

BUSINESS PLAN

For operators of game of chance under
Curacao gaming license (GCB)

WINEVER B.V.

Business Plan Version: 1.0

Our Mission

The purpose of Winever B.V. (hereinafter referred to as the “Company”) is to provide clients with a diverse and engaging range of online casino and sportsbook experiences that cater to the thrill, excitement, and enjoyment of gaming and sports betting. Our mission is to become a premier provider of betting options in the region, offering a comprehensive selection of sports, games, and live events to suit various preferences and interests.

We are dedicated to utilizing state-of-the-art technology and the latest software to create a seamless and reliable platform. Our commitment extends to delivering outstanding customer service with a knowledgeable and approachable support team, ensuring that clients have a clear understanding of their choices and can make informed, strategic decisions aligned with their preferences.

To achieve these goals, the Company plans to partner with Softamber Limited, a trusted platform provider known for its robust infrastructure and premium content offerings. Through Softamber Limited, the Company will have access to a high-quality casino catalog from top-tier providers and an extensive sportsbook, allowing us to provide clients with a well-rounded and satisfying gaming experience that meets the highest industry standards. This collaboration will empower us to uphold our commitment to quality, innovation, and customer satisfaction, positioning Winever B.V. as a trusted leader in the online betting market.

Company and Management

The Company is positioned as an agile startup with a strong foundation from previously launched products, now channeled into its latest innovation, *vip2bet.com*. This new product embodies the company’s accumulated expertise, merging the best practices and proven success elements of earlier products that were strategically discontinued to focus on delivering an exceptional and groundbreaking experience to its Clients.

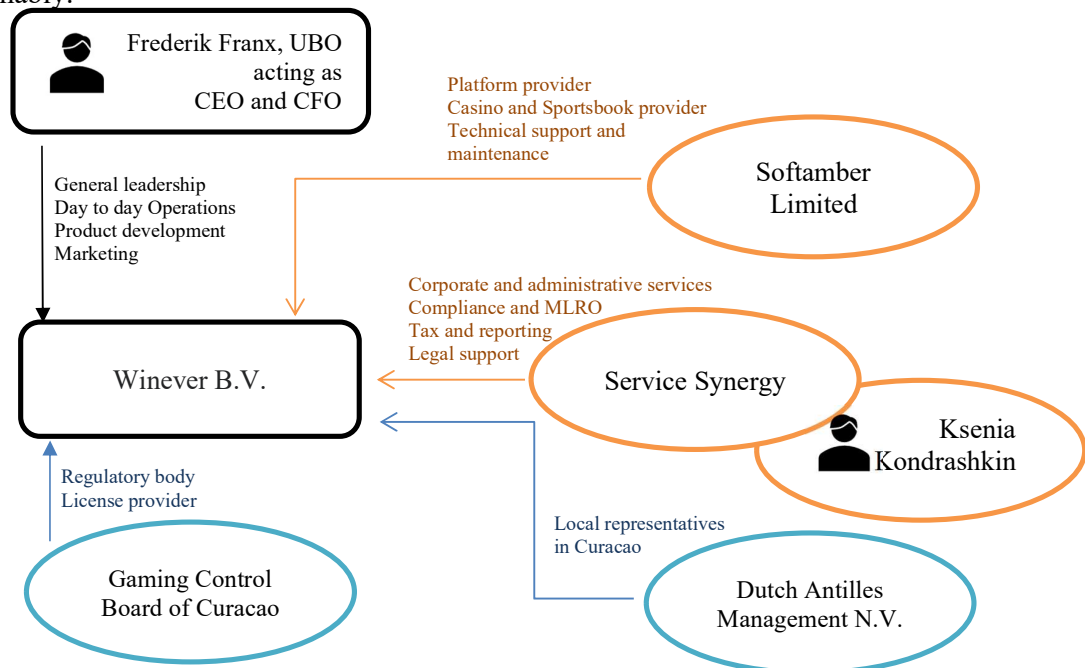
Currently in its early stages, *vip2bet.com* is managed by a streamlined team occupying key managerial roles, while non-core functions are strategically outsourced. The company is led by Mr. Viktors Kolesnikovs, the sole shareholder, who is both CEO and CFO. Mr. Kolesnikovs is an innovative entrepreneur with deep expertise in the payments and gambling industries, which enables him to drive the company forward with a clear vision and financial oversight. Additionally, Mr. Kolesnikovs intends to transition to a Curacao Gaming License, replacing the current sublicense held with Gaming Curacao, to support the company’s regulatory standing and long-term growth goals.

The company’s business model emphasizes efficiency and cost management, leveraging Mr. Kolesnikovs’ extensive business network to secure favorable terms with key partners, including platform and content providers, payment processors, and support services. By aligning variable costs with generated revenue, the company minimizes its initial investment requirements and ensures operational flexibility.

To streamline corporate administration and compliance, the company partners with Service

Synergy, a reputable provider in the gaming industry. Service Synergy manages all critical compliance and administrative functions, offering a turnkey solution that includes policy development, AML (Anti-Money Laundering), KYC (Know Your Customer) measures, and other regulatory controls. The compliance framework is meticulously integrated into daily operations, supported by a specialized team that also handles legal support, financial consulting, tax advisory, and reporting. As required by the Gaming Control Board of Curacao, Ksenia Kondrashkin of the Service Synergy team is appointed as the Compliance Officer, ensuring the company's commitment to regulatory adherence and integrity.

The company's organizational and functional structure is thus streamlined, ensuring that key roles remain in-house while leveraging partnerships for specialized, non-core functions to maximize both efficiency and effectiveness. This lean structure allows the company to focus on product innovation and customer engagement, positioning vip2bet.com to grow rapidly and sustainably.



As is standard in early-stage companies, Winever B.V. has structured its operations to retain agility by outsourcing non-core functions while keeping strategic decision-making with the Ultimate Beneficial Owner (UBO), who also serves as the business and product owner. This model allows the company to focus on key growth areas and innovation, leveraging expert partners to handle essential support functions with precision and expertise.

For technical operations, Softamber Limited, a trusted platform provider, supplies the

company's casino and sportsbook content, ensuring a seamless gaming experience. Meanwhile, Service Synergy, the company's primary sub-contractor, manages a comprehensive suite of outsourced activities, from corporate administration and advisory functions to complex accounting, reporting, and compliance services. This partnership is particularly crucial for maintaining rigorous compliance standards. Service Synergy's dedicated team of experts ensures robust AML (Anti-Money Laundering) processes, KYC (Know Your Customer) protocols, and all regulatory compliance activities are meticulously handled.

Further supporting compliance, Dutch Antilles Management (DAM) fulfills the mandatory local representative role in Curaçao, reinforcing adherence to jurisdictional requirements. Additionally, the Gaming Control Board of Curaçao (GCB) will serve as the primary regulatory body under Curaçao's evolving compliance landscape, replacing the company's previous licensing provider. Together, these partnerships ensure Winever B.V.'s alignment with local and international regulations and promote legal standing within the global gaming market.

This comprehensive outsourced structure enables Winever B.V. to maximize its focus on scaling the core business, delivering a high-quality gaming experience while relying on experienced partners like Service Synergy for specialized operational functions, reinforcing a secure and compliant business foundation.

Corporate governance, Risks and Controls

The company has implemented a streamlined, highly effective corporate governance structure that supports both operational efficiency and robust regulatory compliance. Currently, the Ultimate Beneficial Owner (UBO) serves as the Chief Executive Officer (CEO) and temporarily holds the role of sole director, a position intended to transition to Emagnus, a distinguished Corporate Service Provider based in Curaçao. Emagnus will assume full responsibility for directorship duties, providing seasoned expertise and further reinforcing the company's governance framework. This transition ensures continuous adherence to local

regulatory requirements and enhances accountability in the company's strategic oversight.

To maintain a lean operational model while upholding high standards of service, the company outsources critical operational and technical functions that require specialized skills. These functions include gaming platform development and maintenance, financial and tax reporting, internal audits, and, notably, compliance activities like Know Your Customer (KYC), Anti-Money Laundering (AML), and Risk Oversight (AMRO). Trusted service providers with proven track records in the gaming industry are engaged for these roles, each bringing established methodologies and extensive expertise to ensure accuracy, reliability, and compliance with global standards.

One of the key partners, Service Synergy, is entrusted with a range of crucial responsibilities, including financial reporting, tax advisory, compliance, and AML management. The dedicated compliance team from Service Synergy provides a full suite of regulatory and administrative services, ensuring that all policies, processes, and controls are both rigorously maintained and continuously aligned with regulatory expectations. This arrangement significantly reduces the company's risk exposure by placing compliance and governance tasks in the hands of certified professionals who possess in-depth knowledge of the gaming industry's regulatory landscape and are experienced in navigating complex international compliance requirements.

By structuring the company to prioritize outsourced expertise in essential yet non-core areas, the company can focus resources and energy on scaling its core business functions and enhancing the user experience. This strategic approach not only optimizes operational efficiency but also strengthens the company's overall governance, minimizes potential risks, and underscores its commitment to responsible, compliant growth in the global gaming market.

Our Services

Our flagship product, vip2bet.com, is launching in Eastern Europe, a rapidly growing market for online gaming and sports betting. This expansion is strategically supported by a well-rounded marketing approach, including partnerships with local affiliates, region-specific

advertising, and targeted social media engagement. These efforts are aimed at establishing brand awareness and driving user engagement across Eastern Europe's diverse digital landscape.

Eastern Europe Market Overview

Eastern Europe's online gambling market is expanding quickly, supported by increased internet penetration, mobile usage, and evolving entertainment preferences. With a combined population exceeding 290 million, countries in this region are becoming attractive hubs for digital gaming. Nations like Poland, the Czech Republic, Hungary, and Romania lead in online gaming demand, especially for sports betting and casino games, where user preference is shifting toward platforms that offer localized content, secure payment options, and regulatory transparency.

In particular, sports betting has a longstanding tradition in the region, with soccer, tennis, and basketball among the top sports for betting enthusiasts. Casino gaming is also on the rise, with a preference for live dealer games and locally themed slot games that provide familiar visuals and culturally resonant experiences. Due to the variety of languages, regulatory frameworks, and economic conditions across the region, successful market entry depends heavily on regional adaptations in product offerings, payment solutions, and customer service.

Tailoring vip2bet.com to Eastern European Preferences

Vip2bet.com is customized to cater to the specific demands of Eastern European players, providing a gaming experience that reflects local preferences and ensures high user satisfaction. The platform supports a wide range of languages commonly spoken in the region, making the interface accessible and user-friendly.

In response to the diversity in payment preferences, vip2bet.com offers secure, popular regional payment methods, including local bank transfers, e-wallets, and mobile payment solutions. These are particularly important in Eastern Europe, where players value reliable and familiar

payment options to make transactions convenient and secure. Vip2bet.com also includes the option for cryptocurrency payments, appealing to the region's growing interest in digital currencies.

Moreover, the platform's game content is tailored to reflect local tastes, featuring themes inspired by Eastern European folklore, historic events, and popular culture. This culturally relevant content strengthens player engagement by delivering games that feel uniquely relevant to Eastern European users. Sports betting offerings emphasize the region's most popular sports, including soccer leagues across Europe, basketball, and niche markets in handball and volleyball.

To enhance customer experience, vip2bet.com provides multilingual support with staff knowledgeable in regional gaming culture and familiar with country-specific regulations and standards. This ensures players can receive prompt and accurate assistance in their preferred language, establishing trust and encouraging brand loyalty.

Regulatory Landscape and Compliance

The regulatory landscape in Eastern Europe is complex and diverse, with each country setting distinct requirements for online gaming operators. Vip2bet.com is fully committed to maintaining compliance with all relevant regulations, prioritizing transparency, anti-money laundering (AML) practices, Know Your Customer (KYC) processes, and secure data handling to ensure responsible gaming and build trust with both players and regulatory authorities.

Future Opportunities in Eastern Europe

As the Eastern European market continues to evolve, vip2bet.com's focus on delivering a culturally resonant, secure, and regulation-compliant gaming experience will be central to achieving long-term success. By staying adaptable to regional trends and regulatory shifts, vip2bet.com is well-positioned to become a preferred choice for gaming enthusiasts across Eastern Europe. This approach, combined with Winever B.V.'s commitment to delivering top-

quality content and superior customer service, will drive sustained growth and establish a strong foothold in this dynamic and promising market.

Our Competitive Advantage

Our strategy for establishing a distinct competitive edge in the gaming industry centers on two main pillars: Dynamic Marketing & Product Localization and Compliance & Player Well-being. Through these strategies, we're committed to delivering a uniquely engaging gaming experience that prioritizes player satisfaction, safety, and ethical standards.

Marketing and Product Localization

Our marketing efforts are geared toward building a strong brand presence and meeting local player preferences through targeted and regionally customized approaches. Key components include:

1. **Product Customization and Regional Appeal:** We prioritize tailoring our game offerings to suit regional preferences, ensuring that game themes, designs, and features resonate with local players. By adapting to cultural and behavioral trends, we create a personalized experience that appeals to diverse audiences worldwide.
2. **Affiliate Partnerships for Targeted Growth:** A core part of our customer acquisition strategy, affiliate marketing allows us to work closely with local partners who understand market-specific nuances. These affiliates drive high-quality traffic to our platform and enable targeted outreach, enhancing brand visibility and supporting efficient user acquisition.
3. **Collaborations with Influencers and Industry Leaders:** We engage with key gaming influencers and industry thought leaders to expand our reach and bolster credibility. By leveraging live streams, game reviews, and sponsored content, these partnerships create authentic engagement opportunities that appeal to dedicated gaming audiences.
4. **Robust Social Media & Digital Campaigns:** Utilizing channels such as Facebook, Instagram, Twitter, and emerging platforms, we strengthen our digital presence through engaging content, targeted ads, and interactive campaigns. Viral marketing efforts, amplified through influencer relationships, will deepen brand recognition and foster loyalty.
5. **Localized Outreach and Direct Marketing:** To supplement digital initiatives, we employ targeted outreach campaigns to connect with key demographics, including sports clubs, households, and corporate groups. This localized approach cultivates trust and loyalty, reinforcing our commitment to providing a tailored and accessible gaming experience.

Compliance and Player Well-being

At the heart of our operations lies a commitment to ensuring that our platform upholds fairness, safety, and responsible gaming standards. We have integrated a comprehensive set of measures that prioritize player welfare and adhere to regulatory requirements:

1. Comprehensive Responsible Gaming Features: Our platform incorporates several tools designed to protect players' well-being:

- Loss Limits: Players can set caps on their spending, helping them manage their budgets effectively.
- Cool-Off Periods: Short-term breaks allow players to step back and control impulsive decisions.
- Self-Exclusion Options: For longer breaks, players can opt to exclude themselves to maintain responsible play.
- Time Limits: Our platform enables players to control their usage, reducing risks of excessive play.

2. Fair Play and Certified RNG (Random Number Generator) Systems: Working with top-tier game providers, we ensure all games are supported by transparent and independently tested RNG systems, reinforcing player confidence in our fair play standards.

3. Transparent Payout Rates (PRT): Favorable and transparent payout rates offer players clarity about potential returns, building trust and positioning our brand as a reliable, player-centric platform.

4. Regulatory Compliance and Anti-Money Laundering (AML) Standards: We have engaged compliance specialists to oversee our Anti-Money Laundering (AML) and Know Your Customer (KYC) processes, ensuring adherence to industry and regulatory standards. Our policies are continuously updated to meet evolving legal requirements, reducing compliance risk and enhancing security.

5. Independent Audits & Certifications: Regular third-party audits of our RNG, payout rates, and responsible gaming tools guarantee that we meet regulatory and industry standards. These certifications further establish us as a trustworthy and responsible gaming provider.

By integrating strong compliance measures, responsible gaming features, and rigorous oversight, we provide a secure and ethical gaming environment. Combined with our targeted marketing strategies and localized product approach, these pillars form the foundation of a lasting presence and continued success in the competitive gaming landscape.

Financial Considerations

As for the forecasted financials, for the first five years of operation we foresee the following:

Thsd USD	Year1	Year2	Year3	Year4	Year5
Revenue total Incl:	1,077	1,766	2,155	2,636	3,223
Casino	1,077	1,335	1,643	2,020	2,485
Sport	-	431	513	615	738
COGC					
Royalties	302	495	603	738	903
Other Direct expenses	151	247	280	316	387
Gross Profit	625	1,024	1,272	1,581	1,934
Operating expenses (OPEX)					
Administrative expenses	129	212	280	343	387
Licensing Expenses	65	70	90	100	100
Marketing Expenses	377	636	711	791	806
Other Expenses	54	106	129	158	193
Total OPEX	625	1,024	1,211	1,391	1,486
PBIT	(0)	1	61	190	448

The financial projections offer a comprehensive analysis of the anticipated Gross Gaming Revenue (GGR) from both Casino and Sports Betting segments, as detailed in the preceding financial table. According to our forecasts, while Casino GGR is expected to experience steady and consistent growth, Sports Betting is projected to demonstrate even stronger annual performance. Notably, the growth in Casino revenue is anticipated to slightly outpace the percentage of royalties owed to casino providers each year, thereby enhancing overall profitability.

Royalties, which represent direct expenses, are projected to remain stable at 28% of Casino GGR. Likewise, other direct costs, primarily consisting of bonuses aimed at boosting player engagement in the initial phases, will also be influenced by commission fees paid to Payment Service Providers (PSPs). Initially set at 14%, these costs are forecasted to gradually decrease to 12% over time as the company capitalizes on loyalty and volume discounts from PSPs, reflecting an optimization of operational expenses.

Marketing expenditures are projected to comprise 35% of GGR in the first year, tapering down to 25% as the company matures. This decline illustrates the variable costs associated with user

acquisition and retention, as early-stage investments in marketing are expected to diminish with the development of a loyal customer base. Administrative expenses are anticipated to remain consistent at approximately 12% of revenue each year. This steady rate of administrative costs aligns with the company's strategic focus on product development rather than diversification into new markets or product lines, ensuring that operational support scales with revenue growth.

Licensing expenses are primarily related to the cost of obtaining the gaming license and any additional costs associated with compliance and reporting obligations. This may include the potential recruitment of dedicated personnel to replace the current outsourcing model.

During the first two years of operation, the owner plans to implement a cost-efficient strategy aimed at generating modest net profits while aggressively expanding market share. This approach underscores the company's commitment to establishing a robust market presence in its formative years, thereby setting the stage for sustainable growth in the long term. By prioritizing market penetration and operational optimization, the company is well-positioned to capitalize on the emerging opportunities within the online gaming landscape.

Conclusions

In conclusion, our business plan outlines a robust and strategic roadmap for establishing a successful and responsible gaming company, placing significant emphasis on regulatory compliance as a foundational element. A critical aspect of this strategy involves obtaining a gaming license from the Curaçao Gaming Control Board. This license is essential to ensuring that our operations adhere to the highest legal and regulatory standards, solidifying our position as a credible and compliant entity within the gaming industry.

By diligently navigating Curaçao's rigorous licensing procedures and maintaining unwavering compliance with its gaming regulations, we are establishing a strong foundation built on transparency and integrity. This commitment is vital for long-term success, as the license will not only validate our platform but also instill confidence among players, partners, and stakeholders, affirming that we operate within a secure and well-regulated environment.

Our comprehensive strategy—focused on product localization, data-driven marketing, and strategic partnerships with leading content providers—works harmoniously with our compliance initiatives. By integrating operational excellence with stringent regulatory adherence, we are dedicated to creating a gaming platform that is not only innovative but also safe and equitable. This holistic approach ensures that we effectively address market demands while upholding the highest standards of responsible gaming and player protection.

Looking ahead, the successful acquisition of the Curaçao gaming license will serve as a cornerstone of our business. It will enable us to cultivate a brand renowned for its commitment to compliance, integrity, and the delivery of an exceptional customer experience. As we move forward, this foundational step will empower us to build trust and loyalty within the gaming community, ultimately positioning us for sustainable growth and success in the competitive landscape of online gaming.