

Business Plan of Luminect Limited

The Company

Luminect Limited (“Luminect”) is a company incorporated in Curacao. Luminect has company number 165187 and its registered address is Kaya Richard J. Beaujon z/n, Willemstad, Curacao.

Purpose

Luminect exists to provide an online sportsbook and casino and live casino and will target a small group of jurisdictions. Luminect intends to obtain a gambling licence in Curacao. The team comprises industry professionals with wide experience in online gambling, technology and marketing.

Our Principles and Values

Luminect shall strive to offer innovative next generation of products and ensure we maintain the platform up to date with the latest casino and live casino games by constantly following up with the latest developments in the gaming industry.

We aspire to promote a thrilling gambling experience consequently our user experience will be a priority. We will look to expand our team to employ experienced individuals who are enthusiastic about the industry and that are in line with our vision.

Due to the competitive nature of the industry the management will keep under review concepts for new products/features which do not currently exist in the market. For example, we may look to offer bets on esports as part of a general sports betting product. Luminect will also seek to maintain a brand that is fresh based on the current trends in the industry.

The principals’ team has sufficient industry experience to launch Luminect and ensure the longevity of user experience which will prove vital to developing the customer base gambling on the platform.

Luminect takes the protection of vulnerable persons and anti-money laundering seriously and will uphold Curacao’s controls – see section 7.

Group Ownership and Ultimate Beneficial Owner

The ultimate beneficial owner of Luminct is Mr. Cem Sisman.

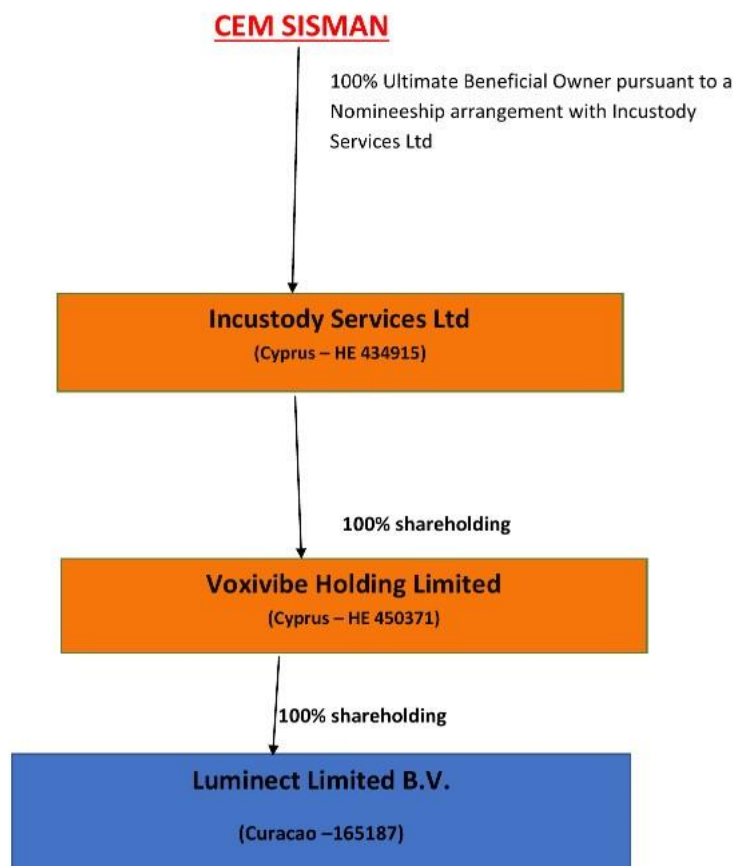
Luminct's immediate shareholder is Voxivibe Holding Limited ("Voxivibe"), a company incorporated in Cyprus.

The registered shareholder of Voxivibe Holding Limited is Incustody Services Ltd ("Incustody"), an incorporation agent in Cyprus, and Incustody holds these shares as nominee for and on behalf of Mr. Sisman.

The nominee arrangement exists to protect the privacy and confidentiality of Mr. Sisman, but the full ownership is always disclosed to regulators and banking partners with a legitimate need to know these details.

Company Ownership Structure

Please see the signed corporate structure chart of Incustody Services Ltd and its group below.



Key Individuals

The key individuals running the business are:

- Cem Sisman - CEO and Technology
- Anne Hopstein - Director and CFO
- Alper Soylemez - Operations and Compliance

Regulatory and Compliance Controls

Luminect will not accept customers from the USA, UK, France and others jurisdictions with a domestic gambling licence regime. Luminect will not accept customers from high risk jurisdictions as defined by the Financial Action Task Force (FATF), including without limitation, North Korea, Iran, and Syria. Luminect will also not accept customers from Russia or Russian-occupied territories of Ukraine, or Belarus. Luminect in any case will not provide its services in jurisdictions where it is not properly licensed.

Luminect will not accept minors (under 18 years of age) as customers. Luminect will adhere to all regulatory requirements of its licence in Curacao.

Luminect understands that gambling can become a problem for some customers, and Luminect will uphold compliance standards to reduce the impact of problem gambling.

Luminect understands that gambling can be used as a source of criminal activity, and Luminect will uphold compliance standards to prevent money laundering and/or match fixing.

Management System

Luminect has a management /back-office system to ensure it can monitor as well as manage everything with ease. The back end will offer an extensive functionality which will allow Luminect to manage all the customer's activities on the platform and also ensure that it can push promotions to existing users as well as identify trends and implement new strategies for promotion to acquire new customers.

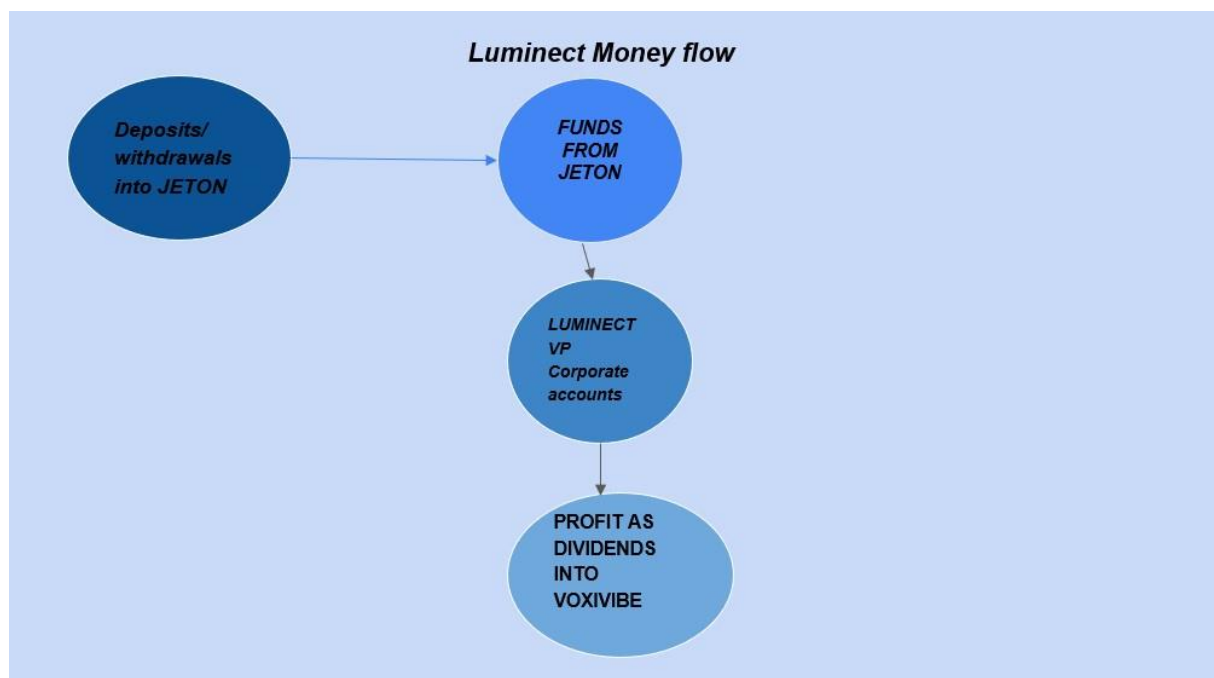
The system will also be user friendly to carry out customer onboarding.

Banking and Payments

Luminect will accept deposits and make withdrawals from customers using Jeton EWallet. Payments will be made using EUROS. Customer losses (i.e company revenues) are settled from Jeton into Luminect's account with Valletta Pay, a leading EMI based in Malta. Luminect will use the funds in Valletta Pay to settle its expenses and operational costs including game provider revenue share fees, staff costs, professional advice etc.

Remaining profits may be withdrawn as profits to the parent company Voxivibe. All such payments shall be done in EUROS.

Money Flow Chart



Casino Game Providers

Luminect shall provide a wide range of the best casino games, both casino and live casino. Luminect shall work with leading providers like Evolution Gaming Malta, NetEnt (now a part of Evolution), Pragmatic Games, EGT, Yggdrasil and Microgaming.

Sportsbook Providers

Luminect shall provide a leading sportsbook product. Luminect shall use the sportsbook product provided by Digitain.

Marketing

Luminect will market its services primarily through contacts with known highvolume gamblers, as well as through some online SEO.

Luminect will not carry out any major advertising campaigns – e.g. TV, radio, print, billboards advertisements.

Luminect will not carry out marketing using social media.

Customer Retention

Luminect will place more emphasis on customer retention than acquisition. Luminect will cultivate a loyal customer base and will do that through excellent customer service and meeting the customer needs.

Bonus rewards will be provided to customers to incentivise their loyalty. Bonuses are used for other instances, such as Welcome Bonuses, VIPs, special sporting events etc.

Launch

The launch will focus on ensuring the offering is ready to meet industry standards in Curacao. The management team have experience of operating a gaming platform in Curacao and are aware of and understand the new standards coming into force. The launch will ensure that customer registration, gameplay, deposits and withdrawals, compliance actions are all operating as expected.

Customer Information

Luminect shall ensure that its website contains the following information:

- Company Information – details of the licensed company, the information includes the company names and addresses.
- Licensing information - The sub-licence number shown under which the company is licensed to operate the website.
- About Us Section – informative summary on the company.
- Contact Us Page and Live Support – availability for customer to email in queries and /or discuss matters live, with a customer support agent
- FAQs - questions and answers for customers to provide information on the most common queries from customers, a quick reference guide for any customers.
- Terms & Conditions – the terms and conditions that customers are bound to by accepting the rules of using the website. These include the following;
 - KYC – Age & Identity Verification
 - Account – rules regulating your account and the use of the account.
 - Deposits and Withdrawals – rules regulating payment activity on the site
- Privacy Policy – declaration of data protection and privacy law compliance.
 - Information on the information collected and its uses.
 - Cookies Policy – information on the types of cookies used and their purposes.
- Responsible Gaming Information.
 - The website will provide a Responsible Gambling link which shows appropriate guidance information to customers and provides links to responsible gambling advice pages.
 - Preventing underage gambling – checks prevent gamblers under the regulated minimum age (standard being 18 years) from using the website.
 - Self-Exclusion – industry standard practice of providing a mechanism for customers to suspend their gambling activity for a predetermined time set by themselves.
- Indemnity and Limitation of Liability

- Complaints – email will be allocated for complaints
- Betting Rules & Regulations
 - General Sports Betting Rules
 - Detailed betting rules per Sport
 - General Casino Game rules
 - Specific Casino rules by Game
- Security Policy - encryption, firewall protection, account protection and verification protocols.
- Payment Providers Information – Details of the payment providers integrated on the website.

Financial Information

(1) Investment schematic showing type of investments, projected costs, explanation and the source of wealth

The parent company, Voxivibe Holding Limited shall provide start-up funding for Luminect, and will invest funds to incorporate the company and the set up the gambling website and pay for the costs of licensing with the regulator in Curacao for as long as the Luminect needs such funding until Luminect realises its own revenues sufficient for its operational needs.

The financing shall ultimately derive from Mr. Sisman from his wealth accumulated from other business activities in the online gambling sector.

(2) Financial estimation for the first, second and third year,

2024-2025	7-10 Million Euros
2026/2027	10- 15 Million Euros
2028/2029	15-20 Million Euros

(3) Description of money flows including billing agents used/payment processors

Customers deposit funds into Luminect via one of a number of payment providers, and customer winning are paid from those payment providers and then any remaining funds (where customer losses exceed customer winnings) are settled into Luminect's bank account. Funds shall be used to pay suppliers such as casino-game providers, staff costs, contractors and other operational costs.

Financial Projections

Luminect has made financial projections for the first 4 years of trading:

	2024	2025	2026	2027
	€M	€M	€M	€M
REVENUE	9,000	12,000	15,000	20,000
Staff Costs/Contractors	900,000	1,200	1,700	2,000
Marketing	20,000	25,000	40,000	50,000
IT and Platform	50,000	80,000	100,000	120,000
Gaming Licence	10.000	10.000	10.000	10.000
Curacao Fees	8000	8000	10,000	10,000
Merchant/Bank cost 2% of Rev	150,000	200,000	350,000	500,000
Office Costs	30,000	35,000	45,000	55,000
Professional Fees	20,000	40,000	70,000	90,000
Gaming Providers	150,000	250,000	350,000	500,000
Total Expenses	1,338	1,848	2,675	3,335
Total NET Profit	7,672	10,152	12,325	16,665