

BUSSINESS PLAN

Rapture B.V.

Trade name «ZAZA»

(online casino)

1th of March, 2024

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1. Overview of the business products and services/brands

Rapture B.V. is a company registered under the laws of Curacao bearing company registration number 156074 and having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Willemstad, P.O. Box 6248, Curacao (hereinafter – “Company”, “It”, “We”).

The Company received a CEG sublicense in November 2021 to enable it to operate as a B2C online casino operator. The Company launched on the Canadian market in April 2022 and continues to operate successfully to this day. Thus, we have successful experience in this direction for more than two years.

Websites under which the Company operates:

-www.zaza.com

Also, the Company has registered the trademark "ZAZA" throughout Europe, Curaçao, Brazil and Canada.

The Company has reached very good results in doing business, making its customers fully satisfied of the legally provided services. The Company has a willing to grow and continue its work in legal field with the established high principals of work. As a brand, the Company has a strong-built strategy of its development and obtaining a Curacao Gaming Control Board online gaming license is one of the huge steps to become better.

The Company will be an online casino business which will be owned and managed in permitted provinces in Canada. As necessary, the geography of the business can be expanded.

The Company's purpose in the Gambling industry is making profits. We have the following as our products and services offering:

- Online casino gaming services
- Operating online legal gaming facilities

The unique features of the online casino the Company offers include:

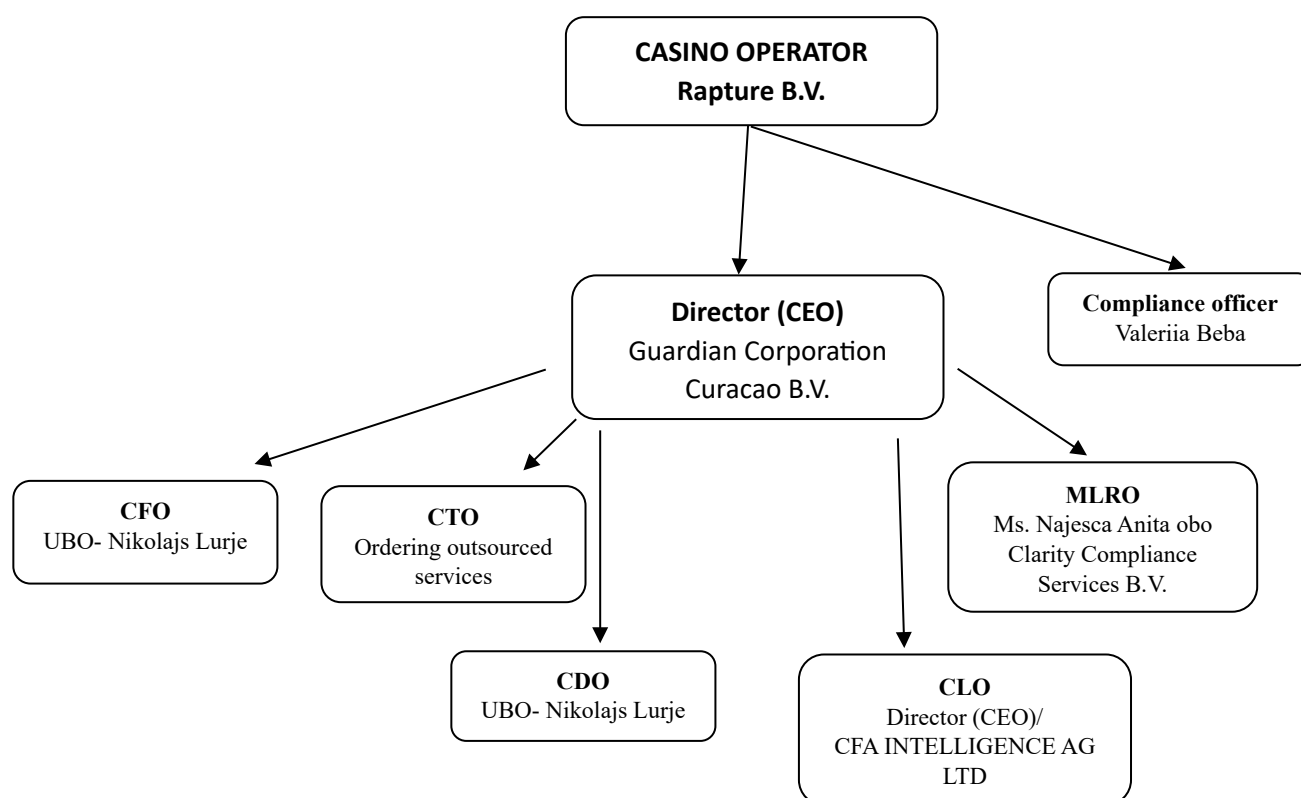
- Design. Our incredible design is the face of our online casino, it welcomes the users and makes their first impression of the online casino as “wow”. Our designers have implemented the best practices to make the website stunning.
- Really big choice of Games that may be competitive within Curacao licensed operators
- Variety of Payment Options. The Company has the experience of using the different payment solutions. From our experience we know that this issue is very important for customers. We make it comfortable for them to choose the payment solution from the variety.
- Safe payment methods. Online casino must be safe in all aspects of its works, especially in the field that concerns money. We use only safe and reliable payment solutions to mitigate all possible risks.
- Live Chat Support. Customers are the priority number one for us. The Live Chat Support available 24/7 will serve our clients on the best level. We want to solve all possible issues of our clients in the shortest terms making the users feel like home.

2. Company management structure.

The Company has formed reliable and effective management structure to provide the stable Company's work. We have hired top-level specialists in every field of work.

The owner (UBO) of this company is officially Nikolajs Lurje, without the participation of any trust.

Here is the detailed organogram of the Company's management:



1. Chief executive officer (CEO)

The CEO is the highest-ranked position in the Company. This executive professional is responsible for the company's overall success. The CEO creates strategies, sets goals and collaborates with an executive board. Other chief officers may report to the CEO.

2. Chief financial officer (CFO)

The CFO is an executive professional who oversees and manages the Company's finances. This function is currently performed by our UBO. The CFO'S duties include creating financial statements, analyzing cash flow and budgeting income and expenses, overseeing and managing the accounting and financial departments within the Company.

3. Chief technology officer (CTO)

The CTO is responsible for the executive technology decisions within the Company. We request these services from third parties (outsourcing). The CTO oversees external technological research and advancements that may help the Company meet its goals. Its duties includes designing a long-term research and development strategy, designing plans for technological advancements and managing a budget for technology needs within the Company.

4. Chief data officer (CDO)

The CDO is an executive professional who manages a company's data strategies and policies. These functions are performed by the Director. The CDO creates procedures for collecting and storing data securely. Also, duties include writing data privacy policies, managing technical teams and managing costs related to data mining software and storage.

5. Chief legal officer (CLO)

The CLO keeps the company abreast of legal changes that affect the firm. These functions are distributed between Director and the partner company CFA INTELLIGENCE AG LTD. Other CLO duties include establishing a curriculum to educate employees on legal matters, overseeing hiring practices, and litigating on behalf of the company.

6. MLRO

MLRO is the person who decides on AML reporting that may affect a company's relationship with its customers and exposure to criminal, legal, regulatory, and disciplinary action.

7. Compliance officer

The Compliance Officer ensures a company function in a legal and ethical manner while meeting its business goals. The Compliance Officer is responsible for developing compliance programs, reviewing Company policies, and advising management on possible risks.

Also, Compliance officer has such responsibilities:

- cooperate with the MLRO to comply with regulatory objective and subjective Financial Intelligence Unit “FIU” reporting. The Compliance Officer must in any case provide information, documentation and/or internal reports that considering their content qualify to be evaluated by the MLRO for FIU reporting as per the FIU reporting indicators .
- the Compliance Officer is specifically in charge of monitoring player onboarding, KYC due diligence as well as any platform related transactions (deposits and withdrawals, including attempts) and to provide timely reports to the MLRO for evaluation and possible reporting to the FIU.

3. Business forecast for 3 years

in EUR	3rd year	2nd year	1st year
SUM DEPS	23 256 496	19 380 413	16 150 344
SUM OUT	8 004 355	6 670 296	5 558 580
IN-OUT	36 037 129	30 030 941	25 025 784
GGR	4 515 158	3 762 631	3 135 526
TOTAL BONUSES	521 895	434 912	362 427
NET REVENUE	3 993 263	3 327 719	2 773 099
TOTAL COSTS	3 639 248	3 094 374	2 629 645
Payment systems	2 238 847	1 865 706	1 554 755
Royalty	610 402	508 668	423 890
Marketing	330 000	285 000	191 000
Financial costs	60 000	60 000	60 000
Legal costs	80 000	75 000	100 000
Other costs	320 000	300 000	300 000
PROFIT	354 015	233 346	143 455

Throughout the three-year forecast period, it's essential to regularly monitor key performance indicators (KPIs) such as user acquisition cost, customer lifetime value, average revenue per user, and return on investment (ROI) to evaluate the effectiveness of strategies and make data-driven decisions. Additionally, maintaining open communication channels with stakeholders, regulatory authorities, and industry partners will be critical for navigating challenges and seizing opportunities in the dynamic online gambling landscape.

4. Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans

Overview of Intended Business Strategy for Growth:

1. User Acquisition and Retention:

- Implement targeted marketing campaigns across digital channels, including social media, search engine optimization (SEO), and affiliate partnerships.
- Offer enticing welcome bonuses, loyalty programs, and personalized promotions to enhance user engagement and retention.
- Invest in customer relationship management (CRM) systems to gather user data according to all regulatory requirements and personalize marketing efforts based on player preferences and behavior.

2. Diversification of Revenue Streams:

- Introduce a variety of new games and betting options to cater to different player preferences and expand revenue streams.
- Form strategic partnerships with leading software providers to access a wider range of games and ensure high-quality gaming experiences.
- Explore opportunities for cross-selling and upselling additional products or services, such as slots, virtual sports betting or live dealer games.

3. International Expansion:

- Conduct market research to identify unregulated target regions with high demand for online gambling.
- Customize marketing strategies and game offerings to appeal to local preferences and cultural nuances in each target market.

4. Technological Innovation:

- Continuously invest in cutting-edge technology to enhance the platform's performance, security, and user experience.
- Explore emerging technologies offer innovative gaming experiences and gain a competitive edge.
- Prioritize mobile optimization and develop a seamless mobile app to cater to the growing number of players accessing the casino via smartphones and tablets.

5. Risk Management and Regulatory Compliance:

- Establish robust risk management protocols to mitigate potential threats such as cybersecurity breaches, fraud, and regulatory non-compliance.
- Stay abreast of changes in gambling regulations and industry standards to ensure full compliance and minimize legal risks.
- Implement strict responsible gambling measures to promote player safety and well-being, including age verification, self-exclusion options, and problem gambling awareness campaigns.

Marketing Plan:

Budget Allocation:

- Digital Marketing- paid advertising campaigns, social media marketing, and content creation.
- Affiliate Partnerships: affiliate marketers who drive user acquisition.
- CRM Systems: implementing and maintaining CRM systems for user data analysis and personalized marketing.

- Sponsorships and Events: for sponsoring industry events, conferences to increase brand visibility.

Excluded Markets:

The Company strictly adheres to all mandatory regulations and set the standards to divide excluded markets from those where it can provide its services.

Excluded markets for the Company include:

1. Markets with strict regulatory restrictions or prohibitions on online gambling, such as countries where gambling is illegal or heavily regulated.
2. Markets with significant legal or political uncertainties that pose risks to business operations and financial stability.
3. Markets with limited potential for profitability due to small population sizes, low internet penetration rates, or cultural barriers to online gambling adoption.

5. Key suppliers and material dependencies.

The Company has outlined its key suppliers depending on the field and the material dependencies accordingly:

1. **Software Providers:** These suppliers provide the essential gaming software and platforms necessary for operating the online casino. They offer a wide range of games such as slots, table games, and live dealer games. Examples include Microgaming, NetEnt, Playtech, and Evolution Gaming and others.
2. **Payment Processors:** Payment processors enable seamless transactions between players and the casino, facilitating deposits, withdrawals, and fund transfers. They play a crucial role in ensuring secure and efficient payment processing. Examples include Verser Pay, EcoPayz, Skrill, Neteller, and traditional banking institutions.
3. **Customer Support Solutions:** Customer support solutions suppliers offer tools and platforms for managing customer inquiries, complaints, and feedback. They help maintain high levels of customer satisfaction and resolve issues promptly to prevent churn.

The Company has created a **Risk Management Strategies** to minimize the impact of supplier loss or interruption and ensure the continuity of its operations, regulatory compliance, and customer satisfaction:

1. **Supplier Diversification:** To mitigate the risk of dependency on a single supplier, the Company shall diversify its supplier base by partnering with multiple software providers, payment processors, and regulatory compliance services. This ensures continuity of operations in case of disruptions or termination of services from any individual supplier.
2. **Contractual Agreements:** Establish robust contractual agreements with critical suppliers that outline service level agreements (SLAs), performance metrics, and dispute resolution mechanisms. These contracts shall include provisions for contingency plans and alternative solutions in the event of service interruptions or breaches of contract.
3. **Backup Systems:** Maintain backup systems and redundancy measures to minimize the impact of supplier interruptions on casino operations. This may include backup servers, redundant payment processing channels, and alternative customer support channels to ensure uninterrupted service delivery to players.
4. **Contingency Planning:** Develop comprehensive contingency plans that outline steps to be taken in the event of supplier loss or interruption. This includes identifying alternative suppliers, activating backup systems, and communicating effectively with stakeholders to mitigate the impact on business operations and customer experience.
5. **Regular Monitoring and Evaluation:** Continuously monitor the performance and reliability of critical suppliers through regular assessments, audits, and performance reviews. Stay updated with industry trends and changes in supplier landscapes to proactively identify potential risks and take appropriate risk management measures.

6. Risk evaluation and management

Certainly, managing risk is crucial in the gambling sphere, and it involves a combination of internal and external processes. Here's an overview of how risk is assessed, mitigated, audited, and overseen in the Company:

1. Risk Assessment:

- **Internal Risk Assessment:** It includes conducting regular internal risk assessments to identify and evaluate potential risks. This concerns risks related to cybersecurity, fraud, regulatory compliance, financial stability, and operational issues.
- **External Risk Assessment:** The Company has to be informed about external factors affecting the industry, such as changes in regulations, technological advancements, and market trends. It includes collaboration with industry experts and consultants to assess external risks.

2. Mitigation Strategies:

- **Operational Controls:** The Company shall implement robust operational controls to minimize the likelihood and impact of the internal and external risks. This may include secure payment processing, data encryption, and fraud detection systems.
- **Regulatory Compliance:** The Company shall ensure compliance with gambling regulations and licensing requirements, establish procedures to adapt quickly to changes in regulatory environments.
- **Cybersecurity Measures:** One of the priorities in mitigation of risks is investment in advanced cybersecurity measures to protect customer data, financial transactions, and the integrity of the gaming platform.

3. Auditing Processes:

- **Internal Audits:** The Company shall conduct regular internal audits of financial transactions, gaming software, and operational processes. This helps identify any discrepancies, irregularities, or areas for improvement.
- **External Audits:** The Company sees it positive to engage third-party audit firms to perform external audits. These audits can include financial audits, security audits, and compliance audits to verify adherence to industry standards and regulations.

4. Oversight Committees:

- **Compliance Committee:** The Company shall establish a compliance committee responsible for ensuring that the online casino as a product of the Company adheres to all relevant regulations. This committee monitors changes in laws and regulations and implements necessary adjustments.
- **Risk Management Committee:** The Company shall form a risk management committee tasked with overseeing the identification, assessment, and mitigation of risks. This committee should regularly report to executive management and the board of directors.

5. Risk Registers:

- **Maintain a Risk Register:** The Company shall create and maintain a comprehensive risk register that shall document identified risks, their potential impact, and mitigation strategies. This register serves as a central repository for tracking risk management efforts.
- **Regular Reviews:** The Company shall periodically review and update the risk register to reflect changes in the business environment, industry dynamics, and internal processes.

6. Financial Audits:

- **Internal Financial Audits:** The Company shall conduct regular internal financial audits to ensure accuracy in financial reporting, identify potential fraud, and assess the overall financial health of the Company.

- **External Financial Audits:** The Company may engage external audit firms to perform independent financial audits. This adds an extra layer of assurance for stakeholders and regulatory bodies.

7. Continuous Improvement:

- **Feedback Loops:** The Company shall establish feedback loops from audits and risk assessments to improve processes continually, learn from incidents and implement corrective actions to enhance risk management strategies.
- **Training and Development:** The Company shall provide ongoing training for employees to ensure they are aware of risks and compliance requirements. This includes training on responsible gambling practices and cybersecurity awareness.

All In all, effective risk management in the Company involves a combination of proactive assessment, robust mitigation strategies, thorough auditing processes, and diligent oversight by committees and management. Continuous improvement and adaptability are key components in maintaining a secure and compliant online gambling operation.

7. Legal and governance framework

Board Oversight.

The current board membership consists of CEO and UBO.

Interaction with Senior Management:

The board sets the strategic direction for the Company and oversees the senior management team responsible for day-to-day operations.

The interaction within the Company consists of the following

1. **Regular Board Meetings:** There are scheduled regular board meetings, usually quarterly, to review key aspects of the online casino's operations. Also, there are established formal agenda that covers strategic planning, financial performance, regulatory compliance, and operational updates.
2. **Pre-Meeting Preparation:** It includes distribution of relevant materials, reports, and documents to board members well in advance of the meeting. It concerns financial statements, compliance reports, marketing updates, and any other information crucial for decision-making.
3. **CEO/Management Presentation:** The board shall allocate time for the CEO or other senior executives to present updates on the online casino's overall performance. Cover key achievements, challenges, and proposed strategies.
4. **Strategic Planning:** The board may discuss the long-term strategic plans proposed by the senior management. These plans shall be overviewed with the overall business goals and market trends.
5. **Operational Updates:** The board shall receive updates from various departments, such as marketing, technology, and customer support, address operational challenges and identify opportunities for improvement.
6. **Risk Management:** The board shall discuss the risk management framework, including potential threats to the business and strategies for mitigation, evaluate the effectiveness of existing risk management measures.
7. **Executive Session:**
 - Hold an executive session, excluding senior management, to discuss sensitive matters, executive compensation, or other confidential topics.
8. **Decision-Making:** The board make decisions on strategic matters, major investments, and any issues requiring board approval, delegate operational decisions to senior management based on established authority levels.
9. **Continuous Communication:** There shall be open lines of communication between board members and senior management outside of formal meetings. The Company encourages a culture of transparency and collaboration.

Matters reserves for the Board of Directors and Ultimate Beneficial Owners (UBOs)

The matters reserved for the Board of Directors and Ultimate Beneficial Owners (UBOs) in the Company pertain to strategic, significant, and high-level decisions. There are areas that are reserved for the Board of Directors and UBOs:

1. Strategic Planning:

- Setting the overall strategic direction and business objectives of the Company.
- Approving major strategic initiatives, partnerships, and alliances.

2. Financial Oversight:

- Approving annual budgets and financial plans.
- Deciding on major capital expenditures and investments.

- Reviewing and approving financial statements.

3. Regulatory Compliance:

- Ensuring compliance with relevant gambling regulations and legal requirements.
- Approving changes to the regulatory framework that might impact the casino.

4. Executive Appointments:

- Appointing or removing the CEO and other key executives.
- Approving executive compensation packages.

5. Legal Matters:

- Approving legal strategies and significant legal actions.
- Addressing legal disputes and settlements.

6. Mergers and Acquisitions:

- Deciding on mergers, acquisitions, or divestitures.
- Approving significant changes in ownership structure.

7. Risk Management:

- Overseeing the risk management framework.
- Approving risk mitigation strategies for major threats to the business.

8. Corporate Governance:

- Establishing and maintaining effective corporate governance policies.
- Approving changes to the company's constitution or bylaws.

9. Corporate Social Responsibility (CSR):

- Setting CSR goals and strategies.
- Approving major CSR initiatives.

10. Dividends and Distributions:

- Deciding on the distribution of dividends to shareholders.
- Approving the allocation of profits.

11. Technology and Innovation:

- Approving major technology investments and initiatives.
- Overseeing the adoption of innovative technologies in the online casino platform.

12. Brand and Marketing Strategy:

- Approving the overall brand strategy and positioning.
- Reviewing major marketing campaigns and initiatives.

13. Data Security and Privacy:

- Ensuring compliance with data protection laws.
- Approving strategies for data security and privacy protection.

14. Crisis Management:

- Overseeing crisis management plans and responses.
- Approving communication strategies during crises.

15. Ethical Standards:

- Setting and upholding ethical standards for the casino's operations.
- Approving policies related to responsible gambling and player protection.

These matters are considered crucial for the long-term success, compliance, and sustainability of the Company. The Board of Directors and UBOs play a pivotal role in providing guidance and oversight in these areas to ensure the Company operates in a responsible, legal, and strategic manner.

Risks for the Company being deadlocked

Regular communication, transparency, and a commitment to resolving conflicts in a constructive manner are crucial for preventing and overcoming deadlocks within the board or company. For the purpose of mitigating the risks of being deadlocked the Company has provisions in place to prevent and avoid deadlocks that include:

1. **Clear Governance Framework:** A well-defined established governance framework with procedures for conflict resolution and decision-making.
2. **Mediation and Arbitration:** There are mechanisms for mediation or arbitration in the governance documents to resolve disputes without causing prolonged deadlocks.
3. **Majority Voting Mechanisms:** The Company implement's clear majority voting mechanisms that may help break deadlocks by allowing decisions to be made based on a majority vote.
4. **Independent Advisors:** The Company may seek input from independent advisors or experts who can provide unbiased perspectives on critical issues, helping to break deadlocks.
5. **Board Committees:** The Company shall delegate certain decision-making powers to specialized committees within the board, which can streamline the decision-making process and reduce the likelihood of deadlock.
6. **Communication and Transparency:** The Company establishes open communication among board members and encourages transparency to address concerns and find common ground.
7. **Time-Limited Deadlocks:** The Company establishes time limits for deadlock resolution to prevent prolonged indecision, which could harm the Company's operations and reputation.

Legal Support and Advice:

Legal support is crucial for the Company, especially considering the complex regulatory environment. A dedicated internal legal team shall provide advice on regulatory compliance, contracts, and other legal matters. Also, in the complicated issues the Company may use the services of external legal counsels.

Board Meetings and Invited Attendees:

- Regular board meetings are scheduled, and additional meetings may be called as needed.
- Besides board members, key executives, such as the CEO, CFO, and heads of major departments, may attend board meetings.
- External experts or consultants may be invited to provide insights on specific matters.

Governance Policies:

Clear governance policies and procedures are in place, outlining the roles, responsibilities, and decision-making processes for both the board and senior management.

Policies cover ethical standards, conflicts of interest, and compliance with relevant laws and regulations.

The Company's list of Policies includes:

1. Code of Conduct and Ethics:

It establishes guidelines for ethical behavior, integrity, and professionalism for all employees and board members, defines expectations regarding conflicts of interest, confidentiality, and fair dealing.

2. Compliance Policies:

It clearly outlines the company's commitment to complying with all relevant local and international gambling laws and regulations, establishes procedures for monitoring and ensuring ongoing compliance.

3. Anti-Money Laundering (AML) and Know Your Customer (KYC) Policies:

It implements policies and procedures to prevent money laundering and terrorist financing, defines due diligence requirements for customer identification and verification.

4. Data Protection and Privacy Policy:

It details how the company collects, processes, stores, and protects user data, ensures compliance with data protection laws and regulations.

5. Financial Policies:

It specifies financial reporting practices, including the preparation and audit of financial statements, define procedures for budgeting, financial controls, and risk management.

6. Board Charter:

It outlines the roles, responsibilities, and authority of the board of directors, clarifies decision-making processes, committee structures, and the relationship between the board and senior management.

7. Risk Management Policy:

It defines the company's approach to identifying, assessing, and mitigating risks, establishes roles and responsibilities for risk management at various levels of the organization.

8. Environmental Sustainability Policy:

It articulates the company's commitment to environmentally sustainable practices, specifies initiatives to minimize the environmental footprint of operations.

9. Confidentiality and Non-Disclosure Policy:

It clearly states expectations regarding the handling of confidential information, specifies consequences for breaches of confidentiality.

8. Target KPIs and business objectives

In the online casino industry, key performance indicators (KPIs) and business objectives play a crucial role in assessing success and guiding long-term strategies. Here's an overview of the Company's KPIs and business objectives:

1. Player Acquisition and Retention:

KPIs:

- Number of new player registrations.
- Player acquisition cost.
- Player retention rate.

Objectives:

- Increase the number of new players through effective marketing strategies.
- Implement loyalty programs and bonuses to enhance player retention.

2. Revenue and Profitability:

KPIs:

- Total revenue.
- Average revenue per user (ARPU).
- Profit margins.

3. Customer Lifetime Value (CLV):

KPIs:

- CLV calculations.
- CLV to Customer Acquisition Cost (CAC) ratio.

Objectives:

- Increase CLV through personalized promotions and engagement strategies.
- Maintain a positive CLV to CAC ratio for sustainable growth.

4. Regulatory Compliance:

KPIs:

- Compliance audit results.
- Number of regulatory fines or penalties.

Objectives:

- Achieve and maintain full compliance with gambling regulations.
- Minimize regulatory risks and penalties.

5. Responsible Gambling Metrics:

KPIs:

- Number of self-exclusions.
- Responsible gambling support interactions.

Objectives:

- Promote responsible gambling practices through educational initiatives.
- Provide robust tools for players to self-manage their gambling behavior.

6. Technology and Security:

KPIs:

- Uptime and system reliability.
- Cybersecurity incident reports.

Objectives:

- Ensure a secure and stable online gaming platform.
- Stay updated with the latest security technologies and practices.

7. Brand Reputation:

KPIs:

- Online reviews and ratings.
- Social media sentiment analysis.

Objectives:

- Maintain a positive brand image through exceptional customer experiences.
- Respond effectively to customer feedback and address concerns promptly.

8. Geographic Expansion:**KPIs:**

- Market share in targeted regions.
- Regulatory approvals for expansion.

Objectives:

- Strategically expand into new markets with growth potential.
- Establish a strong presence in regions with favorable regulatory environments.

9. Social and Community Impact:**KPIs:**

- Community engagement metrics.
- Social responsibility initiatives impact.

Objectives:

- Contribute positively to the communities in which the online casino operates.
- Engage in charitable activities aligned with corporate social responsibility goals.

Measuring Success and Long-Term Objectives:

- **Regular Performance Reviews:** The Company shall conduct regular reviews of KPIs to track progress and identify areas for improvement.
- **Benchmarking:** The Company shall compare the online casino's performance against industry benchmarks to gauge competitiveness.
- **Customer Feedback:** The Company shall use customer surveys, reviews, and feedback to assess satisfaction and identify opportunities for enhancement.
- **Financial Health:** The Company shall monitor financial statements, profit margins, and cash flow to ensure the online casino's financial health.
- **Adaptability:** The Company shall have an ability to adapt to changing market trends, technological advancements, and regulatory requirements.
- **Innovation:** The Company shall measure success in terms of the ability to innovate, introduce new gaming options, and stay ahead of industry trends.

9. Policies and Procedures

The Company uses hybrid approach in creating and implementing its policies and procedures, combining internal and external resources.

- **Internal Oversight:** The Company's internal team shall manage the development process, ensuring policies align with the organization's culture and operations.
- **External Review:** External consultants or legal experts may review the policies for completeness, compliance, and industry best practices in case there is a need.

When establishing policies and procedures the Company establishes specific timelines to communicate with GCB. The expected timelines for the development of policies and procedures are from 1 month considering factors such as the complexity of regulatory requirements and the involvement of internal or external stakeholders.

The board of the Company needs to ensure that the person or entity responsible for developing policies and procedures is qualified, competent, and free from conflicts of interest. This is critical for maintaining the integrity of the regulatory compliance process and ensuring that the policies effectively address legal requirements and industry standards.

Here are key considerations that are used by the Company:

1. Expertise and Experience:

- **Qualifications:** Verification of the qualifications and credentials of the person or entity involved in policy development. Looking for relevant educational background, certifications, and industry experience in gaming regulations and compliance.
- **Track Record:** Assessing the individual's or entity's track record in developing policies for online casinos or similar gaming entities. A proven history of successful policy development is a positive indicator.

2. Industry Knowledge:

- **Understanding of Gaming Regulations:** Ensuring that the person or entity possesses a deep understanding of the specific gaming regulations applicable to the online casino's jurisdiction. This includes knowledge of both national and international standards.
- **Awareness of Industry Trends:** Confirmation that the individual or entity stays abreast of emerging trends and changes in the online gaming industry.

3. Impartiality and Independence:

- **Absence of Conflicts of Interest:** Checking whether the person or entity for potential conflicts of interest that could compromise their objectivity. This includes evaluating any financial interests, relationships, or affiliations that might unduly influence the policy development process.

4. Legal and Regulatory Compliance:

- **Legal Background:** Verification if the person or entity has a legal background or access to legal expertise to ensure that the developed policies align with legal requirements.

5. References and Recommendations:

- **References:** Check of references or recommendations from other entities or organizations that have worked with the person or entity in similar capacities.
- **Due Diligence:** Conduction thorough due diligence, which may involve background checks, interviews, and reviews of past work.

6. **Continual Professional Development:**

- **Commitment to Learning:** Confirmation a commitment to continual professional development. Policies and regulations in the gaming industry can evolve rapidly, and the person or entity should actively stay informed about changes.

7. **Clear Contractual Agreements:**

- **Written Agreements:** Established clear contractual agreements that outline the scope of work, deliverables, and expectations. This includes clauses addressing confidentiality, conflict resolution, and termination.

By thoroughly assessing these factors, the board can form a reasonable belief that the person or entity responsible for developing policies and procedures for the Company is qualified, competent, and not conflicted. Regular communication and oversight throughout the policy development process contribute to a robust and compliant framework for the online casino.

10. SWOT Analysis

Strengths:

1. Established Reputation:

- The online casino has built a strong and positive reputation over the years, gaining the trust of players through fair gameplay, secure transactions, and reliable customer service.

2. Diverse Game Portfolio:

- Boasting a diverse range of high-quality games, including exclusive partnerships with top game developers, the casino offers a wide selection to cater to various player preferences.

3. Innovative Technology Integration:

- The casino embraces innovative technologies, featuring a user-friendly interface, and incorporating emerging technologies.

4. Loyalty Programs and VIP Treatment:

- A well-structured loyalty program and VIP offerings provide incentives for player retention, fostering a dedicated player base and enhancing customer lifetime value.

Weaknesses:

1. Dependency on Specific Unregulated Markets:

- The casino heavily relies on specific unregulated market for its player base, making it vulnerable to economic downturns or regulatory changes due to possible changes in legislation of specific regions.

2. Limited Payment Options:

- The casino currently offers a limited range of payment options, potentially causing inconvenience for players who prefer alternative payment methods.

3. Dependence on Internet Connectivity:

- The success of online casinos relies heavily on stable internet connections. Technical issues or disruptions may impact the player experience and revenue.

Opportunities:

1. Expansion into New Markets:

- Exploring and entering new, unregulated markets provides an opportunity for growth, leveraging the casino's reputation and expertise.

2. Strategic Partnerships with Game Developers:

- Forging strategic partnerships with emerging game developers can enhance the casino's game portfolio, offering unique and exclusive content to attract a broader audience.

3. Enhanced Mobile Gaming Experience:

- With the increasing trend in mobile gaming, investing in a seamless and feature-rich mobile app or website can tap into a growing segment of players.

Threats:

1. Intense Competition:

- The highly competitive online gambling market poses a threat, requiring constant efforts to differentiate and stand out among numerous competitors.

2. Changing Regulatory Landscape:

- Ongoing changes in gambling regulations, especially in the casino's primary market, could lead to compliance challenges and increased operational costs.

3. Cybersecurity Risks:

- The constant threat of cybersecurity attacks may jeopardize player data and financial transactions, necessitating robust security measures.

4. Negative Public Perception:

- Negative publicity or public perception issues related to responsible gambling practices could result in increased scrutiny and potential regulatory actions.