EXECUTIVE SUMMARY

1.1. PROJECT SUMMARY

The initiator of the project is Numereto B.V. a company incorporated in Curacao.

The domain is rolsbet.com.

The screenshot displays the Safenames International Domain Portal interface. At the top, the header includes the Safenames logo and navigation links: Home, WHOIS, Help, Logout, Account, Domain Management, SSL, Search & Order, Support, and Resources. A blue banner below the header shows the user's account information: "Account: OLENA CHUCHMAN | Security level: 1" and "Cashpot balance: 0 | Wire Transfer | Top-Up | History". The main content area is titled "My Domain Names" and shows "1 domain names found (matching 'ROLSBET.COM')". Below this, there is a table with columns: Domain Name, TLD, Account / Sub Account, Registration Term, Registered Date, Renewal Date, and Invoice Info. The table contains one entry for "rolsbet.com" with TLD "com", Account "OLENA CHUCHMAN", Registration Term "2 yrs", Registered Date "18.04.2023", Renewal Date "18.04.2025", and a link to "View (1) Invoices". The page also includes a search bar with "ROLSBET.COM" entered and a pagination bar at the bottom indicating "Page 1 of 1".

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

The screenshot shows the footer and sidebar of the Safenames International Domain Portal. The sidebar on the left is divided into three sections: "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 on the right 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 features a search bar and a "Find" button. Below the search bar, the "Search & Order" section lists "Search & Order Wizard", "Fast Track Search & Order", "Order IDN Domains", and "Order SSL Certificates". The footer at the bottom left contains the copyright notice: "Copyright ©1998-2023 Safenames Ltd."

We are presently in the process of applying for the government license necessary to legally operate under the jurisdiction of the Gaming Control Board.



Company Description:

Welcome to ROLSBET, where the realm of online gaming meets innovation and integrity. Our mission is to provide an immersive and responsible gambling experience in the digital gaming landscape.

Our vision is to cultivate a global gaming community where every player feels empowered, entertained, and secure. We strive to revolutionize gaming by promoting innovation, accountability, and inclusivity.

At ROLSBET, we adhere to a set of core principles:

Innovation Hub: We lead the charge in technological advancement, continuously pushing boundaries to offer cutting-edge games and unparalleled gaming experiences.

Responsible Gaming Advocacy: We proactively promote responsible gaming, implementing robust player protection measures, investing in educational resources, and collaborating with like-minded organizations.

Player-Centric Approach: Our players are our priority, inspiring us to customize experiences, deliver prompt customer support, and continuously enhance our services based on player feedback.

Global Integration: We foster a diverse and inclusive gaming community, breaking down barriers to create a worldwide network that welcomes players from all backgrounds.

Our goals reflect our commitment to excellence:

Excellence in Entertainment: We aspire to create gaming experiences that transcend mere excitement, fostering social connections, skill refinement, and unforgettable moments.

Innovation Leadership: We aim to lead the industry in innovation, setting benchmarks for gaming excellence and surprising our players with fresh and captivating experiences.

Community Impact: We are dedicated to making a positive difference in our community by supporting charitable endeavors, backing local initiatives, and advocating for responsible gaming.

Sustainable Growth: We strive for sustainable growth by balancing financial success with ethical business practices, environmental stewardship, and a steadfast dedication to player welfare.

Join us on our journey to redefine online gaming, where innovation, integrity, and entertainment intersect at ROLSBET.

The project involves the creation of a company offering online games improved by technologies that attract players, based on the experience of working in 7 casinos that have already been created with the participation of the founders of a new gaming platform.

The security payment, in the event of the closure of the online casino for internal reasons or other objective reasons, is returned to the casino owners, but must remain unused during the operation of the online casino as a deposit in case of winning the jackpot, i.e. losses can be minimal.

1.2. UBO BACKGROUND

Chuchman Olena, Founder of Rolsbet.com since February 2023, devised a comprehensive business plan to outline the casino's objectives, target market, and growth strategies on mobile devices. She analyzed market trends, competition, and opportunities for innovation, optimizing revenue through strategic upselling. As Senior Affiliate Marketing Manager at Parimatch from March 2020 to February 2023, she directed marketing initiatives, enhanced engagement with target audiences, and represented the company at industry events. Prior, as Affiliate Manager at Fortuna Live from January 2014 to March 2020, she led

marketing projects, generated leads, and optimized marketing channels for enhanced engagement.

Leveraging her role as the Founder of Rolsbet.com, Olena possesses extensive insights into every aspect of the project, granting her a distinct advantage in guiding the company toward success in his current position as Founder.

CHUCHMAN OLENA

PROFESSIONAL SUMMARY

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. Results-focused employee with experience developing motivated, dependable teams. Communicates and delegates effectively to aid timely, quality completion of projects.

EXPERIENCE

Rolsbet.com, Feb 2023 - Current

Founder

- Develop a comprehensive business plan outlining the casino's goals, target market, and growth strategies on mobile devices.
- Identify and analyze market trends, competition, and opportunities for innovation.
- Maximised revenue by strategic upselling of higher margin items.
- Oversee the development and maintenance of the online casino platform.

Parimatch (Betting company), Kyiv, Mar 2020 - Feb 2023

Senior Affiliate Marketing Manager

- Directed marketing staff in planning and executing promotional projects.
- Optimised marketing channels to increase engagement with target audiences.
- Liaised between company executives and department employees.
- Presented company product at industry events, promoting services and expertise to potential partners or customers.
- Addressed customer questions, feedback and complaints regarding company products.
- Analysed and optimised marketing campaigns for increased ROI.

Fortuna Live (Betting company), Kyiv, Jan 2014 - Mar 2020

Affiliate Manager

- Directed marketing staff in planning and executing promotional projects.
- Generated leads and identified potential new markets.
- Optimised marketing channels to increase engagement with target audiences.
- Addressed customer questions, feedback and complaints regarding company products.
- Presented company product at industry events, promoting services and expertise to potential partners or customers.
- Coordinated resources and schedules for projects to deliver on-time results.

CONTACT

📍 Ukraine, Kryvyj Rih
☎ +380500143306
✉ chuchmanolena34@gmail.com

SKILLS

- BRAND BUILDING
- PROACTIVE
- SELFSTARTER
- PARTNERSHIPS
- MANAGEMENT
- LEADERSHIP
- MARKETING

EDUCATION		
July 2010		
Master of Law		
Law		
Taras Shevchenko Kyiv National University, Kyiv		
LANGUAGE		
Ukrainian	Russian	English
Advanced	Advanced	Intermediate
(C1)	(C1)	(B1)
Deutsch		
Elementary		
(A2)		



1.3. 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)

1.4. INDICATORS OF THE PROJECT

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

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	140 200
Sum of proceeds (SP), EUR	4 747 656
Net average operational receipts per month (NAOR), EUR	30 219
Net profit for the project period, EUR	887 138
Average profitability for the project period (net profit to proceeds	18,69%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	316 278
Average Rate of Return of investments (ARR)	143,07%
Return on investment (ROI)	533%
Profitability index (PI)	2,3
Internal rate of return (IRR)	95,73%
Pay back period of the project in whole (PBP), incl. financing scheme	15 months
	1,25 years

2. COMPANY MANAGEMENT STRUCTURE

The Ultimate Beneficial Owner (UBO) holds the position of CEO and is the sole shareholder of the Operator, actively involved in daily business operations.

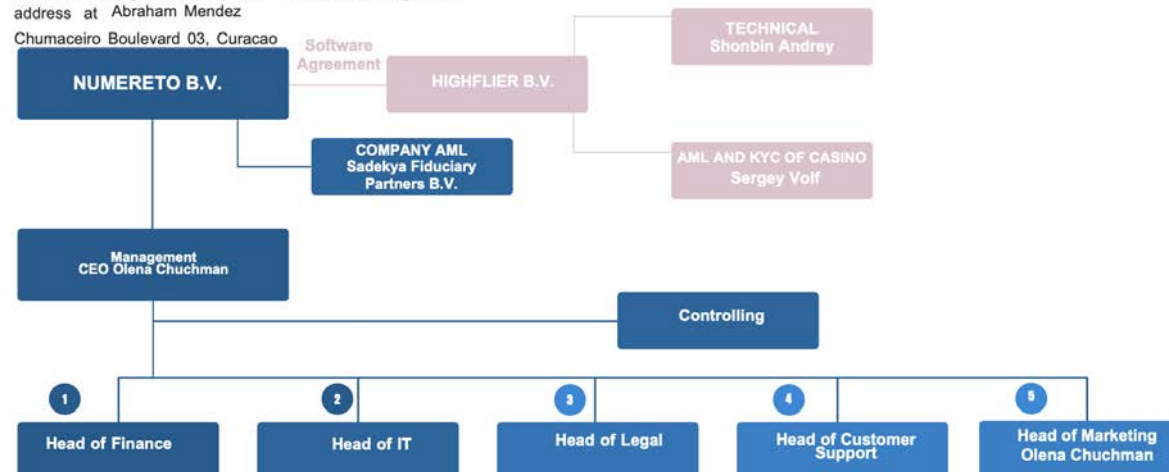
The CEO oversees marketing initiatives, establishes the company's growth trajectories across various sectors, manages the integration of payment solutions, and oversees brand expansion into diverse geographical regions. Senior employees of the company and the director themselves may be invited to participate in board meetings.

Strategies and decisions are directly delegated to departments and functions, ensuring flexible decision-making and preventing decision deadlocks. Legal support is provided internally by respective departments and officers.

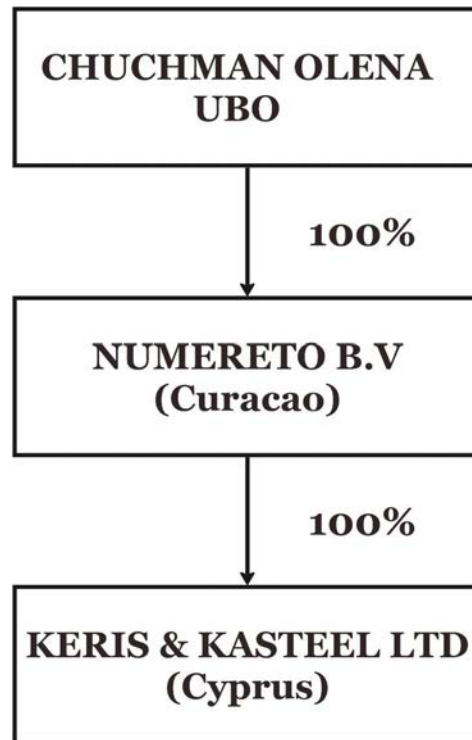
While department heads primarily make decisions, the CEO gives final approval.

Company control structure

NUMERETO B.V., a company incorporated under the laws of Curaçao with registration number 163869 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curacao



OWNERSHIP STRUCTURE



3. FINANCIAL SUMMARY

3.1. FINANCIAL ESTIMATION FOR THE FIRST, SECOND AND THIRD YEAR

Table 2. Cash flow for the first year, thousand EUR

	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	- 140 200	- 128 000	-	-	- 12 200	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 128 000	- 128 000	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 9 400	-	-	-	- 9 400	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 800	-	-	-	- 2 800	-	-	-	-	-	-	-	-
Cash flow - OPERATING	962 161	- 4 850	-	-	-	- 49 957	- 2 445	786	1 150	4 281	7 066	- 27 854	16 373
Proceeds	4 747 656	-	-	-	-	31 720	39 333	44 674	50 261	56 493	65 774	74 611	84 196
Income from clients	4 747 656	-	-	-	-	31 720	39 333	44 674	50 261	56 493	65 774	74 611	84 196
Expenses total	- 3 785 495	- 4 850	-	-	-	- 81 677	- 41 777	- 43 888	- 49 110	- 52 213	- 58 708	- 102 465	- 67 824
Direct costs	- 3 085 679	- 4 850	-	-	-	- 72 341	- 32 441	- 34 552	- 39 774	- 42 328	- 48 038	- 51 128	- 54 528
Advertising costs	- 1 775 118	-	-	-	-	- 36 637	- 21 110	- 23 221	- 25 543	- 28 097	- 30 907	- 33 997	- 37 397

Additional staff costs	- 870 000	-	-	-	-	-	-	-	- 2 900	- 2 900	- 5 800	- 5 800	- 5 800
License fees	- 142 961	- 4 850	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	-	-	-	-	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 422 773	-	-	-	-	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 51 337	- 9 337
Accounting	- 101 333	-	-	-	-	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Office equipment maintenance	- 77 333	-	-	-	-	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 29 440	-	-	-	-	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920
Legal support	- 90 667	-	-	-	-	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833
Taxes	- 277 042	-	-	-	-	-	-	-	-	- 548	- 1 334	-	- 3 959
Profit tax	- 277 042	-	-	-	-	-	-	-	-	- 548	- 1 334	-	- 3 959
Cash flow FINANCING	- 118 478	132 850	-	-	12 200	49 957	2 445	-	-	- 680	- 1 655	27 854	- 4 913
Co-investor's investment	225 306	132 850	-	-	12 200	49 957	2 445	-	-	-	-	27 854	-
Refunds to co-investor	- 343 784	-	-	-	-	-	-	-	-	- 680	- 1 655	-	- 4 913
CASH FLOW OF THE PROJECT	703 483	-	-	-	-	-	-	786	1 150	3 600	5 410	-	11 460
progressive total (cash balance)	703 483	-	-	-	-	-	-	786	1 937	5 537	10 947	10 947	22 407

Table 3. Cash flow for the second year, thousand EUR

	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	- 140 200	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 128 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 9 400	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 800	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	962 161	25 774	34 266	42 149	54 924	28 725	38 236	36 093	40 076	44 387	40 558	9 569	47 079
Proceeds	4 747 656	99 989	120 789	135 421	152 794	150 373	139 229	143 337	149 521	156 696	159 285	163 303	171 194
Income from clients	4 747 656	99 989	120 789	135 421	152 794	150 373	139 229	143 337	149 521	156 696	159 285	163 303	171 194
Expenses total	- 3 785 495	- 74 215	- 86 524	- 93 272	- 97 871	- 121 648	- 100 993	- 107 244	- 109 445	- 112 309	- 118 726	- 153 734	- 124 115
Direct costs	- 3 085 679	- 58 268	- 68 181	- 72 706	- 73 702	- 104 868	- 81 531	- 88 387	- 89 464	- 91 112	- 98 609	- 100 358	- 102 158
Advertising costs	- 1 775 118	- 41 137	- 45 250	- 49 775	- 50 771	- 51 764	- 52 800	- 53 856	- 54 933	- 56 581	- 58 278	- 60 027	- 61 827
Additional staff costs	- 870 000	- 5 800	- 11 600	- 11 600	- 11 600	- 17 400	- 17 400	- 23 200	- 23 200	- 23 200	- 29 000	- 29 000	- 29 000
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	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 422 773	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 51 337	- 9 337

Accounting	- 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	- 3 167
Office equipment maintenance	- 77 333	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417	- 2 417
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 29 440	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920	- 920
Legal support	- 90 667	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833
Taxes	- 277 042	- 6 611	- 9 006	- 11 229	- 14 832	- 7 443	- 10 125	- 9 521	- 10 644	- 11 860	- 10 780	- 2 040	- 12 620	
Profit tax	- 277 042	- 6 611	- 9 006	- 11 229	- 14 832	- 7 443	- 10 125	- 9 521	- 10 644	- 11 860	- 10 780	- 2 040	- 12 620	
Cash flow FINANCING	- 118 478	- 8 203	- 11 175	- 13 934	- 18 405	- 9 236	- 12 565	- 11 815	- 13 209	- 14 718	- 13 378	- 2 531	- 15 660	
Co-investor's investment	225 306	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 343 784	- 8 203	- 11 175	- 13 934	- 18 405	- 9 236	- 12 565	- 11 815	- 13 209	- 14 718	- 13 378	- 2 531	- 15 660	

CASH FLOW OF THE PROJECT	703 483	17 571	23 090	28 214	36 518	19 489	25 671	24 278	26 867	29 669	27 181	7 038	31 419	
progressive total (cash balance)	703 483	39 978	63 069	91 283	127 801	147 290	172 962	197 240	224 107	253 776	280 957	287 995	319 414	

Table 4. Cash flow for the third year, thousand EUR

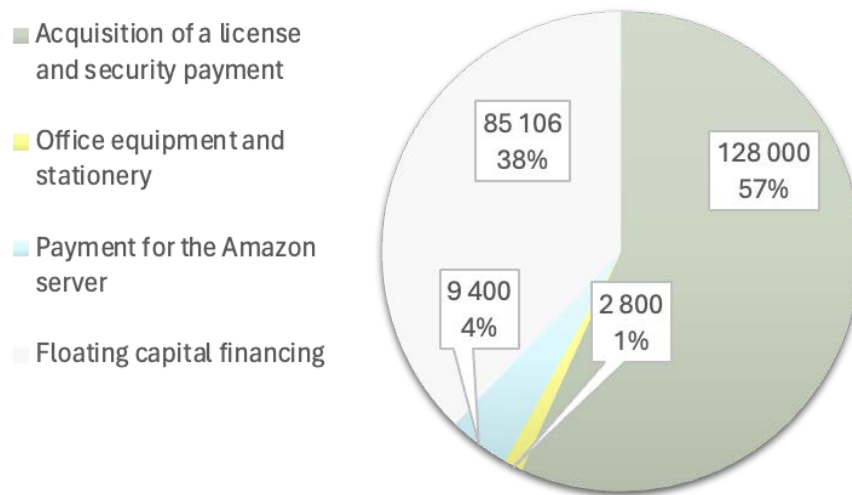
	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	140 200	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	128 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	9 400	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	2 800	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	962 161	46 002	51 770	55 848	44 203	26 072	45 801	52 947	56 705	62 333	51 221	23 445	59 431
Proceeds	4 747 656	177 467	186 773	193 968	192 666	195 882	204 753	216 129	229 028	238 594	232 568	239 450	251 386
Income from clients	4 747 656	177 467	186 773	193 968	192 666	195 882	204 753	216 129	229 028	238 594	232 568	239 450	251 386
Expenses total	- 3 785 495	- 131 466	- 135 003	- 138 121	- 148 463	- 169 810	- 158 952	- 163 182	- 172 323	- 176 260	- 181 346	- 216 005	- 191 955
Direct costs	- 3 085 679	- 109 813	- 111 724	- 113 691	- 127 318	- 153 779	- 137 356	- 139 571	- 147 652	- 150 002	- 158 222	- 160 715	- 166 515
Advertising costs	- 1 775 118	- 63 682	- 65 593	- 67 560	- 69 587	- 71 675	- 73 825	- 76 040	- 78 321	- 80 671	- 83 091	- 85 584	- 85 584
Additional staff costs	- 870 000	- 34 800	- 34 800	- 34 800	- 46 400	- 46 400	- 52 200	- 52 200	- 58 000	- 58 000	- 63 800	- 63 800	- 69 600
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	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 422 773	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 9 337	- 49 337	- 9 337
Accounting	- 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

Office equipment maintenance	-	77 333	-	2 417	-	2 417	-	2 417	-	2 417	-	2 417	-	2 417	-	2 417	-	2 417								
Hosting	-	124 000	-	-	-	-	-	-	-	-	-	-	-	-	-	40 000	-	-								
Office rent	-	29 440	-	920	-	920	-	920	-	920	-	920	-	920	-	920	-	920								
Legal support	-	90 667	-	2 833	-	2 833	-	2 833	-	2 833	-	2 833	-	2 833	-	2 833	-	2 833								
Taxes	-	277 042	-	12 316	-	13 943	-	15 093	-	11 808	-	6 695	-	12 259	-	14 275	-	15 335	-	16 922	-	13 788	-	5 954	-	16 104
Profit tax	-	277 042	-	12 316	-	13 943	-	15 093	-	11 808	-	6 695	-	12 259	-	14 275	-	15 335	-	16 922	-	13 788	-	5 954	-	16 104
Cash flow FINANCING	-	118 478	-	15 283	-	17 302	-	18 729	-	14 653	-	8 307	-	15 213	-	17 713	-	19 029	-	20 999	-	17 110	-	7 388	-	19 983
Co-investor's investment		225 306		-		-		-		-		-		-		-		-		-		-		-		-
Refunds to co-investor	-	343 784	-	15 283	-	17 302	-	18 729	-	14 653	-	8 307	-	15 213	-	17 713	-	19 029	-	20 999	-	17 110	-	7 388	-	19 983
		-		-		-		-		-		-		-		-		-		-		-		-		-
CASH FLOW OF THE PROJECT		703 483		30 719		34 468		37 119		29 549		17 765		30 589		35 233		37 676		41 334		34 112		16 057		39 448
progressive total (cash balance)		703 483		350 133		384 601		421 720		451 269		469 034		499 622		534 856		572 532		613 866		647 978		664 035		703 483

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 0,2 million EUR.

Diagram 1. Investments structure

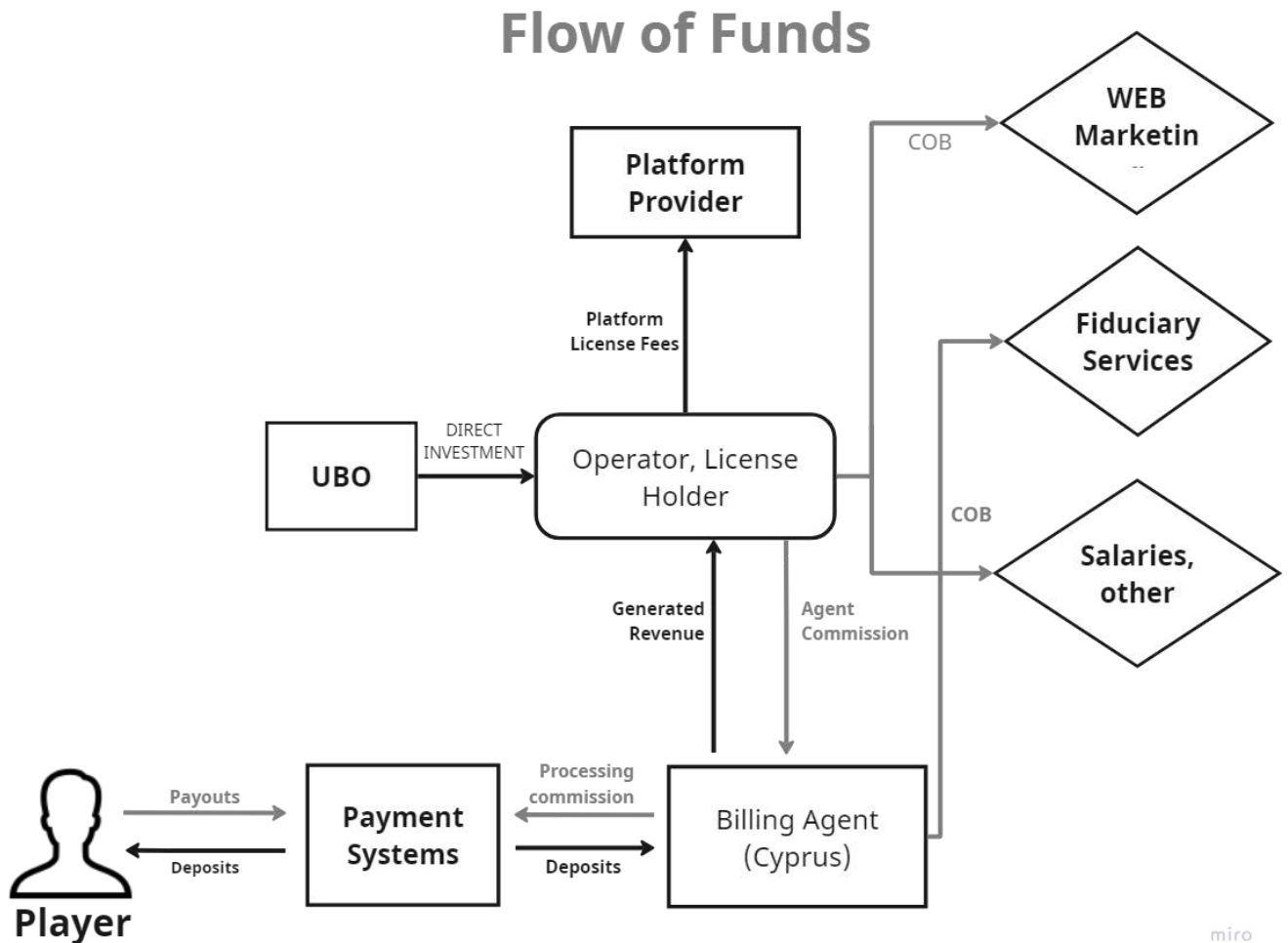


It is planned that the financing of this project will be carried out at the expense of the investor.

The amount of payments to the investor for the period of the project will be 0,3 million EUR.

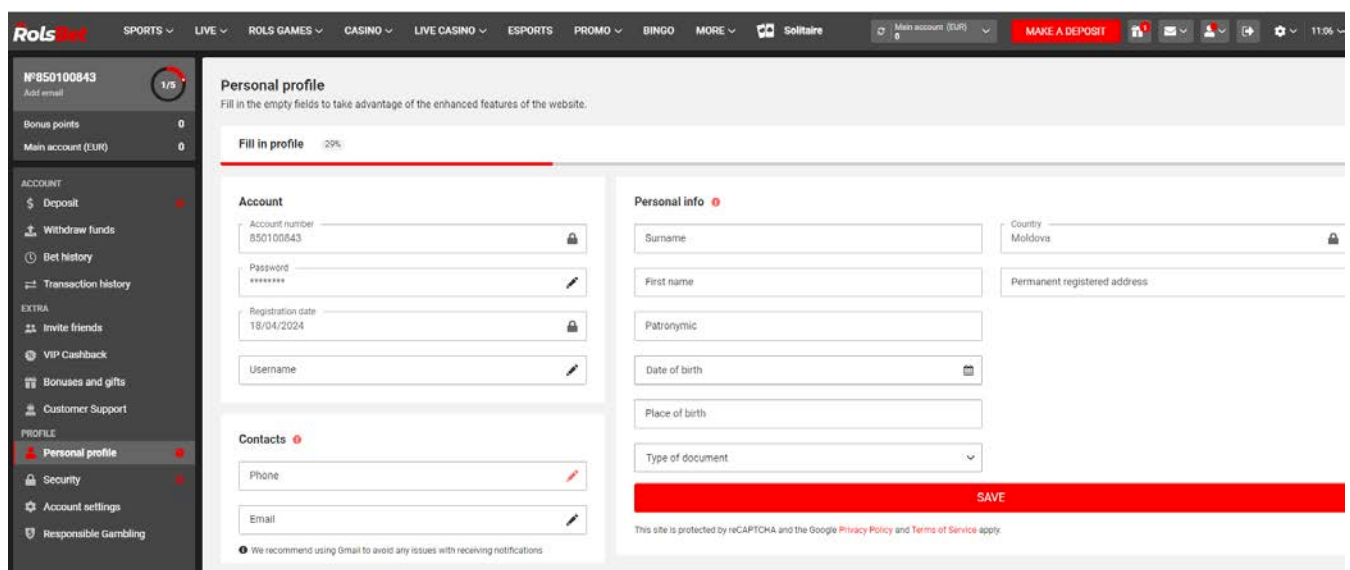
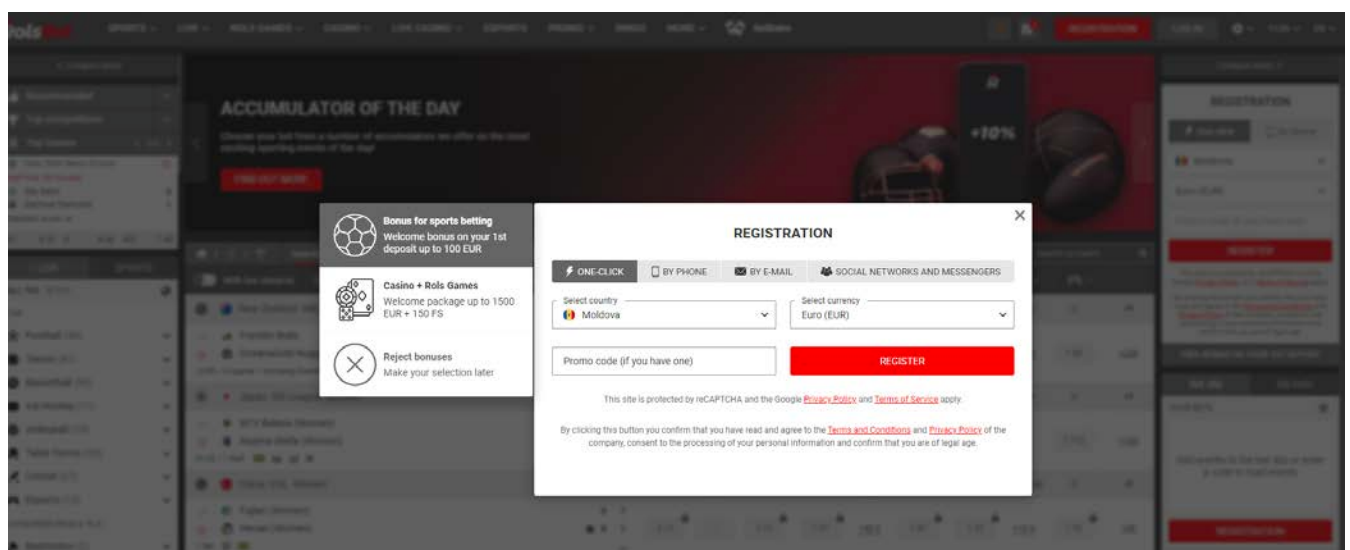
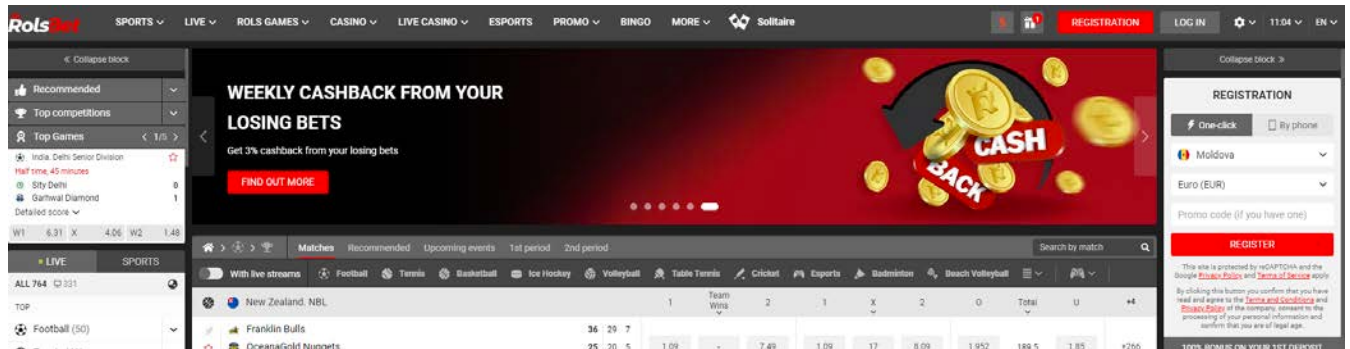
3.3. FLOW OF FUNDS SCHEMATIC

The project's business expenses include license fees paid to the Platform provider, expenditures on web marketing, service fees for employees, and legal fees paid to fiduciary service providers.

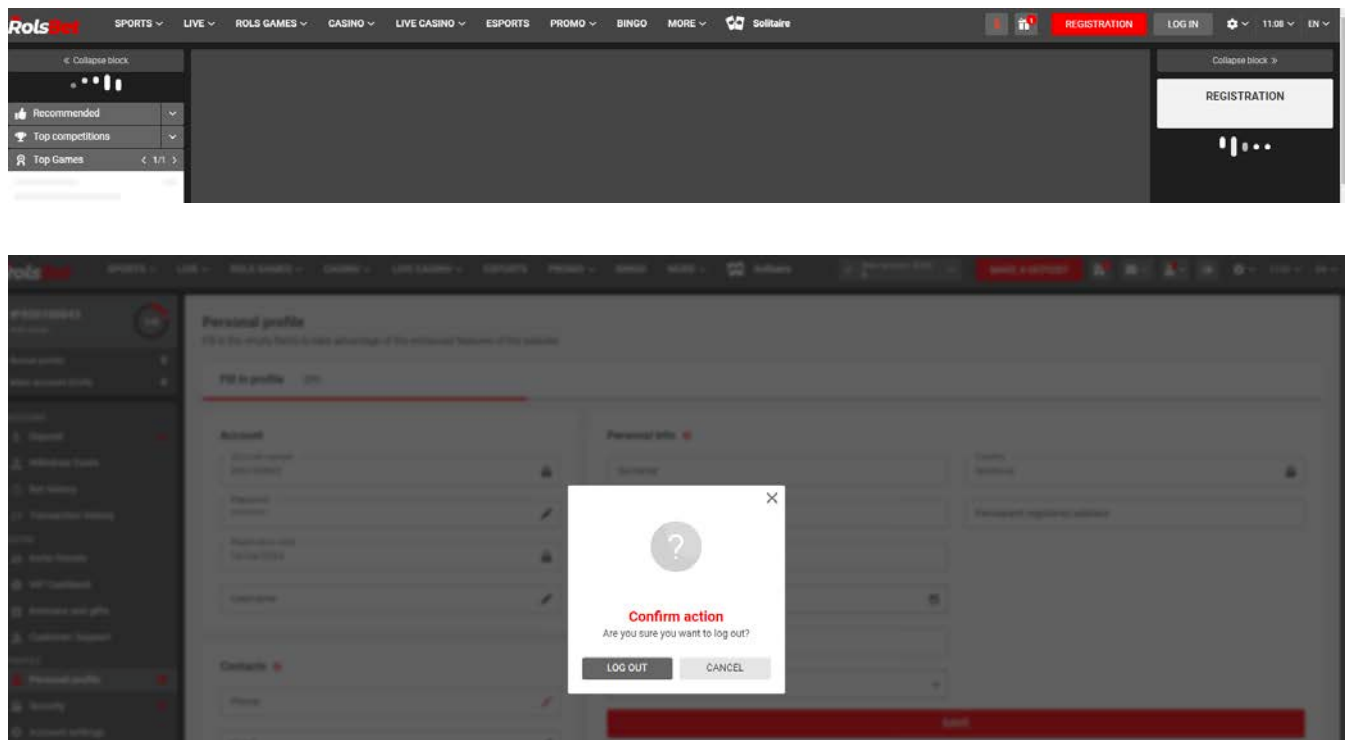


4. PRODUCTS & SERVICES

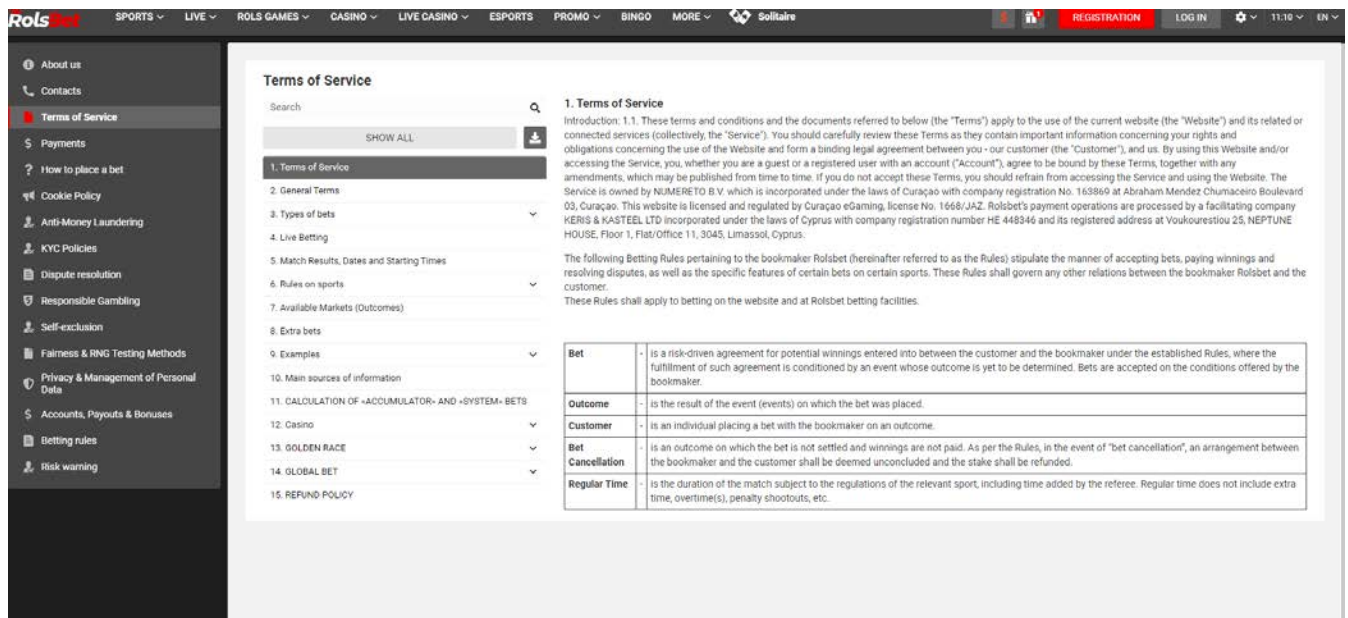
4.1. REGISTRATIONS AND OPENING OF AN ACCOUNT



4.2. LOG IN AND LOGOUT



4.3. TERMS AND CONDITIONS/ RULES AND PROCEDURES



4.4. OBLIGATIONS AS A PLAYER

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

15. REFUND POLICY

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. All bets shall be settled based on the data provided by the processing center.

8. Winnings shall be paid to the bettor within 30 (thirty) calendar days from the date of official publication of the results of the latest event on the bet slip.

9. A bet placed by the Customer shall be deemed won if all outcomes specified in such bet have been predicted correctly.

10. Betting terms (odds, handicaps, totals, maximum stake limits, etc.) may be subject to variation after a bet has been made, but this does not affect the terms at the time the bet was placed. Before entering into an arrangement, the customer shall check all changes in the current pre-match markets.

11. In the case of technical failures and unfinished streams, etc. bets on Esports Live will be refunded only if the event in question does not occur or bets on the event are not settled by the bookmaker.

12. If an employee makes an error while accepting a bet (obvious misprints on the list of events, inconsistency of odds between offered betting markets and the bet, etc.), or a bet is accepted in violation of these Rules, or if there are any other indications that the bet is wrong, the bookmaker reserves the right to declare such bets void.

4.5. PAYOUTS

Search

SHOW ALL

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 glitches, faults or errors in our software in connection with the Services we offer (including betting); your use of rogue equipment and programs or analytical systems, including but not limited to software that allows you to place bets without human intervention (for example, bots), etc.

unfair means of any kind were used to obtain information or circumvent restrictions imposed by the company

The company's management is entitled to request at their discretion any documents from the bettor substantiating their identity or other data they have provided (for example, passport details, residential address), as well as to cancel any payments until all such details have been verified.

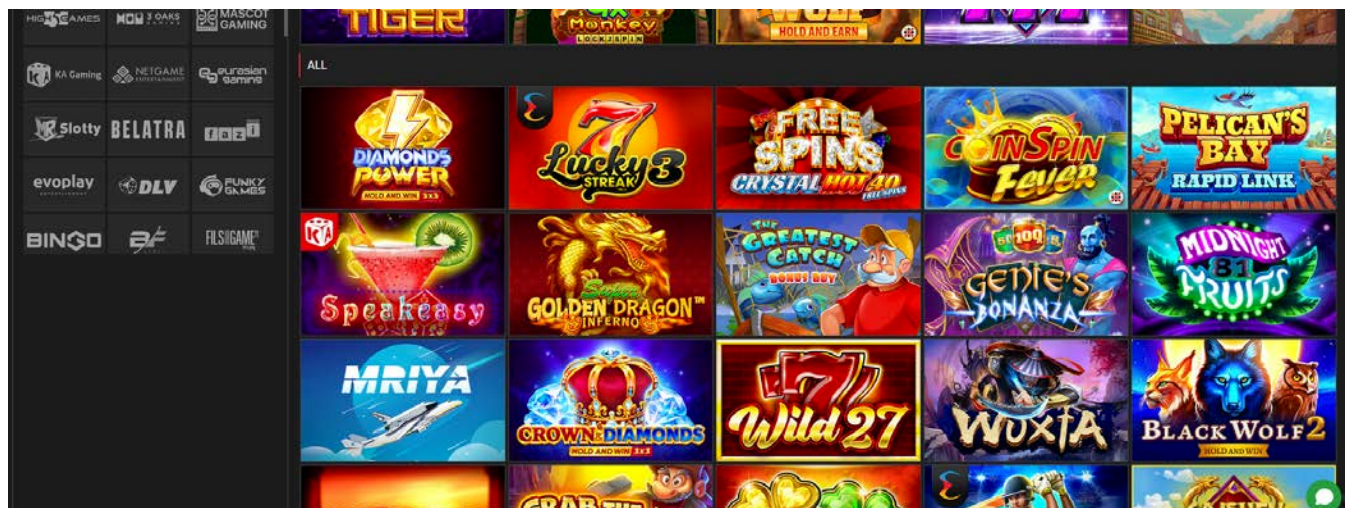
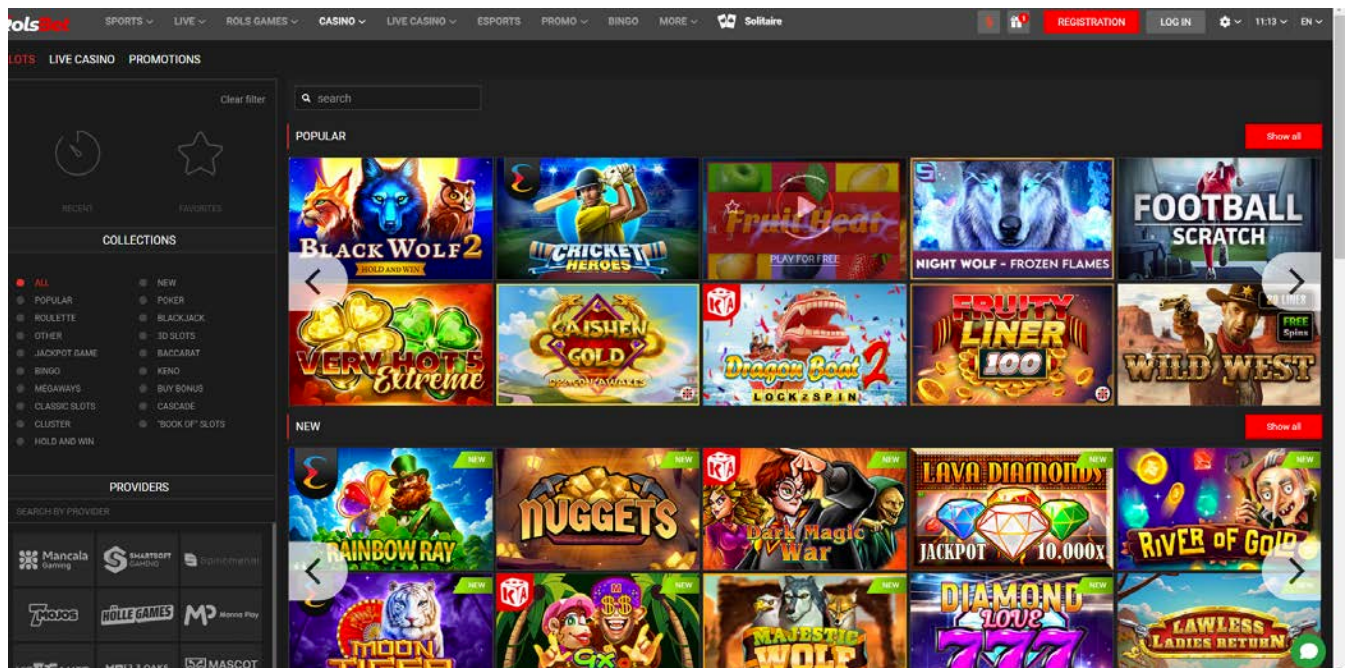
The company's management reserves the right to conduct a video conference as a part of the identity verification process, and/or request for the documents to be sent by post. Verification may take up to 72 hours from the receipt of the documents. The outcome of the video conference can be provided to the customer within 5 working days after a video conference takes place. If it is proven that the data that was provided is not valid, the company is entitled to take any reasonable measures including but not limited to cancelling all bets and suspending all transactions for the duration of their investigation, and to proceed with full verification of the account once any documents required for the verification procedure have been requested.

4. If the customer refuses to undergo verification, the company reserves the right to void their bets (including bets placed from duplicate accounts). Furthermore, the

4.6. WITHDRAWING

You can initiate withdrawals using the specified payment methods detailed below: If your initial deposit was made in FIAT currency, you have the option to withdraw using FIAT methods. Conversely, if you deposited using cryptocurrency, you can withdraw using CRYPTO methods.

4.7. A LIST OF THE GAMES THAT WILL BE PROVIDED



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 Highflier'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:

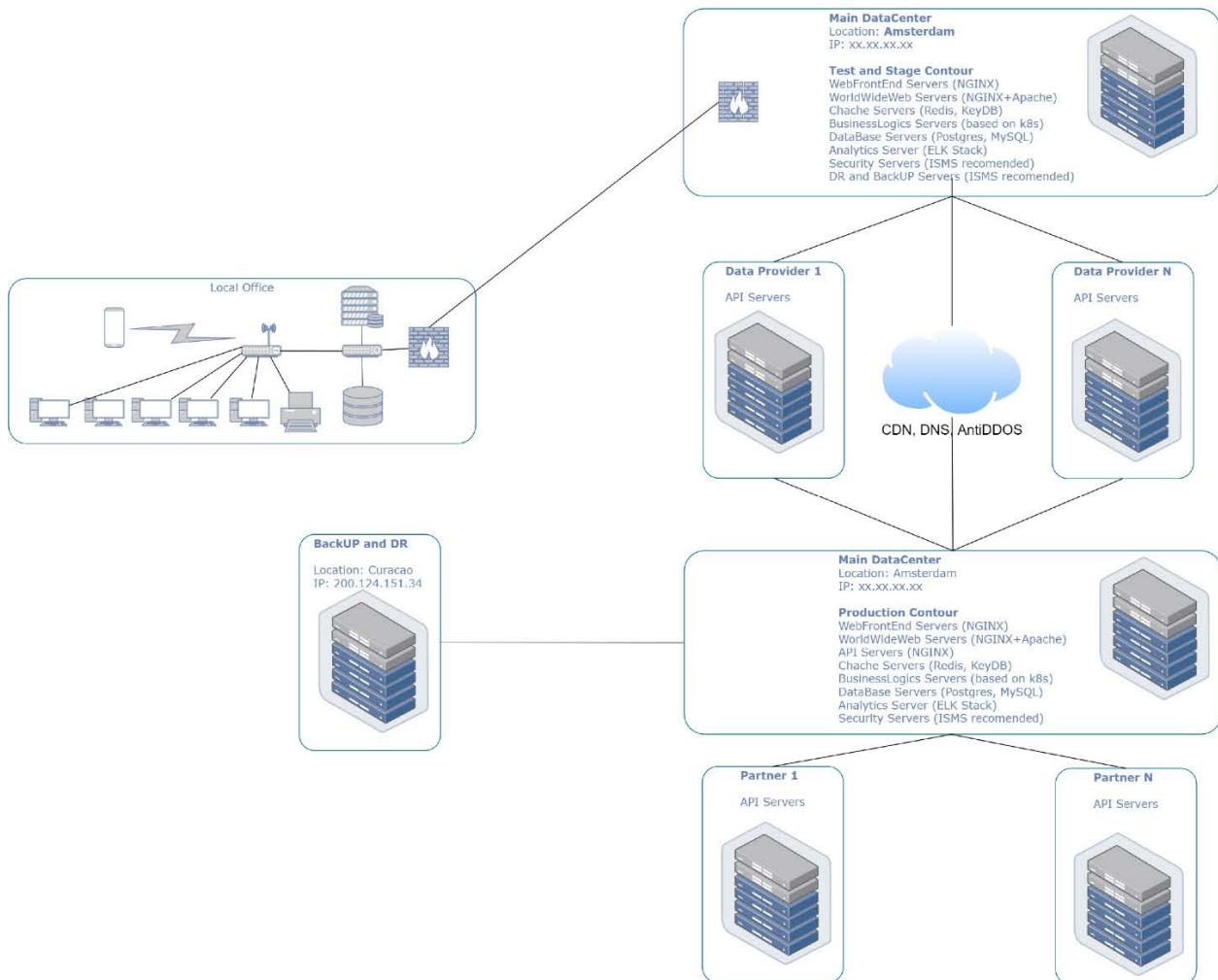
- a) iOS
- b) Android
- c) Windows

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 plan and resilient infrastructure effectively mitigate risks associated with platform implementation. We adhere to stringent

protocols for data backup and restoration, utilizing redundant server systems to minimize service disruptions and data loss. Regular testing and refinement of our disaster plan, crucial for addressing evolving threats and technological advancements, ensures its effectiveness. Collaboration with cybersecurity experts and regulatory bodies provides valuable insights, ensuring that our platform remains at the forefront of disaster preparedness for online casino platforms, safeguarding operations, and maintaining customer trust.



5.2. PAYMENT SERVICE PROVIDERS

Withdrawals can be executed utilizing the payment methods outlined below, according to the following criteria: FIAT - if the deposit was made in FIAT currency, and CRYPTO - if the deposit was made in cryptocurrency.

Payment service providers (at the connection/planning stage): Flatterwave, Paygames, BigIdea, Pion, RoyalPay, SticPay.



flutterwave



RoyalPay

Likewise, rigorous compliance measures in banking services reduce the risk of service interruptions. Simultaneously, utilizing 2 to 3 banks concurrently provides protection against inherent banking risks. Expanding our banking relationships not only improves our bargaining power for favorable terms but also enhances resilience in our financial framework. This proactive approach shields against potential disruptions and strengthens our financial infrastructure. By strategically diversifying our banking partnerships, we optimize risk management strategies, promoting stability and longevity in our financial operations.

5.3. LEGAL AND CORPORATE PROVIDERS

In the legal and corporate service provider sector, there exists a wealth of seasoned professionals boasting extensive experience in the gambling industry. These experts play a crucial role in aiding us to adhere to regulatory, payment, and banking requirements, thus ensuring comprehensive compliance.

6. RISK EVALUATION AND MANAGEMENT

Every department diligently manages its respective set of risks on a daily basis.

6.1. RISK AUDITING

Internal audits, overseen by the Audit Committee consisting of the Head of IT, Head of Legal, and Head of Finance, are conducted annually across all risk categories. Additionally, external audits are performed every three years to provide an independent evaluation of business and financial matters. Regular audits are also carried out on the platform, its software providers, infrastructure, and financial status. A meticulous risk register is maintained and reviewed quarterly by the Audit Committee, complementing daily interdepartmental communication. Furthermore, mandatory financial audits are conducted annually for all companies within the organizational structure.

6.2. RISK OVERVIEW

- **Legal Landscape Oversight (Head of Legal Oversight):** Due to the dynamic nature of legal regulations in online gambling, continuous monitoring is imperative. We keep all staff members informed about the evolving legal framework by regularly disseminating updates regarding legal changes across departments. The legal team collaborates closely with other departments, such as compliance and operations, to ensure a comprehensive understanding of legal obligations and streamline implementation processes. By maintaining open channels of communication with regulatory bodies and industry associations, we prioritize transparency and demonstrate our commitment to adhering to legal standards in online gambling.
 - a) **Legality and Licensing:** Establishing and operating an online casino necessitates acquiring licenses from pertinent regulatory bodies across different jurisdictions. Regulatory stipulations can vary significantly from one jurisdiction to another, and non-compliance with licensing prerequisites can lead to substantial fines, legal ramifications, or even the cessation of operations.

Mitigation: The Operator currently operates under the Curacao eGaming license No. 1668/JAZ and is in the process of applying for a new GCB license

- b) **Data Protection and Privacy Laws:** Online casinos handle extensive volumes of sensitive customer data. Compliance with data protection regulations, such as the EU's General Data Protection Regulation (GDPR), is crucial to evade fines and uphold customer trust.

Mitigation: To address this, only collect and process the minimal amount of personal data necessary for gambling services provision, ensuring data isn't retained longer than required. Establish and enact a data breach response plan to effectively manage and alleviate the repercussions of data breaches, including protocols for notifying affected individuals and relevant regulatory authorities within mandated timeframes. Embed privacy by design and default principles into the development of new products, features, or services, integrating privacy considerations from project inception.

- c) **Advertising and Marketing Restrictions:** Numerous jurisdictions impose stringent regulations on the advertising and marketing of online gambling services to safeguard vulnerable populations, such as minors and individuals with gambling addictions. Non-compliance with advertising standards can lead to regulatory penalties and public condemnation.

Mitigation: To address this, consistently monitor advertising and marketing endeavors to ensure adherence to relevant laws, regulations, and industry standards concerning gambling advertising. Transparently disclose all terms, conditions, restrictions, or limitations associated with promotions, bonuses, or other marketing offers to prevent consumer deception and potential regulatory repercussions. Thoroughly vet third-party advertising partners, agencies, or affiliates to verify their compliance with advertising and marketing regulations and commitment to responsible advertising practices.

- d) **Cross-Border Regulatory Challenges:** Engaging in operations across various jurisdictions can subject online casinos to intricate regulatory landscapes and legal ambiguities. Disparities in gambling laws and enforcement methodologies between borders can present hurdles in maintaining compliance, often necessitating substantial legal support.

Mitigation: Forge strategic alliances with local entities, legal experts, or industry groups in targeted jurisdictions to acquire knowledge of local regulations, navigate regulatory procedures, and foster connections with regulatory bodies. Conduct exhaustive due diligence on potential business partners, affiliates, suppliers, and other external entities to confirm their compliance with regulatory standards and mitigate compliance risks in the casino's cross-border operations. Remain vigilant regarding alterations in gaming regulations and enforcement strategies in targeted jurisdictions by consistently monitoring regulatory updates, industry literature, and legal counsel advisories.

- e) **Changes in Regulation:** The regulatory environment governing online casinos is in a constant state of flux, with new laws, regulations, and enforcement measures emerging regularly. Operators must remain abreast of these regulatory developments and adjust their operations accordingly to mitigate compliance risks.

Mitigation: To address this challenge, conduct comprehensive assessments of how new regulations may impact the casino's operations, financial standing, and risk exposure. Identify areas of compliance vulnerability and devise proactive strategies to mitigate them. Implement agile compliance approaches that facilitate swift adaptation to evolving regulatory requirements. This might involve developing modular compliance solutions, utilizing technology for automation and efficiency gains, and fostering a culture of continuous improvement and innovation. Offer regular training and educational programs for employees on emerging regulations, compliance mandates, and best practices for upholding regulatory standards. Empower staff members to recognize and effectively respond to regulatory changes within their respective roles.

- f) **Enforcement Actions:** Regulatory authorities may conduct investigations or audits to ensure compliance with gambling regulations. Enforcement actions, such as fines, license revocation, or legal proceedings, can have severe consequences for iGaming operators found to be in violation of regulatory requirements.

Mitigation: To address this, conduct regular internal audits and reviews of compliance practices, operations, and procedures to identify

areas of non-compliance, assess risks, and proactively implement corrective actions. Establish open communication channels with regulatory authorities, industry associations, and other stakeholders to foster relationships, seek guidance on compliance matters, and promptly address concerns or questions. Maintain comprehensive documentation and records of compliance activities, including policies, procedures, training materials, audits, and enforcement actions, to demonstrate compliance efforts and support regulatory inquiries or investigations.

- g) **Political and Public Perception:** Public attitudes towards gambling can wield considerable influence on regulatory decisions and public policy initiatives. Negative publicity or public backlash against iGaming operators can trigger heightened regulatory scrutiny and calls for stricter regulations.

Mitigation: To address this, maintain transparency in business operations, regulatory compliance, and corporate governance practices to foster trust with regulators, customers, and the public. Offer educational resources and information to the public about the online casino industry, responsible gambling practices, and potential gambling-related risks. Promote awareness of problem gambling helplines, support services, and resources.

- **Regulatory Risks (Responsible: Compliance Officer):** Mitigating regulatory risks linked to Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance is essential for businesses, especially in financial and gambling sectors. The organization's AML&KYC department holds a critical role in ensuring adherence to relevant laws and regulations aimed at preventing money laundering and terrorist financing activities. This involves establishing robust protocols for verifying customer identities, monitoring transactions for suspicious behavior, and promptly reporting any anomalies to the appropriate authorities. Non-compliance with AML&KYC regulations can lead to severe consequences, including substantial fines, damage to reputation, and potential legal ramifications. Therefore, maintaining strict adherence to these standards is vital for mitigating regulatory risks and upholding the organization's integrity. The AML&KYC department assumes a central role in overseeing compliance efforts, conducting thorough risk assessments, and implementing necessary controls to reduce the organization's exposure to regulatory pitfalls. Additionally,

ongoing training initiatives are crucial to keep employees abreast of evolving AML&KYC requirements and industry best practices. In essence, effective management of regulatory risks associated with AML&KYC compliance demands a proactive and comprehensive approach, with the AML&KYC department serving as a cornerstone in the organization's compliance framework.

a) **Compliance and Anti-Money Laundering (AML) Regulations:**

Online casinos are obligated to adhere rigorously to compliance standards to mitigate the risks of money laundering, terrorist financing, and other illicit activities. Failure to implement adequate AML controls can result in severe regulatory penalties, reputational damage, and legal consequences.

Mitigation: To address this, it's essential to establish a robust AML policy outlining procedures for customer due diligence, transaction monitoring, and reporting suspicious activities. This policy should align with regulatory mandates and industry best practices. Additionally, conducting regular training and awareness programs for casino staff is crucial. These programs educate employees on AML regulations, enable them to recognize red flags of suspicious behavior, and emphasize their role in preventing money laundering and terrorist financing activities.

- **Technical Risks (Responsible: Technical):** The technical department oversees critical areas such as infrastructure upkeep, platform integration, cybersecurity, and data security. It bears the responsibility of ensuring the regular maintenance of infrastructure to minimize downtime and mitigate risks associated with hardware or software malfunctions. Prioritizing the implementation and updating of cybersecurity protocols and technologies is essential to fend off threats like hacking, data breaches, and malware attacks. The technical team must vigilantly monitor for potential security breaches and promptly respond to incidents to mitigate risks and minimize the impact of cybersecurity breaches. Conducting routine audits and security assessments is crucial for identifying vulnerabilities and shortcomings in the infrastructure. This empowers the technical team to proactively address potential risks before they escalate, ensuring the continued integrity and security of the systems.

- a) **Data Security:** Unauthorized access to customer information, including personal details and financial data, poses significant risks such as identity theft, fraud, and legal consequences.

Mitigation: Deploy multi-layered cybersecurity protocols that include firewalls, intrusion detection systems, and encryption mechanisms. Ensure consistent updates of software and security patches to address vulnerabilities and strengthen defenses against evolving threats.

- **Financial Risks (Responsible: Head of Finance):** Financial risks are inherent in all business operations, demanding careful management to ensure sustainability and prosperity. As the individual accountable for financial matters, the Head of Finance plays a pivotal role in recognizing, evaluating, and mitigating these risks. Implementing robust financial controls, monitoring cash flow, and optimizing capital allocation to minimize exposure to these risks are key responsibilities. Additionally, close collaboration with other departments is essential to develop and execute financial strategies aligned with the organization's goals. Through proactive risk management and strategic planning, the Head of Finance aims to safeguard the company's financial well-being and enhance shareholder value. Regular financial analysis and reporting are critical for identifying emerging risks and opportunities, facilitating timely adjustments to financial strategies.

- a) **Taxation:** Taxation policies concerning online gambling vary widely across jurisdictions and significantly impact the profitability of iGaming operators. Fluctuations in tax laws or unforeseen tax obligations can pose financial risks to casino operators.

Mitigation: Engage tax professionals, accountants, and legal experts specializing in international taxation to ensure compliance with local tax laws and regulations. Leverage tax treaties and agreements between nations to mitigate double taxation and optimize tax planning strategies. These agreements may provide provisions for tax credits, exemptions, or reduced tax rates for cross-border transactions. Maintain accurate financial records, robust accounting systems, and meticulous tax filings to adhere to local tax laws and regulations in each jurisdiction where the casino operates. This includes timely submission of tax returns, payments, and compliance with reporting obligations.

- **Litigation Risks (Responsible: Customer Service):** Customer service-related risks involve ensuring compliance with relevant laws and regulations to mitigate the potential for litigation resulting from regulatory breaches. Customer Service establishes clear communication protocols to effectively manage customer expectations, thereby reducing misunderstandings and potential legal disputes. Thorough documentation of customer interactions and resolutions serves as crucial evidence of adherence to service standards and aids in resolving disputes amicably, thus mitigating litigation risks. Regular reviews and refinement of customer service processes based on feedback and performance metrics address recurring issues, minimizing the risk of customer dissatisfaction leading to litigation. Cultivating a culture of transparency and accountability within the customer service team fosters trust with customers and diminishes disputes arising from perceived unfairness or ambiguity. Establishing clear escalation procedures ensures swift resolution of unresolved customer concerns by appropriate management levels, thereby averting the escalation of grievances into potential litigation.

- a) **Responsible Gaming Practices:** Regulatory bodies often require casino operators to uphold responsible gambling standards and implement measures to deter problem gambling behaviors. Non-compliance with responsible gaming regulations can lead to regulatory penalties and damage the operator's reputation.

Mitigation: Deploy self-exclusion tools that allow players to voluntarily exclude themselves from gambling activities for specified durations. Ensure these tools are easily accessible and prominently displayed on the casino's website and gaming platforms. Offer players the ability to set deposit limits and timeouts on their accounts, empowering them to manage their gambling behaviors and control excessive gambling. Customize and enforce these limits to ensure compliance with regulations. Utilize data analytics and monitoring tools to identify players showing signs of potential gambling problems, such as high frequency and amount of wagers. Implement appropriate interventions and support measures for these players as needed.

6.3. RISK OF POTENTIAL CAPITAL LOSS

In the early stages, there's a possibility of potential losses of funds designated for registration, rent, and office equipment. If the online casino closes due to internal or external reasons, the security deposit is refunded to the casino owners. However,

it's crucial to maintain this amount untouched during the casino's operation, solely earmarked as a reserve for jackpot wins, thus minimizing losses.

Mitigation:

Leveraging a combined 25 years of experience in the online casino industry among the founders and co-owners, along with the seasoned managerial expertise of the project mentor, positions the project strategically to mitigate risks associated with market entry to the fullest extent possible.

7. POLICIES AND PROCEDURES

7.1. KNOW YOUR CUSTOMER

The KYC (Know Your Customer) policy includes procedures and guidelines crafted to authenticate and verify clients' identities. Its primary objective is to prevent financial crimes like money laundering, terrorist financing, and fraud by ensuring that casinos possess accurate information about their customers and their financial transactions. Adhering to KYC protocols helps casinos build trust, comply with 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 discourage the illegal concealment of the 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 objective of the Data Privacy Policy is to delineate procedures for collecting, utilizing, retaining, and securing individuals' personal data within an organization. It strives to ensure compliance with data protection laws, protect the privacy rights of customers and employees, and cultivate trust with stakeholders. By establishing clear guidelines and protocols for managing sensitive data, the policy aims to reduce the risk of data breaches, unauthorized access, and misuse of personal information, ultimately enhancing transparency and accountability in data management practices.

7.4. RESPONSIBLE GAMING

The objective of the Responsible Gaming Policy is to encourage healthy and moderate gambling behaviors while mitigating the risks associated 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 resources for self-exclusion, implementing limits on gambling activities, and providing support to those in need, the policy strives 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 details the guidelines, rules, and conditions users must follow when utilizing the platform. It encompasses various aspects such as user responsibilities, account management, payment procedures, dispute resolution, and compliance with relevant laws and regulations. By agreeing to these terms, users acknowledge their comprehension of the rules governing their interaction with the casino, fostering transparency, fairness, and adherence to legal standards throughout their gaming experience.

7.6. SELF-EXCLUSION

This section elaborates on the procedure through which individuals can voluntarily opt to exclude themselves from engaging in gambling activities on the platform for a designated period, usually aimed at managing their gambling habits or addressing addiction concerns.

7.7. DISPUTE RESOLUTION

This section furnishes information regarding the procedures and mechanisms accessible for resolving conflicts or disputes that may arise between the casino and its users, typically delineating steps for escalation and resolution.

7.8. FAIRNESS & RNG TESTING METHODS

This section examines the fairness of the casino's games, affirming their randomness and impartiality, frequently highlighting the utilization of Random Number Generators (RNGs) and the methodologies employed to assess and validate their fairness.

7.9. ACCOUNTS, PAYOUTS & BONUSES

This section elaborates on the procedures for overseeing accounts, payout options, and the terms associated with bonuses, encompassing wagering requirements and limitations.

7.10. BETTING RULES

This section outlines precise rules and regulations governing betting activities on the platform, encompassing 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 directives for recruitment, onboarding, performance assessment, employee development, diversity, disciplinary actions, and termination procedures. The Financial Policy outlines procedures for budget allocation, expenditure oversight, financial statement preparation, auditing, procurement practices, and adherence to accounting standards. The Communication and Social Media Policy delineates protocols for both internal and external communication channels, including email usage, social media directives, media interactions, and branding guidelines. The Information Security Policy addresses the protection of sensitive data, including protocols for data handling, cybersecurity measures, password management, and strategies for preventing data breaches. Internal Policies are crafted to reinforce external policies, subject to periodic review and updates, while the latter undergo continual adaptation, modification, and discontinuation as necessary.

- 7.12. The need to establish and uphold these policies arises from our commitment to long-term operations, particularly considering the substantial initial investment. Our objective is to maintain operations for a minimum of three years under the GCB license, with renewal contingent upon achieving investment returns and meeting key performance indicators outlined in our financial forecasts.
- 7.13. Following established protocols and procedures, the project harnesses a diverse array of resources, both internal and external. The Ultimate Beneficial Owner (UBO) contributes invaluable expertise in gambling and IT, making her an ideal overseer. Key departments such as Legal, IT, Human Resources, and Finance boast significant experience in sustainably managing large-scale gambling ventures. Furthermore, jurisdictions like Curacao, Cyprus, and others offer ample opportunities for collaboration with advisors, specialists, and independent auditors.

The Gaming Control Board (GCB) assists operators by providing guidance and support in policy formulation. This collaborative effort ensures that operators

can customize their policies to comply with regulatory mandates and industry standards. By leveraging the GCB's knowledge and resources, operators can establish robust and efficient policies that promote compliance and integrity within the gambling sphere. Additionally, the GCB offers ongoing assistance and updates to help operators adapt their policies to evolving regulations and emerging challenges. Ultimately, the support provided by the GCB empowers operators to construct and maintain a solid framework for responsible gambling practices.

8. MARKET ANALYSIS

8.1. INCOME AND TURNOVER

2020 has become a successful year for online casinos around the world due to the pandemic and self-isolation. In many countries the revenue of the entire gambling market has grown by a third - at least in relation to the previous 2019. 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. The largest income from online slot machines is generated in the UK, China, Austria, Germany and Italy.

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

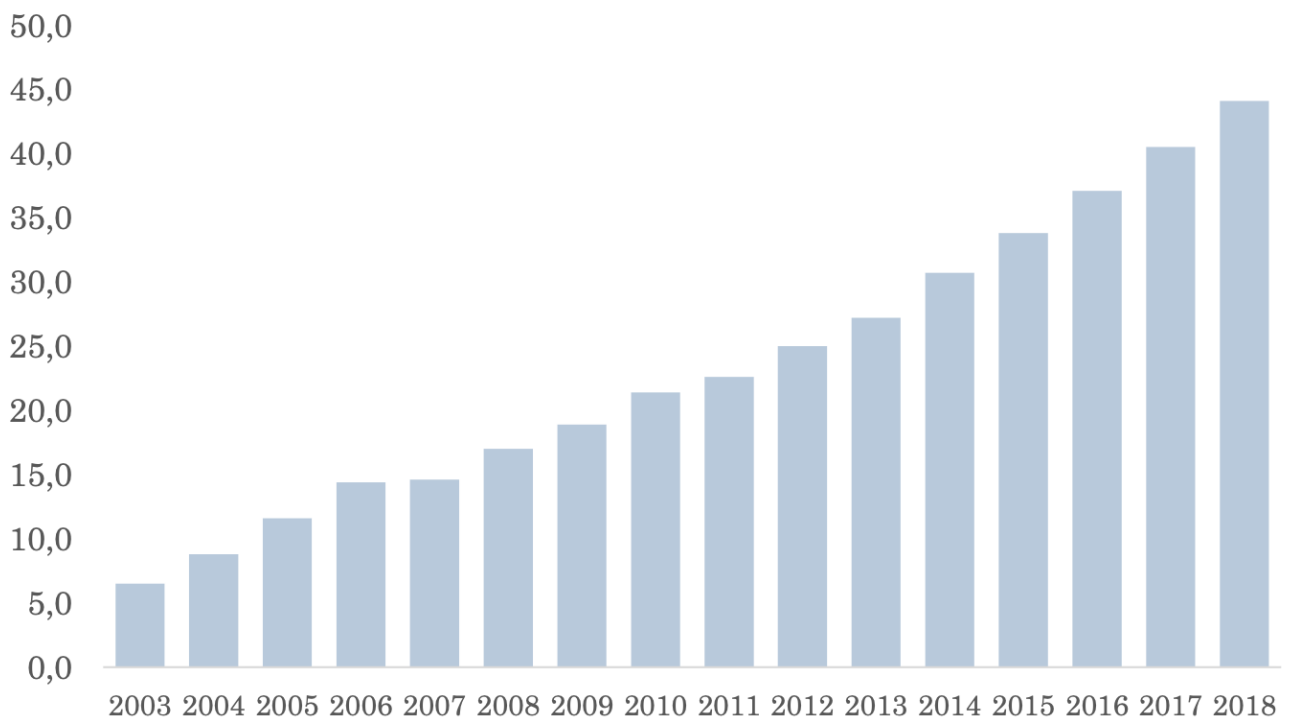
According to Juniper research, gambling is increasingly moving to the online environment. Moreover, the greatest activity is shown by mobile applications. The share of bets made using mobile phones is constantly growing.

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, according to a study by the American Gaming Association.

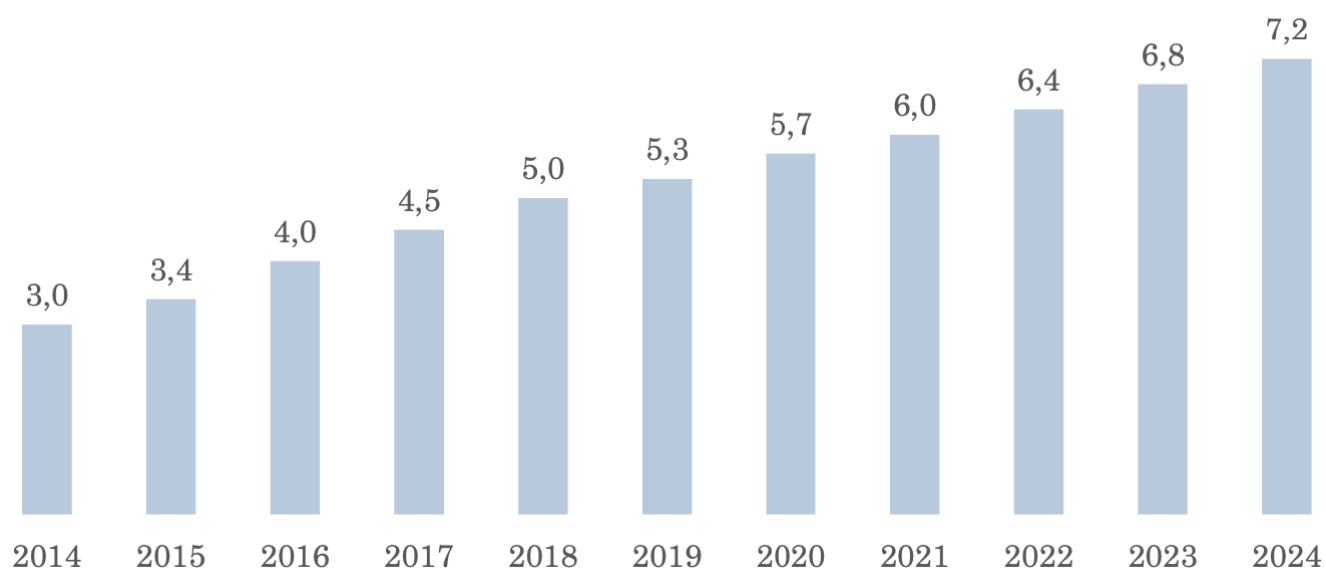
Diagram 2. Revenue from online gambling worldwide, billion euros



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.

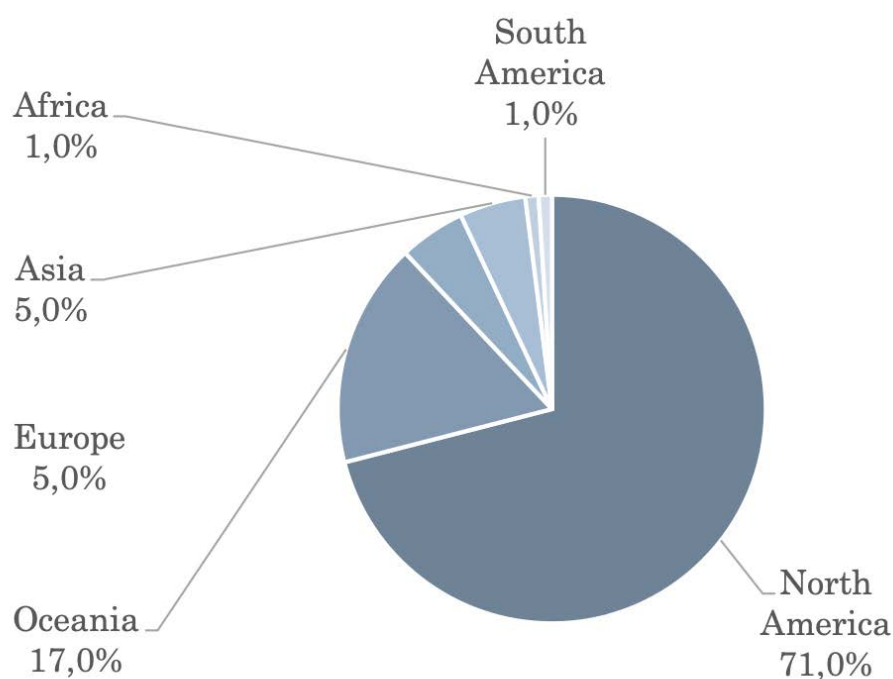
BV1sion presented an overview of the online casino market in 2019, including the GGR market predictions. In 2019, GGR was \$ 5.3 billion (up from \$ 5 billion in 2018). It is predicted that GGR will grow further and will reach \$ 5.7 billion in 2024, and \$ 7.2 billion in 2025.

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



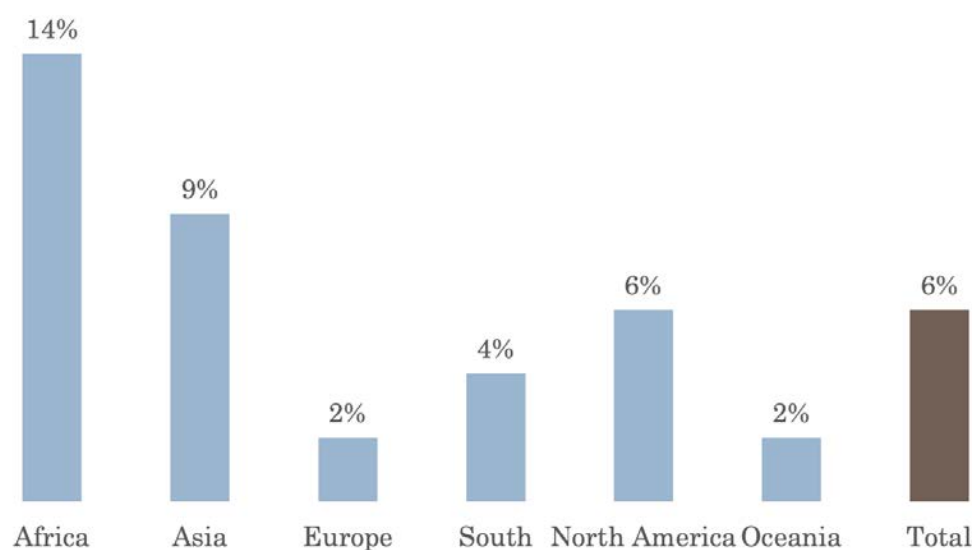
At the same time, Oceania (Fiji, New Zealand, Polynesia, New Guinea, etc.) also has a strong presence with 17% of the global GGR in 2019, significantly ahead of Asia and Europe with 5%.

Diagram 4. Regional structure of gross income of the gambling business in 2019



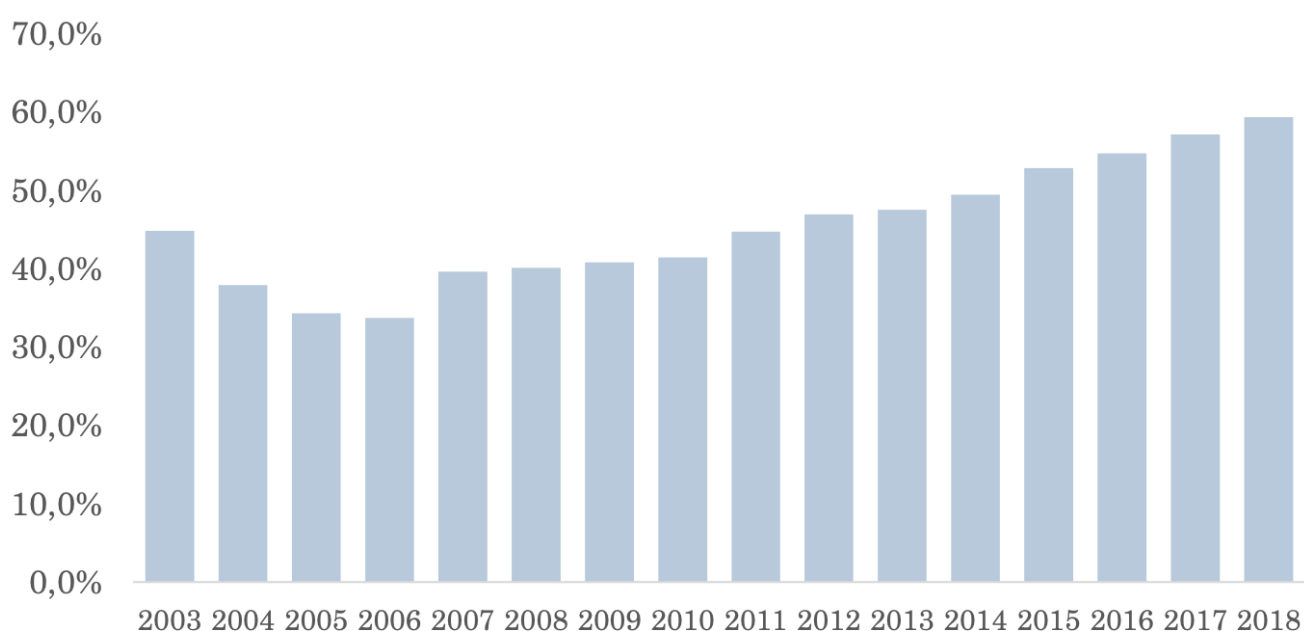
Africa posted the fastest growth rate in 2019 at 14% YoY, while Europe experienced very modest growth.

Diagram 5. Growth in gross income by region in 2019



There was also talk about simplifying the rules. 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.

8.2. NEW GROUPS OF PLAYERS

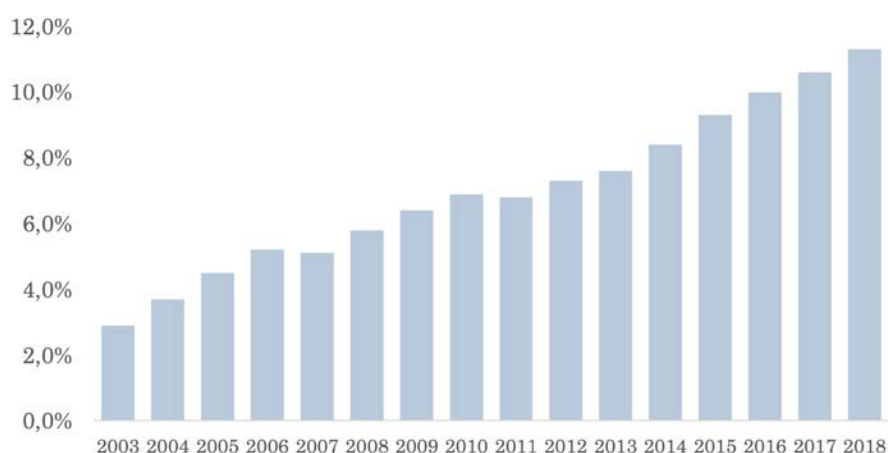
Since 2004, the number of female Internet users aged 18 to 74 has increased by more than 80%, and men by 60%. Online gambling attracted mostly young men, but now it is becoming more popular among women and older people.

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 2009 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.

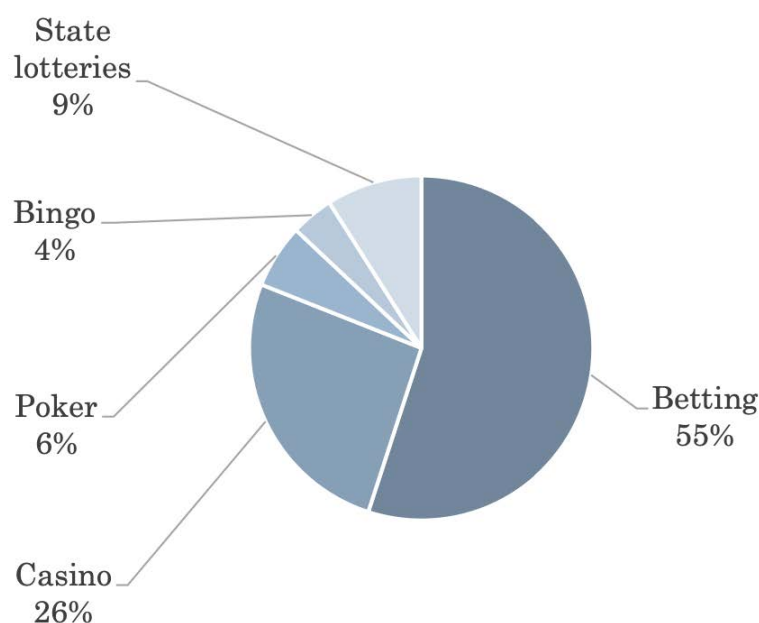
Diagram 7. Share of online gambling income from total gambling income in the world



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 8. Online gaming revenue by type, 2019



8.3. CURRENT TRENDS IN ONLINE CASINOS

Due to the pandemic and self-isolation in many countries, 2020 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 2019, 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 Haushhalter noted that the jackpot could grow to an incredible € 30,000,000! Agree, 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.

Messengers

The new possibilities of the mobile Internet are constantly attracting players. If earlier social networks and telephone means of communication were in trend, now the position of the leader is taken by convenient instant messengers.

Slotegrator is seriously interested in this trend and has created its own Telegram casino. Integration of the gaming platform into the messenger allows users to enjoy gambling on their smartphone at any time.

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.

Women are actively interested in online gambling

The trend of an increase in the number of female gamblers in online casinos was outlined back in 2015. And now it is only getting stronger. According to the research conducted, the fair sex prefers to gamble on personal gadgets and in private. This allows for more leeway and avoids ridicule from male players.

The most active gamblers are women under the age of 35, but older ladies are also not averse to occasionally spinning the reels of slot machines, starting a roulette wheel or throwing cards.

Online casinos made especially for women have already begun to appear, and some operators are conducting advertising campaigns aimed specifically at women.

8.4. MAJOR GAMBLING MARKETS IN ASIA

More than half of the world's population resides in Asia, which is also the home of many avid gamblers. However, unfortunately for these individuals, the majority of Asian countries prohibit gambling. Today, some of the biggest casino operators in the world view Asia as one of the most untapped markets. With favorable deals offered by the likes of MGM, Wynn, and Las Vegas Sands and the prospect of significant tax money plus pressure from the public, Asian state governments are beginning to reconsider their minds.

In the past few years, especially since the COVID pandemic devastated what once was a thriving tourism industry, we have observed an increase in the number of legal operations. Let's look at which Asian nations are preparing to welcome both tourists and locals in their brand-new venues.

Asia Pacific Online Gambling Market size crossed USD 15 billion in 2019 and is anticipated to showcase around 18% growth rate between 2020 and 2026.

A rise in the number of internet users along with increased adoption of digital payments in Southeast Asia will drive the market growth. According to the eConomy Southeast Asia (SEA) 2020 report, around 40 million users from Malaysia, Vietnam, Singapore, the Philippines, Indonesia, and Thailand came online for the first time in 2020. This resulted in increasing the number of internet users to around 400 million, representing 70% of the region's population.

Similarly, digital payments in Southeast Asia are estimated to reach USD 1 trillion by 2025.

Japan

For more than a century, the majority of gambling activities have been prohibited in Japan; at the moment, wagers on certain football games, horse races, and pachinko machines are the only types of gambling in Japan that are permitted.

Japan has witnessed a significant trend toward the licensing of casinos on a bigger scale, thanks to the Integrated Resort (IR) Promotion Act and the Integrated Resort (IR) Improvement Law, which came a few years later. Integrated Resorts are tourist destinations with a hotel, shops, restaurants, and, most significantly, casinos.

In 2021, the recently created Japan Casino Regulatory Commission also published regulations establishing the requirements for setting up casinos and putting the Specified Integrated Resort Area Development Law into effect. The late Shinzo Abe, a supporter of the initiative and former prime minister, was reported as stating that he thought these measures would boost tourism and the country's economy.

Philippines

The Cagayan Economic Zone Authority, which manages licensing for internet operators, and the Philippine Amusement and Gaming Corporations (PAGCOR), which handles licensing for land-based gambling establishments, are the two main regulatory authorities for the Philippine gambling industry.

Although an online casino is permitted to operate from the Philippines, it is not permitted to offer online gaming services within the country. Ironically, foreign companies are permitted to legally provide Filipinos with online gambling services. Further complicating matters, these offshore casino businesses obtain their licenses PAGCOR, the body that was only created to handle licensing for land-based operations

China

With the exception of two state-run lotteries, gambling is forbidden in mainland China. This does not mean, however, that Chinese citizens have nowhere to enjoy casino entertainment. Through some legal loopholes, Macau and Hong Kong, China's two special administrative territories, are allowed to legally provide

gambling entertainment. Seizing the opportunity, China's neighbors invest heavily in attracting and catering to Chinese gambling tourists through luxury five-star casino resorts.

Macau

Due to its huge gambling industry, Macau is known as the Asian "Las Vegas," and its 41 casinos primarily serve high-rolling professionals rather than visitors. The island perfectly captures the "Vegas vibe," including the seemingly limitless supply of neon lights and heavily themed hotels and casinos. Online gambling has not been permitted in Macau since 2015.

Hong Kong

Taking advantage of its increased independence, China's other special administrative region, Hong Kong instated the Jockey Club, an institution wherein horse race betting and sports gambling is permitted, but highly regulated. Gambling and sports betting online are entirely banned and foreign online casino sites are actively and effectively blocked. Other forms of gambling, such as landbased casino games, are only permitted outside Hong Kong's territorial waters, so those who want to gamble are regularly ferried to close by Macau.

Singapore

For a long time, Singapore's gambling options consisted solely of those provided by state-owned businesses: Singapore Pools for lottery-style games and Singapore Turf Club for horse racing and sports betting.

Prior to 2005, Singapore only permitted gambling through government-run establishments, namely the Turf Club for horse races and sports wagers and the Singapore Pools for lotteries. Casinos were strictly prohibited.

The Singaporean government began allowing land-based casinos to operate in the nation in 2005, but only in integrated resorts and with a requirement that any tourists who wished to indulge in this form of entertainment pay an admission fee. Only two gambling licenses are available to international operators in order to better regulate the business, and online gambling is prohibited.

Vietnam

Vietnam began the process of legalizing gambling fairly recently, in 2018 sports betting was permitted and casinos were opened to tourists. While locals are, for

the most part, banned from playing in casinos, there is one initiative to allow the Vietnamese citizens in specifically licensed venues, should they be able to provide proof of monthly income exceeding €370. While many developers are seeking the government's stamp of approval to build more casinos, only one is currently active, with only one other in development.

Cambodia

Only visitors are permitted to gamble at land-based casinos in Cambodia, which is a favorite gambling destination for many of its neighbors whose governments do not yet permit this sort of entertainment. Between 2015 until 2020, online gambling was briefly lawful, but the government has since reversed this decision, making it once again prohibited.

Malaysia

Similar to Vietnam and Cambodia, Malaysia only permits tourists to gamble in physical locations; both internet and physical gambling are banned for its own citizens. The good news is that if you're a Malaysian citizen and you're found gambling, it won't be treated as a crime.

Conclusion

Although it appears that a legalized Asian gambling market is still a considerable time ahead, positive advances are being made, and more and more states are seeing the advantages of the higher tax revenues and the enhanced security that a regulated market would provide for their citizens.

8.5. MARKET FORECAST

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.

Modern technologies for the gambling business are actively developing. This applies to classic slots, video slots and VR (virtual) - gambling. A young generation of players is entering the market, and companies are doing their best to meet the high requirements. This is how esports betting and skill-based games emerged.

The Asian market is the largest in the world in terms of volume, and every year the demand for gambling is only growing. 2019 showed softening in the field of law - more and more countries are legalizing online betting and even casinos. This trend has moved into 2020, which opens new perspectives for the industry. See also the best deals from Asian casinos at 3snet.

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.

9. ONLINE CASINO LAUNCHING RISKS

Unstable legislation

Each country has its own rules regarding gambling, which change quite often. You need to understand that, perhaps, the casino owner will need to decide how to reformat the establishment in the event of changes in the law.

Instability of equipment operation

Since the main locale is the internet, it's important that everything runs like clockwork. If the site or server goes down, the casino will suffer serious losses.

Software

The structure of an online casino is a kind of constructor consisting of three types of software (software, or so-called software): a gaming platform, a payment solution, and gaming content.

Payment systems are the least risky category. All payment solutions are seriously tested by regulatory authorities, banks, etc. Here the risk of getting low-quality software is minimized.

The biggest risk for operators is non-original, or so-called pirated, software. As a result, you can lose experienced and serious players who understand software. They will choose the casino that has the original software. Because it guarantees both payouts and a clear return to player (RTP) percentage. Another aspect that operators often overlook is the back doors. Backdoors is a malicious algorithm that programmers often "screw" onto handicraft software to simply steal money from unsuspecting operators. In addition to backdoor, there is a huge number of errors, bugs, which also entail financial losses.

"Pirate" software is an illegal thing. Clients simply cannot know either the final provider or who they are contracting with, because there is a whole chain of intermediaries. At a certain moment, when you invested money in the development of a casino, installed software, launched a project, spent money on marketing, your provider will simply disappear. This will not happen with the original software, because you always know with whom you have a contract, who is behind this contract and to whom in case of something to contact with problems.

The last aspect is a violation of the copyright law, which is often ignored, but in our country, there is still a possibility to prosecute a person under this law.

A very important aspect when choosing software is security. Serious software development companies spend colossal resources on it. Creation of secure software requires additional time and human resources. Companies deliberately do this in order to end up with a product that will provide security to all customers. And that's something worth working for.

Another very important aspect is the so-called usability, which is often neglected when developing software, because people are chasing functionality. Forgetting about usability, you can face a problem when a lot of unsystematic functionality accumulates on one platform. It is necessary to think about ease of use at all stages: both when drawing up a technical assignment for software development, and subsequently, during modernization and upgrades.

High competition

The owner of a gambling business can receive a lot of money, since this type of service is in great demand. Many seek to occupy a niche, but only casinos with the right approach to business achieve success. You need to tune in to the fact that you must work hard to earn.

Money laundering

Regulatory organizations conduct constant checks about money laundering by criminal structures, financing of terrorism through online casinos. If evidence of inadequate anti-money laundering activities is found, casinos may have their license revoked.

Advertising

Regulatory organizations ensure that gambling advertising is socially responsible, with attention to protecting children, young people and other vulnerable persons from harm or exploitation. This applies to the images of toys, comic book characters, cartoons, fairy tales, brands that children like.

Loss of funds

At the first stage, losses of funds spent on registration, rent and office equipment are possible.

The security payment, in the event of the closure of the online casino for internal reasons or other objective reasons, is returned to the casino owners, but must

remain unused during the operation of the online casino as a deposit in case of winning the jackpot, i.e. losses can be minimal.

Risk insurance

Thanks to the combined 10 years of experience in the field of online casinos of the founders and co-owners of the project and the managerial experience of the project mentor, the risks of entering the market will be minimized as much as possible.

10. FINANCIAL PLAN

10.1. INVESTMENTS

Volume and structure of investments

The total investment required for the project is 0,2 million EUR.

Table 5. Investment budget, thousand EUR

№	Name	Value
1	Acquisition of a license and security payment	128 000
2	Payment for the Amazon server	9 400
3	Office equipment and stationery	2 800
4	Floating capital financing	85 106
Invested capital total (actual need for cash)		225 306

Project Milestones and Implementation of Investments Schedule

The total project implementation period is 36 months (3 years).

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

In the process of project implementation, the following steps must be completed:

- first stage: purchase of license and security payment;
- second stage: payment for the Amazon server;
- third stage: purchase of office equipment, stationery;

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

Table 6. Financial plan, thousand EUR

		Total for 3 years	Apr-24	Jul-24	Aug-24	Sep-24	Feb-25
1	Acquisition of a license and security payment	128 000	128 000	-	-	-	-
2	Payment for the Amazon server	9 400	-	9 400	-	-	-
3	Office equipment and stationery	2 800	-	2 800	-	-	-
4	Floating capital financing	85 106	4 850	-	49 957	2 445	27 854
	Investment total excl. floating capital	140 200	128 000	12 200	-	-	-
	Invested capital total (actual need for cash)	225 306	132 850	12 200	49 957	2 445	27 854

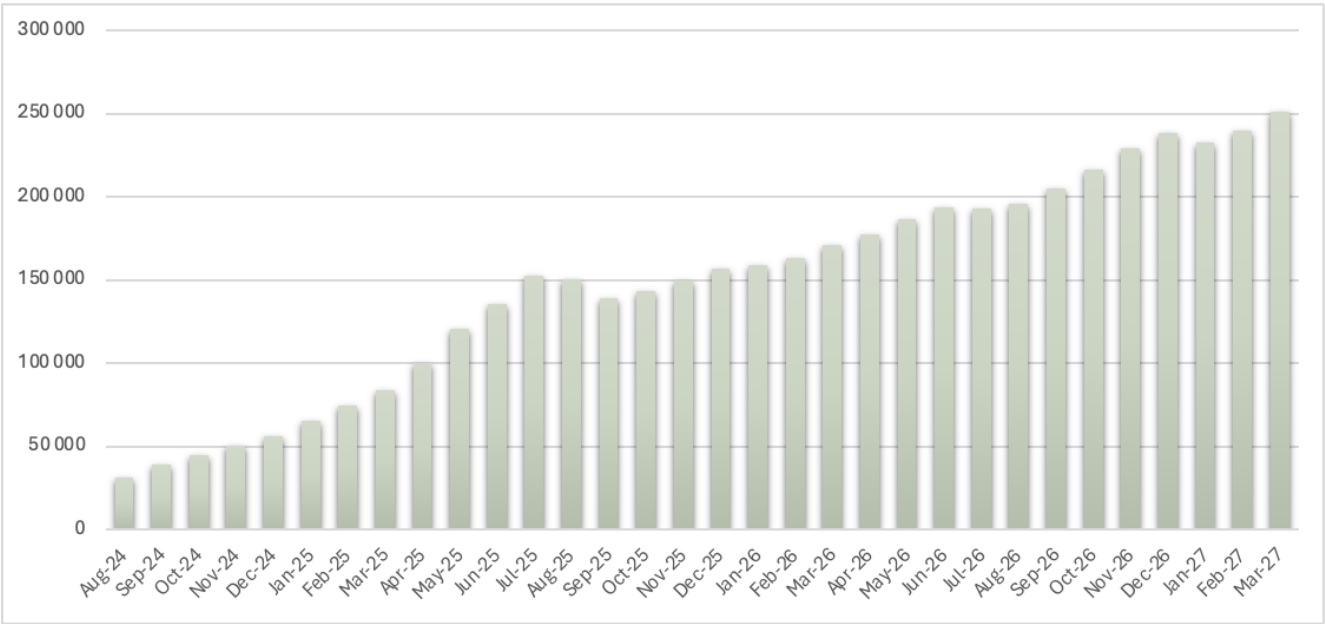
10.2. INCOME PLAN

Income-generating activities and products

Within the framework of this project, it is planned to receive income from the provision of online casino services.

Volume of income

Diagram 9. Dynamics of Sales Proceeds in Euros



The total amount of proceeds for the project period (3 years) will amount to 4,7 million EUR.

Table 7. Income and direct cost plan, thousand EUR

Physical indicators	Unit	Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Total number of clients	ppl	118 691	5 562	36 818	58 226	18 085
Number of new clients	ppl	76 797	4 841	24 122	36 500	11 334
Number of current clients	ppl	41 894	721	12 696	21 726	6 751

Proceeds		4 747 656	222 481	1 472 730	2 329 041	723 404
Income from clients	40,00	4 747 656	222 481	1 472 730	2 329 041	723 404

Direct costs		3 160 703	238 218	909 953	1 520 071	492 461
Advertising costs	22	1 775 118	134 607	559 168	827 086	254 258
Additional staff costs	1 160	870 000	5 800	162 400	504 600	197 200
Salary		297 600	46 500	111 600	111 600	27 900
License fees		143 211	39 628	48 745	48 745	6 093
Depreciation	60 m	74 773	11 683	28 040	28 040	7 010

Indirect costs		422 773	46 683	154 040	154 040	68 010
----------------	--	---------	--------	---------	---------	--------

Accounting		101 333	15 833	38 000	38 000	9 500
Office equipment maintenance		77 333	12 083	29 000	29 000	7 250
Hosting		124 000	0	42 000	42 000	40 000
Office rent		29 440	4 600	11 040	11 040	2 760
Legal support		90 667	14 167	34 000	34 000	8 500

10.3. MARKETING PLAN

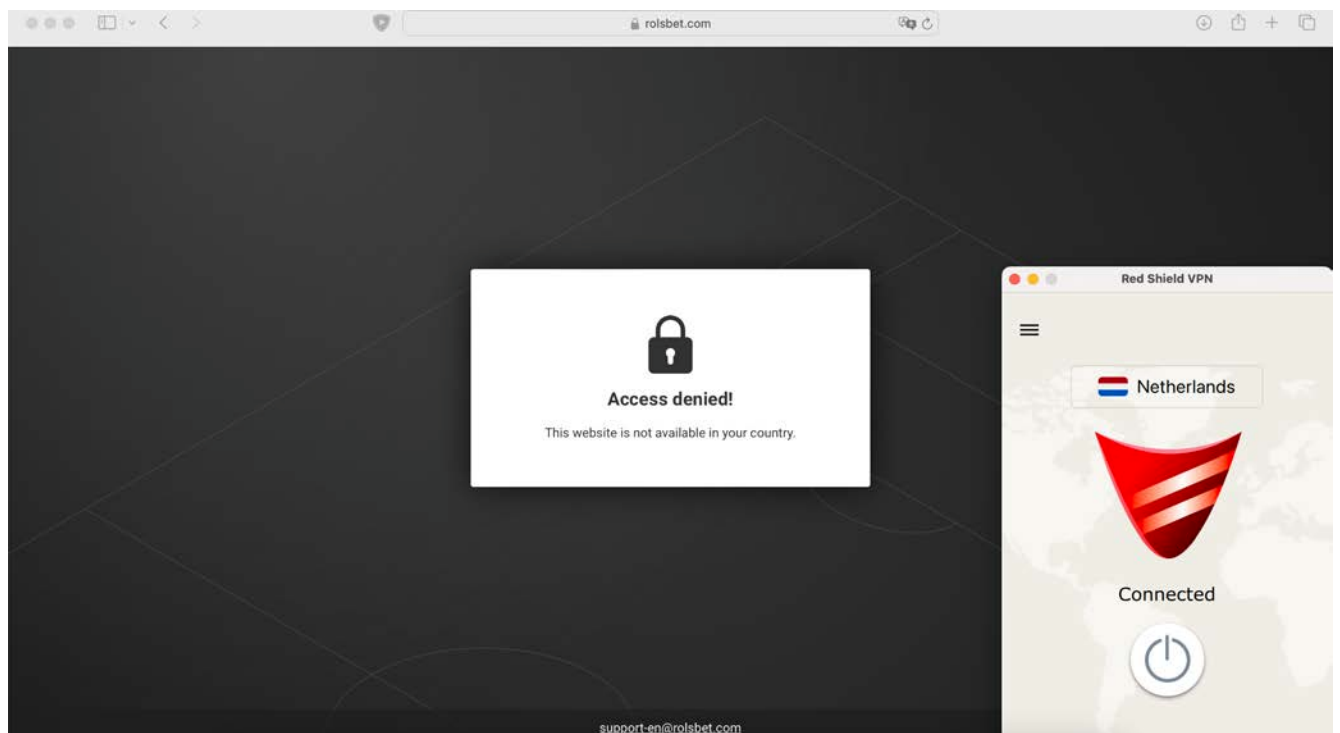
ROLSBET is tailored for discerning individuals aged 18 and above, offering a distinctive and responsible gaming experience. Our detailed marketing strategy delineates plans to foster brand loyalty, captivate the target audience, and propel sales growth through innovative and ethical initiatives.

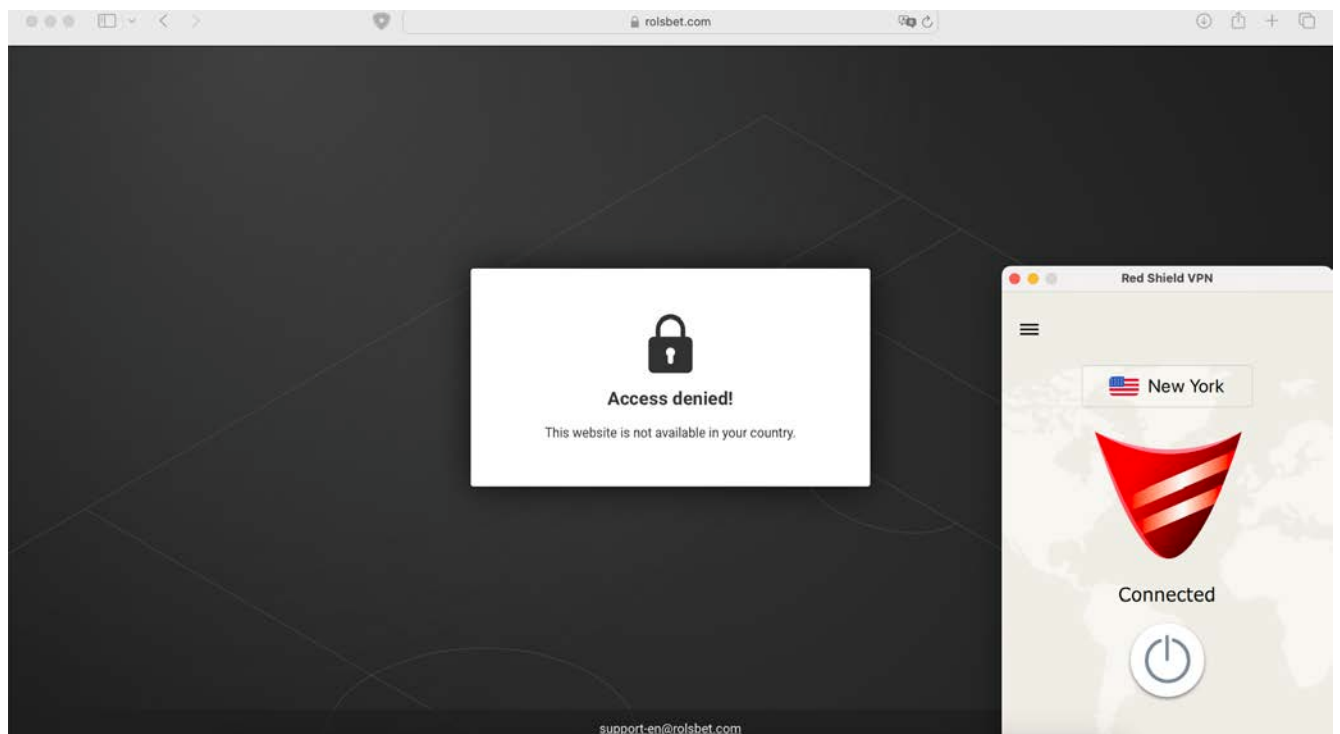
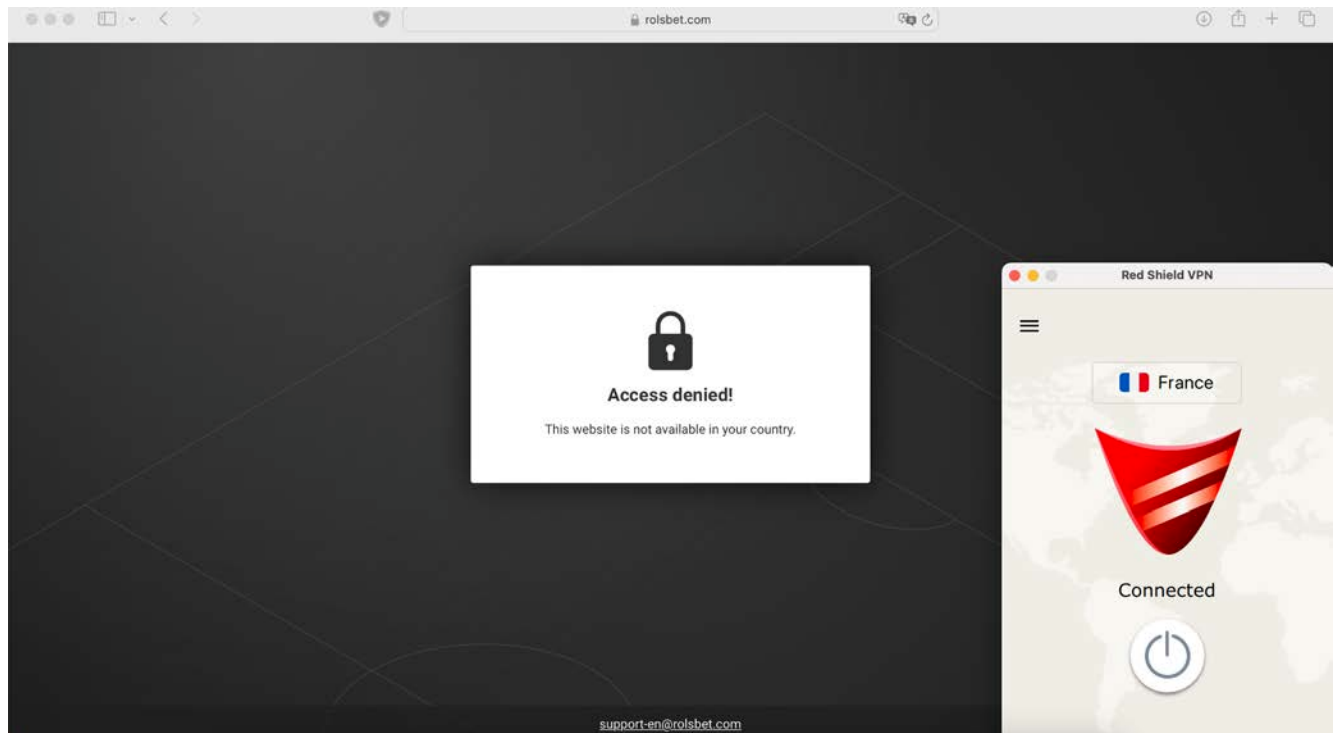
Target Audience:

Demographics: Our primary focus is on adults aged 18 and above, with a specific emphasis on the 21-55 age bracket.

Geographics: We target markets including South Korea, Vietnam, Thailand, Malaysia, Indonesia.

Geoblock: Access is restricted from the USA, France, and The Netherlands, as well as the Dutch Caribbean Islands: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.





Psychographics: Our target audience is composed of individuals who are passionate about cutting-edge technology, avid gamers, and those who prioritize responsible gaming principles.

Marketing Strategies:

a. Brand Identity:

Craft a compelling brand narrative that highlights our dedication to reshaping the gaming landscape through innovation, excitement, and a strong commitment to responsible gaming.

Position ROLSBET as a hub for pioneering technology, diverse gaming experiences, and a vibrant gaming community.

b. Digital Realm Domination:

Enhance the website to provide an intuitive user experience, ensuring seamless navigation across different platforms.

Leverage the potential of social media platforms for targeted advertising, engaging content distribution, and community-building initiatives.

c. Content Odyssey:

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

Forge partnerships with gaming influencers and content creators to amplify ROLSBET's reach and influence.

d. Advocacy for Responsible Gaming:

Integrate responsible gaming messages seamlessly into marketing materials and gaming interfaces.

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

Sales Expeditions:

a. Launch Excitement:

Unveil captivating launch promotions and exclusive bonuses to captivate early adopters.

Utilize strategically timed limited-time offers to instill a sense of urgency and anticipation.

b. Partnership Odyssey:

Establish strategic alliances with gaming affiliates, influencers, and complementary brands to enhance visibility and attract a broader audience.

Create an enticing affiliate program to incentivize third-party promotion.

c. Data-Fueled Refinement:

Leverage analytics tools to gain insights into player behavior, preferences, and the effectiveness of different acquisition channels.

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

d. Customer Harmony Mastery:

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

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

Evaluation Yardsticks:

Continuously monitor crucial metrics, including customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.

Conduct periodic reviews and agile adjustments based on performance analytics.

10.4. PROJECT COSTS

Fixed costs

Staffing and salary

According to the staffing table, the total estimated number of personnel is 6 people with a standard workload with an average salary of 1,8 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 with salaries, thousand EUR

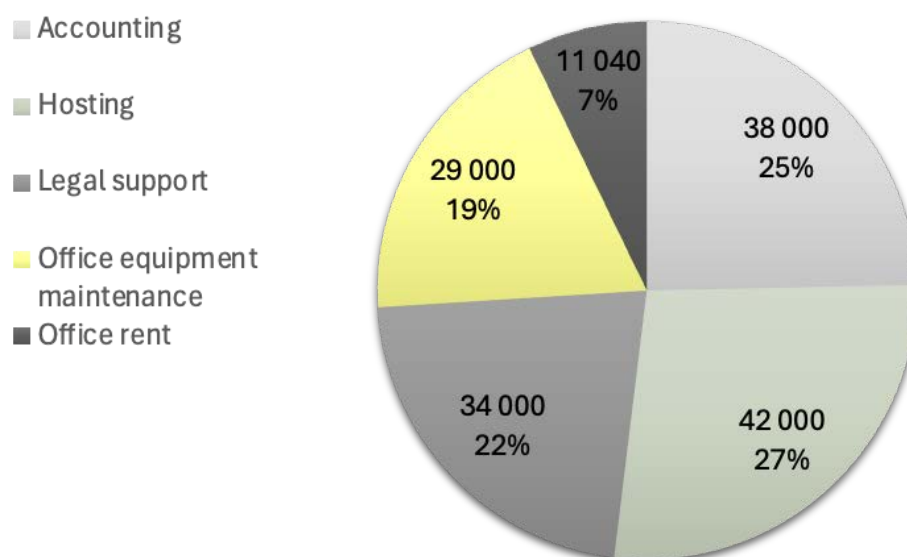
No	Position	Number of people	Salary	Total per month
1	Director	1	2 300	2 300
2	Site developer	1	1 900	1 900
3	Designer	1	1 500	1 500
4	Advertising specialist	1	1 400	1 400
5	Employee	2	1 100	2 200
	Total	6		9 300

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

Table 9. Fixed costs, thousand EUR

No	Item of expense	Total per year
1	Accounting	38 000
2	Office equipment maintenance	29 000
3	Hosting	42 000
3	Office rent	11 040
4	Legal support	34 000
	Total	154 040

Diagram 10. The structure of fixed costs (to the total volume of fixed costs)



Variable costs

Direct production costs

Table 10. Variable costs, EUR

No	Item of expense	Per unit, total	Calculation base
1	Advertising costs	22	for 1 client
2	Additional staff costs	1 160	for 1 person

Diagram 11. Structure of variable costs (to the total volume of variable costs)



Taxes

Taxes of the company as a tax subject

The amount of accrued and paid taxes for the project period will amount to 0,2 million EUR.

10.5. FINANCIAL PLAN

Conditions for attracting investment resources

Financial resource requirements and financing structure

The need for financial resources for the project is 0,2 million EUR.

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

The amount of payments to the investor for the period of the project will be 0,3 million EUR.

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.

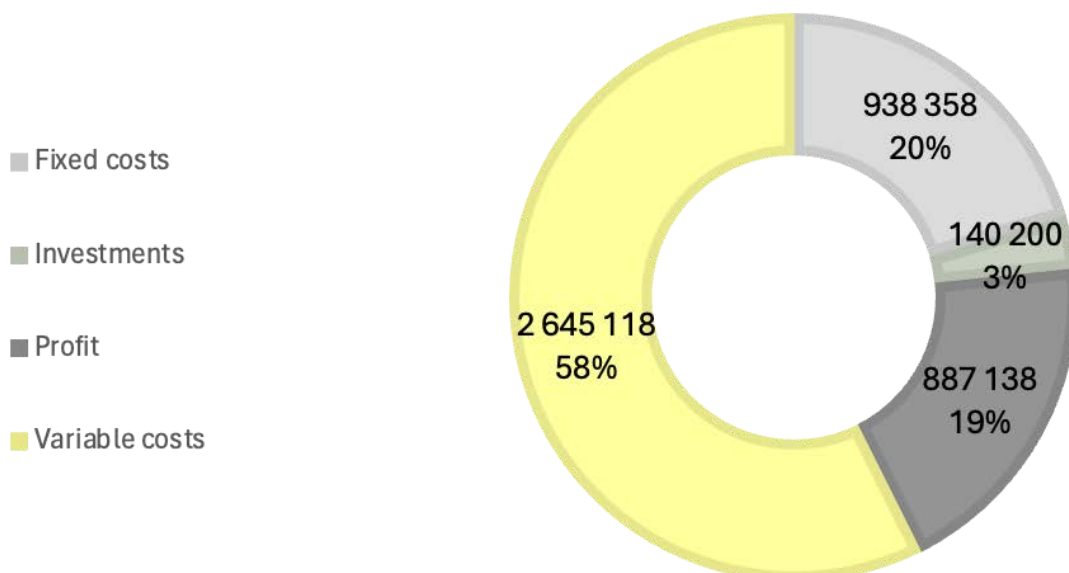
The amount of proceeds for the period of the project reaches 4,7 million EUR.

Negative cash flow reaches 3,7 million EUR and consists of the following main components:

- variable costs - Advertising costs 22 for 1 client; Additional staff costs 1160 for 1 person
- fixed costs - 0,1 million EUR per year;
- taxes - 0,2 million EUR.

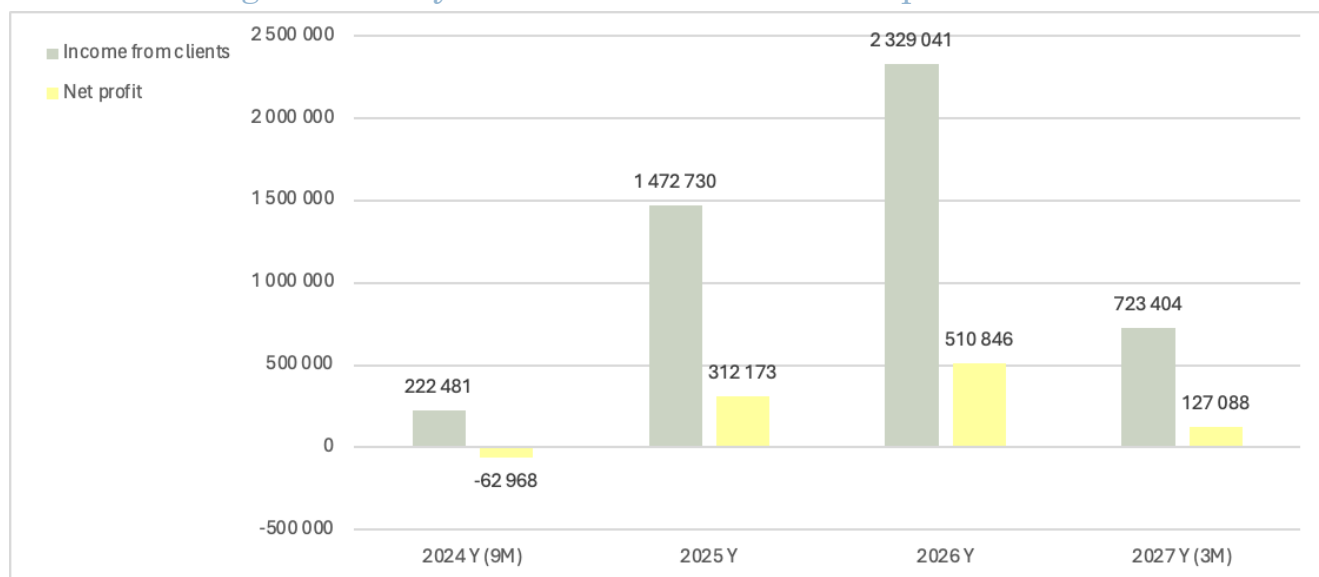
Thus, the balance on operating activities at the end of the project will be equal to the amount of net profit and will be 0,8 million EUR.

Diagram 12. Distribution Structure of Sales Proceeds to Costs and Profit



Indicators of Profit and Loss Plan

Diagram 13. Dynamics of income and net profit in Euros



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, 4,7 million EUR of sales proceeds will be received.

The total cost for the project period will amount to 3,7 million EUR.

Net profit upon completion of the project will amount to 0,8 million EUR.

Table 11. Financial and investment indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	140 200
Sum of proceeds (SP), EUR	4 747 656
Net average operational receipts per month (NAOR), EUR	30 219
Net profit for the project period, EUR	887 138
Average profitability for the project period (net profit to proceeds	18,69%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	316 278
Average Rate of Return of investments (ARR)	143,07%
Return on investment (ROI)	533%
Profitability index (PI)	2,3
Internal rate of return (IRR)	95,73%
Pay back period of the project in whole (PBP), incl. financing scheme	15 months
	1,25 years

10.6. SENSITIVITY ANALYSIS

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