

BUSINESS PLAN 1.0

MOUNTBERG B.V.

April 2024

CONFIDENTIALITY STATEMENT

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Review & Approvals

The following representatives of MOUNTBERG B.V. (hereinafter referred to as “MOUNTBERG”) have approved this document:

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Table of Contents

Company Details	.
Main Contacts	.
Object of the business plan	.
Abstract	.
Executive Summary	3
1 Introduction MOUNTBERG	
1.1 MOUNTBERG Mission	1
1.2 MOUNTBERG Vision	1
1.3 Curaçao Jurisdiction	1
2 Corporate Structure	
2.1 MOUNTBERG Corporate Structure	3
2.2 Cash Flow Structure	3
2.3 Corporate Governance	4
2.4 Management Structure	5
3 MOUNTBERG Product & Services	
3.1 Game Product	6
3.1.1 Slots	6
3.1.2 Table Game and Live Casino	6
3.1.2 Partners	6
3.2 Sources of Income	7
3.3 Banking and Payment	7
4 MOUNTBERG Product & Services	
4.1 Target Audience and Trends	8
4.2 Competitors Analysis	8
4.3 SWOT Analysis	8
4.3.1 Strengths	8
4.3.2 Weakness	9
4.3.3 Opportunities	9
4.3.4 Threat:	9
4.4 Marketing Plan	9
4.4.1 Promotion:	9
5 Systems	
5.1 Technical Infrastructure	8
6 Operations, Back Office & Accounting	
7 AML & CFT and KYS Procedures	
8 Financial Forecast	
8.1 Source of Funds	13
8.2 Forecast	13

Company Details

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Object of the business plan

This document is being provided in an effort to obtain the online gaming licenses currently being issued by the Curaçao Gaming Control Board ("GCB").

Abstract

The business plan is separated into the following six (6) chapters.

Chapter One	(1): Introduction of MOUNTBERG
Chapter Two	(2): Corporate Structure
Chapter Three	(3): MOUNTBERG Product
Chapter Four	(4): MOUNTBERG Marketing
Chapter Five	(5): AML & CFT and KYC
Chapter Six	(6): Financial Forecast

Executive Summary

MOUNTBERG B.V.'s (**hereinafter referred to as "MOUNTBERG"**) business model is providing online casino games to its end users. The solutions extend to software provision with its' main focuses on engaging casino offerings to their players, with over 7,000 games as part of its portfolio. The company will focus on offering a full solution with the functionality of a back office to run the administration, KYC and AML, Gamification, CRM, CMS and other solutions as needed.

MOUNTBERG will conduct its operations through an accredited platform provider that offers a comprehensive casino platform.

For the time being, MOUNTBERG plans to only provide games of chance, where players compete against the house and the outcome is determined at random (such as slots, table games, and live casino games). The company will explicitly request permission from the GCB if it wants to offer other products in the future.

In-depth details about the company, the services provided, the projected financial results, the source of funds related to the first investment, the approach taken with the AML activities, partners, and are all included in this business plan.

Mountberg was established back in August 2020 and is currently operating with 10 live brands.

With the new online gaming licenses currently being issued by the Curaçao Gaming Control Board ("GCB"), MOUNTBERG anticipates that players will feel more secure knowing that their interests are safeguarded.

1 Introduction of MOUNTBERG.

1.1 MOUNTBERG Mission

MOUNTBERG will always put the needs of its customers first and will measure its performance against the most stringent benchmarks in the business. The quality, sophistication, dependability, and commitment of the company's service will speak for itself.

MOUNTBERG's mission is to provide an exceptional online casino experience that surpasses the expectations of our players while upholding the highest standards of integrity, transparency, and responsible gaming. We are dedicated to creating a safe and enjoyable environment for our customers, where they can indulge in a diverse range of casino games while adhering to legal and ethical guidelines.

1.2 MOUNTBERG Vision

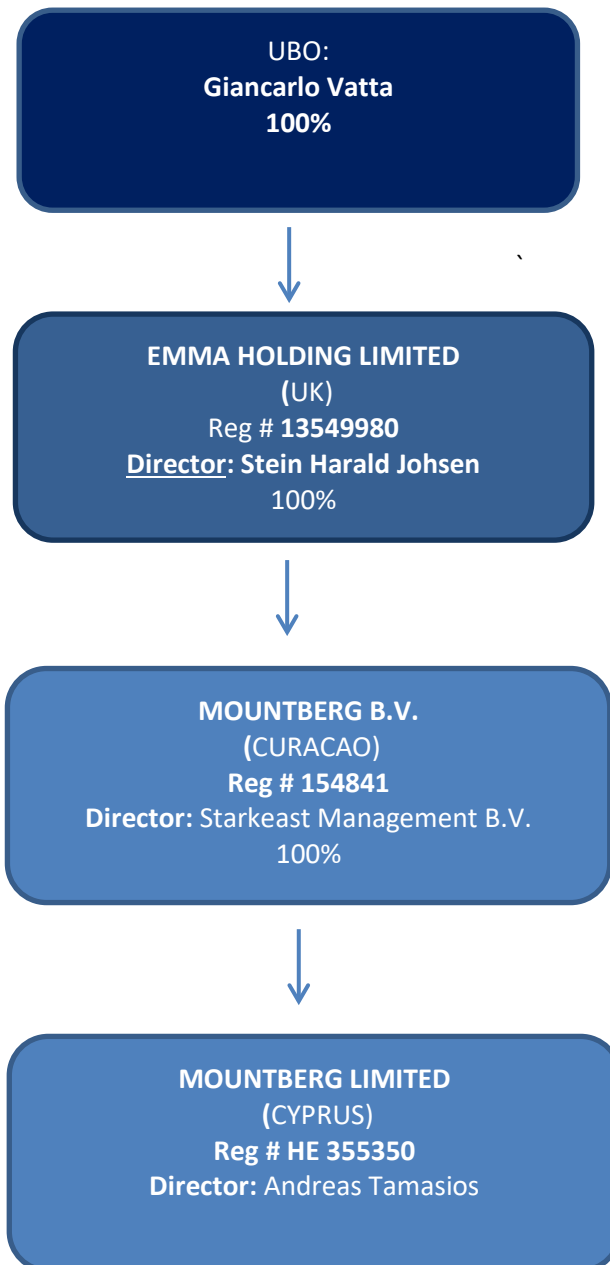
MOUNTBERG envisions itself as a trailblazer in the online casino industry, guided by the seasoned expertise of its founder who possesses a wealth of experience and a keen insight into emerging trends across diverse verticals. Our vision is rooted in a strategic approach that prioritizes player safety, unparalleled gaming experiences, and operational agility.

- **A Player-Centric Focus:** We aspire to venture into multiple markets, establishing a brand synonymous with player safety, exceptional experiences, and adaptability.
- **Agility as a Core Strength:** MOUNTBERG recognizes the dynamic nature of the gaming industry and aims to leverage its agility as a core strength. Our ability to pivot swiftly in response to evolving trends and capitalize on emerging opportunities will be a defining factor in our success.
- **VIP Experience as a Competitive Edge:** Our vision revolves around offering a VIP experience that sets MOUNTBERG apart from the competition. By concentrating on personalized and premium services, we aim to attract and retain a loyal player base, fostering long-term success.

In summary, MOUNTBERG envisions itself not just as an online casino operator but as a dynamic force, setting industry benchmarks through a strategic blend of player-centric focus, operational agility, and a commitment to delivering an unparalleled VIP experience. This vision positions MOUNTBERG to thrive in a rapidly evolving gaming landscape while avoiding the pitfalls associated with excessive overhead and lack of adaptability.

2 Corporate Structure

2.1 MOUNTBERG Corporate Structure



2.2 Corporate Governance

The Board of Directors (the Board) initially comprises Mr. Menno Jordaan. The Board holds a pivotal role in safeguarding MOUNTBERG's success, upholding the legitimate interests of UBO, and considering the perspectives of relevant entities, including the GCB.

The board provides oversight and strategic direction for the company. They ensure that the company operates in accordance with its mission, goals, and legal obligations, while also safeguarding the interests of the UBO.

Responsibilities of the Board encompass setting and overseeing strategic goals, formulating rules, monitoring the performance of the management team, and overseeing the company's risk management and compliance frameworks. This includes a commitment to adhering to local and international legal and regulatory requirements. MOUNTBERG is unwavering in its dedication to the principles of good corporate governance, including accountability, fairness, transparency, and independence. These principles serve as the foundation for achieving strategic objectives, sustained growth, an enhanced business environment, and the promotion of best practices and performance.

The Board will always provide the necessary leadership and ensure that MOUNTBERG will keep strong channels of information sharing and dissemination regarding its operations. Consequently, this required us to establish distinct lines of authority and monitor the performance of all operational components.

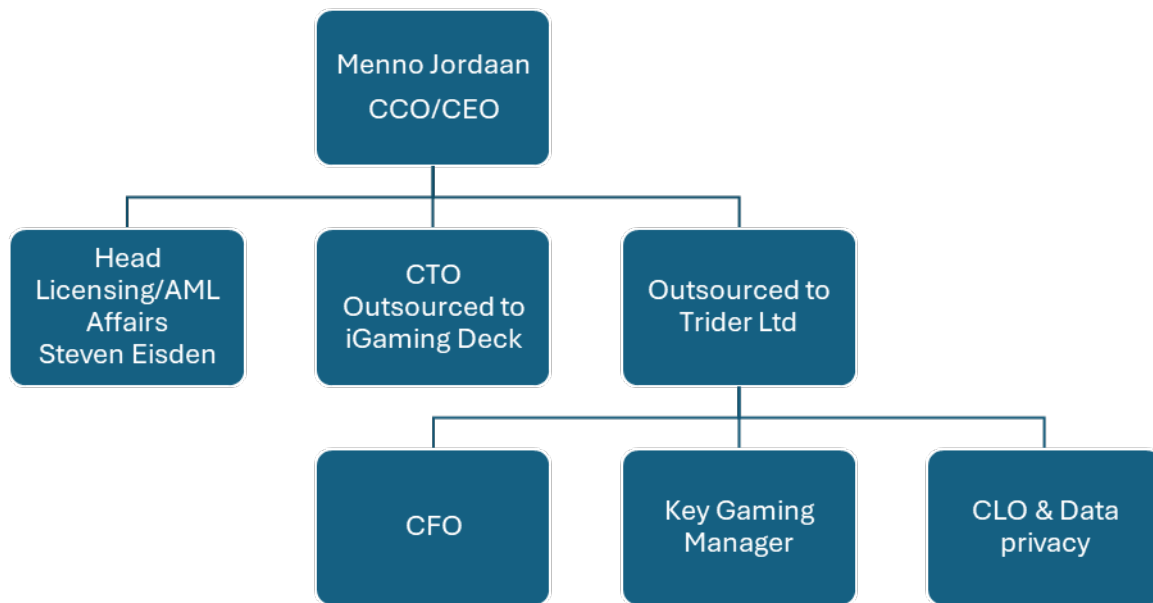
Menno Jordaan as CEO and CCO interact regularly with senior management, including the C-levels, to review operational performance, discuss strategic initiatives, and address any challenges or opportunities facing the company.

While senior management handles day-to-day operational decisions, significant strategic decisions and major transactions require board approval. The board delegates authority to senior management for routine matters but remains actively involved in key decision-making processes, including but not limited to major investments, acquisitions, divestitures, changes to corporate governance, and significant financial transactions.

The company engages external legal counsel specializing in gaming law if necessary to provide legal support and advice to the board and senior management. These legal advisors assist in contractual negotiations, and legal disputes, ensuring the company operates within the bounds of the law.

2.3 Management Structure

MOUNTBERG's management team is composed of a diverse and skilled group of professionals, including but not limited to the following key individuals:



- Chief Executive Officer (CEO) – Menno Jordaan
- Head Licensing/AML Affairs – Steven Eisdén
- CTO - Outsourced to iGaming Deck.
- Key Gaming Manager (Games, Risk & Fraud) – Outsourced to Trider Ltd
- CLO & Data protection – Outsourced to Trider Ltd
- CFO - Outsourced to Trider Ltd

In our management structure, the Chief Executive Officer (CEO), Menno Jordaan, holds the central leadership position, overseeing all aspects of the company's operations and strategic direction. Reporting directly to the CEO is the Head Licensing /AML, Steven, who ensures strict adherence to legal and regulatory requirements, including anti-money laundering (AML), compliance procedures and responsible gaming matters.

Given the complexity and specialized nature of technological infrastructure and development, the role of Chief Technology Officer (CTO) is outsourced to iGaming Deck.

Certain functions, including Key Gaming Manager, CLO and CFO are outsourced to Trider Ltd, a Management Services Company with independent professionals specializing in these services.

This strategic decision allows MOUNTBERG to leverage external expertise while maintaining a focus on core business functions.

Comprehensive agreements between MOUNTBERG and Trider Ltd, as well as between MOUNTBERG and iGaming Deck outline the terms of our outsourcing arrangements. These agreements are available upon request, demonstrating our commitment to transparency and clarity in our operational partnerships.

3 MOUNTBERG Products & Services

3.1 Game Product

MOUNTBERG takes pride in offering a diverse and engaging portfolio of online casino games designed to captivate and delight players. With over 7,000 games as part of its extensive collection, MOUNTBERG ensures a thrilling and dynamic gaming experience for enthusiasts from leading providers such as Pragmatic Play, Play N Go, Relax or Gameart.

The game selection spans a variety of genres, including classic slots, table games, and live casino offerings. The emphasis on quality, innovation, and user experience is evident in each carefully curated title. MOUNTBERG's commitment to staying at the forefront of industry trends is reflected in the continuous expansion and enhancement of its game offerings, providing players with a rich tapestry of choices.

Whether seeking the excitement of slots, the strategy of table games, or the immersive atmosphere of live casino interactions, MOUNTBERG's game product is crafted to meet the diverse preferences of its player community.

With cutting-edge technology and a keen eye for emerging trends, MOUNTBERG ensures that its game portfolio remains a cornerstone of the exceptional online casino experience it aspires to deliver.

3.1.1 Slot Games

Customers will be able to participate in the games offered according to the terms and conditions and other policies set by MOUNTBERG. Customers must meet certain criteria's in order to be found eligible to open a playing account on the website. Customers who provide the requested information and passed the KYC procedures successfully, would be able to open an account to participated in one of the games offered.

3.1.2 Table Games and Live Casino

MOUNTBERG offers an exhilarating gaming experience through its diverse array of table games and live casino offerings. The platform ensures a fair and secure environment for its players, with participation subject to adherence to the specified terms, conditions, and policies. To open a playing account on the website, customers must fulfill certain criteria and successfully complete Know Your Customer (KYC) procedures. Once these requirements are met, players gain access to a thrilling selection of table games and live casino options. From classic favorites like blackjack, and roulette to the immersive live casino environment with real-time dealers, MOUNTBERG provides an engaging and authentic gaming atmosphere for eligible participants.

3.1.3 Partners

In alignment with MOUNTBERG's discerning approach to partnerships, the company exercises meticulous care in selecting collaborators. From the foremost experts in technology to the paramount standards in player safety, MOUNTBERG prioritizes associations that epitomize excellence in their respective domains. This stringent selection process underscores MOUNTBERG's commitment to fostering relationships with partners who share its dedication to the highest levels of technological prowess and player well-being.

- **IGaming Deck**

IGaming Deck offers its clients a comprehensive and cutting-edge casino platform tailored to meet the evolving needs of the online gaming market.

- **Starkeast Management BV**

Starkeast Management BV is the director that will manage the structure. Starkeast Management BV will ensure that MOUNTBERG remains in good standing and complies with all the applicable laws and regulations.

- **Trider Ltd**

Trider Ltd is a reputable company headquartered in Malta that offers to its business partners a customized gaming support including but not limited to Marketing, legal advice, CRM (Customer Relationship Management).

3.2 Banking and Payment

MOUNTBERG already holds operational bank accounts, partnering with reputable institutions like Meno Bank and Valletta Pay. Furthermore, a dedicated bank account has been set up to segregate player funds, ensuring accurate management of player deposits, payments, and associated responsibilities.

For payment processing, MOUNTBERG through his designated merchant of record, is poised to apply for major global e-wallet solutions, encompassing both fiat and cryptocurrency methods. Further diversification will include the incorporation of various credit card and debit card methods, voucher code systems, and other non-standard payment processors. With numerous providers available, this ensures continuity of services.

The establishment of a master agreement with reputable companies will bolster the efficiency of the back office and player functionality. This intricate process will be meticulously overseen by our team, aligning risk scoring with deposit methodology to enhance player protection.

Deposits and withdrawals are subject to the stipulations outlined in the Terms & Conditions and other policies, which may undergo periodic amendments. MOUNTBERG commits to processing withdrawal requests within 2 business days, contingent upon the provision of all requisite due diligence documentation.

Deposited amounts will be available in the account within a reasonable amount of time after the confirmation of the deposit on all available deposit options unless extra verification procedures are needed. MOUNTBERG reserves the right to use additional procedures and means to verify the identity (Know Your Client) when effecting deposits or withdrawals.

4 MOUNTBERG Marketing Strategy

4.1 Target Audience and trends

MOUNTBERG's target audience is diverse, encompassing gaming enthusiasts seeking an immersive and secure online casino experience. Our offerings cater to a broad demographic that values entertainment, innovation, and responsible gaming practices. With a focus on player safety, MOUNTBERG ensures a welcoming space for both seasoned players and newcomers. The target audience includes individuals who appreciate a wide array of casino games, from classic slots to live dealer experiences. MOUNTBERG will focus its operations with a strategic focus on select European and LATAM countries while also venturing into burgeoning markets in Asian at a later stage always avoiding restricted territories such as Turkey, the United States of America, Bonaire, Curacao, France, the Netherlands, Saba, St Eustatius, St Martin, Spain, Australia, and the United Kingdom. Additionally, countries listed on the FATF Blacklist are not included in our target market.

The global online casino gambling sector is currently witnessing increased momentum across various regions. According to projections by Market Research Future, this specialized gambling sector is poised for a notable growth rate of 7.32%, with an anticipated market value reaching USD 503.54 Billion by 2030. The rise in per capita income worldwide is driving heightened interest in this market. The demand for gambling experiences through both desktop and mobile platforms is on the ascent. Presently, gambling has become readily accessible through mobile devices, and this persistent trend is expected to provide significant growth opportunities for the global casino market. These factors collectively contribute to the substantial growth potential of the Global Casino Market.

4.2 Competitors Analysis

Even though MOUNTBERG is a well-established company, it remains crucial to conduct a comprehensive competitor analysis as it continues to fortify its position within the competitive landscape of the online casino industry.

In the dynamic landscape of the online casino market, MOUNTBERG has firmly established its presence with 10 brands at the moment, each tailored to cater to diverse gaming preferences and demographics. Through strategic expansion and meticulous brand development, MOUNTBERG has solidified its position as a leading player in the industry, offering a wide array of gaming experiences to audiences worldwide.

To further distinguish itself from competitors, MOUNTBERG aims to solidify its niche by prioritizing personalized services for players. This includes fostering a robust and immersive gaming environment, offering an exclusive VIP customer experience replete with tailored rewards, delivering customized gaming recommendations, extending individualized promotions and bonuses, ensuring responsive 24/7 customer support, providing flexible payment options, implementing personalized communication strategies, and curating a tailored gaming experience.

4.3 SWOT Analysis

MOUNTBERG understands the massive market potential of the iGaming industry. However, MOUNTBERG recognizes that there are major risks in the iGaming industry. To this end, we have completed a Strengths, Weaknesses, Opportunities, and Threats analysis.

4.3.1 Strengths

MOUNTBERG's strength lies in its highly skilled and experienced team in the online casino sector, backed by solid finances, operational stability, and strategic partnerships. With the founder's extensive industry know-how, the team brings valuable insights, effective leadership, and a keen understanding of market trends. By forming partnerships with reputable gaming platforms and management entities, MOUNTBERG boosts its operational efficiency and ensures regulatory compliance. Additionally, the company's dedication to personalized services, like VIP experiences and tailored promotions, sets it apart as a player-focused platform.

4.3.2 Weakness

The fast-paced gaming industry presents challenges in keeping up with evolving technologies and consumer preferences, amidst fierce competition from innovative rivals. Balancing innovation with responsibility is crucial to avoid overextending resources while staying competitive in the dynamic gaming market.

4.3.3 Threat:

The ever-evolving regulatory landscape in the online gaming sector poses a persistent challenge, which demands agility and adaptability to changing legal frameworks. Additionally, the intense competition within the online casino market presents challenges in maintaining differentiation amidst formidable rivals, requiring continuous innovation. Navigating these threats is crucial for the company to maintain its position in a dynamic and competitive industry. In response, the company is dedicated to close collaboration with regulatory authorities, ensuring proactive compliance. This commitment not only enhances the quality of its offerings but also demonstrates dedication to staying updated on regulatory changes, reinforcing resilience in the face of industry challenges.

4.3.4 Opportunities:

The growing global online casino market presents an opportunity for MOUNTBERG to extend its reach into new devices, including smartphones and tablets, catering to the evolving preferences of a diverse player base. This expansion into mobile gaming allows us to tap into a wider audience while enhancing accessibility.

Simultaneously, industry's dynamic nature grants us the chance to be at the forefront of technological advancements and innovations.

By embracing cutting-edge technologies, we can differentiate ourselves and offer unique and immersive gaming experiences that resonate with tech-savvy players.

4.4 Marketing Plan

MOUNTBERG's comprehensive marketing strategy leverages affiliate partnerships strategically to drive significant traffic to all of its brands. These partnerships, built on existing connections, secure favorable rates and involve dedicated efforts, positioning MOUNTBERG to consistently increase revenue month by month.

Beyond affiliate marketing, MOUNTBERG's approach integrates collaboration with SEO and content marketing, enhancing brand awareness and diversifying traffic sources. This multi-faceted strategy not only reduces reliance on affiliates but also ensures adaptability as the business expands.

The focus extends beyond acquisition to retention and loyalty, where MOUNTBERG's collective expertise in building and executing CRM and Loyalty programs aims to elevate average deposits and lifetime player value, mitigating risks associated with bonus abuse.

GOAL: DIGITAL & EXTERNAL BRAND AWARENESS

Strategy: Online digital presence

Our goal is to elevate MOUNTBERG's brands digital awareness, employing a dual approach through affiliate marketing and SEO content marketing. In the realm of affiliate marketing, strategic partnerships will be forged to amplify MOUNTBERG's brands reach across diverse online platforms.

Thanks to MOUNTBERG's years of experience, we aim to secure favorable rates and dedicated efforts from affiliates to drive significant traffic.

Simultaneously, content marketing initiatives will be deployed to enhance brands visibility. By creating compelling, informative, and shareable content, MOUNTBERG seeks to continue positioning itself as an authoritative and engaging presence within the online gaming community. This multifaceted strategy aims to not only expand MOUNTBERG's digital footprint but also solidify its status as a prominent and reputable player in the online casino industry.

5 AML & CFT / KYC Procedures

5.1 Risk evaluation and management

We continuously risk assess our players when they hit predefined deposit thresholds but to ensure we apply a true Risk-based Approach (RBA) we have also created ongoing monitoring channels where we will also assess risk on a time to time basis.

As a part of the AML/CFT regulatory framework, it requires our organization to adopt measures, policies, controls, and procedures that are commensurate to the money laundering and funding of terrorism (“ML/FT”) risks to which they are exposed to prevent and mitigate the said risks from materializing themselves.

The risk-based approach recognizes that the ML/FT risks faced by each sector and each subject person are different and allows for resources to be invested and applied where they are most required. It is diametrically opposed to a prescriptive tick-box approach and entrusts subject persons with significant discretion in its application. Thus, a risk-based approach envisages the application of checks that are proportionate to the assessed risk. High-risk areas should be subjected to enhanced procedures, whilst simplified or reduced controls may be applied in areas of low risk.

How is this to be achieved? The risk-based approach envisages the application of a risk management process in dealing with ML/FT, including recognizing the existence of risks, undertaking a risk assessment, and implementing systems and strategies to manage and mitigate the identified risks.

The cornerstone of the risk-based approach is the risk assessment which has to be carried out at different stages of a subject person’s activities. This assessment allows the subject person to identify its ML/FT vulnerabilities and the ML/FT risks it is exposed to. On this basis, the subject person will be able to draw up, adopt, and implement AML/CFT measures, policies, controls, and procedures that address any identified risks.

However, each customer exposes the subject person to different risks. A customer-specific risk assessment must therefore be carried out so that the subject person can identify potential risks upon entering into a business relationship with, or carrying out an occasional transaction for, a customer. This assessment enables the subject person to develop a risk profile for the customer and to categorize the ML/FT risk posed by such a customer as low, medium, or high.

We use an automated Risk Assessment Tool as well; this is a tool created internally with our MLRO that considers 8 groups of risk:

- Jurisdiction/Country
- Deposit Methods
- Amount of same or distinct Deposit Methods
- Deposit vs Wager
- Wagered last 12 months
- Net hold last 12 months
- Deposit amount last 12 months
- Game type

The risk in each group goes from 1 to 10 and is matched against a scoring sheet, the sum of all groups' scores divided by 8 gives us the end result, which places the player in LOW, MEDIUM, or HIGH RISK.

This is live so any change at any given moment will affect the score and the risk can decrease or increase, all this is connected to a reporting channel we use to monitor players and take action upon this Risk-Based approach to decide whether we need simplified, regular or enhanced due diligence.

As a general rule, once suspicious transactions, activity, or behaviors are found, these must be reported to the MLRO in case further actions are needed. This report is made through the called SAR/STR (Suspicious Activity Report / Suspicious Transactions Report)

5.2 Policies and Procedures

Policies and procedures are meticulously crafted and implemented internally by our compliance and legal team. Committed to upholding the highest standards, our team ensures that all protocols adhere strictly to regulatory guidelines, fostering an environment of fairness, transparency, and integrity. With a firm dedication to compliance, our terms not only meet but exceed industry regulations, reflecting our unwavering commitment to ethical practices and responsible gaming.

The board holds a firm belief that the team responsible for formulating and implementing our policies and procedures are highly qualified, exceptionally competent, and devoid of any conflicts of interest. Our rigorous selection process ensures that only the most capable and ethical professionals are entrusted with these critical responsibilities. Additionally, ongoing training and evaluation further reinforce their expertise and commitment to upholding the highest standards of governance and compliance within our organization.

6 Financial Forecast

6.1 Forecast*

	YTD1	YTD2	YTD3
GGR generated	90,351	94,869	99,612
# of sites	16	21	25
GGR per site	5,829	4,518	3,984
Revenue:			
Platform fees	1,998	2,098	2,203
Games royalty	14,325	15,041	15,793
Payment fees	16,411	17,231	18,093
Affiliates	959	1,007	1,057
Other	2,378	2,497	2,621
Revenue Total	36,071	37,874	39,768
Revenue % to GGR	40%	40%	40%
Cost of Sales:			
Platform fees	3,335	3,502	3,677
Games royalty	8,761	9,199	9,659
Payment fees	12,842	13,484	14,158
Affiliates	949	996	1,046
Other	4,303	4,518	4,744
Cost of Sales Total	30,190	31,699	33,284
COS % to GGR	33%	33%	33%
Gross Margin	5,881	6,175	6,484

Revenue Growth Outlook: The forecast indicates a promising growth trajectory in Gross Gaming Revenue (GGR) over the upcoming periods. This growth is anticipated to be supported by an expanding number of sites, which is expected to result in an increase in GGR per site.

Cost Management and Gross Margin: While revenue is projected to increase, it's essential to closely monitor and manage costs to maintain a healthy gross margin. Controlling costs of sales will be crucial in ensuring that revenue growth translates into improved profitability.

Regular Monitoring and Adjustment: The company will engage in regular monitoring and adjustment of the forecast, ensuring it remains dynamic and responsive to actual performance and market dynamics. This proactive approach enables the company to maintain agility and adaptability to changing conditions as they evolve.

*This forecast is based on the presumption that there won't be any significant obstacles. These figures might be higher or lower depending on how quickly the economy is expanding.