



West End Gaming Business Plan 2024 - 2027

About West End Gaming

West End Gaming (thereafter “WEG”) is a small but dynamic player in the online and mobile gaming industry. Founded just four years ago, WEG has quickly made a name for itself by leveraging the expertise of its dedicated team. Initially concentrating on markets in Brazil, Peru, and Chile, WEG launched its flagship brand, Alegrebet, offering a range of gaming products and services tailored to the preferences of the local audience.

Despite its size, WEG has been nimble in responding to changes in the gaming landscape. Driven by a commitment to innovation and customer satisfaction, WEG has continuously evolved its offerings to stay ahead of the curve.

Unique Features and Competitive Edge

1. **Localized Offerings:** WEG offers locally branded gaming solutions that resonate with players in its target markets. This approach fosters strong connections with customers and sets WEG apart from larger competitors.
2. **Customer-Centric Approach:** Despite its size, WEG places a strong emphasis on providing exceptional customer service. With a team of well-educated and native language speakers based in each country of operation, WEG ensures that players receive personalized and attentive support 24/7 via live Chat and email. Additionally, WEG has a dedicated CRM team focused on automating routine processes and providing tools to track and measure the productivity and effectiveness of campaigns, promotions, and customer journeys. By prioritizing the needs and satisfaction of players, WEG not only builds trust and loyalty but also fosters long-term relationships, cultivating a loyal customer base.
3. **Strategic Partnerships:** WEG leverages strategic partnerships with established software and media organizations to enhance its product offerings and expand its reach. These collaborations enable WEG to access cutting-edge technology and innovative solutions, giving it a competitive edge in the market.
4. **Expertise:** WEG leverages the expertise of seasoned consultants in the gaming industry. By partnering with experienced professionals, WEG gains valuable insights and guidance, enabling informed decision-making and the identification of growth opportunities. This strategic approach empowers WEG to navigate challenges effectively and stay competitive in the dynamic gaming landscape.
5. **Technology Investment:** WEG invests in state-of-the-art technology to deliver a seamless gaming experience for players. By prioritizing innovation and security, WEG builds trust and credibility among its customer base.

Through these unique features and a commitment to quality and innovation, WEG maintains a competitive edge in the online gaming industry, poised for continued growth and success.

Products and Services Description

1. Sportsbook & Esports:

WEG's sportsbook offering includes a wide range of betting options, powered by BetConstruct's cutting-edge betting engine. With over 70,000 live matches and 140,000 pre-match events monthly, spanning 120+ sports types, our platform provides unparalleled betting opportunities.

Advanced betting tools such as Edit Bet, SuperBet, Counter-offer, and BetBuilder enhance the user experience, while flexible cash-out options (Partial, Full, Auto) empower players to control their bets.

Our domain for sports betting, alegrebet.com, capitalizes on the local language appeal of the word "Alegre," resonating with Portuguese and Spanish-speaking markets.

2. Casino & Virtuals:

WEG's casino offering is powered by industry leaders such as Pragmatic Play, Playtech, Microgaming and Playson, ensuring a diverse and engaging gaming experience.

We prioritize quality and profitability, selecting market-leading providers whose products represent the pinnacle of online casino solutions.

3. Other Services:

Live chat support is available during peak hours, further enhancing the accessibility of our customer service.

As part of our commitment to security and convenience, WEG handles all payment processing services on its platform. We work with top payment system processors to ensure the security and efficiency of transactions. We offer a wide variety of secure deposit options and ensure fast payouts, facilitating seamless transactions for our users.

Web hosting and platform support for our domain are entrusted to BetConstruct (IT Technology Solutions Limited), guaranteeing reliable and robust technical infrastructure for uninterrupted gaming experiences.

Company Management Structure

Stavros Karagkounis : Chief Executive Officer/Chief Financial Officer/ Chief Compliance Officer (CEO/CFO/CCO)

- Stavros Karagkounis is a multifaceted professional with a strong academic background and extensive experience in executive leadership roles. Armed with a degree in Spanish Language and Literature from the National Kapodistrian University of Athens, Stavros pursued further studies in German and Spanish Philology at the prestigious Ruprecht Karls University in Heidelberg, Germany. His academic journey also included postgraduate studies in teacher specialization, focusing on exam evaluation.
- In the realm of professional endeavors, Stavros has made significant contributions, serving as CEO of the National Organisation for the Certification of Qualifications of Greece. During his tenure, he played a pivotal role in advancing the organization's mission and objectives, showcasing his strategic acumen and leadership capabilities.
- Moreover, Stavros held the esteemed position of Director of the Office of the Minister of Infrastructure and Transport from 2016 to 2018. In this capacity, he oversaw critical initiatives and projects, contributing to the development and enhancement of infrastructure and transportation systems.
- Most recently, Stavros has brought his extensive experience and insights to West End Gaming (WEG), where he has served for four years in various executive roles. In addition to that, Stavros has assumed the vital role of Chief Compliance Officer at West End Gaming (WEG). In this capacity, he ensures the company's adherence to legal and regulatory requirements, fostering a culture of compliance and ethical business practices. Stavros' dedication to upholding the highest standards of integrity and accountability underscores his invaluable contribution to WEG's success in the competitive gaming industry.

***Fotini Papaspirou* : Chief Operating Officer (COO)**

- Fotini Papaspirou has a 4 years experience in the gaming industry. She began her career at WEG as a Payments Manager, where she successfully managed payment processes and systems, ensuring efficiency and accuracy in financial transactions. Her performance led to her promotion to Payments Product Manager, where she played a pivotal role in developing and optimizing payment products to enhance user experience with cutting-edge payment solutions.
- In her current role as Chief Operating Officer (COO) at WEG, she assumes responsibility for overseeing the company's overall operational activities. She collaborates closely with the CEO/CFO/CCO to implement strategic initiatives and achieve business objectives, leveraging her extensive experience and expertise in the gaming industry.
- Fotini's leadership extends to key departments such as Marketing, Customer Support and Relationship, Payments, and Risk. She ensures seamless coordination and alignment across these departments to drive operational efficiency and deliver exceptional value to customers and stakeholders.
- With her experience Fotini Papaspirou contributing to the company's ongoing success and growth in the competitive gaming landscape.

This management structure underscores WEG's dedication to harnessing the expertise and passion of our team to drive toward our strategic goals and solidify our position in the gaming sector.

Business Forecasts

West End Gaming (WEG) anticipates a robust financial position driven by healthy Gross Gaming Revenue (GGR) and Net Gaming Revenue (NGR) performance. Our conservative revenue growth projections reflect our strategic approach, forecasting moderate annual growth rates in Sportsbook and Casino income, excluding potential market share increases in Brazil, Chile and Peru. With this prudent strategy, WEG is poised for sustainable growth and long-term success in the dynamic gaming industry.

Over the next three years, WEG sets ambitious yet achievable goals across various fronts:

Projections/Targets:

1. **Revenue Growth:** Aim for a conservative yet achievable revenue growth target, considering market dynamics and competitive landscape. This could be a 20-30% increase in revenue.
2. **Customer Acquisition:** Focus on retaining existing customers and increasing customer loyalty through personalized marketing campaigns and enhanced customer service initiatives. Prioritize customer satisfaction and loyalty by delivering exceptional products and services. Set targets for customer satisfaction metrics such as Net Promoter Score (NPS) and customer retention rates and measure progress against these targets.
Set targets for acquiring new customers, both through marketing efforts and strategic partnerships. Consider factors such as customer acquisition cost (CAC) and customer lifetime value (CLV) to ensure sustainable growth.
3. **Product Expansion, Innovation and Differentiation:** Maintain a focus on innovation and differentiation to stay ahead of competitors and capture market share. Set targets for the launch of new products or features based on market trends and customer preferences. Invest in research and development to drive innovation.

4. **Market Penetration and Expansion:** Continue to penetrate existing markets by increase market share by 5%. Set targets for market share growth and monitor competition closely to identify areas for improvement. If applicable, set targets for expanding into one new market, generating 20% of total revenue from the new market. Consider the regulatory environment and potential challenges in each market.
5. **Cost Management:** Implement measures to control costs and improve operational efficiency. Set targets for reducing expenses by 5% while maintaining or improving service quality.
6. **Profitability Improvement:** Improve gross margin by 5% through cost optimization measures and pricing adjustments.
7. **Strategic Partnerships:** Continue to build strategic partnerships with key industry players to expand market reach and enhance product offerings. Set targets for the number of strategic partnerships formed and measure their impact on revenue and market penetration.

Cash Flow Considerations:

1. **Cash Flow Projections:** Develop detailed cash flow projections to ensure sufficient liquidity to support business operations and growth initiatives. Implement cash flow forecasting tools and processes to improve visibility and control over cash flow.
2. **Capital Expenditures:** Plan for any necessary capital expenditures, such as technology upgrades or infrastructure investments, and include these in the cash flow projections.
- 3.
4. **Financing Options:** Evaluate financing options to support growth initiatives, such as bank loans, lines of credit, equity financing, or seek investors to support WEG's initiatives and capitalize on emerging opportunities in the dynamic gaming industry. Consider the cost of capital and the impact on cash flow when making financing decisions.
5. **Contingency Planning and Risk Management:** Identify potential risks and uncertainties that could affect cash flow, such as regulatory changes, economic downturns, cyber security threats and develop contingency plans to mitigate these risks and ensure business continuity. Maintain a buffer of cash reserves to cover unexpected expenses or revenue shortfalls.

Strategy For Business Growth

SWOT Analysis

Strengths:

1. **Specialized Expertise:** Our team possesses specialized expertise and experience in the gambling industry, enabling us to develop tailored solutions and provide exceptional service to our customers.
2. **Agile Decision-Making:** As a small company, we have the advantage of agility in decision-making processes, allowing us to quickly adapt to market changes and capitalize on emerging opportunities.
3. **Niche Market Focus:** Focusing on specific niche markets allows us to establish ourselves as experts in those areas and build strong relationships with our target audience.
4. **Personalized Customer Service:** We prioritize personalized customer service, fostering strong relationships with our clients and ensuring high levels of satisfaction and retention.

5. **Innovative Technology Integration:** Our commitment to integrating innovative technologies into our products and services enhances user experiences and keeps us competitive in the market.

Weaknesses:

1. **Limited Resources:** As a small company, we may have limited financial and human resources compared to larger competitors, which could constrain our ability to scale and expand rapidly.
2. **Brand Recognition:** Building brand recognition and awareness may be challenging due to limited marketing budgets and resources.
3. **Limited Product Portfolio:** Our product portfolio may be limited in scope compared to larger competitors, potentially limiting our appeal to a broader audience.
4. **Market Dependence:** Dependence on specific niche markets may expose us to risks associated with market fluctuations or regulatory changes in those areas.

Opportunities:

1. **Market Expansion:** Opportunities exist to expand into new geographic regions or target new customer segments, diversifying our revenue streams and mitigating market-specific risks.
2. **Partnerships and Collaborations:** Forming strategic partnerships with complementary businesses or industry players can enhance our market reach, product offerings, and brand visibility.
3. **Technological Advancements:** Leveraging advancements in technology, such as mobile gaming platforms or virtual reality, presents opportunities to innovate and differentiate our products.
4. **Regulatory Changes:** Favorable regulatory changes in the gambling industry may open up new markets or streamline compliance requirements, creating opportunities for growth and expansion.

Threats:

1. **Regulatory Uncertainty:** Evolving regulatory landscapes and compliance requirements pose a threat to our operations, requiring constant monitoring and adaptation to ensure compliance.
2. **Competitive Pressure:** Intense competition from established players and new entrants in the market may erode market share and put pressure on pricing and profitability.
3. **Economic Downturns:** Economic downturns or financial instability in key markets could impact consumer spending habits and discretionary income, affecting demand for our products and services.
4. **Technological Disruption:** Rapid advancements in technology may lead to the emergence of disruptive innovations or alternative gaming platforms, posing a threat to our market position and relevance.

Strategy and Plans:

To capitalize on the promising growth prospects in Latin America and Africa, particularly in countries like Brazil and Nigeria, WEG is strategically planning to increase revenue through targeted expansion and localized marketing efforts.

1. **Expansion in Latin America:**
 - **Targeted Advertising:** With the Latin American gambling market forecasted to reach \$3.4 billion USD by 2025 (* Source: Statista.com), WEG will increase advertising efforts in Brazil, Peru and Chile, focusing on digital channels and local media outlets to capture a larger share of the growing market and expand its revenue on those countries.

- **Localization of Brand:** To resonate with the diverse Latin American audience, we'll localize our brand with culturally relevant content and promotions, enhancing customer engagement and loyalty.
- 2. **Adaptation to Regulatory Changes:**
 - **Compliance and Licensing:** Given the anticipated regulatory changes in Brazil, WEG will proactively ensure compliance with local regulations and acquire necessary licenses to operate legally in the market, safeguarding our business against regulatory risks.
- 3. **Expansion into Nigeria:**
 - **Seizing Market Opportunities:** With Nigeria's online gambling market projected to reach \$641.20 million USD by 2024 (* Source: Statista.com), WEG is planning to enter the market, capitalizing on rising internet penetration and the popularity of mobile gaming among Nigerians.
 - **Focus on Sports Betting:** Considering the thriving online sports betting segment, we'll prioritize offering competitive sports betting options tailored to Nigerian preferences, aiming to capture a significant market share.
- 4. **Strategic Marketing Approach:**
 - **Efficient Advertisement Spend:** Utilizing insights from market research, we'll optimize advertising spend, targeting high-potential customer segments to maximize ROI.
 - **Personalized Marketing:** Leveraging customer profiling, we'll personalize marketing campaigns to cater to the unique preferences of Latin American and Nigerian consumers, driving customer acquisition and retention.
 - **Digital Marketing Campaigns:** Launch targeted digital marketing campaigns across various channels including Google Ads, social media advertising, and affiliate marketing to reach potential customers.
 - **Search Engine Optimization (SEO):** Optimize website content and structure for search engines to improve organic visibility and attract organic traffic.
 - **Email Marketing:** Build and segment email lists to deliver personalized promotional offers, newsletters, and updates to subscribers.
 - **Social Media Engagement:** Create engaging social media content, run contests, and interact with followers to build brand loyalty and increase brand awareness.
 - **Partnerships and Sponsorships:** Form strategic partnerships with other businesses, influencers, or sports teams to reach a wider audience and enhance brand credibility.
 - **Customer Retention Programs:** Implement loyalty programs, referral incentives to encourage repeat business and increase customer lifetime value.

By executing these strategies, WEG aims to capitalize on the exponential growth opportunities presented in Latin American and African markets, achieving substantial revenue growth and establishing a strong foothold in these regions.

Financial Plan:

With a strategic focus on optimizing revenue from players' gaming activity and bolstering our financial position, we have decided to retain earnings in the next couple of years to fund our operations in the market. Supported by shareholder contributions and potential investments, we are providing a breakdown of projected expenses and our marketing budget. Despite our current modest scale and revenue, our plan charts a path towards substantial growth and market influence.

With these budgeted expenses and marketing costs, WEG aims to effectively manage its finances while strategically investing in growth opportunities to achieve its business objectives.

Expenses:

Operational Expenses: This includes essential costs associated with platform services, as well as revenue sharing agreements for both sportsbook and gaming software
Estimated Monthly Expense: €8,000 - €10,000

Payment Processing Fees: Costs associated with processing payments and transactions made by customers.
Estimated Monthly Expense: €2,000 - €3,000

Direct Operational Expenses: This includes salaries for employees including marketing personnel, and administrative roles, professional services such as costs for legal, accounting and other fees required to operate the business.
Estimated Monthly Expense: €5,000 - €7,000

Total Monthly Expenses: Approximately €15,000- €20,000

Marketing Budget:

Digital Marketing: Investing in online advertising channels such as Google Ads, social media ads, and content marketing via social media channels.
Estimated Monthly Budget: €5,000 - €6,000

Affiliate marketing: We invest in affiliate marketing programs to expand our reach and acquire new customers through strategic partnerships.
Estimated Monthly Budget: €5,000 - €10,000

SEO and SEM: Search engine optimization (SEO) and search engine marketing (SEM) efforts to improve the company's visibility in search engine results and drives organic traffic to our platform.
Estimated Monthly Budget: €2,000 - €3,000

Events and Sponsorships: Participating in industry events, sponsorships and collaborating with influencers and streamers.
Estimated Monthly Budget: €15,000 - €20,000

Email Marketing: Building and nurturing email lists, sending promotional emails, and running email marketing campaigns.
Estimated Monthly Budget: €2000

Total Monthly Marketing Budget: Approximately €29,000 - €39,000

It's important to note that these budget numbers are estimates and may vary depending on the specific needs and goals of the company, as well as market conditions and competitive landscape. Regularly reviewing and adjusting the budget based on performance and ROI.

Target KPIs and Business Objectives:

Our success is defined by clear and measurable Key Performance Indicators (KPIs) and strategic business objectives. By setting precise targets, we aim to drive growth, enhance customer satisfaction, expand market share, and foster innovation.

Target KPIs:

1. **Gross Gaming Revenue (GGR) and Average Revenue Per User (ARPU):** Aim to increase annual gross revenue by 15% to drive overall growth and profitability. Concurrently, elevate the Average Revenue Per User (ARPU) metric to optimize monetization strategies and enhance individual customer value.
2. **Net Gaming Revenue (NGR) Growth:** Strive for an annual revenue increase of 15-30% by expanding market presence and enhancing customer engagement. Additionally, target an improvement in gross margin by 5-8% annually through operational efficiencies, cost management, and strategic pricing strategies.
3. **Customer Acquisition Cost (CAC) and Active Player Accounts:** Target a 10-15% quarterly growth in new customer acquisitions while measuring the cost-effectiveness of acquiring new customers. Simultaneously, increase the number of Active Player Accounts through targeted marketing campaigns and strategic partnerships.
4. **Customer Retention Rate and Churn Rate:** Maintain a high customer retention rate of 60-70% by delivering exceptional user experiences and personalized offerings. Keep churn rate low to ensure long-term customer loyalty and revenue stability.
5. **Player Lifetime Value (LTV):** Focus on maximizing the long-term value of acquired customers by implementing strategies to increase customer lifetime value and enhance overall profitability.
6. **Market Share Expansion:** Set a goal to capture 8-10% market share in targeted regions within 2-3 years by implementing effective market penetration strategies and emphasizing competitive differentiation.
7. **Return on Investment (ROI) for Marketing Campaigns:** Evaluate the effectiveness of marketing campaigns by measuring ROI and optimizing marketing spend to maximize customer acquisition and retention.
8. **Brand Awareness:** Increase brand awareness and recognition by 20-25% within 12 months through strategic branding initiatives, digital marketing efforts, and community engagement. Strengthening brand presence enhances customer trust and loyalty, driving overall business growth.
9. **Product Innovation:** Launch 1-2 new innovative products or features annually to address evolving customer needs, improve user experience, and differentiate from competitors. Innovation is key to staying ahead in a dynamic market environment.
10. **Compliance and Regulatory Metrics:** Ensure adherence to regulations and compliance metrics to mitigate risks and maintain the trust and confidence of customers and regulatory authorities alike. Upholding compliance standards is crucial for sustainable business operations.

Measuring Success and Long-Term Business Objectives:

- **Financial Performance:** Success is measured by achieving targeted revenue growth, profitability, and return on investment. Long-term objectives include sustainable revenue streams, profitability, and financial stability.
- **Customer Satisfaction:** Monitoring customer feedback, satisfaction scores, and retention rates indicates the effectiveness of products and services. Long-term objectives include building strong customer relationships, loyalty, and advocacy.
- **Market Expansion:** Tracking market share growth, penetration rates, and expansion into new regions demonstrates progress in market expansion efforts. Long-term objectives include establishing a strong market presence and leadership position in target markets.

- **Innovation:** Assessing the rate of product innovation, adoption rates of new features, and market response to innovations indicates the company's ability to stay ahead of competitors. Long-term objectives include fostering a culture of innovation and continuous improvement.
- **Brand Equity:** Measuring brand awareness, perception, and equity over time reflects the effectiveness of branding and marketing strategies. Long-term objectives include building a reputable and trusted brand synonymous with quality and excellence.

By setting clear and measurable KPIs aligned with business objectives, the company can track progress, identify areas for improvement, and drive towards long-term success and sustainable growth.

Supplier Management and Risk Mitigation

In the dynamic landscape of online gaming, strategic partnerships with key suppliers play a pivotal role in ensuring operational efficiency, delivering a seamless user experience, and maintaining regulatory compliance. Our business recognizes the critical importance of these partnerships and has implemented robust strategies for supplier management and risk mitigation.

Key Suppliers:

1. **Payment Providers:** Our partnerships with reputable payment providers enable secure and efficient financial transactions on our platform. These providers encompass payment processors and e-wallet services ensuring a diverse range of payment options for our players. Notably, partnerships with industry leaders like Directa24 and AstropayOneTouch expand our reach into emerging markets, offering a plethora of payment methods. These strategic alliances are indispensable for ensuring the smooth functioning of our operations and enhancing the overall user experience on our platform.
2. **Betconstruct:** As our primary platform provider, Betconstruct plays a central role in delivering a robust and reliable gaming platform that powers our operations. In addition to offering advanced gaming software and infrastructure, Betconstruct also provides integrated KYC (Know Your Customer) services and robust data privacy compliance measures, ensuring the security and integrity of our platform and safeguarding user data in accordance with regulatory requirements.
3. **Casino Providers:** Through direct partnerships with leading casino providers like Betsoft, Endorphina, iSoftbet, Microgaming, Netent, Pariplay, Pragmatic Play, Red Rake, Red Tiger, Stakelogic and Evolution, we offer a diverse range of casino games, enhancing the gaming experience for our users. These providers contribute high-quality gaming content, including slots, table games, and live dealer games, enriching our platform's offerings and attracting a wider audience of players.

Risk Management:

1. **Payment Providers:**
 - **Risk:** Disruption of Payment Services
 - **Mitigation:** Maintain backup payment providers or alternative payment methods to ensure continuity of financial transactions in case of service interruptions or disputes with primary providers. Both of our primary providers, Directa24 and AstropayOneTouch, offer a comprehensive array of payment options tailored to the countries where we operate. In the event of any disruption with one provider, we can seamlessly transition to the other, ensuring continuity of service

and minimal impact on our users' experience. Also, we maintain relationships with other payment providers to serve as backup options in case of disruptions or disputes with our primary providers.

- Risk: Security Breaches or Fraudulent Activities
 - Continual Monitoring and Evaluation: We continually monitor the performance and reliability of our payment providers to identify any potential issues or concerns. By staying vigilant and responsive to changes in the payment landscape, we can quickly address any disruptions and maintain the integrity of our financial operations.
 - Comprehensive Transaction Records: We diligently maintain daily and monthly records of all transactions processed through our payment providers. By meticulously documenting each transaction, we ensure transparency and accountability in our financial processes. These comprehensive records serve as invaluable resources for auditing, analysis, and reconciliation purposes, enabling us to detect and investigate any irregularities or discrepancies promptly. Additionally, these records provide insights into transaction patterns and trends, facilitating informed decision-making and risk management strategies.
- Risk: Regulatory Compliance Challenges
 - Mitigation: Stay informed about evolving regulatory requirements in the jurisdictions where payment providers operate. Ensure compliance with data protection laws, anti-money laundering regulations, and other relevant regulations to minimize legal risks.

2. Betconstruct:

- Risk: Service Downtime or Technical Issues
 - Mitigation: We have established Service Level Agreement (SLAs) with Betconstruct(IT Technology Solutions Limited) to ensure uptime guarantees and prompt resolution of technical issues.
- Risk: Data Breaches or Privacy Violations
 - Mitigation: Collaborate closely with Betconstruct to implement robust data security measures, including encryption and access controls, to protect user data and comply with privacy regulations.
- Risk: Dependency on Betconstruct's Performance
 - Mitigation: Conduct regular performance evaluations and audits of Betconstruct's services to ensure they meet contractual obligations and performance standards. Explore diversification strategies or contingency plans in case of service disruptions or failures.

3. Casino Providers:

- Risk: Content Quality or Integrity Issues
 - Mitigation: Conduct thorough due diligence before partnering with casino providers to ensure the quality and integrity of their gaming content. Establish clear contractual agreements outlining quality standards, compliance requirements, and dispute resolution mechanisms.
- Risk: Regulatory Compliance and Licensing
 - Mitigation: Verify the regulatory compliance and licensing status of casino providers in the jurisdictions where they operate. Ensure that all gaming content offered on the platform complies with local regulations and licensing requirements to avoid legal issues or fines.

By fostering strategic partnerships with key suppliers and implementing comprehensive risk management strategies, we ensure the stability, integrity, and success of our operations in the competitive online gaming market.

Legal and Governance Framework

The Legal and Governance Framework of WEG ensures robust oversight, compliance, and ethical conduct across all business operations. The board of directors plays a crucial role in setting the strategic direction of the company, overseeing risk management, and ensuring adherence to legal and regulatory requirements. The current board membership comprises [number] experienced professionals with diverse backgrounds and expertise relevant to the industry and market landscape.

Board Oversight and Interaction with Senior Management:

The board, including the CEO as a member, maintains regular communication and interaction with senior management to facilitate informed decision-making and strategic alignment. While senior management is responsible for day-to-day operations and execution, the board provides guidance, oversight, and approval on key matters. This collaborative approach ensures that the company's strategic objectives are effectively communicated, understood, and executed at all levels of the organization.

Reserved Matters and Potential Deadlocks:

Certain matters are reserved for the board of directors and ultimate beneficial owners (UBOs), including significant financial transactions, changes to corporate structure, and major strategic decisions impacting the company's direction. In the event of potential deadlocks, established governance mechanisms and dispute resolution procedures are in place to facilitate resolution and ensure continuity of business operations.

Legal Support and Advice:

WEG receives legal support and advice from a reputable legal firm Artemiou, Pieri & Associates L.L.C specializing in corporate law, regulatory compliance, and industry-specific legal matters. These legal advisors provide guidance on navigating complex legal and regulatory landscapes, ensuring the company's activities remain compliant and aligned with best practices.

Board Meeting Attendees and Policies:

In addition to board members, subject matter experts may be invited to board meetings to provide insights, updates, and recommendations on relevant topics. This may include senior executives, legal counsel, financial advisors, and industry consultants. A clear policy governs board meeting attendance, outlining criteria for invitation and participation to maintain efficiency and confidentiality.

Policies and Procedures Overview

In our commitment to transparency, regulatory compliance, and operational excellence, we have developed comprehensive policies and procedures to guide our business operations. These policies cover various aspects of our business, including compliance, risk management and data security practices.

Outlined below are the current operational guidelines and procedures in effect:

1. Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT)

Overview:

Money laundering involves concealing the origin and ownership of proceeds from criminal activities, enabling criminals to disguise illegal income as legitimate. Conversely, terrorist financing involves providing funds or financial support to individual terrorists or non-state actors. While money laundering involves funds of illicit origin, terrorist financing can involve both legal and illegal sources.

Key Processes of Money Laundering and Terrorist Financing:

1. **Placement:** Involves placing physical cash proceeds into player accounts or using them for goods or services.
2. **Layering:** Utilizes multiple transactions to obscure the audit trail and separate funds from their illegal origin.
3. **Integration:** Laundered money is integrated into the financial system, appearing as normal business funds.

Policy Objectives:

Our company is committed to preventing money laundering and terrorist financing to minimize risks such as reputational, legal, and regulatory. We aim to stay updated on national and international initiatives, protect our operations, and safeguard our reputation from threats of criminal activities.

Obligations and Policies:

- Appoint a designated Money Laundering Reporting Officer (MLRO) to oversee compliance.
- Verify customer identities and conduct due diligence measures before account opening and for transactions exceeding €2,000.
- Maintain a secure online list of registered customers and retain identification and transactional documentation.
- Provide initial and ongoing training to staff on identifying suspicious transactions and reporting procedures.
- Develop and maintain policies in line with evolving statutory and regulatory obligations.
- Report any suspicion of money laundering or terrorist financing to the Financial Intelligence Unit (FIU) and cooperate with relevant authorities.
- Implement measures to examine complex or large transactions and ensure compliance with regulatory requirements.

Risk-based Approach and Suspicious Transaction Reporting:

- Utilize a risk-based approach for client identification, verification, and KYC requirements.
- Monitor all transactions for unusual or suspicious activity and report suspicions to the MLRO.
- Internal reporting procedures involve completing a Suspicious Transaction Report (STR) and notifying relevant authorities.

Customer Identification and Due Diligence Procedures:

- Conduct general due diligence procedures for establishing business relationships and transactions exceeding €2,000.
- Apply enhanced due diligence measures for high-risk customers and transactions, including politically exposed persons.
- Renew customer identification regularly and rely on third parties for due diligence performance when appropriate.

This comprehensive framework ensures our commitment to preventing money laundering and terrorist financing while complying with legal and regulatory requirements. Our policies

and procedures are developed internally, with regular updates to maintain compliance and effectiveness. We are dedicated to transparency, timely reporting, and ongoing education to mitigate risks and safeguard our operations.

2. Customer Registration and Account Management Policy

2.1 Customer Acceptance Policy:

Our Customer Acceptance Policy outlines the criteria for accepting customers on our platform. We do not accept entities falling into certain categories, including legal entities or arrangements, individuals below the legal age for registration or betting, individuals holding multiple game accounts, non-residents of our operational jurisdiction, terrorists, or persons subject to specific sanctions. Additionally, we may terminate a business relationship with an existing customer if they fail to provide requested information, engage in unauthorized activities, or attempt to deceive the company.

2.2 Completing the Application Form:

To open a Player account, customers must complete the online application form, providing all required data as mandated by the National Law. This includes personal information such as name, address, confirmation of legal age, and a valid email address. Each customer is permitted only one Player Account, and registration must be done personally. We reserve the right to refuse any application for a Player Account, but will honor existing contractual obligations.

2.3 Player Account

Customers are required to provide and maintain accurate information to create and maintain a Player Account. Failure to do so may result in rejection of registration or closure of the Player Account. Upon request, customers must provide official documents to confirm the accuracy of their registration information. Participation in our Games for real money requires registration and depositing funds into the WEG Account via authorized methods listed on our platform. Customers may choose to register or log in using username or email account, with the option to log out at any time.

WEG may appoint Payment Solution Providers to handle fund transactions on its behalf. Customers are prohibited from opening or using multiple WEG accounts, and any such action will result in temporary blocking or immediate closure of all accounts. Winnings, bonuses, and funds accrued from multiple accounts will be voided. Registration requests are submitted online via the registration form, subject to WEG's discretion to refuse or close a WEG Account after fulfilling contractual obligations.

Players must provide all mandatory information accurately in the registration form to be considered verified. This includes personal details, identity documents, contact information, place of residence, payment information, and any other required data. WEG conducts verification procedures, and accounts may be blocked, closed, or bonuses voided if false or misleading information is provided.

WEG reserves the right to close existing accounts without explanation, with full balance payouts unless fraudulent behavior is suspected, in which case appropriate authorities may be notified.

2.4 Log in and Logout

As part of the registration process, players must choose their username and password for logging into the website. It is the player's sole and exclusive responsibility to ensure that their login details are kept securely. These credentials are used by players to access our gaming sites.

While WEG takes all necessary security measures, it is the player's responsibility to protect their Player ID and Password. Any actions carried out using their login details are at their own risk, and they should not share their login credentials with anyone else.

WEG retains the right to terminate events and/or games at any time. In such cases, all pending wagers on the suspended events/games will be refunded to the customer's account.

An Account Holder is prohibited from allowing any other individual, including minors, to use or reuse their Account, access and/or use any material or information from the website, accept any Prize, or access and/or participate in the Services. If we have reasonable suspicions that a customer has allowed any other individual to use or reuse their Account, we reserve the right, at our absolute discretion, to temporarily block the customer's account immediately and/or close said account. Any winnings obtained by allowing any other individual to use or reuse the Account will be void.

If we discover that a customer's account is held or managed by a minor (a person under the age of 18), the corresponding account will be immediately closed, all bets will be considered null and void, and all deposits shall be reimbursed.

3. Deposits into WEG Account, Withdrawals, and Payments

To participate in any Game, players must make a deposit into their player's account from an account or source of which they are the account holder. Players may only participate in any Game if they have sufficient funds in their WEG account for such participation. WEG does not provide players with any credit for participation in any Game. It is important to note that a player's account cannot be used as a bank account, and WEG reserves the right to deduct an administration charge if deposits into and withdrawals from a player's account are detected without commensurate betting or any other gaming activity.

All information required to deposit funds into a WEG Account can be found under the "Account" and "Deposit" pages of the website. Players can use any of the methods available as specified in these pages, which may be amended from time to time.

When using a payment method for depositing funds, player funds only clear when WEG has received an approval and authorization from the payment system. Should WEG not receive such authorization, the player's account will not be credited with those funds.

WEG complies with Anti-Money Laundering and Counter-Terrorist Financing legislation provisions and reserves the right to use additional procedures and means to verify the player's identity when effecting deposits into their WEG Account or processing their withdrawals.

WEG does not grant any credit for the use of its services.

Credit balances in a WEG Account will not bear interest, and WEG cannot be regarded as a financial institution. Should WEG have reasonable suspicions that funds are deposited without the intention of conducting betting and other gaming and gambling transactions, or to exceed daily deposit limits, WEG reserves the right not to credit the player's account and/or to cancel the transactions with the funds being returned to the player. In all cases, WEG cannot be held liable for these funds and undertakes no responsibility against the player.

Funds deposited into a WEG Account must be used for bona fide transactions, with the strict intention of conducting betting and other gaming and gambling transactions.

Depending on the payment method chosen by the Account Holder, minimum and/or maximum deposit limits may apply.

Card deposits may, from time to time, be partially and/or fully declined subject to certain security systems managed in collaboration with a Payment Solution Provider and/or a Financial Institution. Such security measures could decline Cards that are legitimate but could nevertheless not be possible to process at a particular time. WEG's personnel do not control or influence these security mechanisms, nor do they have any knowledge of the reasons for any deposits being declined.

If a payment method is used in respect of which the player is not the account holder and/or if they make use of funds which do not belong to them, including the use of a payment method which is stolen, cloned, or unauthorized, WEG reserves the right to treat any deposit into the Account as being invalid (and any winnings arising from such deposit as void).

Payout Management Procedure

Verification of Payment Method and Identity

For any withdrawal request, the following procedure is followed:

- Betting activity is analyzed to conclude the validity of the customer's balance amount.
- Along with the source of funds check, all relevant documents are requested, if not already on file, for ID verification (e.g., Passports, National Identity Cards, or any other identification deemed fit for all withdrawals).
- The Company may request address verification by asking for copies of utility bills, bank statements, or any other document it deems fit.
- For withdrawals where there has been a prior deposit with a credit/debit/prepaid card, the Company may request copies of the card (both front and back of the card, with only the first 6 and the last 4 digits of the card visible, plus the CVV/CVV2 number at the back side of the card covered).
- If the deposit method of the account is a Prepaid Voucher, the Company reserves the right to request a receipt showing proof of purchase of the voucher and/or the exact vouchers used for deposits before any withdrawals are processed. In the event that a customer fails or is unable to furnish such proof, the Company shall be entitled to temporarily or permanently block the customer's account and retain the credit in the Player Account.

Closed-Loop Policy

All withdrawals will be remitted only to the same account from where the funds paid into the player's account originated. To the extent that this is not possible (e.g., expired card), the Company will at least make sure that the alternative route belongs to the same customer and is secure.

Restriction on Cash Deposits/Withdrawals

The Company does not accept cash or cheque deposits, nor does it pay out funds in cash under any circumstances.

4. Privacy Policy

Privacy: WEG is committed to safeguarding users' personal information. This Privacy Policy outlines how we collect, use, and protect users' data to ensure transparency and trust in our services..

Information Collected: We collect personal information, such as name, contact details, and transaction history, to provide and improve our services. This includes information provided during registration and through interactions with our platform.

Means of Collecting and Processing Data: We collect information through lawful and fair means, including users' interactions with our platform, communications with us, and from third-party service providers.

Information Use: Personal information is used to deliver services, provide customer support, and process transactions. We may also use it for promotional offers and to enhance our users experience.

Consent: By using our services, users agree to the terms of this Privacy Policy. We may update the policy from time to time, and your continued use constitutes acceptance of any changes.

Access: We strive to maintain accurate and up-to-date information. Users have the right to access, update, or request deletion of your personal information.

Cookies: We use cookies to improve user experience and track site usage. Users can manage cookie preferences through your browser settings.

Security: We employ security measures to protect users' personal information from unauthorized access or disclosure.

Protection of Minors: Our services are not intended for individuals under 18 years of age. We take steps to prevent access by minors.

International Transfers: Personal information may be stored and processed in countries outside your own. By using our services, users consent to such transfers.

Third-Party Practices: We are not responsible for the privacy practices of third-party sites linked to or from our platform.

Legal Disclaimer: Our services are provided on an "AS-IS" basis, and we are not liable for events beyond our control.

5. Terms and Conditions

The Terms and Conditions (T&C) form the legal framework governing the use of our platform. Users are asked to actively accept them when they register and when there are material changes according to governing regulations. While the complete T&C are available on our website, the following overview highlights key points.

Key Sections:

1. **User Responsibilities:** Users are required to adhere to specified guidelines and regulations while using our platform, ensuring fair and responsible gaming practices.
 - Individuals must be registered as Account Holders to participate in games for money.
 - Account registration requires providing personal information such as name, email, username, and password.
 - Applicants must confirm they are at least eighteen (18) years old and not residents of certain restricted countries that are outlined clearly in the T&Cs.

- Users must adhere to specified guidelines and regulations while using our platform, ensuring fair and responsible gaming practices.
 - Account holders are responsible for maintaining up-to-date account details, including name, country of residence, email address, and phone number.
2. **Account Management:** Guidelines for account creation, maintenance, and security measures to safeguard user information and assets.
 - Registered users are responsible for managing their accounts, including account creation, security measures, and password protection.
 - Users must ensure accuracy and completeness of information provided during registration.
 - The platform reserves the right to block accounts for users providing false data and to request additional proofs of identity.
 3. **Risk Acknowledgment:**
 - Users acknowledge and accept the platform's rules and policies, including changes and updates.
 - Company reserves the right to refuse service and void any bonus or winnings in cases of fraudulent system usage.
 4. **Dispute Resolution:**
 - Procedures for addressing disputes and complaints between users and the platform are outlined.
 - Users agree to resolve disputes in accordance with the platform's policies and procedures.
 5. **Financial Transactions:** Policies regarding deposits, withdrawals, payments, and currency conversions to facilitate transparent and secure financial transactions.
 - *Available Payment Methods:* Users can make deposits using various payment methods based on their country and selected currency. Details regarding fees, limits, and other terms are provided on the Deposits and Withdrawals page, with Alegrebet reserving the right to modify these terms as needed.
 - *Account Ownership Verification:* For security purposes, it is essential that the name on the payment method used matches the account owner's name on Alegrebet. Failure to comply may result in transaction cancellations.
 - *Erroneous Transactions:* Users are required to report any erroneously transferred funds immediately. Winnings resulting from such errors are considered invalid, and bets are refundable.
 - *Deposit Purposes and Restrictions:* Deposits should be made exclusively for betting, poker, casino, or financial betting purposes. Any suspected fraudulent activity may lead to deposit cancellation and cost recovery.
 - *Financial Limitations:* Various financial limitations apply, including maximum winnings per ticket, maximum bet amounts, and restrictions on the coefficient of winnings. These limitations are subject to change and are specific to each event and bet type.
 - *Payment Processing and Verification:* Payments are processed within 72 hours, and users may be required to verify their identity and account details before withdrawals are approved. Alegrebet reserves the right to investigate and verify user information to ensure compliance and prevent fraud.
 - *Withdrawal Policy:* Withdrawals are processed without commission and are subject to certain conditions, including withdrawal limits, frequency, and verification requirements. Failure to comply with these requirements may result in additional fees or processing delays.
 6. **Refund Policy for Specific Cases:** Specifies conditions under which refunds may be issued to users, ensuring transparency and fairness.

User Agreement: By accessing and using our platform, users agree to abide by the Terms and Conditions outlined herein.

Reference to Full T&C: The complete Terms and Conditions can be found on our website alegrebet.com ensuring transparency and accessibility for all users.

6. Responsible Gambling Policy

WEG is dedicated to responsible gaming, striving to raise awareness of problem gambling and enhance prevention, intervention, and treatment efforts. Our Responsible Gambling Policy underscores our commitment to mitigating the negative impacts of problem gambling and promoting responsible gaming practices.

Key Principles:

Player Security: We prioritize player safety by preventing underage participation, safeguarding privacy, and ensuring fairness through independent monitoring.

Protection against Problem Gambling: Through partnerships with research institutes and therapy organizations, we work to create a secure and responsible gambling environment. Clients exhibiting signs of problem gambling are offered support and may be restricted from certain products for their well-being.

Self-Responsibility: While we provide tools for controlling gambling, we emphasize the importance of self-responsibility in using these tools effectively. Transparent products and access to professional advice and support are provided to assist customers.

Protection of Minors: WEG prohibits minors from participating in gambling activities, with age verification measures in place during registration. We encourage parental involvement and offer recommendations for additional safeguards.

Addressing Problematic Behavior: We educate customers on identifying problematic gambling behavior and provide resources for seeking help. Features such as self-exclusion, session duration limits, deposit limits, and reality checks empower users to manage their gaming responsibly.

Our commitment to responsible gaming ensures a safe and enjoyable experience for all users.

Internal vs. External Development:

At our company, we take a comprehensive approach to crafting policies and procedures, leveraging both internal expertise and external consultancy services. Our internal team of experts collaborates closely with external consultants who possess specialized knowledge in regulatory compliance, legal frameworks, and industry best practices. This synergistic partnership ensures that our policies are finely tuned to our unique needs while remaining compliant with evolving regulatory standards and industry norms. As part of this approach, we engage in paid services from BetConstruct (IT Technology Solutions Limited) for essential functions such as KYC, payments, and risk management, further enhancing the robustness and effectiveness of our operational framework.

Timelines and GCB Communication:

We are committed to maintaining open communication with regulatory authorities, including the Gaming Control Board (GCB), throughout the development and implementation of our policies and procedures. Regular updates and progress reports will be provided to the GCB to ensure ongoing compliance and adherence to regulatory guidelines. Our timelines for policy development and updates will be clearly outlined and adhered to, reflecting our dedication to proactive regulatory compliance.

Qualifications and Competence:

Our commitment to maintaining a secure and compliant gaming environment is exemplified by our selection of Betconstruct (IT Technology Solutions Limited) services for Know Your Customer (KYC), payments and risk management of player accounts. Betconstruct is a renowned industry leader with a proven track record in providing cutting-edge solutions for regulatory compliance and risk mitigation in the iGaming sector. Their expertise in identity verification, fraud detection, and responsible gaming measures aligns seamlessly with our commitment to prioritizing player safety and regulatory compliance.

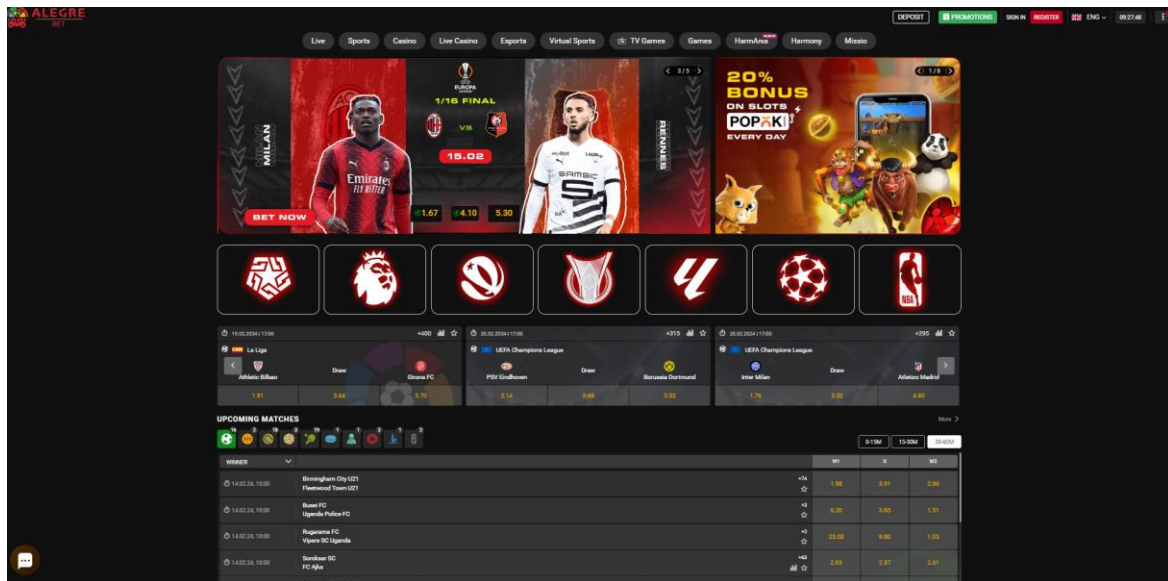
The board has carefully vetted Betconstruct's qualifications, competence, and industry reputation, and believes, acting reasonably, that they are exceptionally qualified and competent to provide the necessary services. Their extensive experience and dedication to maintaining the highest standards of integrity and security give us confidence in their ability to effectively manage KYC processes and mitigate risks associated with player accounts.

By partnering with Betconstruct, we not only enhance the security and integrity of our gaming platform but also demonstrate our unwavering commitment to regulatory compliance and responsible gaming practices. This strategic collaboration underscores our dedication to providing players with a safe, transparent, and enjoyable gaming experience while adhering to the highest standards of industry best practices.

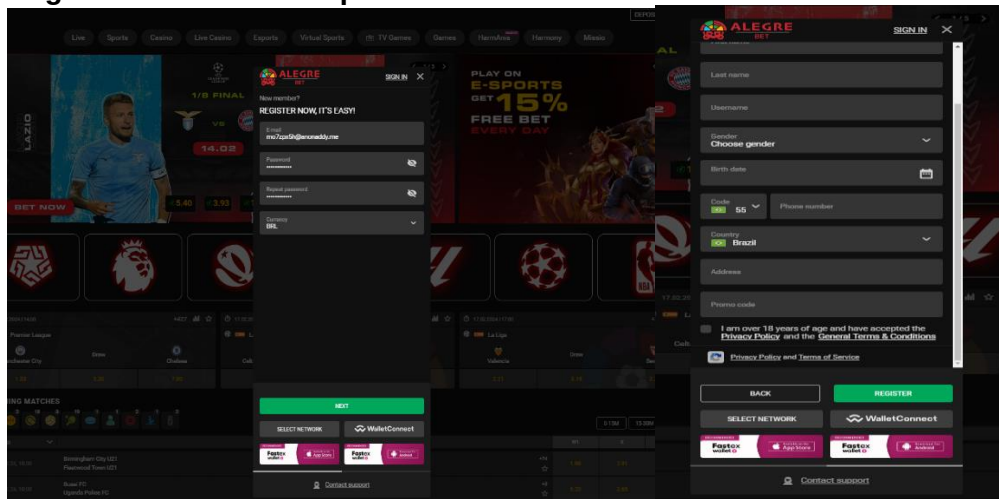
Website Presentation

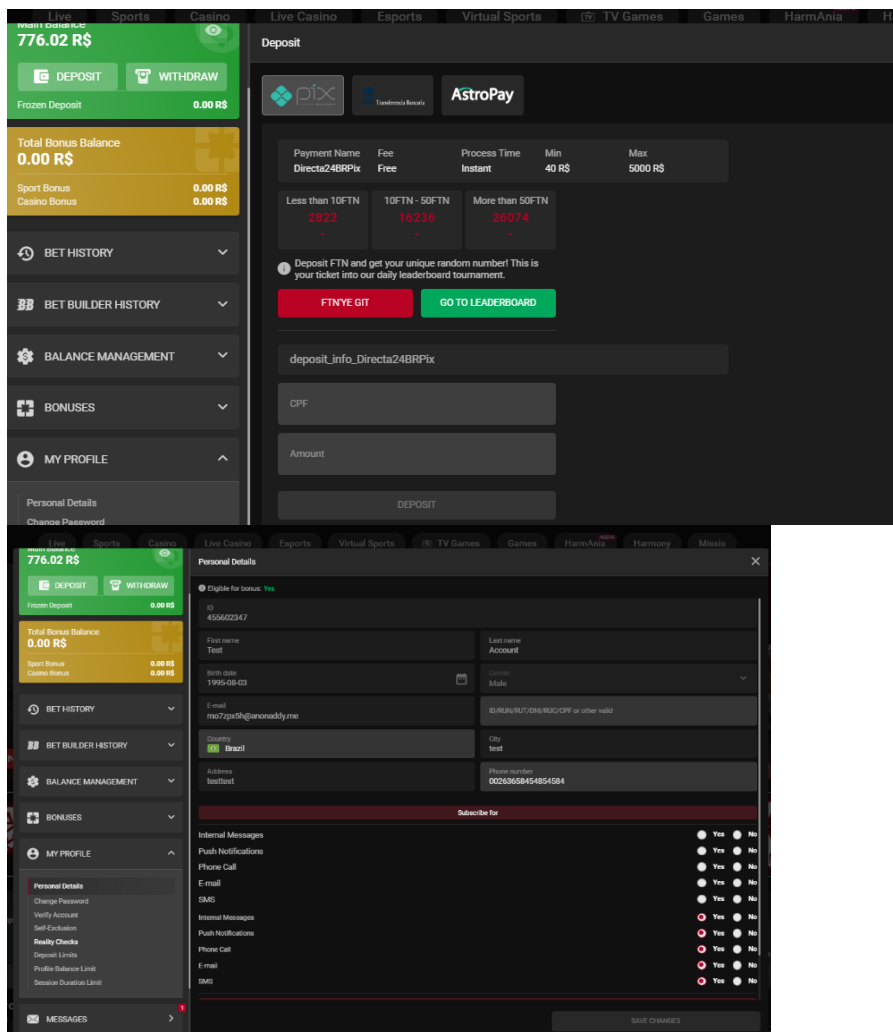
In conclusion to our Business Plan, we are pleased to showcase snapshots of our website, alegrebet.com.

Homepage

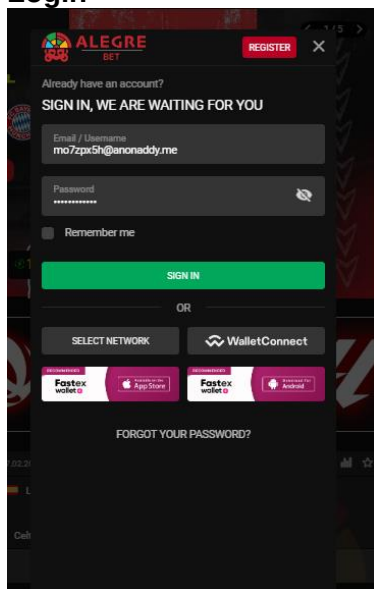


Registration/ Profile/ Deposits





Login



Sports Book

ALL SPORT CASINO LIVE CASINO

