



ONLINE CASINO

WINWIN

Alasia soft B.V.

WinWin

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1. EXECUTIVE SUMMARY

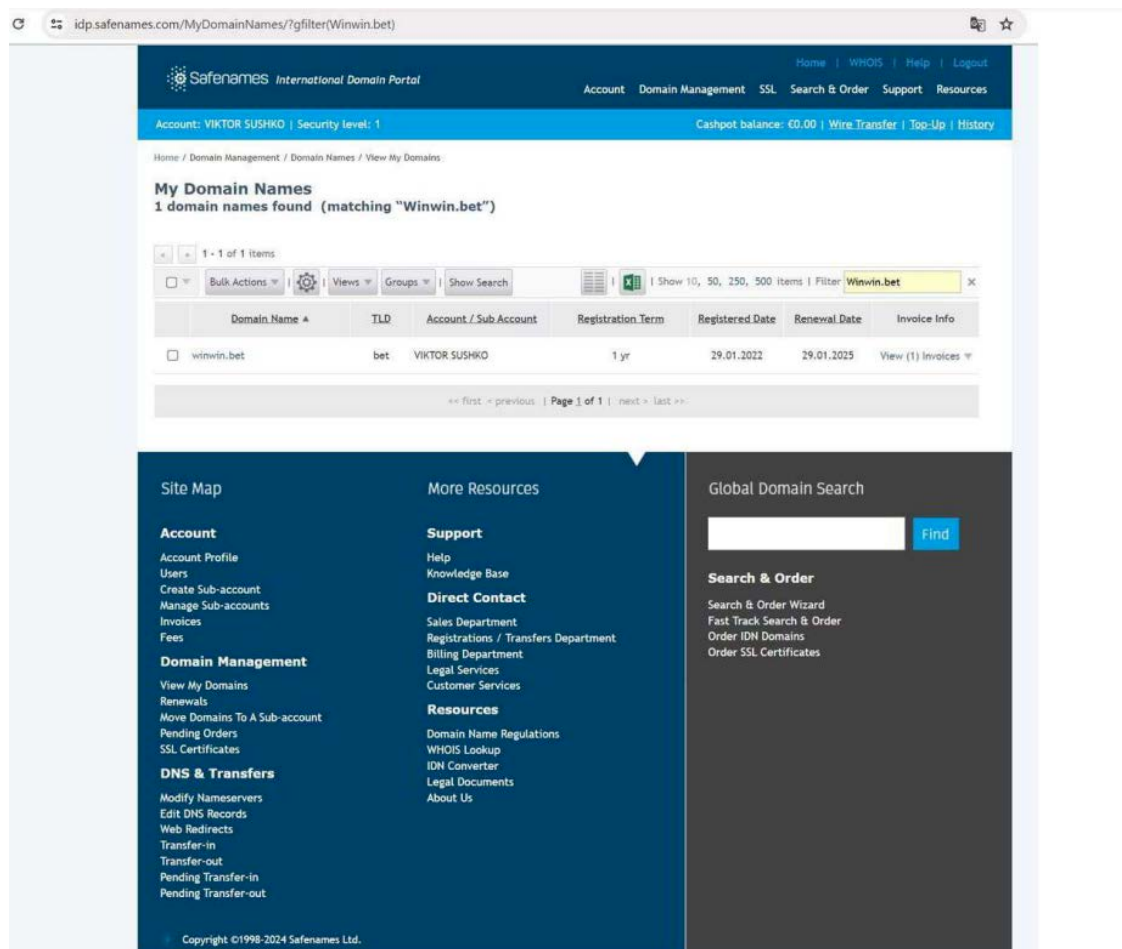
1.1. PROJECT SUMMARY

The initiator of the project is Alasia soft B.V. a company incorporated in Curacao.

Service will be provided by FERTAMI LTD, a company incorporated in the Republic of Cyprus, reg number HE 413010, with its registered office at: Valaoriti, 5, Flat/Office 102, Latsia, 2220, Nicosia, Cyprus.

Winwin operates under the Curacao eGaming license with the registration number B2C-2N8ZJXQW-1668JAZ. Alasia Soft B.V. is the entity behind Winwin, dedicated to offering enriched online gaming experiences by integrating cutting-edge technologies to captivate players. Winwin's domain, winwin.bet, is owned and managed by Alasia Soft B.V., a company based in Curacao.

The domain is winwin.bet.



Starting in 2024, the prospective regulatory authority overseeing our operations will be the

Gaming Control Board. We are currently in the process of applying for the government license required to operate legally under this authority.



The project involves the creation of a company offering online games improved by technologies that attract players, based on the experience of working in 7 casinos that have already been created with the participation of the founders of a new gaming platform.

The security payment, in the event of the closure of the online casino for internal reasons or other objective reasons, is returned to the casino owners, but must remain unused during the operation of the online casino as a deposit in case of winning the jackpot, i.e. losses can be minimal.

Company Description:

Enter the realm of WINWIN, an online gaming enterprise dedicated to providing an engaging and conscientious gambling platform. We epitomize innovation, integrity, and thrills in the ever-evolving world of digital gaming.

Vision:

At WINWIN, we envision a global gaming community where every participant feels empowered, entertained, and safe. Our goal is to revolutionize the gaming sphere by fostering innovation, embracing accountability, and cultivating an inclusive environment for players of all backgrounds.

Mission:

WINWIN is driven by a set of core principles:

- **Innovation Hub:** We lead the charge in technological progress, constantly pushing creative boundaries to deliver an unmatched gaming experience with an array of cutting-edge games.
- **Responsible Gaming Advocacy:** We take a proactive stance on responsible gaming, implementing robust player protection measures, investing in educational resources, and

collaborating with like-minded organizations dedicated to promoting healthy gaming habits.

- Player-Centric Approach: Our players are the nucleus of our operations, driving us to provide tailored experiences, prompt customer support, and an unwavering dedication to refining our services through player input.
- Global Integration: We dismantle geographical divides, constructing a worldwide gaming network that embraces players from various cultural, social, and geographical backgrounds..

Goals:

- Excellence in Entertainment: Our pursuit of excellence permeates every facet of entertainment, ensuring that our games transcend mere excitement to become platforms for social connection, skill refinement, and unforgettable moments
- Innovation Leadership: We aspire to lead the charge in industry innovation, setting benchmarks for gaming excellence and consistently surprising our players with fresh and captivating gaming experiences.
- Community Impact: At the core of our corporate ethos is a commitment to making a positive difference in our community. We achieve this by supporting charitable endeavors, backing local initiatives, and advocating for responsible gaming as an integral part of our corporate social responsibility.
- Sustainable Growth: We strive for sustainable growth by harmonizing financial prosperity with ethical business conduct, environmental stewardship, and a steadfast dedication to the welfare of our players.

1.2. UBO BACKGROUND

Sushko Viktor, founder of WinWin.bet since June 2021, oversees the financial aspects of the business, implementing budgeting, financial forecasting, and expense management strategies. He ensures robust security measures to safeguard customer data and financial transactions while leading a skilled and motivated team. Prior to this role, as Affiliate Marketing Executive at Favorit Sport, Kyiv, Ukraine (Jun 2015 - Jun 2021), he managed SEO strategies and drafted advertising content. As a Betting Manager at Favorit Sport, Kryvyi Rih, Ukraine (Jun 2008 - May 2015), he coordinated cross-functional teams to assess product quality and liaised with stakeholders to enhance customer experience. His earlier roles include Betting Shop Cashier at Favorit Sport, Kryviy Rih, Ukraine (Mar 2006 - May 2008), and Manager at Kryvvi Rih Iron Ore Plant, Kryviy Rih, Ukraine (Feb 2000 - Mar 2006), where he optimized trading hours and prepared reports for upper management.

As the former Founder at Winwin, Viktor possesses unparalleled knowledge of all underlying processes of the project, giving him a distinct advantage in leading the company towards success in his role as Founder.



SUSHKO VIKTOR

EXPERIENCE

CONTACT

- +380500143323
- sushko.vitality@gmail.com
- Ukraine, Kryvii Rih

PROFESSIONAL SUMMARY

Sales and marketing leader experienced in managing high performing teams. Focused and determined professional with expertise to promote company message to wide audience. Confident and persuasive communicator in-person and in digital spaces.

SKILLS

- Partnerships management
- Ability to present the company
- Promotional strategies
- Brand building
- Customer-focused

LANGUAGE

- Russian, Advanced (C1)
- Ukrainian, Advanced (C1)
- English, Intermediate (B1)
- Spanish, Beginner (A1)

Founder Jun 2021- Present

WinWin.bet

- Oversee the financial aspects of the business, including budgeting, financial forecasting, and expense management.
- Implement robust security measures to protect customer data and financial transactions.
- Build and lead a skilled and motivated team

AFFILIATE MARKETING EXECUTIVE Jun 2015 - Jun 2021

Favorit Sport, Kyiv, Ukraine

- Oversaw search engine optimisation strategy to drive brand awareness.
- Drafted advertising content for television and media promotions.
- Conducted advanced market and competitive analyses.

BETTING MANAGER Jun 2008 - May 2015

Favorit Sport, Kryvyi Rih, Ukraine

- Closely coordinated with cross-functional teams such as tech, content, design, marketing, sales and conversion to assess product quality.
- Liaised with internal stakeholders, collaborated and recognized their needs to provide customers with top-class digital gambling products.
- Conceptualized and planned programmes and activities to encourage more visitors and produce more profits.

BETTING SHOP CASHIER Mar 2006 - May 2008

Favorit sport, Kryvyi Rih, Ukraine

- Performed routine checkout duties without supervision to enhance store operations and guest experience.
- Balanced tills accurately at the end of each shift to match with system totals.
- Informed customers about special offers and featured items to encourage further purchases.

MANAGER Feb 2000 - Mar 2006

Kryvyi Rih iron ore plant, Kryvyi Rih, Ukraine

Adapted trading hours to leverage seasonal trends and changes in customer behavior.

- Prepared reports for upper management to review sales, services and foot traffic trends.

EDUCATION

MASTER OF ORGANIZATIONS MANAGEMENT - ECONOMICS

Kryvyi Rih National University, Kryvyi Rih, Ukraine
Graduated with honours

1.3. A LIST OF THE GAMES

Main types of casino games:

- Type 1 – Games of Chance (RNG-based games such as slots and casino table games)
- Type 2 – Betting (including live betting and virtual-sports betting)
- Type 3 – Live Dealer Games
- Type 4 – Pooled-prize games (such as lotteries and parimutuel)
- Type 5: Promoting peer-to-peer games (such as sport-exchange, bingo and poker)

1.4. INDICATORS OF THE PROJECT

The economic efficiency of the project was confirmed by calculating traditional financial indicators used in project analysis.

Table 1. Indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	142 976
Sum of proceeds (SP), EUR	4 837 625
Net average operational receipts per month (NAOR), EUR	46 908
Net profit for the project period, EUR	1 419 953
Average profitability for the project period (net profit to proceeds	29,35%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	684 516
Average Rate of Return of investments (ARR)	21,99%
Return on investment (ROI)	893%
Profitability index (PI)	4,8
Internal rate of return (IRR)	156,66%
Pay back period of the project in whole (PBP), incl. financing scheme	15 months
	1,25 years

2. COMPANY MANAGEMENT STRUCTURE

Board oversight - UBO is the CEO and sole shareholder of the Operator, he is engaged in the day-to-day operation of the business.

The CEO handles marketing issues, determines the company's development directions in various areas, payment solutions integration, and brand expansion across different geographical locations. Head employees of the company and the director himself may be invited to board meetings.

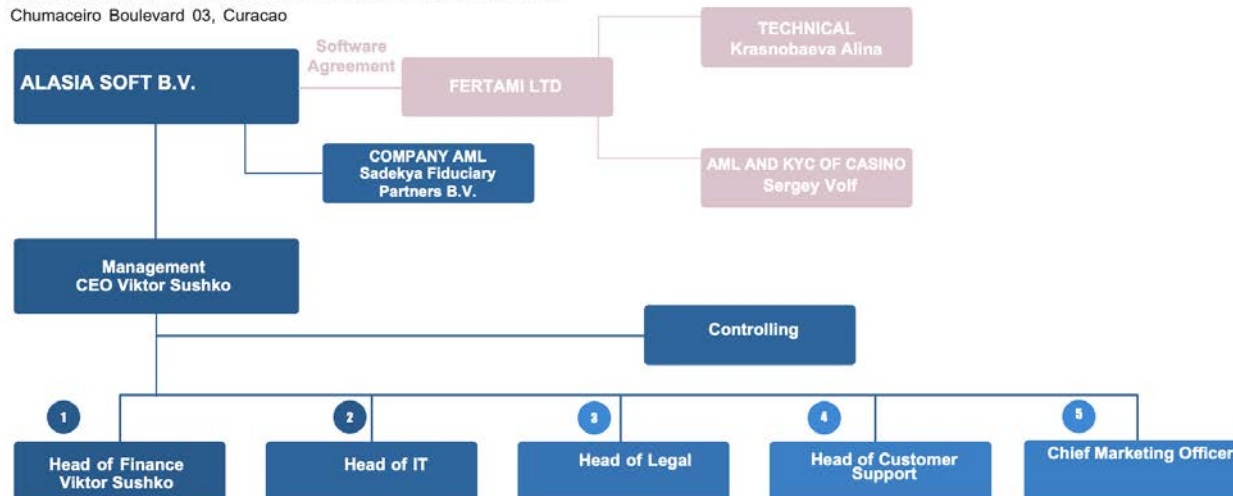
He delegates strategies and decisions directly to Departments and functions. This structure ensures the versatility of decision-making and ensures that no decision is deadlocked.

Legal support is provided in-house by respective Departments and officers.

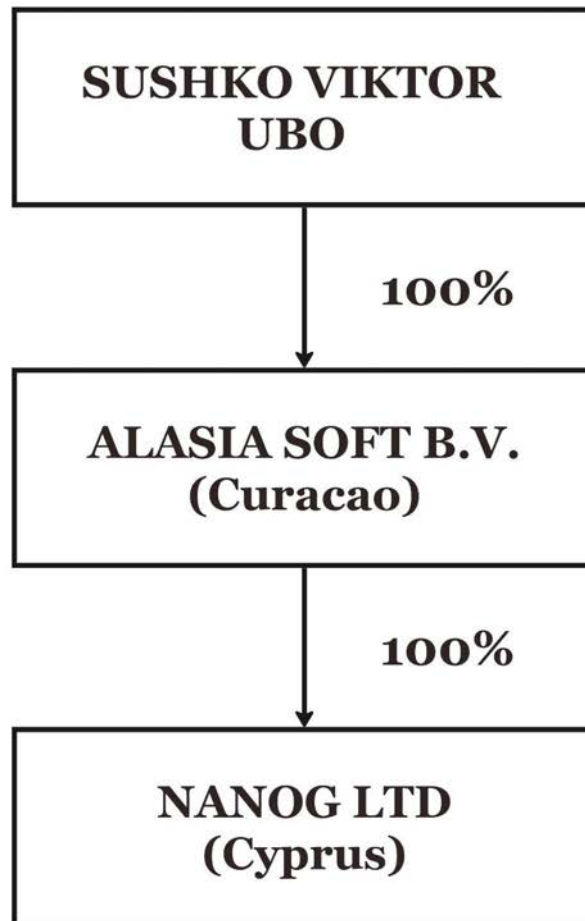
Most decisions are made by the Department Heads and finalized by the CEO.

Company control structure

ALASIA SOFT B.V. , a company incorporated under the laws of Curaçao with registration number 163748 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curacao



OWNERSHIP STRUCTURE



3. FINANCIAL SUMMARY

3.1. FINANCIAL ESTIMATION FOR THE FIRST, SECOND AND THIRD YEAR

Table 2. Cash flow for the first year

	Total for 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 142 976	- 128 500	-	-	- 14 476	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 128 500	- 128 500	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 12 076	-	-	-	- 12 076	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 400	-	-	-	- 2 400	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 496 207	- 4 850	-	-	-	- 41 381	2 169	5 002	7 686	10 622	13 898	- 24 084	20 572
Proceeds	4 837 625	-	-	-	-	31 850	39 813	44 909	50 027	55 636	61 866	70 035	80 276
Income from clients	4 837 625	-	-	-	-	31 850	39 813	44 909	50 027	55 636	61 866	70 035	80 276
Expenses total	- 3 341 417	- 4 850	-	-	-	- 73 231	- 37 644	- 39 907	- 42 341	- 45 014	- 47 967	- 94 118	- 59 704
Direct costs	- 2 441 547	- 4 850	-	-	-	- 62 164	- 26 577	- 28 102	- 29 779	- 31 623	- 33 653	- 41 052	- 43 507
Advertising costs	- 1 329 320	-	-	-	-	- 26 460	- 15 246	- 16 771	- 18 448	- 20 292	- 22 322	- 24 554	- 27 009
Additional staff costs	- 671 667	-	-	-	-	-	-	-	-	-	-	- 5 167	- 5 167
License fees	- 142 961	- 4 850	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	-	-	-	-	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 478 133	-	-	-	-	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 53 067	- 11 067

Table 3. Cash flow for the second year

	Total for 3 years	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 142 976	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 128 500	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 12 076	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 400	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 496 207	26 636	33 347	40 960	53 414	35 386	59 936	61 341	63 038	62 962	66 296	32 659	68 560
Proceeds	4 837 625	90 750	102 326	115 355	132 400	139 938	148 183	151 162	159 719	166 038	171 600	176 969	182 362
Income from clients	4 837 625	90 750	102 326	115 355	132 400	139 938	148 183	151 162	159 719	166 038	171 600	176 969	182 362
Expenses total	- 3 341 417	- 64 115	- 68 979	- 74 394	- 78 985	- 104 551	- 88 247	- 89 821	- 96 681	- 103 076	- 105 304	- 144 310	- 113 802
Direct costs	- 2 441 547	- 46 208	- 49 179	- 52 447	- 53 525	- 84 176	- 60 947	- 62 126	- 68 506	- 74 923	- 76 211	- 82 704	- 84 070
Advertising costs	- 1 329 320	- 29 710	- 32 681	- 35 949	- 37 028	- 38 139	- 39 283	- 40 461	- 41 675	- 42 925	- 44 213	- 45 539	- 46 906
Additional staff costs	- 671 667	- 5 167	- 5 167	- 5 167	- 5 167	- 10 333	- 10 333	- 10 333	- 15 500	- 20 667	- 20 667	- 25 833	- 25 833
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 478 133	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 53 067	- 11 067
Accounting	- 122 667	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833

Office equipment maintenance	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 28 800	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900
Legal support	- 106 667	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333
Taxes	- 421 737	- 6 840	- 8 733	- 10 881	- 14 393	- 9 309	- 16 233	- 16 629	- 17 108	- 17 086	- 18 027	- 8 539	- 18 665
Profit tax	- 421 737	- 6 840	- 8 733	- 10 881	- 14 393	- 9 309	- 16 233	- 16 629	- 17 108	- 17 086	- 18 027	- 8 539	- 18 665
Cash flow - FINANCING	- 310 047	- 8 488	- 10 837	- 13 502	- 17 861	- 11 551	- 20 144	- 20 635	- 21 229	- 21 203	- 22 370	- 10 597	- 23 162
Co-investor's investment	213 290	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 523 337	- 8 488	- 10 837	- 13 502	- 17 861	- 11 551	- 20 144	- 20 635	- 21 229	- 21 203	- 22 370	- 10 597	- 23 162

CASH FLOW OF THE PROJECT	1 043 185	18 147	22 509	27 458	35 553	23 835	39 793	40 705	41 809	41 759	43 926	22 062	45 398
progressive total (cash balance)	1 043 185	62 043	84 553	112 011	147 564	171 399	211 192	251 897	293 706	335 466	379 392	401 454	446 852

Table 4. Cash flow for the third year

	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 142 976	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 128 500	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 12 076	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 400	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 496 207	71 754	70 999	74 367	73 803	58 361	77 018	80 804	80 674	84 691	84 798	57 859	86 908
Proceeds	4 837 625	187 865	193 513	199 323	205 304	211 464	217 808	224 342	231 073	238 005	245 145	252 499	260 074
Income from clients	4 837 625	187 865	193 513	199 323	205 304	211 464	217 808	224 342	231 073	238 005	245 145	252 499	260 074
Expenses total	- 3 341 417	- 116 110	- 122 513	- 124 956	- 131 501	- 153 103	- 140 790	- 143 538	- 150 398	- 153 314	- 160 347	- 194 640	- 173 166
Direct costs	- 2 441 547	- 85 477	- 92 093	- 93 586	- 100 290	- 126 247	- 108 672	- 110 352	- 117 250	- 119 032	- 126 035	- 127 926	- 138 259
Advertising costs	- 1 329 320	- 48 313	- 49 762	- 51 255	- 52 793	- 54 376	- 56 008	- 57 688	- 59 419	- 61 201	- 63 037	- 64 928	- 64 928
Additional staff costs	- 671 667	- 25 833	- 31 000	- 31 000	- 36 167	- 36 167	- 41 333	- 41 333	- 46 500	- 46 500	- 51 667	- 51 667	- 62 000
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 478 133	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 11 067	- 51 067	- 11 067
Accounting	- 122 667	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833	- 3 833
Office equipment maintenance	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 40 000	-

Office rent	- 28 800	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900	- 900
Legal support	- 106 667	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333	- 3 333
Taxes	- 421 737	- 19 566	- 19 353	- 20 303	- 20 144	- 15 789	- 21 051	- 22 119	- 22 082	- 23 215	- 23 245	- 15 647	- 23 840	- 23 840
Profit tax	- 421 737	- 19 566	- 19 353	- 20 303	- 20 144	- 15 789	- 21 051	- 22 119	- 22 082	- 23 215	- 23 245	- 15 647	- 23 840	- 23 840
Cash flow - FINANCING	- 310 047	- 24 280	- 24 016	- 25 194	- 24 997	- 19 592	- 26 122	- 27 448	- 27 402	- 28 808	- 28 845	- 19 417	- 29 584	- 29 584
Co-investor's investment	213 290	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 523 337	- 24 280	- 24 016	- 25 194	- 24 997	- 19 592	- 26 122	- 27 448	- 27 402	- 28 808	- 28 845	- 19 417	- 29 584	- 29 584

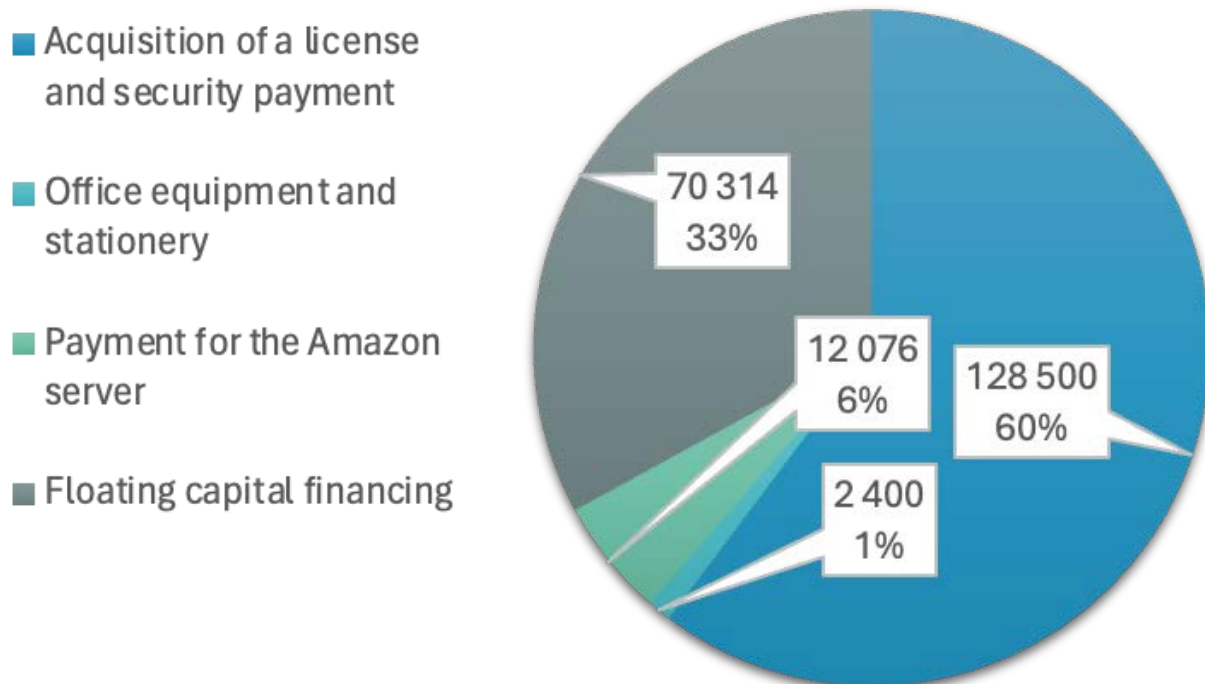
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CASH FLOW OF THE PROJECT	1 043 185	47 474	46 984	49 172	48 806	38 769	50 896	53 357	53 272	55 883	55 953	38 443	57 324	57 324
progressive total (cash balance)	1 043 185	494 327	541 310	590 483	639 289	678 057	728 953	782 310	835 582	891 465	947 418	985 861	1 043 185	1 043 185

3.2. INVESTMENT SCHEMATIC SHOWING TYPE OF INVESTMENTS, PROJECTED COSTS, EXPLANATION BY WHOM AND SOURCE OF WEALTH

The need for financial resources for the project is 213,3 thousand euro.

Diagram 1. Investments structure

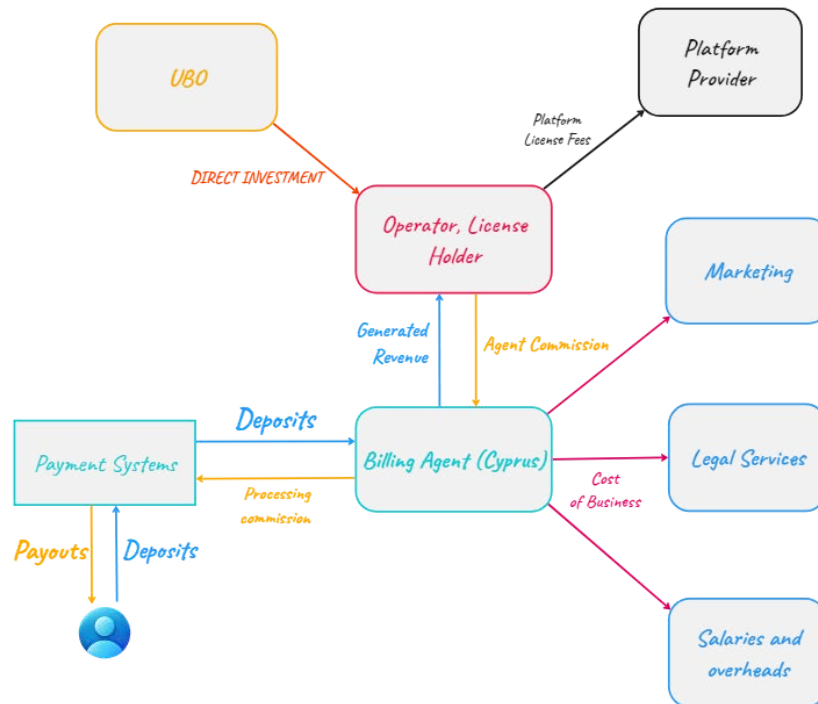


It is planned that the financing of this project will be carried out at the expense of the investor.

The amount of payments to the investor for the period of the project will be 523,3 thousand euro.

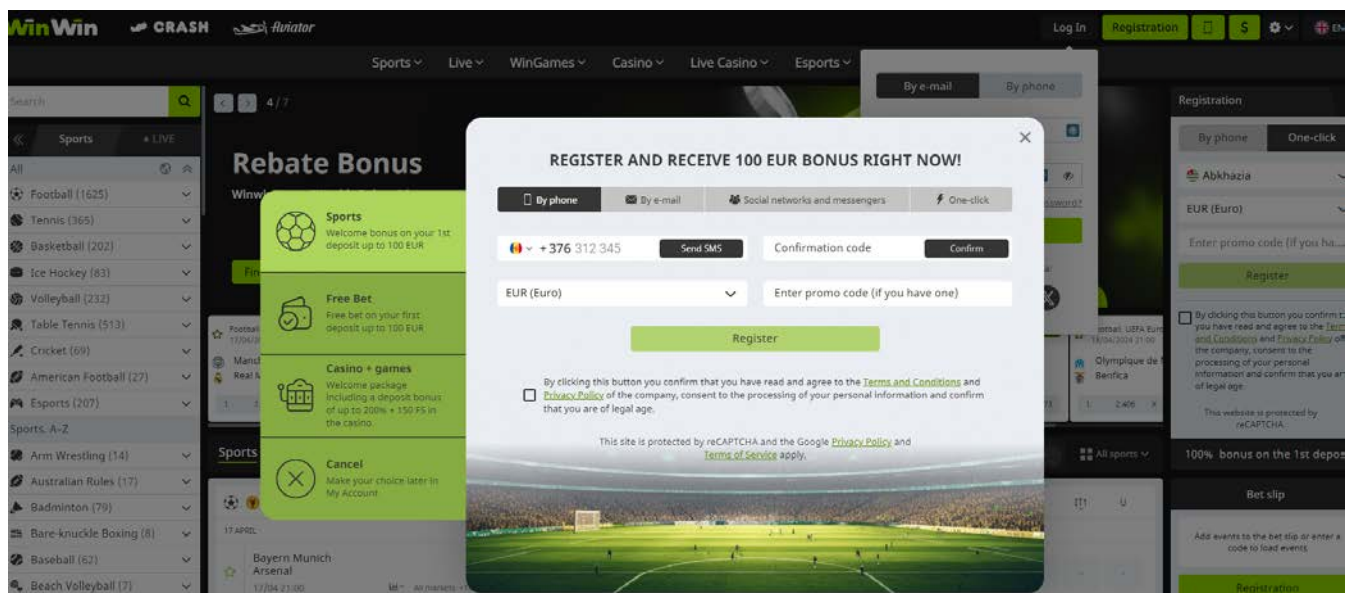
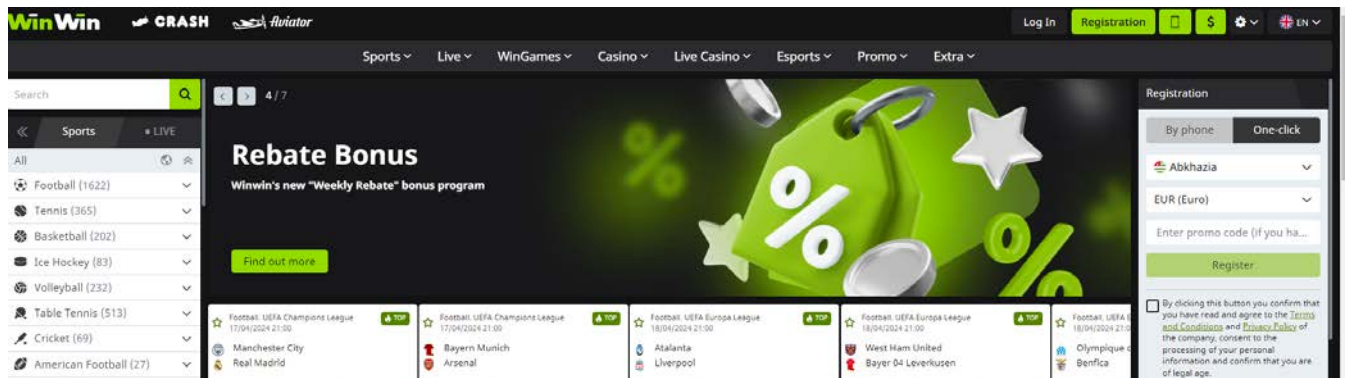
3.3. FLOW OF FUNDS SCHEMATIC

The cost of business for the project includes license fees to the Platform provider, Web-marketing, Service fees to employees and legal fees to fiduciary service providers.



4. PRODUCTS & SERVICES

4.1. REGISTRATIONS AND OPENING OF AN ACCOUNT



WinWin CRASH Aviator

Main account (EUR) 0

Personal profile
Fill in the empty fields to take advantage of the enhanced features of the website!

Edit all

Personal info

Surname

First name

Date of birth

Place of birth

Passport details

Type of document

Select document type

Address

Country
Andorra

Permanent registered address

Contacts

Phone

Email

Recent sessions

172.255.5.36, Limassol

ACCOUNT

- Deposit
- Withdraw funds
- Bet history
- Transaction history

EXTRA

- Invite friends
- Casino VIP Cashback
- Bonuses and gifts
- Customer Support

PROFILE

- Personal profile
- Security
- Account settings
- Responsible Gaming

Top up your account

Deposit

Bonus on Account
The more you bet, the more bonuses you get!

Find out more

Link your phone number
To withdraw

4.2. LOG IN AND LOGOUT

WinWin CRASH Aviator

Log In Registration

Sports betting welcome bonus of up to 100 EUR
Make your first deposit and get a 100% bonus of up to 100 EUR

Find out more

Log in

By e-mail By phone

ID or Email

Password

Remember Forget your password?

Log in

You can log in to the website via:

Registration

By phone By one-click

Abkhazia

EUR (Euro)

Enter promo code (if you have one)

Register

By clicking this button you confirm that you have read and agree to the Terms and Conditions and Privacy Policy of the company, consent to the processing of your personal information and confirm that you are of legal age.

This website is protected by reCAPTCHA.

100% bonus on the 1st deposit

Sports

Football Tennis Basketball Ice Hockey Volleyball All sports

Football: UEFA Champions League
17/04/2024 21:00
Manchester City vs Real Madrid
1 1.875 X 4.365 2 5.03

Football: UEFA Champions League
17/04/2024 21:00
Bayern Munich vs Arsenal
1 2.619 X 3.715 2 2.743

Football: UEFA Europa League
18/04/2024 21:00
Atalanta vs Liverpool
1 4.67 X 4.67 2 1.704

Football: UEFA Europa League
18/04/2024 21:00
West Ham United vs Bayer 04 Leverkusen
1 3.94 X 4.025 2 1.973

Football: UEFA Europa League
18/04/2024 21:00
Olympique Lyonnais vs Benfica
1 2.406

WinWin CRASH Aviator

Main account (EUR) 0

Personal profile
Fill in the empty fields to take advantage of the enhanced features of the website!

Edit all

Personal info

Surname

First name

Date of birth

Place of birth

Passport details

Type of document

Select document type

Address

Country
Andorra

Permanent registered address

Contacts

Phone

Email

Recent sessions

172.255.5.36, Limassol

ACCOUNT

- Deposit
- Withdraw funds
- Bet history
- Transaction history

EXTRA

- Invite friends
- Casino VIP Cashback
- Bonuses and gifts
- Customer Support

PROFILE

- Personal profile
- Security
- Account settings
- Responsible Gaming

Top up your account

Deposit

Bonus on Your Account Balance
The more you bet, the more bonuses you get!

Find out more

Link your phone

Are you sure you want to log out?

OK Cancel

4.3. TERMS AND CONDITIONS/ RULES AND PROCEDURES

The screenshot displays the WinWin website's 'TERMS AND CONDITIONS' page. The header includes the WinWin logo, 'CRASH', and 'Aviator' game icons, along with navigation links for Sports, Live, WinGames, Casino, Live Casino, Esports, Promo, and Extra. A search bar is located on the left. The main content area is titled 'TERMS AND CONDITIONS' and contains a section for '1. GENERAL TERMS AND DEFINITIONS'. This section explains the betting rules and provides definitions for terms like Bet, Outcome, Customer, Bet Cancellation, and Regular Time. A sidebar on the left lists various sections of the terms and conditions, with '1. GENERAL TERMS AND DEFINITIONS' currently selected.

1. GENERAL TERMS AND DEFINITIONS

The following Betting Rules pertaining to the bookmaker Winwin (hereinafter referred to as the Rules) stipulate the manner of accepting bets, paying winnings and resolving disputes, as well as the specific features of certain bets on certain sports. These Rules shall govern any other relations between the bookmaker Winwin and the customer. These Rules shall apply to betting on the website and at Winwin betting facilities.

Bet - is a risk-driven agreement for potential winnings entered into between the customer and the bookmaker under the established Rules, where the fulfillment of such agreement is conditioned by an event whose outcome is yet to be determined. Bets are accepted on the conditions offered by the bookmaker.

Outcome - is the result of the event (events) on which the bet was placed.

Customer - is an individual placing a bet with the bookmaker on an outcome.

Bet Cancellation - is an outcome on which the bet is not settled and winnings are not paid. As per the Rules, in the event of "bet cancellation", an arrangement between the bookmaker and the customer shall be deemed uncompleted and the stake shall be refunded.

Regular Time - is the duration of the match subject to the regulations of the relevant sport, including time added by the referee. Regular time does not include extra time, overtime(s), penalty shootouts, etc.

4.4. OBLIGATIONS AS A PLAYER

This screenshot shows a different section of the WinWin website's 'TERMS AND CONDITIONS' page, focusing on the obligations of a player. The sidebar on the left lists sections from '2. GENERAL TERMS' to '23. CALCULATION OF ACCUMULATOR AND SYSTEM BETS'. The main content area contains a list of rules, including age restrictions, prohibited activities, and the bookmaker's right to refuse bets. A right-hand sidebar provides links to 'ABOUT US', 'CONTACTS', 'TERMS AND CONDITIONS', 'PAYMENTS', and 'HOW TO PLACE A BET'.

2. GENERAL TERMS

3. TYPES OF BETS

4. RULES ON SPORTS

5. LIVE BETTING

6. EXAMPLES

7. MATCH RESULTS, DATES AND STARTING TIMES

8. AVAILABLE MARKETS (OUTCOMES)

9. EXTRA BETS

10. GENERAL BETTING RULES

11. SELF-EXCLUSION

12. DISPUTE RESOLUTION

13. ACCOUNTS, PAYOUTS & BONUSES

14. TOTALIZATOR 15-TOTO

15. TOTO «CORRECT SCORE»

16. TOTALIZATOR FOOTBALL-TOTO

17. TOTO «ICE HOCKEY»

18. TOTO «BASKETBALL»

19. TOTO «FIFA»

20. ESPORTS TOTO

21. TOTO FREE

22. MAIN SOURCES OF INFORMATION

23. CALCULATION OF ACCUMULATOR AND SYSTEM BETS

NEPTUNE HOUSE, Floor 1, Flat/Office 11, 3043, Limassol, Cyprus. ALPHA-SOFT B.V. is licensed and regulated by Curaçao eGaming, license No. 1668/JAZ. Remember that gambling can be addictive. Play responsibly.

2. Bets may only be placed by individuals who are 18 years of age or the age of majority in their state (if the age of majority is over 18) and agree to the Betting Rules offered by the bookmaker. The customer shall be held liable for violation of this regulation.

3. By registering and playing on the website, you confirm that you do not suffer from a gambling addiction.

4. The following individuals are not allowed to place bets:

- Individuals who are under 18 years of age at the time of placement;
- Individuals who directly participate in the events being bet on (e.g. sportspeople, coaches, referees, club owners or club management, or other individuals who can influence the outcome of the event), as well as any individuals acting on their behalf or affiliating with them;
- Individuals representing other bookmakers;
- Individuals who are prohibited from entering into a contract with a bookmaker subject to the effective legislation.

5. The right to access and/or use the Website (including any or all of the products offered through the Website) may be considered illegal in certain countries (including, for example, the USA, the United Kingdom, Cyprus, the Netherlands, etc.). We do not intend for our Website to be used for sports betting, gambling or other purposes by people who reside in countries or jurisdictions in which such types of activity are illegal. The list of explicitly forbidden territories is:

Aruba, Australia, Bonaire, Curacao, France, Iran, Iraq, Netherlands, Saba, Spain, St Maarten, Statia, U.S.A or the U.S.A dependencies, United Kingdom, North Korea, Myanmar.

6. The fact that our Website is available in such a country and/or jurisdiction or that it can be displayed in the official language of any of those countries cannot be considered official authorization or legal grounds for using our Website and depositing funds into your account or withdrawing your winnings. The availability of the Website does not mean that it contains any proposals, incitement or invitation to use or subscribe to betting, gambling or any of the other services in any jurisdiction where such activity is illegal.

7. You are responsible for determining whether your accessing and/or use of the Website is compliant with applicable laws in your jurisdiction and you warrant to us that gambling is legal in the territory where you reside. When opening an account and/or using our Website you must make sure that your actions are legal in the territory in which you reside. You also guarantee and agree that you have received legal advice before registering on our Website. If we become aware that you are a resident in a country where the use of our Website is considered illegal, we will have the right to close your account and refund any remaining balance on your account at the moment of its closure (after the deduction of any winnings credited after your most recent deposit was made).

8. The bookmaker shall be entitled to refuse bets from customers who fail to abide by these Rules. The bookmaker reserves the right to refuse to accept a bet of any type from any customer should they violate social standards of

ABOUT US

CONTACTS

TERMS AND CONDITIONS

PAYMENTS

HOW TO PLACE A BET

4.5. PAYOUTS

13. ACCOUNTS, PAYOUTS & BONUSES

13.1. ACCOUNTS

13.2. DEPOSITS AND PAYOUTS

- There are various ways of depositing and withdrawing funds from the Customer's account. All deposit and withdrawal methods can be found in the "Payments" section.
- All withdrawal requests are processed 24/7.
- The Winwin Security Service is entitled to:
 - decline cash withdrawal requests if deposits were made through e-payment systems;
 - refuse any withdrawal should the deposit or withdrawal amounts be inconsistent with bets placed (the Customer must place bets with stakes which add up to the sum of all deposits and the bets must have odds of at least 1.1; placing a high volume of bets that have a minimal impact on your balance shall not be taken into account, i.e. bets placed on opposite outcomes in games such as Roulette, Baccarat, Craps and Dice). Permitted withdrawal amounts shall be calculated based on the amount of the bets placed from any given deposit;
 - refuse any withdrawal if the betting account is misused. In this case your account must be verified before withdrawal can take place.
- The Winwin Security Service does not recommend Customers:
 - transfer funds from one payment system to another;
 - deposit and withdraw funds without placing bets;In the foregoing events, funds will be returned to your account.
- You can only withdraw funds using the same payment details that were used for depositing funds into your account. If you use different methods to make a deposit, withdrawals should be proportionate to the deposits made using any particular method.
- Winwin may refuse withdrawals via payment systems or in cash and offer a bank transfer as a substitute. The company may, at its discretion, restrict one or more of the payment methods you use to make deposits and/or

Table of Contents:

1. GENERAL TERMS AND DEFINITIONS	
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7. MATCH RESULTS, DATES AND STARTING TIMES	
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13.2. DEPOSITS AND PAYOUTS	
13.3. BONUSES	

Navigation Menu:

- ABOUT US
- CONTACTS
- TERMS AND CONDITIONS
- PAYMENTS
- HOW TO PLACE A BET

4.6. WITHDRAWING

Withdrawals can be executed through the designated payment methods as outlined below: FIAT withdrawals are permissible if the initial deposit was made in FIAT, while CRYPTO withdrawals are authorized for deposits made in cryptocurrency.

4.7. A LIST OF THE GAMES THAT WILL BE PROVIDED

Game Grid:

Sea Treasures MAX COEF: X12 NEW	CRASH MAX COEF: X12 BEST	Crystal MAX COEF: X12 BEST	Lucky Wheel MAX COEF: X12 BEST	Under and Over 7 MAX COEF: X12 BEST
21 MAX COEF: X2 BEST	Vampire Curse MAX COEF: X252 BEST	Apple Of Fortune MAX COEF: X336 BEST	Scratch Card MAX COEF: X50 BEST	Indian Poker MAX COEF: X75 BEST

Navigation and Search:

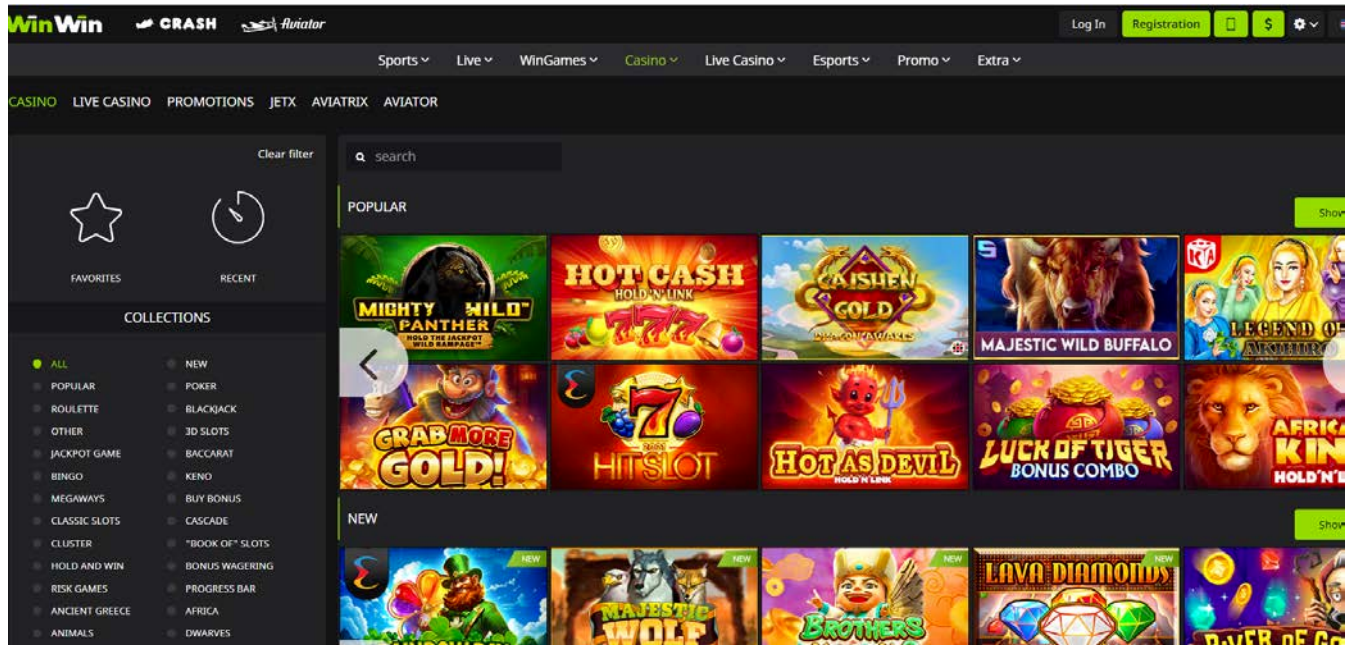
- Log In
- Registration
- Search: Game search...
- Categories: All Games, Lotteries, Slots, Climb to Victory, Dice, Card Games, Other games
- Sort: By popularity, Alphabetically

FAQ Section:

EXTRA CASHBACK until 30.04.2024

- Select a game: 3%
- Select a game: 3%

CASHBACK AVAILABLE 0.00 EUR



5. KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1. PLATFORM DESCRIPTION

The critical supplier for the project is Fertami Ltd. - the supplier of the software platform. **Fertami Ltd**, a company registered under the laws of the Republic of Cyprus under registration number HE 413010 (“Fertami”) has developed **the Unionsoft Platform** (“**Platform**”) - a software solution for betting companies with 24/7 stream of data and technical support. The Platform provides betting website operators with a reliable software solution designed to deliver high performance and security. Built on advanced technologies, it offers a diverse range of features, including real-time data updates, support for multiple types of bets, huge selection of sports and flexible customization options.

1. Platform specifications

1.1. General specifications

1.1.1. The Platform’s structure

The functional structure of the Platform includes the following modules:

- a)* the option to register as a customer
- b)* the option to log in and reset the password
- c)* the option to make deposits and withdrawals
- d)* the option to place bets
- e)* the option to view betting history
- f)* the option to view deposit history
- g)* the option to receive bonuses
- h)* the option to view bonus history
- i)* the option to contact the customer support team
- j)* the option to self-exclude
- k)* the option to place limits on deposits
- l)* deployment of two-factor authentication
- m)* deployment of secret phrase authentication
- n)* databases and tables of real events containing established statistics or dynamic odds
- o)* service for obtaining odds on events through an API
- p)* service for tracking customer money – records of deposits, bets, and withdrawals
- q)* service for integrating the Platform with the payment services of other third-party providers through an API
- r)* service for notifying customers about a future event, changes, adverts, and marketing for promotions by email, text message and pop-up message on mobile devices

- s) tool for protecting and restricting access and assigning competences to Fertami's employees (BackOffice) and displaying an employee's level of access in their profile
- t) profiles for the technical service departments of remote operating units (B2C) including the department structure, information about the SLA and the serviced business units of the operator or affiliates
- u) technical support service including the systems for logging in, registration, and recording and resolving questions and problems from service contractors when using email services or live communication
- v) display of short messages to customers (primarily the status of their account and customer legal compliance)
- w) the option for customers to put forward and discuss customer ideas to improve the platform's services and install new services, and the option to introduce ratings
- x) document management – files received from customers – loading files and exchanging them with colleagues securely, tagging, the option to add comments and information about users that downloaded files, version control
- y) cookie service – storage and sharing of useful links to various online resources, customer recommendations and content on the basis of information accumulated about a customer, improvement and suggestions for customers to make using the platform easier and more efficient
- z) responsible gaming service – a service for customers to set up their own limits and self-exclude with the option to customize these to suit the different requirements of the various jurisdictions
- aa) Anti-fraud and AML service – the option to connect third-party resources through an API from government bodies in different jurisdictions to verify customers when they register and if they engage in suspicious activity
- bb) service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals
- cc) voting service – the opportunity for customers to vote for the operator's various marketing or informational promotions posted and sent to customers through the Platform's services
- dd) service for issuing ratings – mechanisms for determining the activity and popularity of Platform users and creation of reports on VIP customers

Compatibility with related platforms

The Platform is compatible with third-party betting platforms and individual slots, casino, corporate back-office portal sufficient for general navigation and information research, a payment system aggregator, and a customer support module.

The Platform also supports:

- a) marketing modules from third parties

- b) integration with the business solutions including CMS, CRM, and BackOffice
- c) integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- d) integration with additional structures providing prior verification services on customers, KYC, AML, fraud prevention, and PEP lists to help the operator decide whether to accept certain users
- e) provision of API for several modules
- f) integration with system managing access to information resources for providing the betting odds.
- g) integration with AWS and other data storage services that have security certificates and are located within the EU.

Ergonomic features

It is possible to modify the Platform's interface according to the developed and agreed designs.

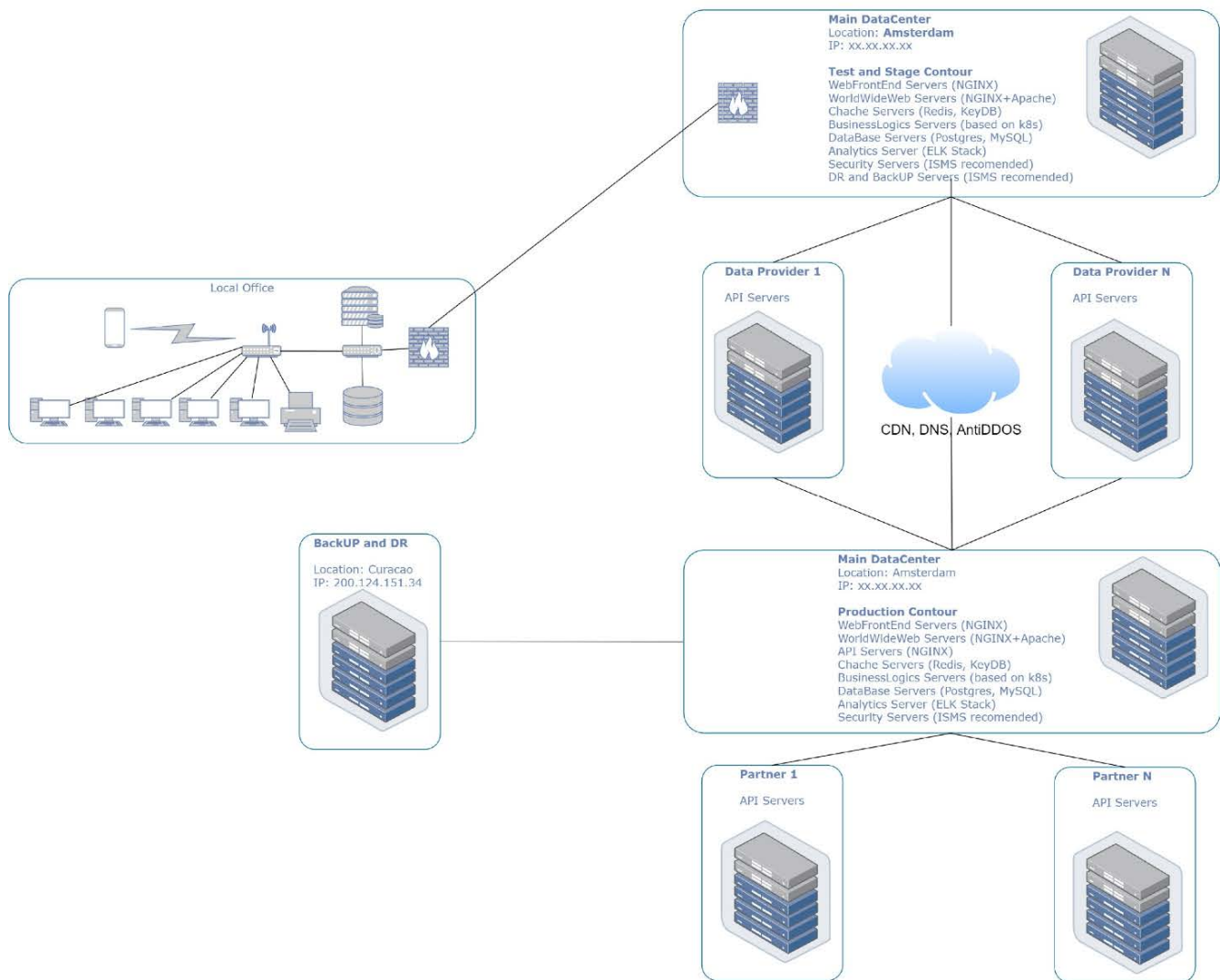
The Platform supports access from the following mobile platforms:

- a) iOS
- b) Android
- c) Windows

The Platform supports adaptive web design (or an adaptive user interface) capable of carrying out W3C CSS3 requests with a changing proportion grid and also support flexible changes to image proportions.

Platform-related risks

Thanks to our comprehensive disaster plan and resilient infrastructure, the risks associated with its implementation are kept to a minimum. Our platform employs robust protocols for data backup and restoration, featuring redundant server systems to mitigate service interruptions and reduce data loss. Regular testing and refinement of the disaster plan, essential for staying ahead of evolving threats and technological advancements, guarantee its efficacy when called upon. Collaborating with cybersecurity specialists and regulatory authorities not only furnishes valuable insights but also ensures that our platform remains at the forefront of disaster preparedness for online casino platforms, safeguarding both operations and customer confidence.



5.2. PAYMENT SERVICE PROVIDERS

An essential category of crucial suppliers comprises payment service providers (PSPs). We guarantee seamless payment processing by engaging with some of the most reputable PSPs operating within the pertinent jurisdictions. The following PSPs are currently being considered or are in the planning stage: euPago, eZeewallet, Colibrix, PayOp, Mifinity, GateExpress, and EasyPaygame.





Similarly, stringent compliance measures in banking services mitigate the risk of service loss, while employing 2 to 3 banks concurrently shields us from inherent banking risks. Diversifying our banking relationships not only enhances our negotiating power for favorable terms but also bolsters resilience in our financial structure. This proactive stance not only safeguards against potential disruptions but also strengthens our financial infrastructure. Through strategic diversification of our banking affiliations, we optimize our risk management strategy, fostering stability and longevity in our financial operations.

5.3. LEGAL AND CORPORATE PROVIDERS

Within the legal and corporate service provider domain, there exists a multitude of seasoned professionals with extensive expertise in the gambling industry. These specialists play a crucial role in aiding us to adhere to regulatory, payment, and banking requirements, thereby ensuring comprehensive compliance. Within the legal and corporate service provider domain, there exists a multitude of seasoned professionals with extensive expertise in the gambling industry. These specialists play a crucial role in aiding us to adhere to regulatory, payment, and banking requirements, thereby ensuring comprehensive compliance.

6. RISK EVALUATION AND MANAGEMENT

Every department diligently manages its own set of risks on a daily basis.

6.1. RISK AUDITING

Internal audits, overseen by the Audit Committee consisting of the Head of IT, Head of Legal, and Head of Finance, are conducted annually across all risk categories. Additionally, external audits occur every three years to provide an independent evaluation of business and financial matters.

Regular audits are also performed on the platform, its software providers, infrastructure, and financial status. A risk register is meticulously maintained and reviewed by the Audit Committee on a quarterly basis, complementing the daily communication between departments.

Furthermore, mandatory financial audits are carried out annually for all companies within the organizational structure.

6.2. RISK OVERVIEW

- **Legal Landscape Oversight (Oversight by Head of Legal):** Given the dynamic nature of legal regulations in online gambling, continuous monitoring is imperative. Regular updates regarding legal changes are disseminated throughout departments to ensure all staff members stay informed about the evolving legal framework. The legal team collaborates closely with other departments, including compliance and operations, to ensure a thorough grasp of legal obligations and streamline implementation processes. By maintaining open channels of communication with regulatory bodies and industry associations, we promote transparency and showcase our dedication to adhering to legal standards in online gambling
 - a) **Legality and Licensing:** Establishing and operating an online casino necessitates acquiring licenses from pertinent regulatory bodies across different jurisdictions. Regulatory stipulations can vary significantly from one jurisdiction to another, and non-compliance with licensing prerequisites can lead to substantial fines, legal ramifications, or even the cessation of operations.
Mitigation: The Operator presently operates under the Curacao eGaming license No. 1668/JAZ and is in the process of applying for a new GCB license.
 - b) **Data Protection and Privacy Laws:** Online casinos handle extensive volumes of sensitive customer data. Compliance with data protection regulations, such as the EU's General Data Protection Regulation (GDPR), is crucial to evade fines and uphold customer trust.
Mitigation: To address this, only collect and process the minimal amount of personal data necessary for gambling services provision, ensuring data isn't retained longer than required. Establish and enact a data breach response plan to effectively manage and alleviate the repercussions of data breaches, including protocols for notifying affected

individuals and relevant regulatory authorities within mandated timeframes. Embed privacy by design and default principles into the development of new products, features, or services, integrating privacy considerations from project inception.

- c) **Advertising and Marketing Restrictions:** Numerous jurisdictions impose stringent regulations on the advertising and marketing of online gambling services to safeguard vulnerable populations, such as minors and individuals with gambling addictions. Non-compliance with advertising standards can lead to regulatory penalties and public condemnation.

Mitigation: To address this, consistently monitor advertising and marketing endeavors to ensure adherence to relevant laws, regulations, and industry standards concerning gambling advertising. Transparently disclose all terms, conditions, restrictions, or limitations associated with promotions, bonuses, or other marketing offers to prevent consumer deception and potential regulatory repercussions. Thoroughly vet third-party advertising partners, agencies, or affiliates to verify their compliance with advertising and marketing regulations and commitment to responsible advertising practices.

- d) **Cross-Border Regulatory Challenges:** Engaging in operations across various jurisdictions can subject online casinos to intricate regulatory landscapes and legal ambiguities. Disparities in gambling laws and enforcement methodologies between borders can present hurdles in maintaining compliance, often necessitating substantial legal support.

Mitigation: Forge strategic alliances with local entities, legal experts, or industry groups in targeted jurisdictions to acquire knowledge of local regulations, navigate regulatory procedures, and foster connections with regulatory bodies. Conduct exhaustive due diligence on potential business partners, affiliates, suppliers, and other external entities to confirm their compliance with regulatory standards and mitigate compliance risks in the casino's cross-border operations. Remain vigilant regarding alterations in gaming regulations and enforcement strategies in targeted jurisdictions by consistently monitoring regulatory updates, industry literature, and legal counsel advisories.

- e) **Changes in Regulation:** The regulatory environment governing online casinos is in a constant state of flux, with new laws, regulations, and enforcement measures emerging regularly. Operators must remain abreast of these regulatory developments and adjust their operations accordingly to mitigate compliance risks.

Mitigation: To address this challenge, conduct comprehensive assessments of how new regulations may impact the casino's operations, financial standing, and risk exposure. Identify areas of compliance vulnerability and devise proactive strategies to mitigate them. Implement agile compliance approaches that facilitate swift adaptation to evolving regulatory requirements. This might involve developing modular compliance solutions, utilizing technology for automation and efficiency gains, and fostering a culture of continuous improvement and innovation. Offer regular training and educational programs for employees on emerging regulations, compliance mandates, and best practices for upholding regulatory standards. Empower staff members to recognize and effectively respond to regulatory changes within their respective roles.

- f) **Enforcement Actions:** Regulatory authorities may conduct investigations or audits to ensure compliance with gambling regulations. Enforcement actions, such as fines, license revocation, or legal proceedings, can have severe consequences for iGaming operators found to be in violation of regulatory requirements.

Mitigation: To address this, conduct regular internal audits and reviews of compliance practices, operations, and procedures to identify areas of non-compliance, assess risks, and proactively implement corrective actions. Establish open communication channels with regulatory authorities, industry associations, and other stakeholders to foster relationships, seek guidance on compliance matters, and address concerns or questions promptly. Maintain comprehensive documentation and records of compliance activities, including policies, procedures, training materials, audits, and enforcement actions, to demonstrate compliance efforts and support regulatory inquiries or investigations.

- g) **Political and Public Perception:** Public attitudes towards gambling can influence regulatory decisions and public policy initiatives. Negative publicity or public backlash against iGaming operators can lead to increased regulatory scrutiny and pressure for stricter regulations.

Mitigation: Uphold transparency in business operations, regulatory compliance, and corporate governance practices to build trust with regulators, customers, and the public. Provide educational resources and information to the public about the online casino industry, responsible gambling practices, and potential gambling-related risks. Promote awareness of problem gambling helplines, support services, and resources for those in need. Monitor online and offline channels for mentions, reviews, and discussions about the online casino brand, and proactively address any negative feedback or misconceptions through targeted communications and engagement strategies.

- **Regulatory Risks (Responsible: Compliance Officer):** Mitigating regulatory risks linked to Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance is imperative for businesses across diverse sectors, notably financial and gambling industries. The organization's AML&KYC department holds the crucial task of upholding pertinent laws and regulations aimed at thwarting money laundering and terrorist financing activities. This involves establishing robust protocols to authenticate customer identities, scrutinize transactions for suspicious behavior, and promptly report any anomalies to the relevant authorities. Non-compliance with AML&KYC regulations carries significant repercussions, such as hefty fines, damage to reputation, and potential criminal charges. Thus, maintaining unwavering adherence to these standards is pivotal for curtailing regulatory risks and preserving the organization's credibility. The AML&KYC department assumes a central role in supervising compliance endeavors, conducting thorough risk assessments, and implementing requisite controls to mitigate the organization's exposure to regulatory pitfalls. Furthermore, continuous training initiatives are essential to keep employees abreast of evolving AML&KYC mandates and industry best practices. In essence, effective management of regulatory risks associated with AML&KYC compliance necessitates a proactive and holistic strategy, with the AML&KYC department serving as a cornerstone in the organization's compliance architecture.

- a) **Compliance and Anti-Money Laundering (AML) Regulations:** Online casinos are obligated to adhere rigorously to compliance standards to deter money laundering,

terrorist financing, and other unlawful activities. Inadequate implementation of AML controls can lead to regulatory penalties, harm to reputation, and legal repercussions.

Mitigation: Establish a robust AML policy detailing procedures for customer due diligence, transaction monitoring, and reporting suspicious activities. Ensure alignment with regulatory mandates and industry best practices. Regularly conduct training and awareness programs for casino staff to educate them on AML regulations, recognizing red flags of suspicious behavior, and their role in thwarting money laundering and terrorist financing endeavors.

- **Technical Risks (Responsible: Technical):** Infrastructure upkeep, platform integration, cybersecurity, and data security are key areas of concern. The technical department shoulders the responsibility of ensuring regular maintenance of infrastructure to reduce downtime and alleviate risks associated with hardware or software malfunctions. Prioritizing the implementation and updating of cybersecurity protocols and technologies is crucial to ward off cyber threats like hacking, data breaches, and malware attacks. Vigilantly monitoring for potential security breaches and promptly responding to incidents are fundamental duties of the technical department to mitigate risks and minimize the fallout of cybersecurity breaches. Carrying out routine audits and security assessments aids in pinpointing vulnerabilities and shortcomings in the infrastructure, empowering the technical team to preemptively tackle potential risks before they escalate.

- a) **Data Security:** Unauthorized access to customer information, encompassing personal details and financial data, poses risks of identity theft, fraud, and legal consequences.

Mitigation: Deploy multi-layered cybersecurity protocols comprising firewalls, intrusion detection systems, and encryption mechanisms. Consistently update software and security patches to rectify vulnerabilities and fortify defenses against evolving threats.

- **Financial Risks (Responsible: Head of Finance):** Financial risks are inherent in all business operations, necessitating careful management to ensure sustainability and prosperity. As the individual accountable for financial matters, the Head of Finance assumes a central role in recognizing, evaluating, and mitigating these risks. Implementing robust financial controls, monitoring cash flow, and optimizing capital allocation to minimize exposure to these risks are key responsibilities. Furthermore, close collaboration with other departments is essential to develop and execute financial strategies aligned with the organization's goals. Through proactive risk management and strategic planning, the Head of Finance endeavors to safeguard the company's financial well-being and enhance shareholder value. Regular financial analysis and reporting play a critical role in identifying emerging risks and opportunities, facilitating timely adjustments to financial strategies.

- a) **Taxation:** Taxation policies pertaining to online gambling exhibit considerable variability across jurisdictions and wield substantial influence on the profitability of iGaming operators. Fluctuations in tax laws or unforeseen tax obligations can pose financial risks to casino operators.

Mitigation: Engage tax professionals, accountants, and legal experts with proficiency in international taxation to ensure adherence to local tax laws and regulations. Capitalize on tax treaties and agreements between nations to mitigate double taxation and optimize tax planning strategies. These treaties may offer provisions for tax credits, exemptions, or reduced tax rates for cross-border transactions. Maintain precise financial records, robust

accounting systems, and diligent tax filings to comply with local tax laws and regulations in each jurisdiction where the casino conducts operations. This encompasses timely submission of tax returns, tax payments, and adherence to reporting obligations.

- **Litigation Risks (Responsible: Customer Service):** Customer service-related risks entail ensuring compliance with pertinent laws and regulations to mitigate the potential for litigation stemming from regulatory breaches. Customer Service institutes clear communication protocols to effectively manage customer expectations, thereby reducing the incidence of misunderstandings and potential legal disputes. Thorough documentation of customer interactions and resolutions serves as vital evidence of adherence to service standards and aids in amicably resolving disputes, thereby mitigating litigation risks. Regular reviews and refinement of customer service processes based on feedback and performance metrics address recurring issues, minimizing the risk of customer dissatisfaction leading to litigation. Cultivating a culture of transparency and accountability within the customer service team fosters trust with customers and diminishes disputes arising from perceived unfairness or ambiguity. Establishing clear escalation procedures ensures swift resolution of unresolved customer concerns by appropriate management levels, thereby averting the escalation of grievances into potential litigation.

- a) **Responsible Gaming Practices:** Regulatory bodies often mandate casino operators to uphold responsible gambling standards and enact measures to deter problem gambling behaviors. Non-compliance with responsible gaming regulations can result in regulatory penalties and tarnish the operator's reputation.

Mitigation: Deploy self-exclusion tools enabling players to voluntarily exclude themselves from gambling activities for specified durations. Ensure accessibility and prominent display of these tools on the casino's website and gaming platforms. Provide players with options to set deposit limits and timeouts on their accounts, empowering them to manage their gambling behaviors and curb excessive gambling. Customize and enforce these limits to ensure compliance. Utilize data analytics and monitoring tools to detect players exhibiting signs of potential gambling problems, such as frequency and amount of wagers. Implement appropriate interventions and support measures for these players as necessary.

6.3. RISK OF POTENTIAL CAPITAL LOSS

During the initial phase, there is a possibility of potential losses of funds designated for registration, rent, and office equipment. If the online casino closes due to internal or external reasons, the security deposit is refunded to the casino owners. However, it is crucial that this amount remains untouched during the casino's operation, serving solely as a reserve in case of winning the jackpot. This precaution is taken to minimize losses.

Mitigation:

With a combined 25 years of expertise in the online casino industry among the founders and co-owners, along with the seasoned managerial experience of the project mentor, the project is strategically positioned to mitigate risks associated with market entry to the fullest extent possible.

7. POLICIES AND PROCEDURES

7.1. KNOW YOUR CUSTOMER

The KYC (Know Your Customer) policy comprises procedures and guidelines aimed at verifying and authenticating the identity of clients. Its primary objective is to prevent financial crimes like money laundering, terrorist financing, and fraud by ensuring that casinos possess accurate information about their customers and their financial activities. By adhering to KYC protocols, casinos instill trust, fulfill regulatory obligations, and mitigate risks associated with illicit activities within the financial system.

7.2. ANTI-MONEY LAUNDERING

The primary objective of the Anti-Money Laundering (AML) policy is to prevent the unlawful concealment of the origins of funds acquired through criminal endeavors. AML policies and procedures are formulated to identify and discourage money laundering, terrorist financing, and other illicit financial activities within financial institutions.

7.3. DATA PRIVACY

The purpose of the Data Privacy Policy is to delineate how an organization gathers, utilizes, retains, and safeguards the personal data of individuals. Its objective is to ensure adherence to data protection regulations, protect the privacy rights of customers and employees, and cultivate trust with stakeholders. By articulating precise guidelines and protocols for managing sensitive data, the policy aims to reduce the likelihood of data breaches, unauthorized access, and misuse of personal information, thereby fostering transparency and accountability in data management procedures.

7.4. RESPONSIBLE GAMING

The objective of the Responsible Gaming Policy is to encourage safe and balanced gambling habits while minimizing the potential risks linked with excessive or problematic gambling. It delineates strategies and principles to shield players from the adverse effects of gambling addiction, encompassing financial distress, mental health challenges, and social repercussions. By furnishing resources for self-exclusion, imposing limits on gambling engagement, and extending assistance to those in need, the policy endeavors to cultivate a responsible and enduring gambling milieu, prioritizing player well-being and upholding the integrity of the gaming sector.

7.5. TERMS OF USE

The Terms of Use policy for an online casino delineates the guidelines, regulations, and terms that users are required to follow while utilizing the platform. It encompasses various aspects including user obligations, account administration, payment processes, conflict resolution, and adherence to relevant laws and regulations. By consenting to these terms, users confirm their comprehension of the regulations governing their engagement with the casino, thereby ensuring transparency, equity, and adherence to legal standards throughout their gaming involvement.

7.6. SELF-EXCLUSION

This outlines the procedure for individuals to voluntarily opt-out of engaging in gambling activities on the platform for a designated period, usually to regulate their gambling habits or address addiction concerns.

7.7. DISPUTE RESOLUTION

This section elaborates on the processes and mechanisms accessible for resolving conflicts or disputes that may emerge between the casino and its users, typically delineating steps for escalation and resolution.

7.8. FAIRNESS & RNG TESTING METHODS

This section addresses the fairness of the casino's games, affirming their randomness and impartiality, frequently highlighting the utilization of Random Number Generators (RNGs) and the methodologies employed to assess and validate their fairness.

7.9. ACCOUNTS, PAYOUTS & BONUSES

This section elaborates on account management protocols, payout modalities, and the stipulations associated with bonuses, encompassing wagering prerequisites and limitations.

7.10. BETTING RULES

This section furnishes precise rules and regulations governing betting activities on the platform, encompassing game-specific guidelines, maximum and minimum wagering limits, and any supplementary terms applicable to various types of bets.

7.11. INTERNAL POLICIES

Human Resources Policy encompasses guidelines related to recruitment, orientation, performance assessment, staff development, diversity, disciplinary measures, and termination protocols.

Financial Policy outlines procedures for budget allocation, expenditure oversight, financial statement preparation, auditing, procurement practices, and compliance with accounting norms.

Communication and Social Media Policy delineates protocols for both internal and external communication channels, encompassing email protocols, social media usage directives, media interactions, and brand representation guidelines.

Information Security Policy addresses safeguarding sensitive data, including protocols for data handling, cybersecurity measures, password management practices, and strategies for preventing data breaches.

Internal Policies are primarily designed to uphold external policies, with the latter undergoing periodic review and updates, while the former are subject to continual adaptation, modification, and discontinuation as warranted.

7.12. The imperative to implement and uphold these policies is driven by our commitment to long-term operations, particularly considering the substantial initial investment involved. We intend to maintain operations for a minimum of three years under the GCB license, with renewal contingent upon achieving investment returns and meeting project key performance indicators, as outlined in our financial forecasts.

7.13. To adhere to the established policies and procedures, the project draws upon a diverse array of resources, both internally and externally. The Ultimate Beneficial Owner (UBO) brings valuable experience in both gambling and IT, making her an ideal overseer. Essential departments such as Legal, IT, Human Resources, and Finance possess significant expertise in managing large-scale gambling operations sustainably. Moreover, jurisdictions like Curacao, Cyprus, and others offer ample opportunities for engagement with advisors, experts, and independent auditors.

The Gaming Control Board (GCB) supports operators by offering guidance and assistance in developing their policies. This collaborative effort ensures that operators can tailor their policies to meet regulatory requirements and industry standards. By leveraging the GCB's expertise and resources, operators can establish robust and effective policies that foster compliance and integrity within the gambling sector. Additionally, the GCB provides ongoing support and updates to help operators adapt their policies to evolving regulations and emerging challenges. In summary, the assistance provided by the GCB empowers operators to establish and uphold a solid framework for responsible gambling practices.

8. MARKET ANALYSIS

8.1. INCOME AND TURNOVER

2020 has become a successful year for online casinos around the world due to the pandemic and self-isolation. In many countries the revenue of the entire gambling market has grown by a third - at least in relation to the previous 2019. This indicates the robustness and promise of this business model.

Over the past few years 85 countries around the world have legalized online gambling. Online betting and betting in slot machines and other gambling games together account for 70% of the income of all Internet gambling.

Gambling on the global network is very popular due to the wide variety of offers and comfortable gaming process without any restrictions. The largest income from online slot machines is generated in the UK, China, Austria, Germany and Italy.

Research firm Juniper has calculated that online gambling betting turnover will reach \$ 950 billion by 2024 and will continue to grow, Yogonet reports.

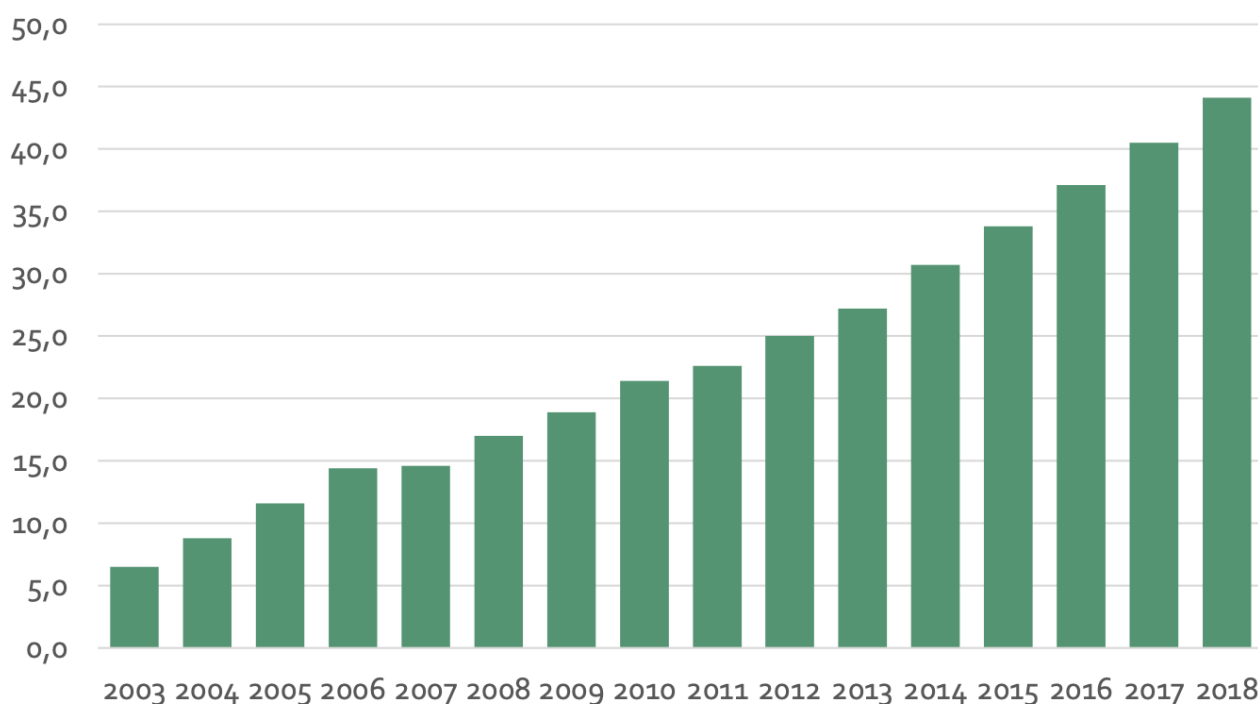
According to Juniper research, gambling is increasingly moving to the online environment. Moreover, the greatest activity is shown by mobile applications. The share of bets made using mobile phones is constantly growing.

The authors of the study also noted that, despite the general trend towards the regulation of national gambling markets, a few countries are moving towards the prohibition of gambling via the Internet and mobile applications.

The global online gambling market already accounts for 13% of the total global legal gambling market and this figure is constantly growing.

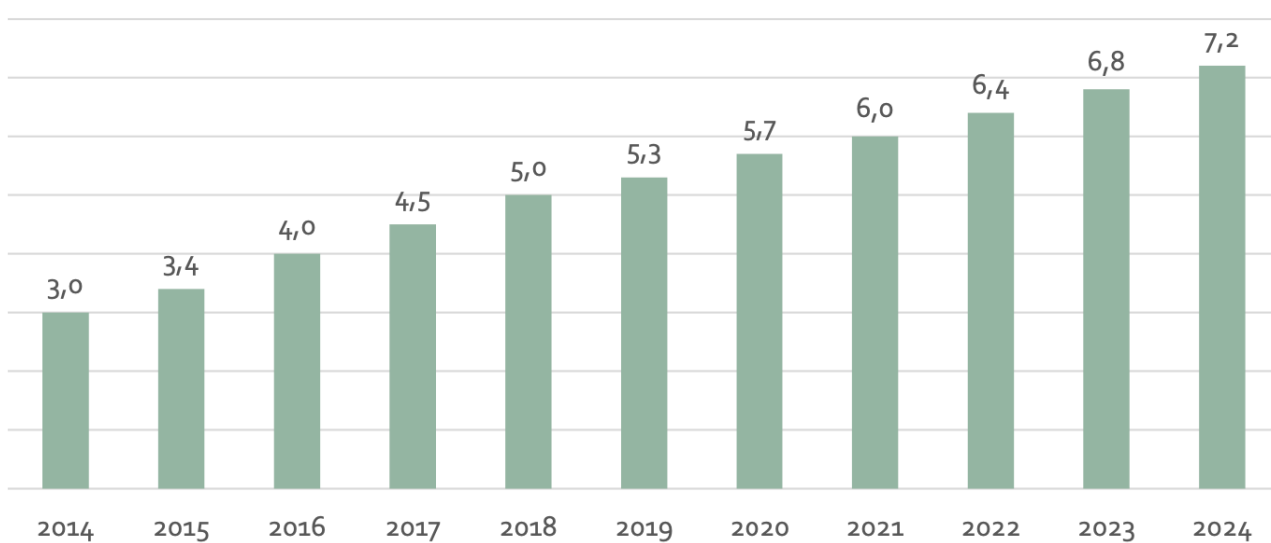
About 85 countries have allowed online gambling, according to a study by the American Gaming Association.

Diagram 2. Revenue from online gambling worldwide, billion euros



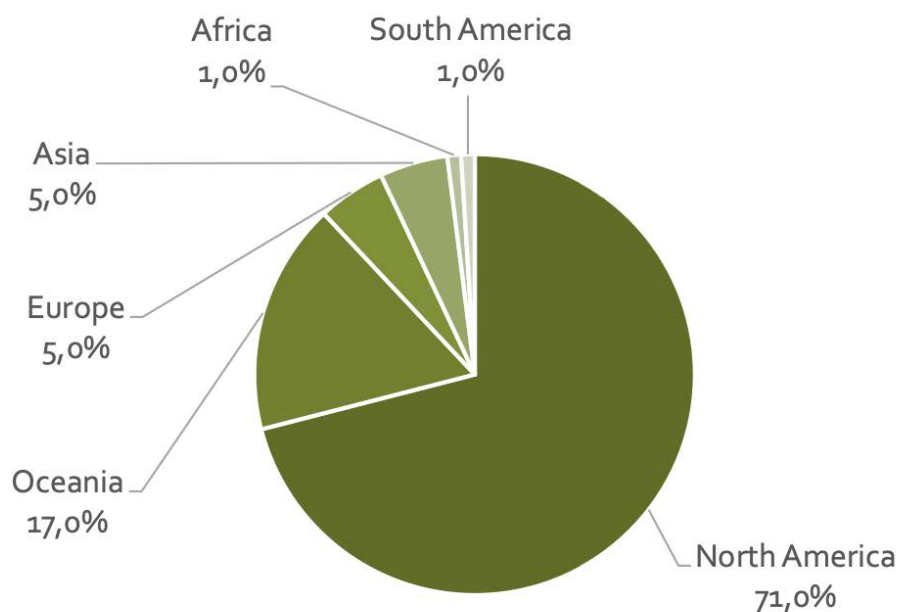
Gross Gaming Revenue is a financial indicator that determines the gross revenues of a gambling establishment. The GGR parameter allows you to track the dynamics of the behavior of gambling players around the world.

Diagram 3. Forecast of Gross Gaming Revenue, \$ billion



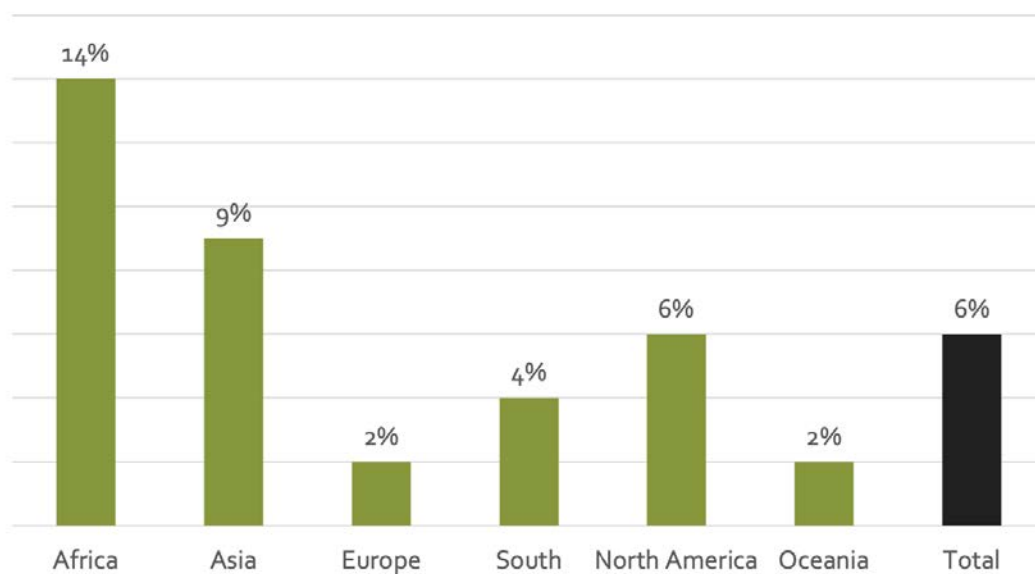
At the same time, Oceania (Fiji, New Zealand, Polynesia, New Guinea, etc.) also has a strong presence with 17% of the global GGR in 2019, significantly ahead of Asia and Europe with 5%.

Diagram 4. Regional structure of gross income of the gambling business in 2019



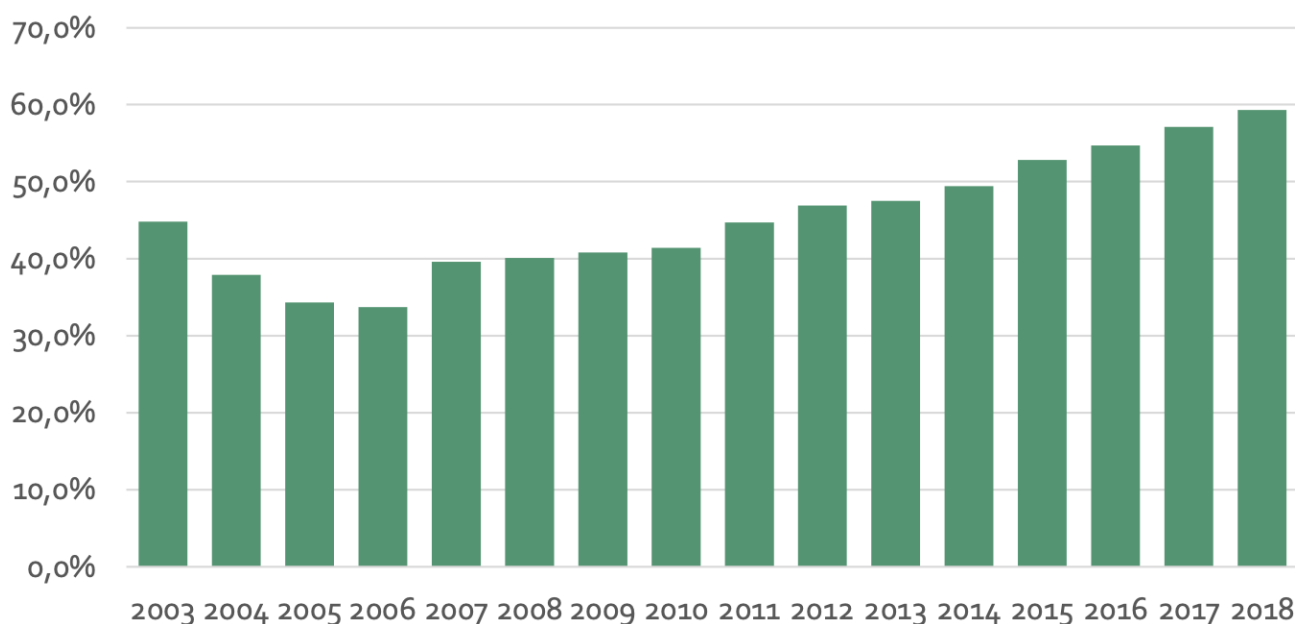
Africa posted the fastest growth rate in 2019 at 14% YoY, while Europe experienced very modest growth.

Diagram 5. Growth in gross income by region in 2019



There was also talk about simplifying the rules. Operators of online gambling operating in the European Union are forced to obtain licenses in several countries, which require licensing. But a more general approach would be better for them. More compliance requirements create unnecessary infrastructure duplication and costs, which adds unnecessary administrative burdens for regulators.

Diagram 6. The share of the "white market" in online gambling revenue worldwide



Since 2003, the market has grown by an average of 23% annually. The dominant elements were betting, casino and poker. Online gaming is becoming more and more popular, and its progress is driven by factors such as the spread of the Internet, the emergence of new markets and new groups of players.

8.2. NEW GROUPS OF PLAYERS

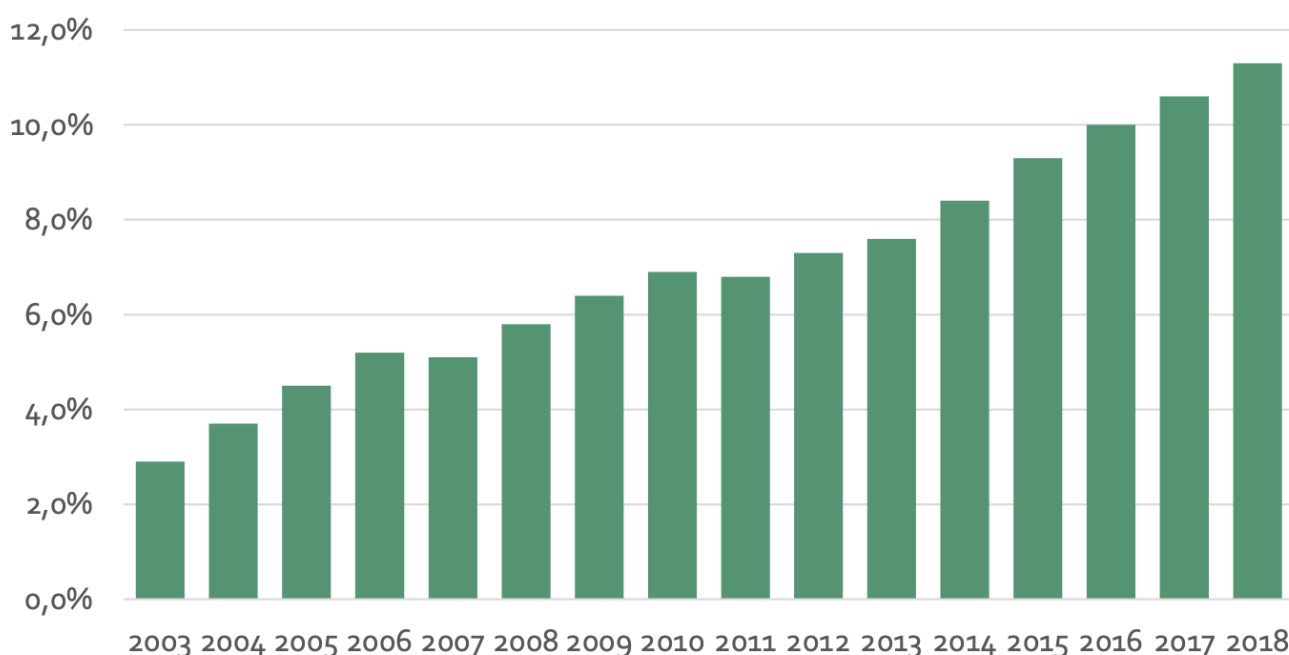
Since 2004, the number of female Internet users aged 18 to 74 has increased by more than 80%, and men by 60%. Online gambling attracted mostly young men, but now it is becoming more popular among women and older people.

Different types of players have different preferences and reasons to play. Most people do it for fun, others do it to win money, and some do it to relax. Whatever the reason, operators and developers should keep an eye on player preferences. Age differences between players are also increasing as the Internet continues to spread in society. The image of the average male player between the ages of 25 and 35 is becoming increasingly blurred.

According to a study by GP Bullhound, 43% of all online gamblers in 2009 were women. Their favorite segment is still bingo, but they play in different directions. Research shows that the play behavior of men and women is different. Women tend to play longer and bet lower, while men do it more often and bet more, but the games are shorter.

Bingo is becoming more and more popular because the game offers the opportunity to relax in a social society.

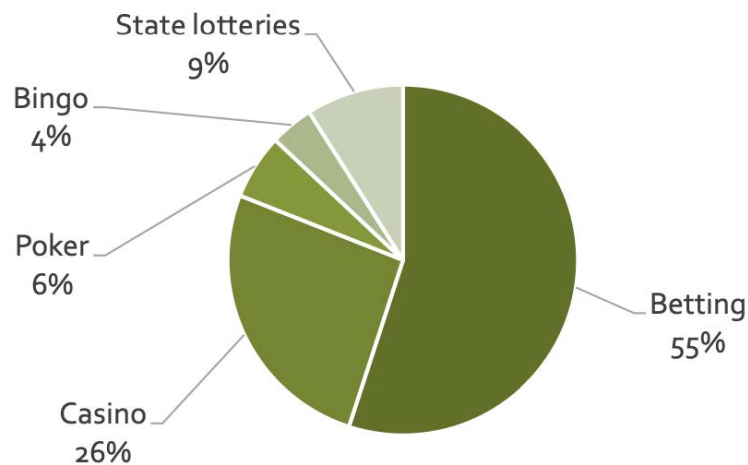
Diagram 7. Share of online gambling income from total gambling income in the world



It is important to note that most of the popular forms of remote gambling today are traditional casino games, betting and poker variations. The popularity of different types of online gambling depends on gender. The bingo industry is expected to have the highest growth rates as more women are interested in the iGaming industry and bingo.

Nevertheless, online gambling is still more popular among men. Young men are especially prone to gambling. Women enjoy playing just as much, but they choose simpler games like lotteries and slots. The difference can be explained by the socialization of the roles of men and women. Betting, casino games and skill games are traditionally associated with male audiences, while women are more accustomed to playing, having fun, rather than getting an adrenaline rush.

Diagram 8. Online gaming revenue by type, 2019



8.3. CURRENT TRENDS IN ONLINE CASINOS

Due to the pandemic and self-isolation in many countries, 2020 has become a very successful year for online casinos around the world: there is an increase in the revenue of the entire online gambling market in the world by a third compared to the previous period last year. And during the crisis of 2008, it practically had no effect on the wallet of online casino customers. This indicates the robustness of this business model.

New technologies are having a profound impact on the gaming market. Active development is predicted for mobile gambling, and only the best new products will withstand competition, which means that users will notice an improvement in the quality of mobile gambling.

All technical changes, including those related to the speed of mobile data transmission, will not be particularly noticeable to end users, they will take place, so to speak, in the background. But the qualitative and specific changes will be on the face.

The main surprise will be virtual reality in online gambling. Thanks to the development of Microsoft HoloLens, HTC Vive and Playstation VR, video slots and other online games will become more spectacular and amazing than ever before soon.

Virtual reality technology

New advances in VR technology make it possible to faithfully reproduce the emotions and physiological sensations experienced by a person in a real casino. With the help of virtual reality glasses, anyone who wishes today can walk through the hall of a masterfully recreated gambling establishment, talk to the dealer and place bets at any gaming table.

Such giants of the gaming market as Microgaming, Novomatic, NetEnt, Lucky VR, Topgame Technology and others are working in the direction of the development of virtual reality games.

Back in the winter of last year, at the international conference ICE Totally Gaming, Microgaming presented an impressive stand, where the virtual roulette game was demonstrated. The software used has clearly shown that virtual reality is achievable, and a great future awaits it in the gambling industry.

The company NetEnt is actively studying VR technologies. Visitors to exhibitions dedicated to online gambling have already repeatedly experienced the Jack and the Bean Tree slot machine. The amazingly realistic journey was appreciated by both players and competitors.

Talking about their achievements in the field of virtual reality, Novomatic representatives note the main advantages of realistic online games: full immersion in the gameplay; incredible emotions, even brighter than in real life; the ability to use the resource in any convenient place where there is an Internet connection; exciting and varied plots.

Novomatic is one of the pioneers in the implementation of VR technology in online gambling, which has many new developments.

Recently, the idea of the possibility of integrating virtual gameplay into social networks has been repeatedly expressed. Most likely, such an idea will soon be implemented.

Social games combined with slot machines

Online gambling in a social format is gaining popularity. We recently reviewed the new Castle Builder 2 slot from Microgaming, which evolves gameplay through advances in spinning reels and placing bets.

The advantage of social gambling is that it is much more dynamic and addictive than a traditional slot machine. Such games allow you to choose a playable character and follow different paths depending on the character of the hero. In addition, the characters are invited to develop: to accumulate experience, skills and achievements, and due to this, get more favorable conditions for the game. The role of the reel slot machine is that the winning combinations not only bring money, but also the resources necessary to continue in the game.

Currently, slot machines with social game capabilities are in great demand, so many developers are working on their creation. In the second half of 2019, several fresh new products were released.

Progressive Poker Jackpot with a live dealer

Slot machines with a progressive jackpot are chosen by many gamblers, as this is a chance to win a large cash prize. Now this technology is smoothly spreading to poker. Evolution Gaming has already introduced the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em!

The initial size of the jackpot is 1,000,000 euros, but since it is cumulative, the amount increases in proportion to the activity of the players. Evolution Gaming Product Director Todd Haushhalter noted that the jackpot could grow to an incredible € 30,000,000! Agree, playing poker with such a prize at stake is much more fun. The game also has a second level jackpot with lower fixed payments.

Other developers of live online casino games are also considering introducing an attractive progressive jackpot for players.

Live-games

Live dealer games have become very popular in the past year. And this is just the beginning of their successful development. In future, it is expected to further popularize live games in conjunction with VR technology. The developers plan to create even more realistic games with improved functionality and open new studios for broadcasting games in real time.

Skill games

Most modern players rely not only on luck, but also on their own skills. This inspired many providers to develop platforms containing strategy games. They need to apply certain skills, which is very attractive for players. This promises immense popularity for skill games soon.

Gamification

This concept implies the use of game dynamics and game thinking to attract an audience to the process and solutions to marketing problems. Gamification will no doubt become a new trend in gambling and promises new missions, competitions, bonus programs and rewards to attract gamblers.

Entertainment content

Online casino operators strive to keep users on their resource in every possible way. Now, in addition to chats, special sections with useful non-game content will be used for this: movies, TV series, music videos and TV shows. In addition, plot details of many slots will appear in online casinos.

Big data

Another trend of the current year will be Big Data technology. It provides the collection and storage of a huge amount of information and is indispensable for the progressive online gambling industry. Thanks to the ability to analyze and sort a large amount of data, games will effectively adapt to the interests and needs of the target audience.

Mergers and acquisitions

According to experts' forecasts, the development of the gambling market is so rapid that by 2024 its volume will exceed \$ 60 billion. So, in 2024, gambling companies will expand and increase their capital.

Messengers

The new possibilities of the mobile Internet are constantly attracting players. If earlier social networks and telephone means of communication were in trend, now the position of the leader is taken by convenient instant messengers.

Slotegrator is seriously interested in this trend and has created its own Telegram casino. Integration of the gaming platform into the messenger allows users to enjoy gambling on their smartphone at any time.

Individual slots

Creation of slots for individual orders will also be included in the top online casino services. The development of unique slots will allow operators to gain a competitive advantage in the market and maximize brand awareness.

Cryptocurrencies

Cryptocurrencies are famous for such significant advantages as anonymity, convenience, minimum fees and the absence of prohibitions from legislation. Thanks to this, they will become one of the most popular means of payment in the field of Internet gambling. In addition to bitcoin, the following currencies will gain popularity: litecoin, dogecoin, ethereum, ripple, monero, zcash and others.

Currently, the use of cryptocurrencies by customers is alarming, since they are associated with illegal, i.e. gray financial market. At the first stage, it is not recommended to use settlements with clients in cryptocurrency.

Security issues in online gambling

New technologies imply the search for new ways to solve security issues. Moreover, DDoS attacks have become more frequent lately. In the past year, they have done a lot of damage to online bookmaker sites. As it turned out, even large operators with close attention to security issues, such as Britain's William Hill, are not immune from hacker provocations. Last fall, the services of this operator were unstable, and with 5 million revenue a day, the losses will be rightly called significant.

In 2019, a significant proportion of gambling operators' investments were directed towards security.

Women are actively interested in online gambling

The trend of an increase in the number of female gamblers in online casinos was outlined back in 2015. And now it is only getting stronger. According to the research conducted, the fair sex prefers to gamble on personal gadgets and in private. This allows for more leeway and avoids ridicule from male players.

The most active gamblers are women under the age of 35, but older ladies are also not averse to occasionally spinning the reels of slot machines, starting a roulette wheel or throwing cards.

Online casinos made especially for women have already begun to appear, and some operators are conducting advertising campaigns aimed specifically at women.

8.4. MARKET FORECASTS

Research company Juniper calculated that betting turnover in the online gambling segment will reach \$ 950 billion by 2024 and will continue to grow even before the pandemic, according to Yegonet.

According to Juniper research, gambling is increasingly moving to the online environment. Moreover, the greatest activity is shown by mobile applications. The share of bets made via mobile phones is constantly growing.

The authors of the study also noted that, despite the general trend towards the regulation of national gambling markets, a few countries are moving towards a complete ban on gambling via the Internet and mobile applications.

The global online gambling market already accounts for more than 13% of the total global legal gambling market and this figure is constantly growing.

Niche revenue is expected to reach \$ 65 billion by 2024, and the niche itself will undergo a series of changes and reforms depending on the market.

Modern technologies for the gambling business are actively developing. This applies to classic slots, video slots and VR (virtual) - gambling. A young generation of players is entering the market, and companies are doing their best to meet the high requirements. This is how esports betting and skill-based games emerged.

The Asian market is the largest in the world in terms of volume, and every year the demand for gambling is only growing. 2019 showed softening in the field of law - more and more countries are legalizing online betting and even casinos. This trend has moved into 2020, which opens new perspectives for the industry. See also the best deals from Asian casinos at 3snet.

In Africa, the online gambling market is now at the stage of rapid development and growth. The main problem is that currently, in most countries of the continent, casino activities are not regulated in any way (but they are not prohibited at the legislative level either). Therefore, it will take time to fully unleash the potential of this market.

9. RISKS OF OPENING AN ONLINE CASINO

Unstable legislation

Each country has its own rules regarding gambling, which change quite often. You need to understand that, perhaps, the casino owner will need to decide how to reformat the establishment in the event of changes in the law.

Instability of equipment operation

Since the main locale is the internet, it's important that everything runs like clockwork. If the site or server goes down, the casino will suffer serious losses.

Software

The structure of an online casino is a kind of constructor consisting of three types of software (software, or so-called software): a gaming platform, a payment solution, and gaming content.

Payment systems are the least risky category. All payment solutions are seriously tested by regulatory authorities, banks, etc. Here the risk of getting low-quality software is minimized.

The biggest risk for operators is non-original, or so-called pirated, software. As a result, you can lose experienced and serious players who understand software. They will choose the casino that has the original software. Because it guarantees both payouts and a clear return to player (RTP) percentage. Another aspect that operators often overlook is the back doors. Backdoors is a malicious algorithm that programmers often "screw" onto handicraft software to simply steal money from unsuspecting operators. In addition to backdoor, there is a huge number of errors, bugs, which also entail financial losses.

"Pirate" software is an illegal thing. Clients simply cannot know either the final provider or who they are contracting with, because there is a whole chain of intermediaries. At a certain moment, when you invested money in the development of a casino, installed software, launched a project, spent money on marketing, your provider will simply disappear. This will not happen with the original software, because you always know with whom you have a contract, who is behind this contract and to whom in case of something to contact with problems.

The last aspect is a violation of the copyright law, which is often ignored, but in our country, there is still a possibility to prosecute a person under this law.

A very important aspect when choosing software is security. Serious software development companies spend colossal resources on it. Creation of secure software requires additional time

and human resources. Companies deliberately do this in order to end up with a product that will provide security to all customers. And that's something worth working for.

Another very important aspect is the so-called usability, which is often neglected when developing software, because people are chasing functionality. Forgetting about usability, you can face a problem when a lot of unsystematic functionality accumulates on one platform. It is necessary to think about ease of use at all stages: both when drawing up a technical assignment for software development, and subsequently, during modernization and upgrades.

High competition

The owner of a gambling business can receive a lot of money, since this type of service is in great demand. Many seek to occupy a niche, but only casinos with the right approach to business achieve success. You need to tune in to the fact that you must work hard to earn.

Money laundering

Regulatory organizations conduct constant checks about money laundering by criminal structures, financing of terrorism through online casinos. If evidence of inadequate antimoney laundering activities is found, casinos may have their license revoked.

Advertising

Regulatory organizations ensure that gambling advertising is socially responsible, with attention to protecting children, young people and other vulnerable persons from harm or exploitation. This applies to the images of toys, comic book characters, cartoons, fairy tales, brands that children like.

Loss of funds

At the first stage, losses of funds spent on registration, rent and office equipment are possible.

The security payment, in the event of the closure of the online casino for internal reasons or other objective reasons, is returned to the casino owners, but must remain unused during the operation of the online casino as a deposit in case of winning the jackpot, i.e. losses can be minimal.

Risk insurance

Thanks to the combined 10 years of experience in the field of online casinos of the founders and co-owners of the project and the managerial experience of the project mentor, the risks of entering the market will be minimized as much as possible.

10. FINANCIALS

10.1. INVESTMENT PLAN

Volume and structure of investments

The total investment required for the project is 213,3 thousand euro.

The funds raised under the project are planned to be distributed in the following areas of financing:

- acquisition of a license and security payment;
- payment for the server "Amazon";
- purchase of office equipment, and stationery;
- floating capital financing.

Table 5. Investment budget

№	Name	Value
1	Acquisition of a license and security payment	128 500
2	Payment for the Amazon server	12 076
3	Office equipment and stationery	2 400
4	Floating capital financing	70 314
Invested capital total (actual need for cash)		213 290

The largest share in investment costs is acquisition of a license and security payment (about 60%).

Project Milestones and Implementation of Investments Schedule

The total project implementation period is 36 months (3 years).

The duration of the investment period (before the launch of the project) is 0,3 years.

In the process of project implementation, the following steps must be completed:

- first stage: acquisition of a license and security payment;
- second stage: payment for the Amazon server;
- third stage: purchase of office equipment, stationery;

A phased work schedule with a financing schedule is presented in the table below.

Table 6. Financial plan, euro

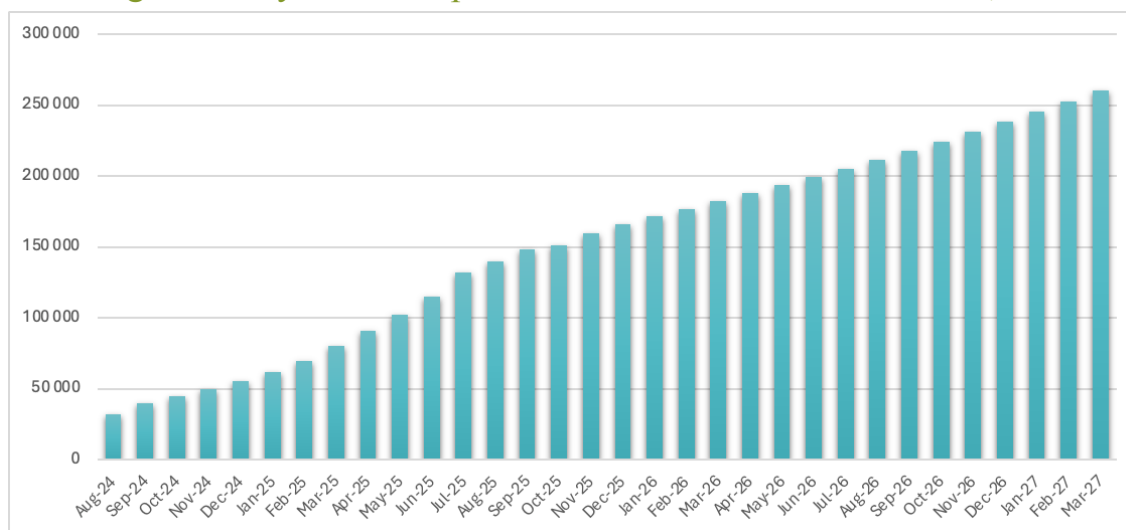
		Total for 3 years	Apr-24	Jul-24	Aug-24	Sep-24	Feb-25
1	Acquisition of a license and security payment	128 500	128 500	-	-	-	-
2	Payment for the Amazon server	12 076	-	12 076	-	-	-
3	Office equipment and stationery	2 400	-	2 400	-	-	-
4	Floating capital financing	70 314	4 850	-	41 381	-	24 084
	Investment total excl. floating capital	142 976	128 500	14 476	-	-	-
	Invested capital total (actual need for cash)	213 290	133 350	14 476	41 381	-	24 084

10.2. INCOME PLAN

Income-generating activities and products

Within the framework of this project, it is planned to receive income from the provision of online casino services.

Diagram 9. Dynamics of proceeds from sales and direct costs, euro



The total amount of proceeds for the project period (3 years) will amount to 4 837,6 thousand euro. An aggregate plan for generating income and financing direct costs is presented in the table below.

Diagram 10. Dynamics of income and net profit in Euros

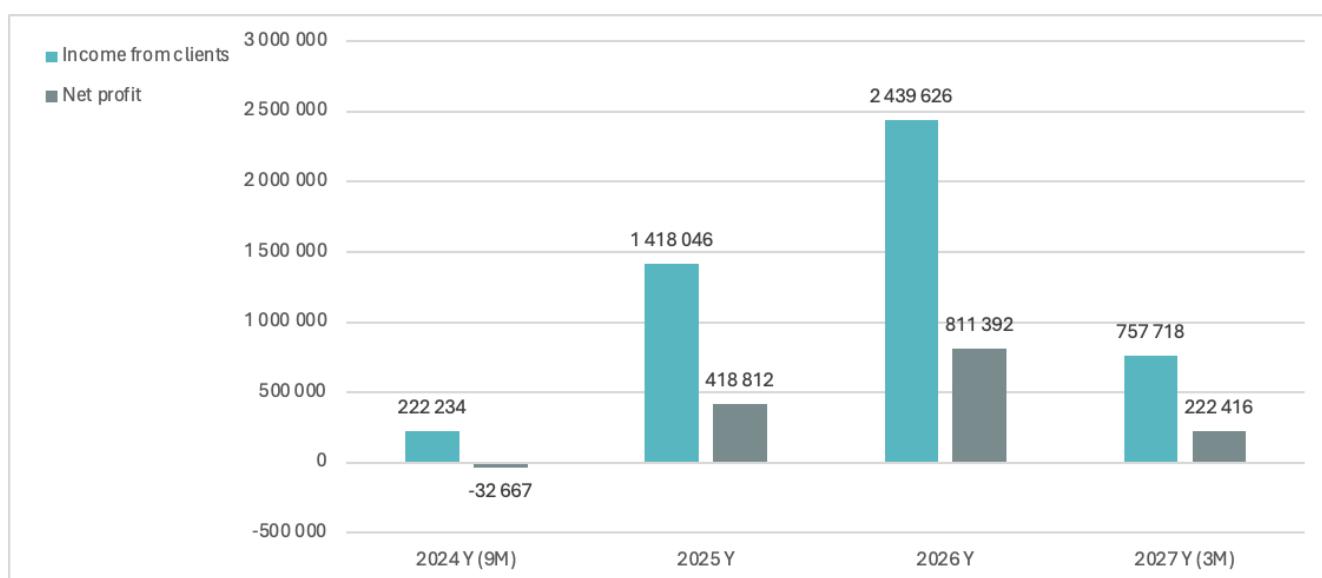


Table 7. Income and direct cost plan

36

Physical indicators	Unit	Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Total number of clients	ppl	106 321	4 884	31 166	53 618	16 653
Number of new clients	ppl	70 244	4 274	21 617	33 844	10 509
Number of current clients	ppl	36 077	611	9 549	19 774	6 144

Proceeds		4 837 625	222 234	1 418 046	2 439 626	757 718
Income from clients	45,50	4 837 625	222 234	1 418 046	2 439 626	757 718

Direct costs		2 517 801	195 009	698 843	1 224 580	399 369
Advertising costs	18	1 329 320	97 217	411 736	627 473	192 894
Additional staff costs	1 033	671 667	0	98 167	408 167	165 333
Salary		297 600	46 500	111 600	111 600	27 900
License fees		142 961	39 378	48 745	48 745	6 093
Depreciation	60 m	76 254	11 915	28 595	28 595	7 149

Indirect costs		478 133	55 333	174 800	174 800	73 200
Accounting		122 667	19 167	46 000	46 000	11 500

53

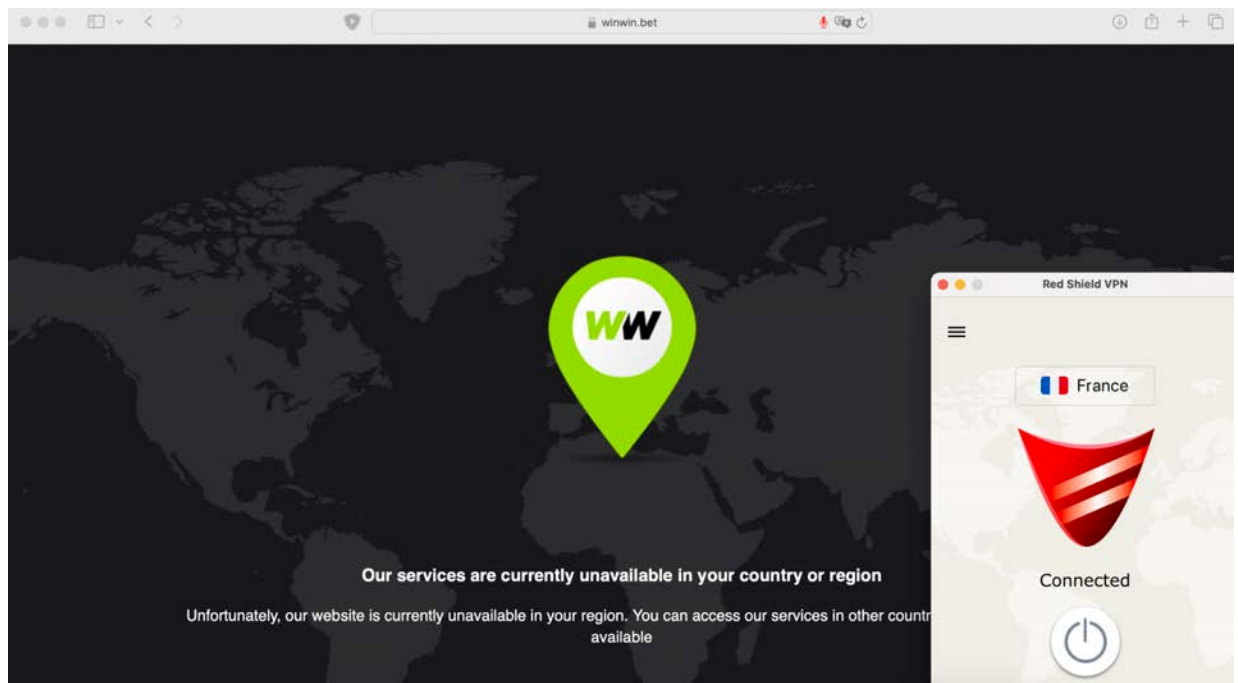
Office equipment maintenance	96 000	15 000	36 000	36 000	9 000
Hosting	124 000	0	42 000	42 000	40 000
Office rent	28 800	4 500	10 800	10 800	2 700
Legal support	106 667	16 667	40 000	40 000	10 000

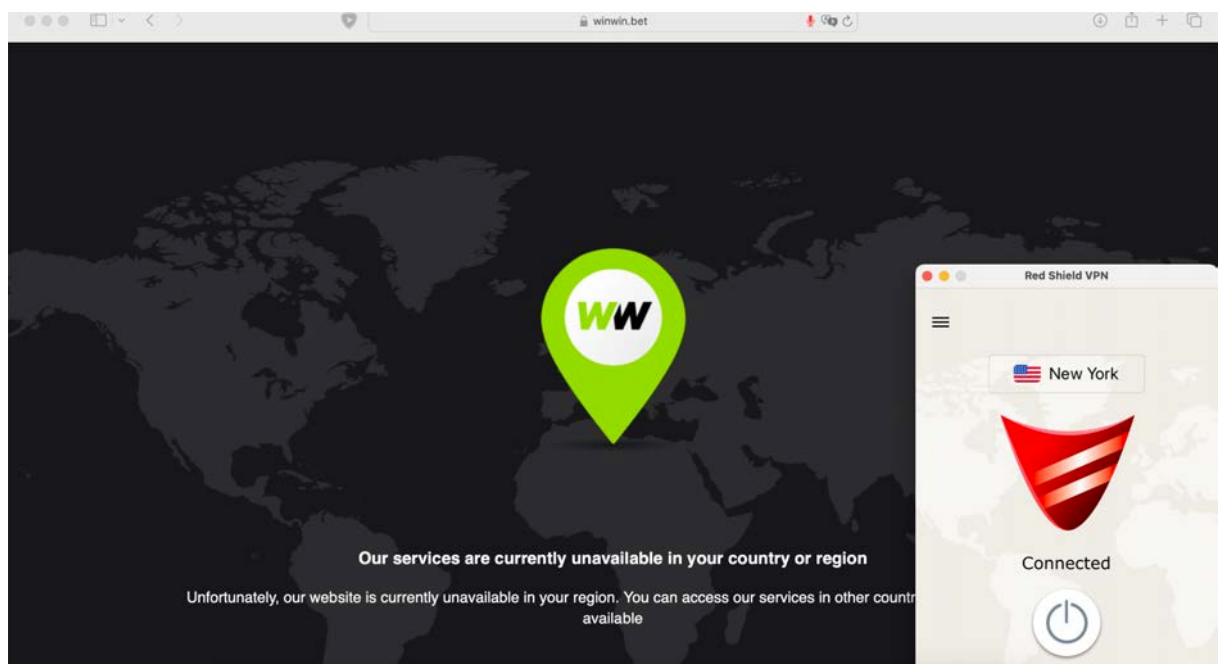
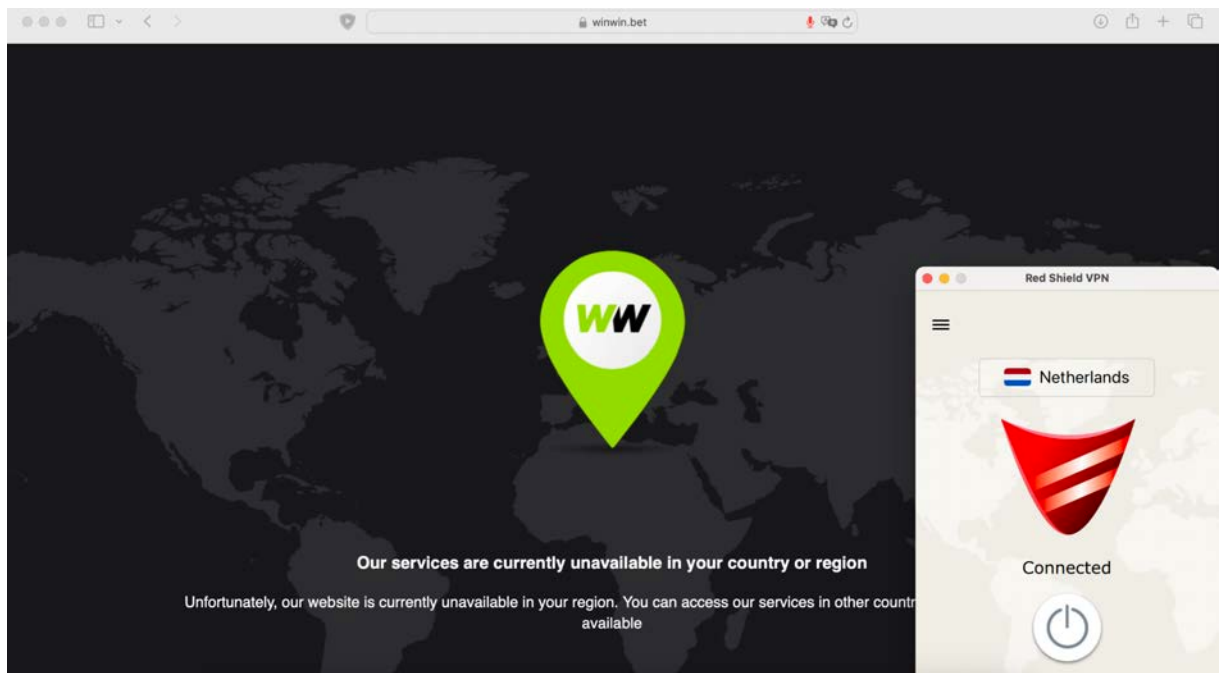
10.3. MARKETING PLAN

WINWIN is crafted for discerning individuals aged 18 and above who seek a unique and responsible gaming encounter. This extensive marketing blueprint delineates strategies aimed at forging brand affinity, captivating the target demographic, and fostering sales growth via innovative and ethical endeavors.

Target Audience:

- Demographics: Our primary focus is on adults aged 18 and above, with a particular emphasis on the 25-41 age bracket.
- Geographics: Our target markets include Argentina, Peru, Chile.
- Geoblock: We restrict access from the USA, France, and The Netherlands, as well as the Dutch Caribbean Islands: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.





- Psychographics: Enthusiasts of cutting-edge technology, gaming aficionados, and those valuing a commitment to responsible gaming practices.

Marketing Strategies:

a. Brand Identity:

Cultivate a compelling brand narrative emphasizing dedication to reshaping the gaming landscape through innovation, excitement, and a strong foundation in responsible gaming.

WINWIN as a nexus for groundbreaking technology, diverse gaming experiences, and a thriving gaming community.

b. Digital Realm Domination:

- Elevate the website for an intuitive user experience, ensuring seamless navigation across various platforms.
- Leverage the potential of social media platforms for targeted advertising, captivating content dissemination, and community-building endeavors.

c. Content Odyssey:

- Develop a content strategy featuring engaging blog posts, interactive tutorials, and exclusive insights from developers to foster a sense of community and sustained player engagement.
- Forge partnerships with gaming influencers and content creators to amplify NexusGamer Ventures' reach and impact.

d. Advocacy for Responsible Gaming:

- Infuse responsible gaming messages organically within marketing materials and gaming interfaces.
- Integrate features such as session duration reminders, spending limits, and voluntary self-exclusion tools to empower players.

Sales Expeditions:

a. Launch Excitement:

- Unveil captivating launch promotions and exclusive bonuses to enthrall early adopters.
- Employ strategically timed limited-time offers to instill urgency and anticipation.

b. Partnership Odyssey:

- Form strategic alliances with gaming affiliates, influencers, and synergistic brands to amplify visibility and attract a broader audience.
- Establish an enticing affiliate program to motivate third-party promotion.

c. Data-Fueled Refinement:

- Harness analytics tools to glean insights into player behavior, preferences, and the efficacy of various acquisition channels.
- Propel data-driven optimizations in marketing strategies, targeting precision, and overall user experience.

d. Customer Harmony Mastery:

- Implement an agile Customer Relationship Management (CRM) system to personalize communications, promotions, and offers based on individual player preferences.
- Leverage targeted email marketing campaigns for personalized promotions and real-time updates.

Performance Assessment Metrics:

- Continuously monitor pivotal metrics, including customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.
- Undertake periodic reviews and agile adjustments based on performance analytics.

10.4. PROJECT COSTS

The following types of costs were identified in this project:

- fixed costs;
- variable costs.

Fixed costs

Staffing and salary

According to the staffing table, the total estimated number of personnel is 6 people with a standard workload with an average salary of 1 860 euro per month.

The total payroll will amount to 9,3 thousand euro per month (297,6 thousand euro in 3 years).

It is planned to pay for the work of all employees of the company on a time-based basis. At the same time, in the future, it is planned to develop a system of financial incentives (bonuses, bonuses, etc.).

Table 8. Staffing table with salaries, euro

№	Position	Number of people	Salary	Total per month
1	Director	1	2 100	2 100
2	Site developer	1	1 600	1 600
3	Designer	1	1 600	1 600
4	Advertising specialist	1	1 500	1 500
5	Employee	2	1 250	2 500
	Total	6		9 300

Other current (fixed) expenses

When calculating the financial indicators of this project, current fixed costs with an average amount of 174,8 thousand euro per year were taken into account.

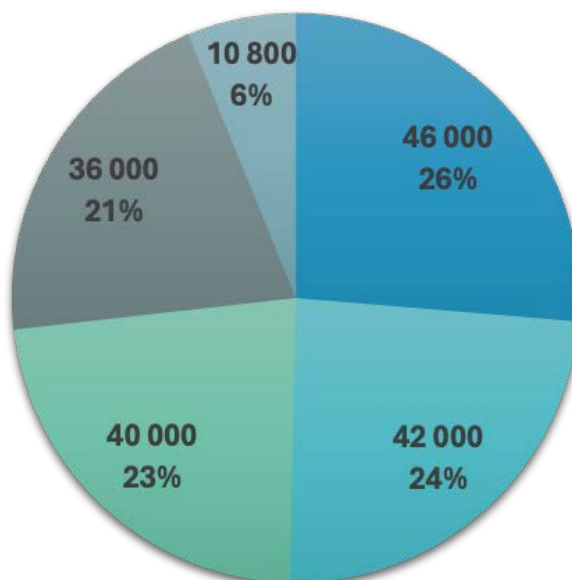
A complete list of ongoing fixed costs is presented in the table below.

Table 9. Fixed costs, euro

No	Item of expense	Total per year
1	Accounting	46 000
2	Office equipment maintenance	36 000
3	Hosting	42 000
3	Office rent	10 800
4	Legal support	40 000
	Total	174 800

Diagram 11. The structure of fixed costs (to the total volume of fixed costs)

- Accounting
- Hosting
- Legal support
- Office equipment maintenance
- Office rent



Variable costs

Direct production costs

A complete list of current variable costs is presented in the table below.

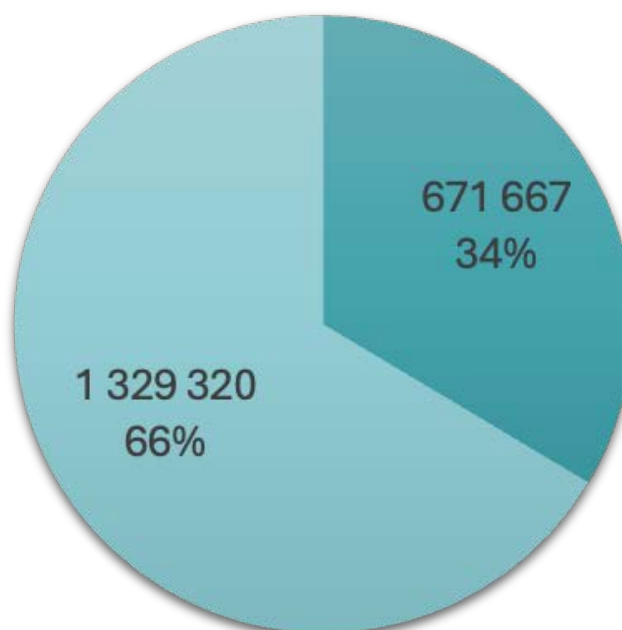
Table 10. Variable costs, euro

№	Item of expense	Per unit, total	Calculation base
1	Advertising costs	18	for 1 client
2	Additional staff costs	1 033	for 1 person

A detailed plan for financing direct costs is presented in the Appendices.

Diagram 12. Structure of variable costs (to the total volume of variable costs)

- Additional staff costs
- Advertising costs



Taxes

The amount of accrued and paid taxes for the project period will amount to 421,7 thousand euro.

10.5. FINANCIAL PLAN

Conditions for attracting investment resources

Financial resource requirements and financing structure

The need for financial resources for the project is 213,3 thousand euro.

It is planned that the financing of this project will be carried out at the expense of the investor.

The amount of payments to the investor for the period of the project will be 523,3 thousand euro.

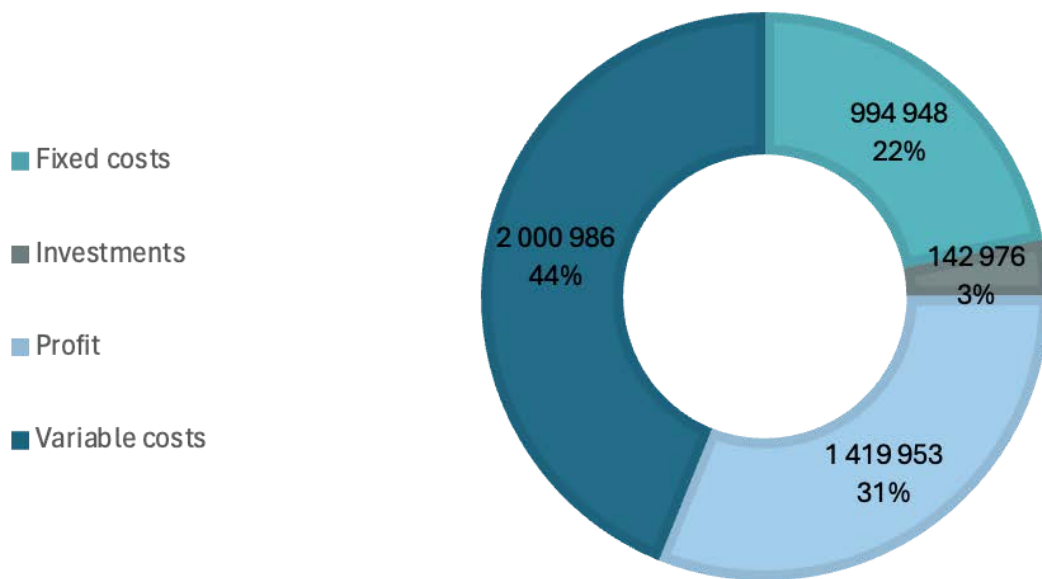
Indicators of the cash flow plan

Positive cash flows from operating activities are generated by sales proceeds, while negative cash flows arise from the company's operating costs. The total proceeds for the project period amount to 4,837.6 thousand euros (EUR).

The negative cash flow comprises the following key components:

- Variable costs: Advertising costs 18 for 1 client; Additional staff costs 1033 for 1 person
- Fixed costs: 174.8 thousand euros (EUR)
- Taxes: 421.7 thousand euros (EUR)

Diagram 13. Distribution Structure of Sales Proceeds to Costs and Profit



Financial Performance

The project calculation horizon is 36 months (3 years). The investment period of the project (until the launch of the project) is 3 months (0,3 years). The working period of the project (from the launch) is 33 months (2,7 years).

To calculate the financial indicators of the project, taking into account the nature of the project, a discount rate of was adopted.

In total, for the entire period of the project implementation, 4 837,6 thousand euro of sales proceeds will be received.

The total cost for the project period will amount to 3 341,4 thousand euro.

Net profit upon completion of the project will amount to 1 419,9 thousand euro.

Table 11. Financial and investment indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	142 976
Sum of proceeds (SP), EUR	4 837 625
Net average operational receipts per month (NAOR), EUR	46 908
Net profit for the project period, EUR	1 419 953
Average profitability for the project period (net profit to proceeds	29,35%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	684 516
Average Rate of Return of investments (ARR)	21,99%
Return on investment (ROI)	893%
Profitability index (PI)	4,8
Internal rate of return (IRR)	156,66%
Pay back period of the project in whole (PBP), incl. financing scheme	15 months
	1,25 years

SWOT analysis

Table 12. SWOT analysis

Strengths	Weaknesses
• Significant experience of the project managers and team members in the field of communications and casino management • High quality service Strict policy against any type of fraud, which protects players from any potential troubles during the game • Wide range of games	• Competitors can quickly offer similar products or services • Limited pricing flexibility • Not available in all countries • Online content requires high internet speed Lack of a clearly formulated long-term strategy (due to the nature of the business)
Opportunities	Threats
• Growing popularity of mobile gambling Constant emergence of new technologies • Global trend towards legalizing online casinos	• Instability of the political environment • High competition Impossibility of local placement of equipment and/or bans on the use of international services in some countries • Decrease in disposable income of the population against the backdrop of economic recession