

TC Entertainment N.V.

Business Plan

Version:	2
Date of version:	15.08.2024
Created and approved by:	Sonmez Hatice Aydogan
Confidentiality level	

1. Confidentiality statement

This is a confidential document between TC Entertainment N.V. (herein referred to 'the Company'). It contains confidential and / or proprietary information that may not be

disclosed or discussed with anyone outside the aforementioned organizations, without written approval of the Company.

2. Introduction

The Company is set up under the laws of Curacao and has a remote gaming license with Curacao e-Gaming. The Company is owned by Mrs Sonmez Hatice Aydogan (50%) and Mr Unal Aydogan (50%). They bring more than 20 years of experience in the gaming industry. The company is self-sufficient and the funds are generated by the business income. The Company's activity is based on offering of casino and sport games from the top and highly respected developers, duly licensed in reputable jurisdictions.

The Company currently operates under Curacao licence within the jurisdictions where it is allowed to operate. If at any point in time the company is disallowed from any market where the activity is deemed critical then the Company will consider an application to operate in such jurisdiction. However, this has not been forecast at the present stage. The Company does not have any other license from other jurisdictions as of now. Depending on the actual financial performance and position and Management objectives, the Management of the Company may consider another license application from countries that may require such license to operate legally.

In aspiring to capture a significant market share, the business model is very simple to keep the service simple and easy to enjoy and to provide an excellent service to its customers. The main objective of any business is profit. the Company will advocate responsible gaming and will also ensure that it provides adequate security measures, while still providing entertainment through its casino games.

The licence from Curacao has been sought since Curacao is deemed to be one of the highest regarded jurisdictions with a thorough legislation for regulating any gaming business, and having reasonable taxes imposed. Above everything else, the regulator is regarded as very approachable, where they sit and listen to, not only players' concerns, but even operators' concerns. and that is deemed critical for the Company as we start our journey in the remote gaming world.

The company operates its iGaming services via the following URLs: betorder.com, bets4you.com, globalbahis.com, hititbet.com, lordspoker.com and troybet.com. The websites themselves are marketed using various marketing tools and through different marketing offers to attract enough players to attain the market share desired. Consideration of legal means of marketing in the different jurisdictions is also taken into account. A substantial amount of investment is made towards attracting players to the websites; that would ultimately help the company register out target players' database.

The websites are developed in such a manner that allows both registered players as well as prospective players to obtain details and information about the various casino games and sport that is offered. This will include the general terms & conditions governing the modus operandi of the Company and the player's gaming activities.

3. Objectives

The company is seeking to adopt strategies of market development and market penetration to enhance their growth and presence in the gaming market. As part of their ongoing strategy, the Company is seeking to enter new markets via the Curacao B2C gaming license.

The primary objective of the Company presently is to continue operating the B2C remote gaming licence from Curacao. This would allow the Company to operate with a licence from reputable jurisdictions including Canada, New Zealand, Finland, Norway, Germany, and Austria. The target markets with the Curacao licence in hand will also include other European jurisdictions where the Curacao licence is accepted. Within these markets we aim to become a well trusted and well-regarded entity within the gaming industry.

Other important objective for the Company is that we offer a good quality service in terms of design that reach and exceed the players' expectations as well as following a non-aggressive, non-invasive method of advertising the company's product. We want players to come to our websites because they genuinely enjoy their experience with us. From an operational perspective our aim is to develop and implement data analytics to develop and ultimately improve risk management effectiveness, resulting in better management and attaining better results for us, as all player wins would be adequately covered for, allowing a good profit margin for the company.

We aim to be customer focused, providing players with a stable gaming entertainment environment and fast personalised services through the customer support team. Services are simple to use with minimal bureaucratic processes, however not at the expense of becoming non-compliant. Hence due diligence requirements are being stated as part of the Terms & Conditions and players' accounts will be blocked, and players disallowed from playing if they fail to comply with the requirements as prescribed by law.

3. Our business models

Key partners: 1. iGaming experts 2. B2B game aggregators 3. B2B game developers 4. Payment service providers 5. Data Center 6. Cloud provider	Resources: 1. Creative and competent staff 2. High quality gambling content	Valuable offers: 1. Accessibility 2. Convenience 3. Risk mitigation 4. Customer-oriented approach 5. Wide selection of casino games	Client interaction: 1. Remote support 2. Personal support 3. Community 4. Personal offers 5. Collective improvement of products	Client segment: 1. Players via affiliates 2. Casino players 3. Internet users
	Key business activities: 1. Branding 2. Service development 3. Developing of loyalty program 4. New customer engagement and customer retention		Sales channels: 1. Advertising in social media 2. Advertising in internet and printed magazines 3. Affiliate programs 4. Direct sales	
Expenses: 1. Office rental 2. Hosting colocation rental 3. IGaming platform rental 4. Commissions of games provider 5. Staff costs			Source of income: 1. Gross gaming revenue	

5. The iGaming industry and the Company

The iGaming Industry is an ever-changing industry and as a consequence, gaming operators are forced to constantly change to keep up with the new developments in the industry. The global iGaming industry has continued to grow, and new operators keep mushrooming hoping to attract a slice of the market share. The European market keeps fragmenting with more jurisdictions joining the likes of UK, France, Italy, Spain, Sweden, and Denmark: introducing iGaming legislation to regulate their internal markets. Operators focusing on the European markets are being forced to seek multiple licences in order to accept players from the said jurisdictions. This is obviously proving to be a major cost and duplication of effort for the said operators.

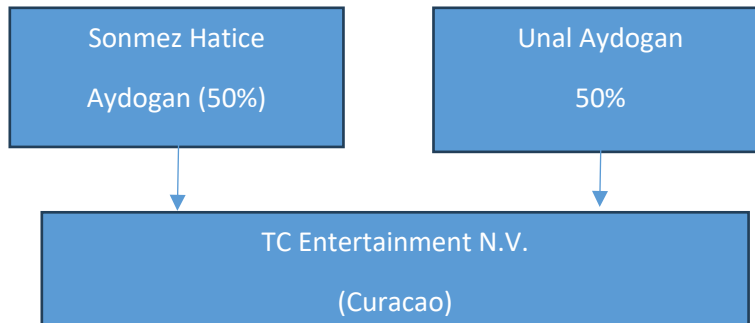
The economic climate does not seem to particularly affect the industry. Even though players are continuously bombarded (via the various news networks) with the continuous global recession – the industry keeps growing. In fact, a steady growth is expected as outlined below:



companies operating over 400+ licences. Once the said jurisdictional benefits are encompassed with the company's internal competitive advantages, the likelihood of success is next to certain.

6. Company structure

TC Entertainment's company structure is straightforward, as depicted in the diagram below:



7. Management of Operations

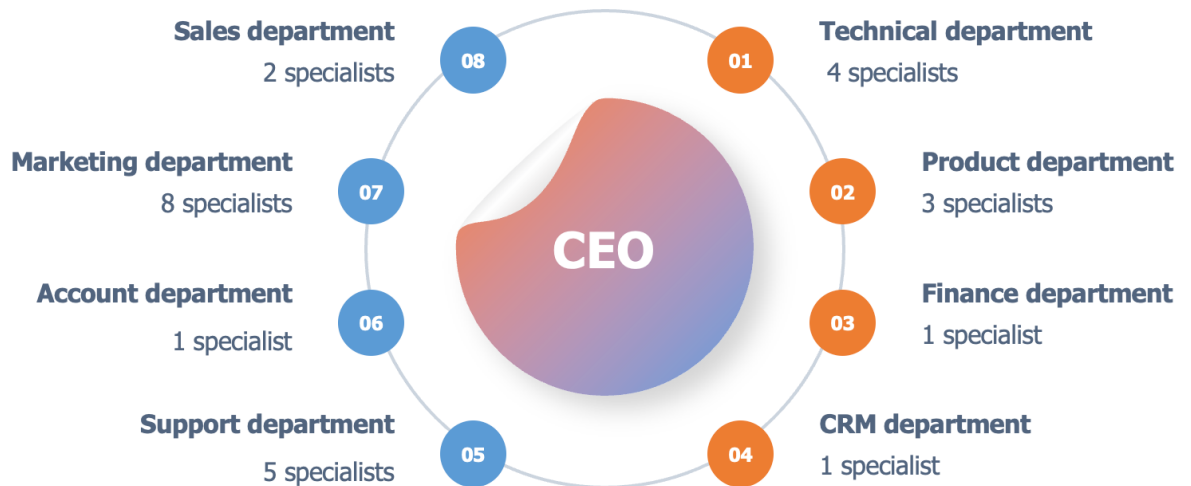
We have huge marketing experience across all verticals. More than 20 years' experience of working with gambling. Our clients are the biggest casinos over the world.

Growth and market share are TC Entertainment's main strategies and consequently, the company will invest in growing a team who will be capable of achieving the desired objectives.

Due to the extensive resources available to support the gaming industry, it is our intention to set up ample manpower and gradually increase our local presence. The company will have up to 10 employees and the number will be increased as the business continues to grow. Their guidance and further commitment to grow with our company is an essential component to solidify our progress in the industry.

The Management team of the Company will be headed by the owners, and will be made up of employees working within the Company and outsourced if required. The goal is to eventually have a fully operational team here to cater for all the human resourced required to operate under the Curacao gaming license.

TC Entertainment's company structure will comprise of:



8. Our Product

TC Entertainment's Platform is a combination of multiple systems and subsystems cumulatively representing a product offered to the company's clients for the latter to run online gaming businesses.

a. Set up

We are constantly conducting all necessary tests on the system to ensure that its security, stability and expected performance are maintained. Any proposed changes to the software will be rigorously tested on the staging environment first, before they may be released into production. Rollback functionalities will always be available to enable a quick return to a previous system state in the event that any unexpected behaviour is experienced after releasing software.

The web portal is based on CMS built-in which can be administered by the content administrator.

A player will be required to register an account before he can access the full range of casino games.

Other features include:

1. Create/update user profile
 - Personal information
 - Contact information
 - Payment method (credit/debit card/other)
 - Attach documents
2. Single wallet
 - Check transactions

- Check balance
 - Deposit money
 - Request for money withdrawal
3. Play games for real and/or bonus money
 4. Personalization
 - Set way to receive notifications
 - Internal email
 - Personal email
 - SMS
 - Privacy Settings
 5. Responsible Gaming

Our website shall offer our players with all the necessary functionalities related to responsible gaming in line with Player Protection Directives. In particular, the system has a functionality available for players to set any desired bet limits. User deactivation and prohibition of subsequent logins is also possible. Players shall have an option to set deposit, wager, and loss limits within any specified time periods, immediately upon first login after account registration. Such limits are applicable for all games offered within the same website. Limit setting functionalities always remain available to the player.

b. Back Office system

The back office is a web-based tool for administration and management of the Gaming System.

Only the Company's staff will have access to the back office and the appropriate teams from our outsourcing partner. The employees have restricted access to the back-office modules and data according to their job roles.

Security

1. The access to the back office is strictly through https (SSL) encrypted connection.
2. Submitted data on the web server uses encryption to support high level of security and prevent unauthorized access.
3. All sensitive data that is stored in the database is encrypted for preventing unauthorized access.
4. The System will provide strong authentication at the Web server
5. The trusted subSystem model will be used, and per-user authorization will occur within the application.
6. User access and permission roles on module pages on the Web server will be controlled with authorization. Permissions within the database will be controlled by a user-defined role.

Scalability

The system is built around loosely coupled components that exchange data through well designed APIs. The communication is secured and encrypted. The system is based on distributed architecture which allows vertical and horizontal scaling.

Availability

All applications in the infrastructure for the Gaming System are deployed on a minimum of 2 servers and behind a load balancer to maintain high availability.

i. User management and access controls

Access control

Each action that exists in the system as well as display field is mapped to specific privilege. All existing modules or functionalities also have specific privileges. For the user to be able to see or use specific action he must have the appropriate privilege, in one of the roles assigned to him.

ii. Record logs, changes to games and audit requirements

All changes to player information and the player wallet will be permanently logged. Details including the timestamp and the respective user who carried out the change will form part of the logged information.

Our system has the functionality to flag high betting volumes or high value winnings by a specific player. Flagged accounts will be investigated to ensure that there are no anomalies in the system or errors in the games that might have led to the high value winnings.

The system is tracking each action taken in the system with the following information:

1. Username;
2. Timestamp;
3. Action;
4. Changes made; and
5. Auto time outs.

iii. Platform modules

The system will contain the following sections:

1. Roles and access management;
2. Player management;
3. Management of player Segments;
4. Fraud Management;
5. Cashier (payments and transactions);
6. Bonuses;
7. Email templates management;
8. Responsible gambling/gaming;
9. Game management; and
10. Dashboards and reports.

9. Technical Setup

Security details

The data centre provides all the necessary security through its firewalls, anti-DDOS, and continuous monitoring systems. All servers are constantly monitored via admin-software focusing on the proper use, temperature, and any failures.

10. Marketing Plan

Target customers



The aim is to reach out to players across our target regions. We understand that there may be some relevant imposed regulations in those target regions. The company will consider the legal requirements of each jurisdiction and will only target players in jurisdictions where the Curacao licence is accepted. Besides the consideration of the legal requirements, we will also perform a financial feasibility to gauge its viability.

The marketing will be targeted to different age groups and utilising different marketing promotions, offers and bonuses to attract the various types of players. TC Entertainment will ensure that no form of marketing is deemed to be attractive for underage players. To the contrary the Company Services will be strictly marketed for adults only. The aim is to attract players having the largest disposable income as well as prospective players that are attracted to this type of entertainment. We will align our marketing targets to those age group of 30+ years old, which according to our research has the most disposable income.

The Company wants to do things right and not only wants to have the licence but it also wants to ensure its prospective players, that the company will not defraud them, but neither will they allow their players to defraud the company or other players, through irregular manipulations that would disadvantage other players and / or the Company. We will ensure adequate measures and controls that will manage such risks and any issues arising.

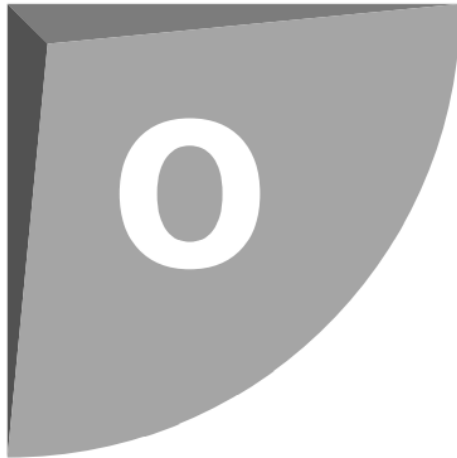
Our manpower will be carefully selected to comprise of very knowledgeable persons about the gaming industry. We plan to provide them with adequate training and guidance to ensure that the service that they provide is second to none.

To boost our player database, we will adapt a suitable affiliate system. Independent affiliates will bring new players for a fee. The affiliates will be provided with their personal cabinet and an affiliate link, which allows the connection of players to the affiliate. An affiliate will get a fee for each registration, deposit or bet depending on a revenue share program. This will be specifically geared towards attracting business solely to the Curacao licensed business, and hence its activity is focused on the Company. The company will also encourage player feedback through customer support to better

understand what the players desire in their experience with the Company. Any complaints received, will also be logged, investigated, and even acted upon as soon as possible to ensure the best service to players.

11. Market locations





OPPORTUNITIES

1

New markets.

From time to time countries in which gambling is illegal now are changing their legislation. That can give us new opportunities.

2

Competitors.

It's an usual situation that some companies are shut down and this increase our chances to take a bigger part of the market.

3

Grows.

This market is actively growing each year (approximately 10% per year).

4

New solutions.

We actively working to attract new payment and game providers, that increase the popularity of the Company.

5

New partners.

We unstoppable working to spread our business network. Each our new partner it's a big step in our success story and can bring a huge profit for a company.

SWOT ANALYSIS

In terms of strengths, operational excellence is presented in such areas as a flawless gaming experience, ease of use of the platforms, and responsiveness of customer service. This followed positive testimonials from customers and partners pointing to the strength of the variety of games, fair play policies, and attractive bonuses that have made the company popular in the market. Besides, innovation is another one of its great strengths, having exclusive game titles that offer a different kind of experience for crypto gambling. The business is further bolstered by valuable assets such as proprietary technology and intellectual property.

However, the organization also has some of its weaknesses. Definitely, the main areas of weakness that the organization needs to work on include the game variety, incorporation of new technology, and the customer support among others. For that matter, some customers and partners have also complained of issues related to slow withdrawals or strict conditions on bonuses. This really points out the areas where they need improvement and early sorting. The company can also be exposed to some competitive gaps in technology, market reach, and brand recognition among others, which otherwise could hamper growth.

In the area of opportunities, this would relate to the firm tapping into emerging trends such as mobile gaming, e-sports, and the usage of cryptocurrencies. Its strength of innovative technology and ethical gaming practice may attract valuable partnerships. Adjacent markets and geographical market expansion into less competitive areas is a very significant opportunity that can provide new growth avenues.

However, the possible threats lie down the lane. Competitors' actions, ignored weaknesses, and unpreparedness for the market trend might call in some of the significant risks. Other factors that pertain to the external environment include the economic downturn, political issues, and changes in regulations, to name a few. All these could affect the stability of the company and further growth.

Financial Projections

BUSINESS PROJECTIONS	Pre-operative	1 year	2 years	3 years
Period				
Revenues EUR		100,000	500,000	800,000
Initial expense EUR	First year expense EUR	Second year expense EUR	Third year expense EUR	
Fee for new license	60000	0	0	0
Systems Audit	2500	0	0	0
Compliance Audit	3500	0	0	0
Annual fixed fee	0	60 000	60 000	60 000

Annual Compliance contribution		50	5000		5000
Minimal fee €5.000			00		
Tax- 0	0		0		0
Share Capital	40 000		0		0
Key role	3000		3000		3000
Other expense	1000		2000		2000
Total expense	15000		71980		99920
Total Operating & Marketing expense	24000		150000		225000
					375000