



Starfish Media N.V

BUSINESS PLAN

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1. Confidentiality Statement

The information contained herein is confidential between Starfish Media N.V (hereinafter 'SM') and the Gaming Curacao Board (hereinafter 'GCB'). This document contains private information that may not be divulged or discussed with anyone outside the aforementioned organisations without written consent from STARFISH.

Brief Overview

The Business Plan indicates the Company's intention to be regulated in Curacao in accordance with the Legislation.

2. Description of the Company

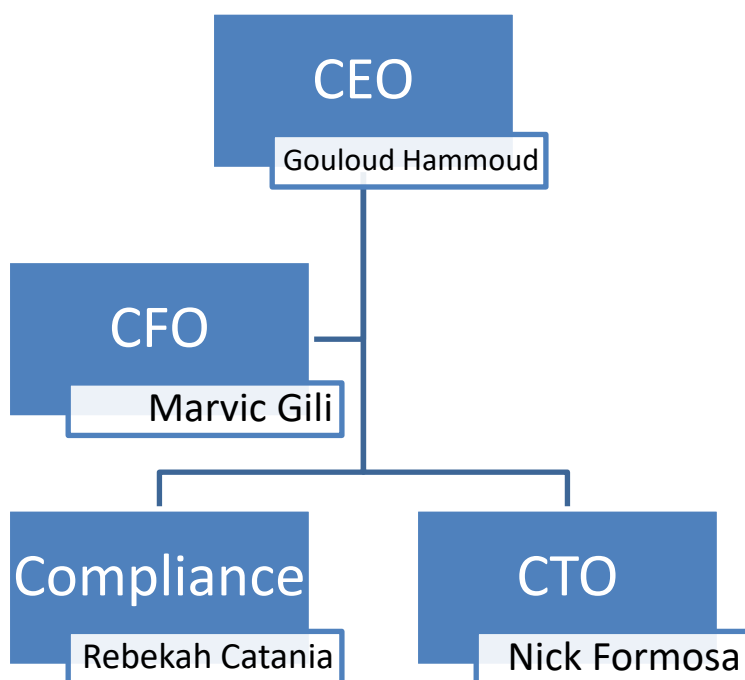
STARFISH has been operating as a B2B company since December 29th 2014 under Licence No. 1668/JAZ.

3. The Team

The team behind the Company has been operating in the respective industries for a number of years and brings a wealth of experience and expertise to this venture.

The skills and expertise of the key roles required in the team is provided below:

Key Role	Name	Job title/role within company	In house/outsourced
CEO/General Manager	Gouloud Mercedes Hammoud	Director	Outsourced
Day to Day management	Gouloud Mercedes Hammoud	Director	Outsourced
Compliance	Rebekah Catania	Compliance Manager	In house
CTO	Nick Formosa	CTO	In house



4. Professional Back-up

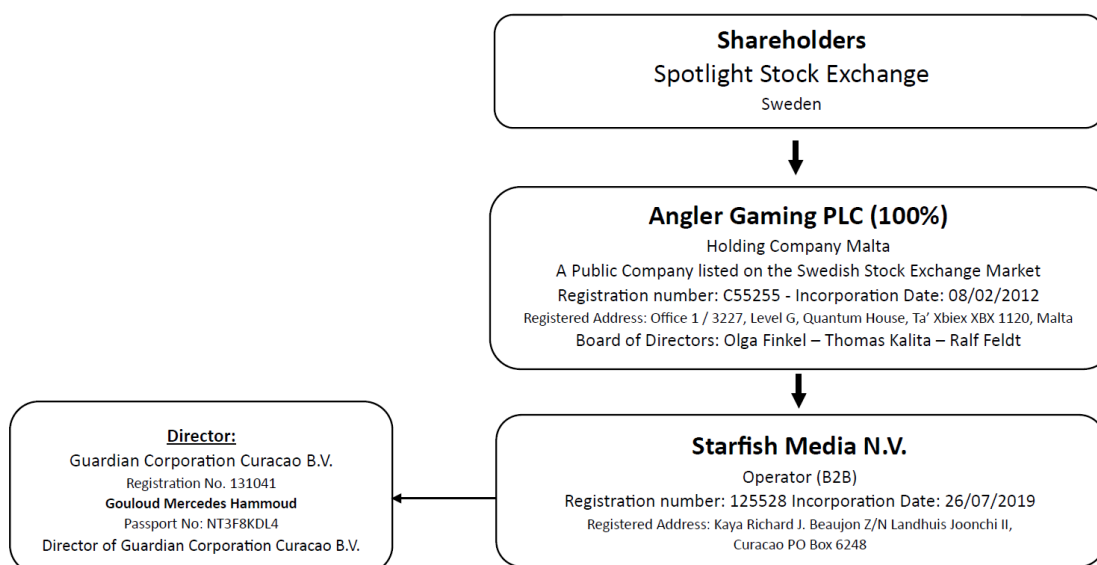
Further to the above, the Company also intends to engage other experienced professionals to back up its operations. Such professionals include:

Services	Providers
Event, content and odds provision for betting Services	N/A
Fraud Management Services	Inhouse
Holding and Managing of Players Funds Services	Inhouse
Customer Due Diligence Services	Inhouse
Colocation services and other Managed Information Technology Services	Azure
Back-up and Disaster Recovery Services	Certria - Rotterdam
Payment Processing Services	Please see below
Legal Services	WH Partners
Compliance Services	
Accountancy of Tax Advisory Services	MGI Malta
Player Support Services	Inhouse
Marketing and Advertising Services	Inhouse
Providing Function of Money Laundering Reporting Officer	Inhouse
Provide dispute resolution services to players	To be
Player Registration Services	Inhouse
Supply and Management of Material Elements of a Game	Please see below
Supply and Management of Software Services	Please see below

5. Overview of the Business Products and Services

SM has been operating as a B2B company since December 29th 2014 under Licence No. 1668/JAZ.

Please see below structure of Starfish Media N.V



The below is the Url link for Starfish

<https://www.futocasi.com/ja/>

6. Key Suppliers and Material Dependencies

Starfish is an aggregator and the below are the gaming providers registered under the company:

- PragmaticPlay
- Playson
- PlayNGo
- Yggdrasil
- Boongo
- Hacksaw Gaming
- Evolution Gaming
- Pragmatic Live
- RelaxGaming
- NoLimitCity

The below is the list of PSP's.

- Astropay
- Cashlib
- Centiwise
- Celoxo
- Coinspaid
- Flexipin
- Wipay
- Interac
- Mifinity
- Muchbetter
- Neteller
- Pay retailers
- Paysafe card
- Skrill
- EcoPayz
- Vega wallet
- Volt

7. Risk evaluation and management.

Starfish has various policies and procedures in place to evaluate the risk and management being crucial components. The policies cover risk identification, risk assessment, risk mitigation, internal controls, audit processes, oversight committees, risk registers, external business and finance audits. Further information and the provision of policies and procedures are available for GCB review upon request.

Name of external financial auditors: MGI Malta Limited

8. Target KPIs and business objectives

The main KPI's of our business is through financial KPI's since these are the most important indicators of the success of the business. Financial statements are available for review upon GCB request.

Other KPI's include but are not limited to customer satisfaction and loyalty and operational efficiency.

We monitor regularly the KPI's performance which are reviewed periodically to assess progress and identify areas for improvement.

9. Policies and Procedures

The policies and procedures are done internally.

The documents are readily available for review upon GCB request.

We have an internal team reviewing the policies and procedures and confirm that all persons are qualified, competent and not conflicted.

10. Financial Projections

FORECASTED PROFIT & LOSS

	2024	2025	2026
	€	€	€
INCOME			
Net sales (=real income)	30,000,000	33,000,000	36,300,000
	<u>30,000,000</u>	<u>33,000,000</u>	<u>36,300,000</u>
DIRECT COSTS	(18,000,000)	(19,800,000)	(21,780,000)
GROSS PROFIT	<u>12,000,000</u>	<u>13,200,000</u>	<u>14,520,000</u>
EXPENSES			
Administrative / Marketing / Software Services	(8,000,000)	(9,000,000)	(10,000,000)
<i>Operating income (income before tax)</i>	<i>4,000,000</i>	<i>4,200,000</i>	<i>4,520,000</i>
Corporate tax	0%	0	0
<i>Profit after tax</i>	<u><u>4,000,000</u></u>	<u><u>4,200,000</u></u>	<u><u>4,520,000</u></u>