

Newlinetec

Business Plan

April 2024

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Confidentiality Notice

This respective Business Plan (2024) of Newlinetec B.V. (hereinafter referred to as the “**Business Plan**”), along with any accompanying official documentation, presentations, communications, and/or anything else of a similar nature has been provided to you by Newlinetec B.V. (C 144486) for the exclusive purpose of evaluating and analysing the business (hereinafter referred to as the “**Purpose**”).

The aforementioned Business Plan and accompanying documentation, presentations, and communications includes sensitive, proprietary, and confidential information pertaining to, *inter alia*, Newlinetec B.V.’s business approach, strategic targets, partnerships, material dependencies, marketing strategies and projections, game and payment suppliers, risk management, due diligence processes, financial forecasts and data, key performance indicators, business objectives, corporate structure, policies and procedures, data, intellectual property, trade secrets, etc. (hereinafter referred to as “**Confidential Information**”).

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Artificial Intelligence (AI) Disclaimer

The Business Plan was drafted entirely by Newlinetec B.V. and no portion of it was written by and/or using any Artificial Intelligence (AI) or AI Language Tools (e.g. ChatGPT). The information, projections, and strategies contained within the aforementioned Business Plan reflects Newlinetec B.V.’s own research, analysis, and workflow. None of the content included in the Business Plan or Confidential Information used Artificial Intelligence or AI Language Tools in any capacity whatsoever. Newlinetec B.V. takes responsibility for all the content provided, and we have verified the information for accuracy and reliability to the best of the Company’s professional abilities.

Business Overview

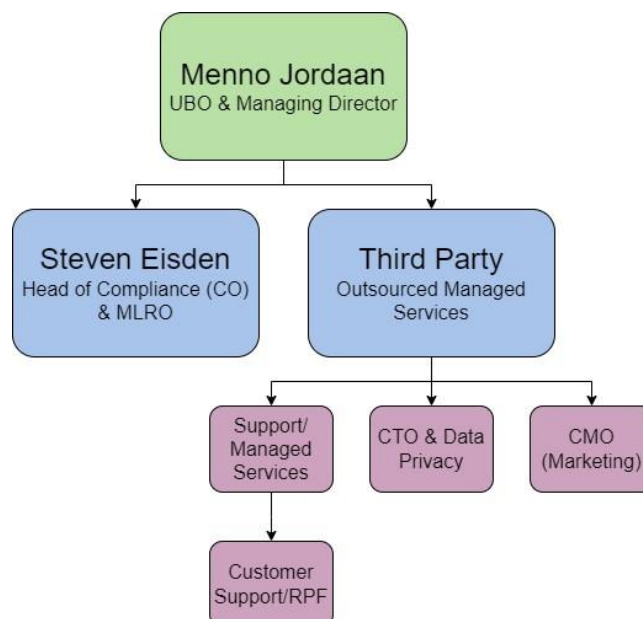
1.1 Executive Summary

Newlinetec B.V. is a company registered and based in Curaçao, with the company registered number 144486, authorised with the license 8048/JAZ2021-029 issued by Antillephone Services N.V., regulated by the Laws and Government of Curaçao (hereinafter referred to as the “**Company**” or as “**Newlinetec B.V.**”). The Company is a well-established and experienced business with operations focused on maintaining and growing a multi-brand Business-to-Client (B2C) operation. The Company is consistently striving for success, understanding different markets, and using our success as a catalyst for facilitating growth, creating new opportunities, and launching brands.

The fundamental and core principle which serves as the backbone for the Company’s ethos is our commitment to curating a sustainable business model that pursues longevity. Newlinetec B.V. has a strategic focus on enhancing our responsiveness and communication to maintain player loyalty and securing a concrete position within the market. In pursuit of our strategic focus, the Company prioritizes innovative practices to ensure Newlinetec B.V. stays at the forefront as a business.

1.2 Company Structure

The Company’s values are enshrined through effective management and strong leadership. Two of the most crucial factors for Newlinetec B.V., therefore, our company management structure consists of experienced and hardworking individuals that uphold and evoke our values and business endeavours.



In the Company's structure, Mr Menno Jordaan holds the main leadership position, overseeing all the fundamental aspects of Newlinetec B.V.'s operations and strategic direction. In addition, Mr Jordaan utilises his vast experience in finance and accounting to ensure these aspects of the Company's business are appropriately safeguarded. Mr Steven Eisdien, the Head of Compliance & Anti-Money Laundering (AML) Affairs, ensures that the Company maintains strict and constant adherence to all legal and regulatory requirements, including AML, Compliance Procedures, and Responsible Gambling (RG) matters. In light of the complexity of the technological infrastructure, Newlinetec B.V. has outsourced the role of Chief Technology Officer (CTO) and other key functions including Chief Marketing Officer (CMO) and other respective services.

1.3 Business Approach

Newlinetec B.V. has operated for several years, guided by the seasoned expertise of its team, who possess a wealth of knowledge and experience. The Company's vision and strategy is deeply founded and focused on prioritizing player safety, unmatched game experience, operational agility, and responsiveness. The Company prides itself on the following values which lead our business approach:

a) Innovation and Adaptability: Newlinetec B.V. has clear commitment to innovation, driving the Company to remain at the forefront of the gaming industry. This value is evoked through our dedication to having the best technologies and creative solutions to enhance the gaming experience. Our adaptability is key for allowing us to swiftly respond to players, their preferences, and technological advancements, ensuring that we consistently meet and exceed the expectations of our players and stakeholders.

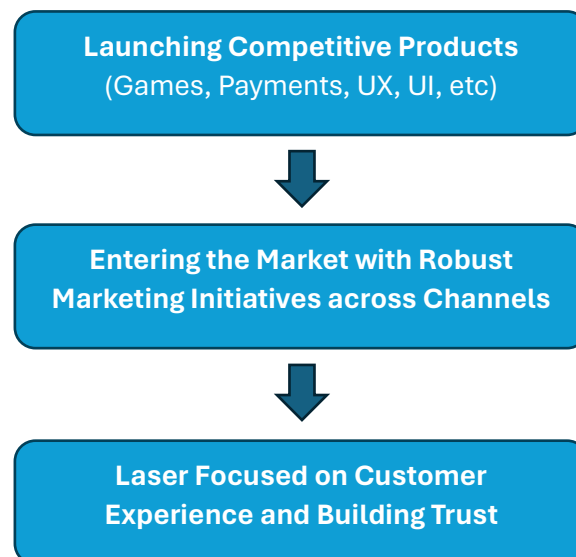
b) Sustainability and Growth: The Company is consistently pursuing a sustainable business model designed for longevity. Newlinetec B.V. adopts strategies that not only foster long-term success and growth. This involves a balanced approach to expansion, market presence, and the development of our multi-brand B2C operations, all while maintaining financial stability and ethical business practices.

c) Player-Centric Approach: Recognizing the importance of our players, Newlinetec B.V. places player safety, satisfaction, and loyalty at the forefront of our mission. This value is manifested through our commitment to providing a safe and engaging environment, enriched with unmatched game experiences. We prioritize open communication and responsive support to build and maintain trust with our players, fostering a loyal community that feels valued and respected.

d) Operational Excellence: Guided by the seasoned expertise of our team and our commitment to regulatory compliance, Newlinetec B.V. is dedicated to achieving operational excellence. This encompasses a multifaceted approach to business operations, from strategic planning and execution to quality control and continuous improvement. Our goal is to ensure that every aspect of our operation reflects our high standards, contributing to our esteemed position in the market and our ability to secure and grow our market share in an ever-changing and competitive landscape.

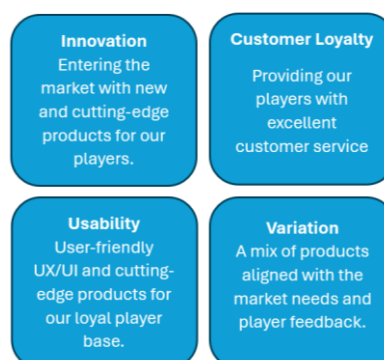
1.4 Strategic Goals and Initiatives

The Company uses the aforementioned business approach and values to ensure that our strategic goals and initiatives are pursued and attained. We have several fundamental missions which are an integral part of our business:



1.5 Key Product Strategy Enablers

Newlinetec B.V. has several key product strategy enablers that play a pivotal role in our ongoing pursuit towards our strategic goals and initiatives including:



1.6 Marketing Approach

Newlinetec B.V. is committed to utilizing a dynamic and effective range of different marketing strategies and approaches to reach the Company's strategic goals. This includes the following main marketing channels:



Digital



Affiliates network - Strong affiliates portfolio.



Social Media Marketing – Create and manage accounts on different social media platforms



Streamers and Influencers – Create a portfolio of streamers and influencers that can promote Betgoals on their channels among the community.



SEO – Build a strong SEO optimized Website and Pages, Blog etc



Media Buying and Programmatic.

Newlinetec B.V. does **not** target forbidden territories such as Turkey, United States of America, Bonaire, Curaçao, France, Netherlands, Saba, St Eustatius, St Martin, Spain, Australia, and the United Kingdom. Furthermore, blacklisted countries on the [FATF Blacklist](#) are **not** targeted.

1.7 BetGoals



[BetGoals](#), is Newlinetec B.V.'s flagship brand, which offers a wide range of different options which includes the following:

- Casino
- Live Casino

- Sportsbook
- Crash Games
- E-Sports
- Parlaybay

BetGoals has an ongoing “[Blog](#)” which provides its active player base with additional information about the brand’s games, offerings, and general information. The wide range of games, options, online community, and support from the brand fosters a competitive edge in the industry.

1.8 Primebetz



[Primebetz](#), is one of Newlinetec B.V.’s brands, an online casino with a range of different games, bonuses, and high-end technological security measures. Primebetz offers over **4,000** different and exciting online casino games.

Business Forecasts

2.1 Financial Projections

The financial projections for Newlinetec B.V., depict a very promising trajectory of growth, spanning over various Key Performance Indicators (KPIs) that are crucial for assessing and determining the Company’s financial performance and operational efficiency:

Business KPI	2024	2025	2026	2027
Income NGR	2,823,103	6,498,987	8,210,761	9,109,372
Marketing	1,700,095	2,400,653	1,837,631	1,915,037
Game Provider & Platform Fees	644,277	1,382,068	1,726,658	1,910,244
Operational Cost	786,877	1,128,162	1,172,253	1,310,990
License Tax	25,000	25,000	25,000	25,000
EBITDA	-333,146	1,563,105	3,449,249	3,948,101

2.2 Business Growth

The Financial Projections indicate Newlinetec B.V. is a successful multi-brand B2C Operation on a strong growth path, overcoming initial challenges to achieve significant profitability by enhancing revenue streams, optimizing market expenditure, and efficiently managing operational and partnership costs. The Financial Projections alongside strategic cost management efforts is indicative of the Company's well-positioned standing in the competitive gaming industry indicating sustainable growth.

2.2.1 Income from Net Gaming Revenue (NGR)

The Income NGR in the Company's Financial Projections is expected to see a significant upward trend, starting from €2,823,103 in the year 2024, and more than tripling to €9,109,372 by 2027. The aforementioned substantive increase in NGR indicates a very strong and growing demand for the Company's game offerings, reflecting significant successful market penetration.

2.2.2 Marketing Expenses

The Marketing Expenses are forecasted to increase initially, peaking at €2,400,653 in the year 2025, before a strategic and steady reduction to €1,915,037 by the year 2027. This pattern indicates a strong initial investment in marketing, to capture concrete market share. and solidify our multi-brand B2C Operation Followed by a more efficient, optimized marketing strategy that supports sustained growth with reducing expenditure. The Marketing Expenses are expressed in-depth in Section 2.3 and Section 2.4 of this respective Business Plan.

2.2.3 Game Provider & Platform Fees

The Game Provider & Platform Fees associated with the Company's business model and financial projections are forecasted to almost triple from €644,277 in the year 2024 to €1,910,244 by the year 2027. The aforementioned forecast is an indication and representation of the Company's expanding portfolio, with additional external expenses that are associated with enhancing the game experience for Newlinetec B.V.'s player base.

2.2.4 Operational Costs

The Operational Costs of the Company are estimated to increase from €786,877 in the year 2024 to €1,310,990 by the year 2027. This gradual rise can be attributed and interpreted as a reflective benchmark indicator of the Company, which is scaling its operations to support increased revenue and customer base, with additional long-term

investments in staff, technology, and infrastructure which is essential to maintain a high-level of service and game quality.

2.2.5 License Tax

The applicable License Tax of Newlinetec B.V. remains constant throughout our financial projections, set at €25,000. The fixed License Tax throughout our Financial Projections provides a predictable element for the Company's financial planning.

2.2.6 Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA)

The EBITA figures from the year 2024 to the year 2027 indicated in Section 2.1 (Financial Projections), indicates an initial investment phase which surpasses initial revenue. However, the Company anticipates a significant and remarkable overall financial turnaround, with EBITDA expected to reach €1,563,105 in the year 2025 and exponentially increasing to €3,948,101 by the year 2027. This respective improvement highlights a lot of positive attributes of the Company, including; successful cost management, increased revenue, and operational efficiency, culminating into concrete and robust profitability.

2.3 Marketing Budget

The below breakdown of the Company's marketing budget across different channels from the year 2024 to the year 2027 provides an in-depth and insightful overview into Newlinetec B.V.'s strategic marketing approach towards brand visibility, customer acquisition, and engagement:

Channel	2024	2025	2026	2027
Brand Awareness	150,000	250,000	250,000	250,000
Affiliate Marketing	850,095	1,200,653	637,601	715,037
Social Media	200,000	250,000	250,000	250,000
Streamers & Influencers	200,000	300,000	300,000	300,000
Media Buying & Programmatic	300,000	400,000	400,000	400,000
TOTAL	1,700,095	2,400,653	1,837,631	1,915,037

2.4 Market Growth

The overall distribution of the marketing budget for the Company not only serves as a reflection of the allocation of resources towards various marketing efforts, but also indicates Newlinetec B.V.'s adaptability and focus on these respective channels which are expected to yield the highest Return On Investment (ROI).

2.4.1 Brand Awareness

The section of the marketing budget allocated for brand awareness remains consistent at €250,000 annually after an initial investment of €150,000 in the year 2024. The initial upfront investment indicates a strong effort to establish the brand presence in the market, followed by sustained investment to maintain visibility and recognition. Brand awareness campaigns are an industry-standard practice that are crucial for long-term growth, creating an important foundational image that supports other marketing initiatives that are expressed in this respective marketing budget.

2.4.2 Affiliate Marketing

The affiliate marketing budget showcases a degree of fluctuation, in terms of investment. Starting at €850,095 in the year 2024, with the investment peaking at €1,200,653 in the year 2025. After which, the trajectory of the investment decreases to €715,037 by the year 2027. This trend reflects a strong initial strategy to facilitate the expansion of the Company's customer base through affiliate marketing, followed with a more measured approach as Newlinetec B.V. optimizes its networks and focuses on effective partnerships.

2.4.3 Social Media

The Company's investment in social media marketing is set to moderately increase from €200,000 in the year 2024 to €250,000 from the year 2025 onwards, indicating a steady approach to leveraging social media platforms as a catalyst for growth. Newlinetec B.V.'s consistent investment in this form of marketing underscores the unequivocal importance of social media, engaging with the online community, promoting new games, driving user retention and acquisition through strong digital campaigns and content marketing, in accordance with law.

2.4.4 Streamers & Influencers

Newlinetec B.V.'s budget for collaborations with streamers and influencers is planned to grow from €200,000 in the year 2024 to €300,000 from the year 2025 onwards. This respective allocated budget highlights the Company's concrete commitment to leveraging the reach, engagement, and influence of online personalities within this industry to promote their offerings. This is a well-established marketing strategy and approach that is known for its effectiveness in directly engaging with potential users and enhancing brand awareness and credibility.

2.4.5 Media Buying & Programmatic

Media Buying and Programmatic advertising are an important aspect of the Company's marketing budget. The budget for the year 2024 is set at €300,000, increasing to €400,000 from the year 2025 and for the subsequent years. This investment provides additional emphasis on data-driven advertising to optimize advertisement placements and targeting, maximizing online visibility and presence, as well as conversion rates across various digital platforms.

2.4.6 Overall Marketing Strategy

Overall, the Company's total marketing expenditure reflects an initial surge in the year 2025 to €2,400,653, before a strategic reduction to €1,915,037 by the year 2027. This indicates a focused investment which builds a strong brand presence and customer base, followed by optimisation and efficiency improvements in the marketing budget. The distribution of the budget across multiple channels demonstrates a balanced and multifaceted marketing strategy, aiming to maximize reach and impact across various customer touchpoints while adjusting to the effectiveness and ROI of each channel over time. In summary, the planned marketing investments showcase Newlinetec B.V.'s proactive and dynamic approach towards building and maintaining a strong market presence. Through a combination of brand awareness, affiliate marketing, social media engagement, influencer collaborations and data-driven advertising, the company aims to capture and retain a significant share of the market while optimising its marketing spending for the best possible ROI.

Key Suppliers & Material Dependencies

3.1 Game Suppliers

Newlinetec B.V. has been partnered through a contractual agreement with **iGaming Deck Ltd** since December 2021, a company incorporated and registered in the Isle of Man, with a Business-to-Business (B2B) License issued by the Gambling Supervision Commission of the Isle of Man. iGaming Deck Ltd supplies over **700** games from a wide range of different Game Providers (GPs) to Newlinetec B.V. The longstanding and strong business relationship between iGaming Deck Ltd and Newlinetec B.V., helps the Company mitigate certain risks. If a Game or Game Provider is not available for our players, Newlinetec B.V. can mitigate risks by utilizing other games offered by iGaming Deck Ltd to ensure we continue our business with minimal operational issues.

In addition, to the Company's longstanding relationship with iGaming Deck Ltd, Newlinetec B.V. has also been partnered through a contractual agreement with **Gammix**

STS B.V., a company incorporated and registered in Curaçao, licensed by the Central Government of Curaçao. Gammix STS B.V. supplies over **9,750** games from a wide range of different GPs to Newlinetec B.V. This additional strong and longstanding business relationship further reduces and mitigates risks associated with providing games to our ever-growing loyal player base. The Company is committed to ensuring that our business operation functions with little to no operational concerns, and we continuously diversify our business to ensure we mitigate risk.

3.2 Payment Suppliers

Newlinetec B.V. has an ongoing partnership through a contractual agreement with **Trinitydigi Ltd** since February 2020, a company incorporated and registered in Cyprus. In addition, Trinitydigi Ltd is a 100% subsidiary of Newlinetec B.V., therefore, as a subsidiary the Company mitigates risk and evokes an additional layer of security to the business model. Trinitydigi Ltd supplies a diverse range of different Payment Service Providers (PSPs) to the Company. Trinitydigi Ltd's vast portfolio of PSPs ensure that Newlinetec B.V. can provide safe, transparent, and reliable payment methods to its players. Trinitydigi Ltd offers over **30** Payment Service Providers (PSPs), therefore, Newlinetec B.V. can continuously provide safe, transparent, and reliable payment methods and mitigate risk through this diverse portfolio.

3.3 Software Supplier & Back-Office

The Company also has an ongoing partnership with iGaming Deck Ltd, holder of Isle of Man B2B Software Supplier licence, which supplies the Company with Player Account Management (PAM) and Back-Office (BO) services. iGaming Deck Ltd has state-of-the-art software and fast support, facilitated through their dedicated Account Managers (AMs) and technical support team. iGaming Deck Ltd's powerful and user-friendly BO ensures that Newlinetec B.V. can manage its daily operations and has access to a wide selection of different reports. In conjunction with iGaming Deck Ltd's extensive catalogue and single Application Programming Interface (API) integration, this respective B2B Software Supplier ensures that Newlinetec B.V. has a seamless operation. The Company mitigates additional risks associated with technical and integration-related issues through iGaming Deck Ltd; acting as both a Game Aggregator (GA) and Software Supplier.

3.4 Additional Feedback

Newlinetec B.V. has a dynamic portfolio which ensures operations are streamlined with little to no disruptions. Technical issues, changes to games, and other industry-standard challenges can be mitigated, and our longstanding partners share our values and remain committed to providing excellent services and facilitate business development.

Risk Management

4.1 Business Due Diligence

In terms of risk management, prior to onboarding a new potential business partner, Newlinetec B.V. gathers the following information and performs the necessary due diligence checks to ensure the Company has a strong ongoing Know Your Customer (KYC) and Know Your Business (KYB) process, which includes:

4.1.1 Proof of Identification (POI)

The Company obtains a certified true copy of government-issued Passports for the following individuals of the new potential business partner:

- All the Directors
- All the Ultimate Beneficiary Owners (UBOs) (i.e. owning 25% or more)
- Any other legally authorised person(s) who represents the business.

4.1.2 Proof of Address (POA)

The Company obtains a certified copy of the Utility Bills (i.e. issued no later than in the last 3 months) for the following individuals of the new potential business partner:

- All the Directors
- All the Ultimate Beneficiary Owners (UBOs) (i.e. owning 25% or more)
- Any other legally authorised person(s) who represents the business.

4.1.3 Business Documentation

The following additional documentation and information is obtained from our potential business partners to ensure we conduct a concrete and sufficient KYB process.

- Memorandum & Articles (M&A):
- Company Excerpt
- Company Structure

In addition, aside from the aforementioned KYC and KYB processes, the Company conducts Enhanced Due Diligence (EDD) for potential business partners that have a risk association which is considered to be high based on the Company's assessment.

4.1.4 Adverse Media (AM) Screening

The Company meticulously reviews all documents, conducts a series of Adverse Media (AM) searches on all the respective Directors and UBOs using the Compliance, Anti-Money Laundering (AML), and Politically Exposed Persons (PEPs) AI-driven tool [Comply Advantage](#). The Compliance Team ensures that all the documentation is correct, valid, not expired, and applicable for our internal processes.

4.1.5 Business Risk Assessment

After the aforementioned processes are completed, Newlinetec B.V. conducts a Business Risk Assessment (BRA) to identify and mitigate any potential risks associated with onboarding the respective new potential business partner.

4.2 Financial Due Diligence

In addition to the aforementioned Business Due Diligence detailed in Section 4.1 of the Newlinetec B.V. Business Plan, the Company has an additional diverse range of checks and balances which further mitigate risk and ensure the appropriate risk management is conducted from a finance perspective:

4.2.1 Financial Policies & Procedures

The Company mitigates risk through concrete financial policies and procedures that ensure clarity, consistency, and the smooth operation of Newlinetec B.V. The financial policies and procedures ensure all applicable risks are mitigated appropriately, and internal actions are taken to ensure all employees are aware of the necessary action and integral role they play in assisting and mitigating risk.

4.2.2 Financial Monthly Reports

Newlinetec B.V., ensures on a monthly basis that the actual performance of the Company is compared and contrasted with the annual budget. Any variances (i.e. both positive and negative variances) are analysed accordingly. Negative variances are treated with additional importance to determine whether any immediate corrective action is necessary to prevent further negative impacts in the upcoming months. The Company's monthly reports mitigate risk to a significant degree.

4.2.3 Operational Plan

The Finance Department of the Company, in accordance with other internal departments conduct and prepare an Operational Plan on an annual basis for the upcoming year. The Operational Plan is signed off in Quarter 4 (Q4) of the prior year. This plan is reviewed on a monthly basis and small adjustments are made accordingly to address unforeseen circumstances and to mitigate risk. Our risk tolerance and management are parallel to our sustainable approach, ensuring operational stability and consistent profitability. The Company adopts a more risk-adverse strategy.

4.2.4 Regulatory Reporting

On an annual basis, as a Curaçao entity, the Company is legally obligated to coordinate the preparation of the appropriate Financial Statements and filing of Tax Returns in accordance with the Laws of Curaçao. This ensures that Newlinetec B.V. conduct the necessary regulatory compliance vis-à-vis our financial and legal obligations.

Target KPIs & Business Objectives

5.1 Overview of Main KPIs

The Key Performance Indicators (KPIs) for the year 2024 through till the year 2027 offers a comprehensive overview of the financial and operational performance of the Company. The KPIs reflect the growth trajectory of Newlinetec B.V. in the industry as a multi-brand B2C business. The below metrics serve as integral indicators of the Company's success in attracting and retaining customers, generating revenue, and managing costs effectively.

KPI	2024	2025	2026	2027
Deposits	3,525,256	14,254,907	17,841,600	19,974,240
Turnover	81,689,842	177,587,369	224,362,250	249,917,150
GGR	3,267,594	7,103,495	8,974,490	9,956,686
Bonus Cost	444,491	604,507	763,729	847,314
NGR	2,823,103	6,498,987	8,210,761	9,109,372

5.1.1 Deposits

The projected deposits showcase a substantial increase from €3,525,256 in the year 2024 to €19,974,240 by the year 2027, indicating a strong increase and a substantive growth in the player base. The surge is a reflection of the Company's successful customer acquisition strategies and a high level of trust between Newlinetec B.V. and the players.

5.1.2 Turnover

The turnover for the Company is expected to more than triple from €81,689,842 in the year 2024 to €249,917,150 by the year 2027. This significant increase not only signifies a much higher engagement level from players; but this also reflects that Newlinetec B.V.'s strategic endeavours are reflecting in the respective statistical data.

5.1.3 Gross Gaming Revenue (GGR)

The GGR for the Company has a growth trajectory from €3,267,594 in the year 2024 to €9,956,686 in the year 2027. The aforementioned increase in GGR highlights Newlinetec B.V.'s effectiveness in game selection and platform appeal, ensuring a steady increase in revenue from gaming activities across the Company's multi-brand B2C business operation.

5.1.4 Bonus Cost

The projected Bonus Cost can be interpreted as a clear incentive to attract and retain players. The estimated growth from €444,491 in the year 2024 to €847,317 in the year 2027 is a substantial and notable increase. This controlled and sustainable increase indicates the Company's strategic approach to using bonuses as a tool to attract players does not impede profitability with disproportionate costs of acquisition and retention.

5.1.5 Net Gaming Revenue (NGR)

The NGR (i.e. the revenue which remains after deducting the bonus cost from the GGR) showcases a promising rise from €2,823,103 in the year 2024 to €9,109,372 in the year 2027. This crucial metric demonstrates the Company's success in generating profitable revenue from its core operations, even after taking into account the cost of player incentives such as the bonus cost.

5.1.6 Conclusive Overview

The main KPIs projected for the year 2024 till the year 2027 for the Company paint a picture of a strong upward trajectory, characterised by an expanding customer base, increasing player engagement, and effective cost management. The steady increase in deposits and turnover points to a growing active player community, furthermore, the upward trends in GGR and NGR reflects the Company's ability to monetise its gaming offerings in an effective manner. In addition, the strategic management of the bonus cost highlights the Company's focus on sustainable growth, ensuring that player acquisition and retention strategies enhance profitability rather than impede it. This balanced and dynamic approach coupled with strong operational performance positions Newlinetec

B.V. well for continued success in this competitive industry. In conclusion, these respective KPIs indicate the current financial health and operational efficiency of the Company in the upcoming years. Newlinetec B.V.’s strategic initiatives appear to be resulting in profitable outcomes, signalling a promising future for the business.

5.2 Player Acquisition Overview

The player acquisition overview from the year 2024 through till the year 2027 provides insight into the Company’s growth in terms of attracting new users and converting them into active players, along with a breakdown of the effectiveness of various acquisition channels.

KPI	2024	2025	2026	2027
New Registrations	52,070	73,512	75,770	84,972
New Depositors	15,621	22,054	22,731	25,492
Aquisition breakdowns	2024	2025	2026	2027
Affiliates	51%	51%	35%	44%
Other Measures	49%	49%	65%	56%

Corporate Governance & Framework

6.1 Board of Directors

The Board of Directors (BoD) of Newlinetec B.V. (as indicated in Section 1.2 of the Business Plan) comprises of Mr. Menno Jordaan. The BoD plays an integral role in ensuring the success of the Company, safeguarding the legitimate interests and endeavours of the Ultimate Beneficiary Owner (UBO), as well as taking into consideration the perspectives of other respective entities, such as the Curaçao Gaming Control Board (GCB). The BoD oversees and guides the Company’s strategic endeavours, they make sure the business aligns with its core objectives, legal responsibilities, whilst also protecting the interests of the UBO.

The responsibilities of the Board of Director’s include setting and overseeing strategic goals, formulating rules, monitoring management performance, and overseeing risk management and compliance frameworks. This commitment involves adhering to local and international legal and regulatory requirements. The Company is committed to good corporate governance principles; accountability, fairness, transparency, and independence, which form the foundation for achieving strategic objectives, sustained growth, and promoting best practices.

Mr Menno Jordaan, as Managing Director, regularly interacts with Senior Management, including all executives, to review operational performance, discuss strategic initiatives, and address challenges as well as opportunities. Senior Management manages day-to-day operations, however, all significant and strategic decisions, as well as major transactions require the Board of Director's prior approval. The BoD delegates routine matters to Senior Management, however, remains actively involved in all key decision-making processes, such as but not limited to; major investments, acquisitions, divestitures, changes to corporate governance, and significant financial transactions.

6.2 Deadlock

The possibility of a “deadlock” which can be described as a fundamental disagreement at either the level of the Board of Directors (BoD) or at the Shareholder level. The most common occurrence of “deadlock” occurs when the BoD has a number of Directors which can result in a tied vote (e.g. 50% / 50%). However, in the case of Newlinetec B.V., the possibility of a “deadlock” is not present at all due to the corporate structure of the Company. The corporate structure of the Company mitigates all potential risks of a “deadlock” from occurring.

6.3 Legal Support & Advice

Newlinetec B.V. relies on a well-established and concrete Legal & Compliance Department consisting of various internal individuals that have the necessary skills and experience in this particular industry to provide the Company with the required legal support to proceed with its general activities within the industry.

The Company is committed to ensuring that it abides by all the applicable legislative and regulatory requirements. In addition, the Company seeks advice from external legal counsel specialising in gaming law, as needed from time to time, to support both the BoD and Senior Management. The legal advisors assist in contractual negotiations, legal disputes, and ensuring Newlinetec B.V. operates within legal boundaries.

6.4 Board Meetings

The Director (as indicated in Section 1.2) conducts board meetings in accordance with the necessary and general expectations of the Company. Furthermore, the Director liaises with Senior Management on a regular basis to ensure the operations and general activities of the Company occur in an effective and timely manner.

Policies and Procedures

7.1 External Policies & Procedures

The Policies & Procedures for the Company are drafted externally by third party professionals with several years of experience in online gaming. These policies are drafted in liaison with the operational team of Newlinetec, for example Risk Payment and Fraud team, to ensure they are fully implemented in practice. Upon request, Newlinetec B.V. is able to provide the Curaçao Gaming Control Board (GCB) a timeline of the external policies and our ongoing commitment.

End of Business Plan 2024
