

Business Plan of Topxgo N.V.

Table of Contents

1. Overview of Products and Services/Brands
2. Company Management Structure
3. Business Forecasts for 3 Years
4. Growth and Market Penetration Strategy
5. Key Suppliers and Dependencies
6. Target Key Performance Indicators (KPIs) and Business Goals
7. Policies and Procedures

Executive summary

1. Overview of Products and Services/Brands

Company Overview

Topxgo N.V. is a company incorporated under the laws of Curaçao, with company registration number 165952, and registered address in Curaçao. Topxgo N.V. operates the digital gaming platform TopX and holds a valid Certificate of Operation. The company currently has an active application for a gaming license (Application no. OGL/2024/496/0781) with the Curaçao Gaming Authority, operating under a transitional arrangement as outlined in the National Ordinance on Games of Chance (*Landsverordening op de Kansspelen, P.B. 2024, no. 157*).

How It Works:

- **Registration:** Users must create an account to use our platform. User login and information are protected by security measures such as IP verification, browser fingerprinting, and database encryption.
- **Payment:** The user accesses the wallet and chooses any convenient payment method.
- **Game:** The user can play slot machines or buy lottery tickets.
- **Winnings:** Any winnings can be withdrawn to the user's bank account or cryptocurrency wallet.

Unique Features:

- Use of advanced technologies to ensure secure and fair games.
- Innovative gaming mechanics and unique bonus offers for users.
- A strong team of professionals with experience in the gambling industry.
- Platform availability through smartphones and PCs.
- Platform accessibility via a Telegram bot, increasing audience reach and convenience.
- Fast and secure account replenishment through cryptocurrencies and bank cards.

Casino Concept Overview

Games Offered: Slots, roulette, blackjack, baccarat, and other casino games.

Exclusive Design: Luxurious, intuitive, and trust-inspiring UI/UX.

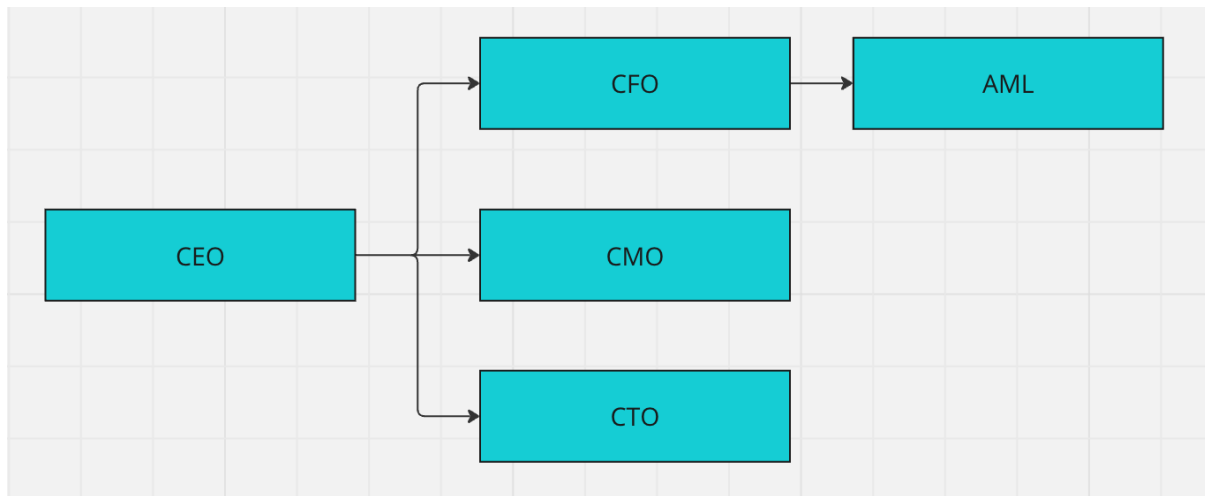
Loyalty Program: Personalized bonuses and rewards for regular users.

24/7 Operation & Security: Full-time availability and robust user data protection.

Partnerships: Ongoing partnership with **SoftGamings** for integrated provider solutions and user engagement.

2. Company Management Structure

Organizational Structure:



Role Descriptions

Executive Management

- **Director – Fedor Zavyalov:** Oversees the overall strategic direction of the company, ensuring alignment with long-term business goals. Responsible for high-level investor relations, legal compliance, and maintaining regulatory communication. Provides leadership across all departments and ensures strategic consistency in all operations, partnerships, and regulatory matters.
- **Operating Director – Maxim Kovalev:** Manages day-to-day operations, including internal workflows, staffing, platform delivery, and performance metrics. Maxim ensures timely product releases, coordinates cross-functional teams, and monitors key performance indicators (KPIs) to optimize operational efficiency and ensure sustainable growth.

Compliance

- **Compliance Officer – Derek Hendriks, CAMS Certified:** Leads the company's anti-money laundering (AML) and counter-terrorist financing (CTF) efforts. Serves as the primary liaison with the Curaçao Gaming Authority (CGA), Financial Intelligence Unit (FIU), and other regulatory bodies. Monitors gaming and payment activities, prepares Suspicious Activity Reports (SARs), and ensures internal policies meet international compliance standards. Implements a two-tiered risk defense framework across the organization.

Product Management Team

- **Project Manager – Kirill Kalinin:** Oversees project timelines and the coordination of internal teams. Ensures that product development milestones are met and that

interdepartmental tasks are executed efficiently. Acts as a bridge between technical teams and executive management to align business goals with product output.

- **Product Manager – Alexander Kachan:** Manages the game portfolio and user-facing features of the platform. Responsible for the design, implementation, and optimization of in-game bonus systems, user experience (UX), and overall player engagement strategies.

Technology Team

- **CTO / Lead Backend – Vsevolod Golovzhin:** Leads backend architecture design, API integration, and provider/payment gateway connectivity. Oversees all technical aspects of the platform's server-side functionality, ensuring reliability, scalability, and regulatory compliance in system performance.
- **Lead Frontend – Mikhail Tatochenko:** Responsible for the development and performance of all user-facing components. Designs and maintains the visual interface and ensures optimal user experience (UX/UI) across devices and platforms.
- **Lead Data Analyst – Yakov Pavlov:** Builds analytical frameworks to evaluate player behavior, forecast lifetime value (LTV), and detect potential fraud. Supports data-driven decision-making through customized reports and behavioral modeling.
- **Lead DevOps – Yuri Elistratov:** Maintains and improves infrastructure uptime, system deployments, and CI/CD pipelines. Ensures high availability and operational resilience of the platform through advanced monitoring and automation.
- **Lead QA – Nikita Ilin:** Designs and manages the quality assurance process, ensuring every release meets performance and security standards. Oversees testing protocols, bug reporting, and validation procedures prior to go-live.

Operations & CRM

- **Lead CRM – Lina Molotowa:** Develops and executes customer retention strategies, bonus campaigns, and player engagement mechanics. Uses CRM tools to analyze player segments and drive personalized communication and loyalty programs.
- **HR Director – Vladislav Sannikov:** Oversees recruitment, onboarding, and compliance training. Ensures that team structure supports business needs and maintains internal culture. Conducts performance reviews and manages team development initiatives.
- **Finance – Marina Paripsa:** Handles all financial operations, including budgeting, accounting, payroll, and tax compliance. Manages internal controls, financial reporting, and reconciliation of payment systems.

Interaction with Company Management:

- **Monthly Reports:** Key department heads present monthly reports on current activities and achievements to the CEO.
- **Joint Meetings:** Regular joint meetings of the CEO and departments to discuss strategic and operational issues.

Matters Reserved for the Board of Directors:

- **Strategic Decisions:** Defining strategic priorities and long-term development plans for the company.

- **Major Financial Transactions:** Approval of major investment and financial transactions.
- **Charter Amendments:** Making changes to the company's charter.
- **Appointments and Dismissals:** Appointment and dismissal of senior management.

Conflict Resolution:

- **Mediation:** Engaging an independent mediator to resolve conflicts.
- **Reserve Mechanisms:** Using pre-approved procedures and rules for decision-making in deadlock situations.

Legal Support and Consultations:

- **In-house Lawyers:** Ensuring the company's activities comply with legal and regulatory requirements.
- **External Law Firms:** Consultations on corporate law, tax planning, and other legal aspects.

Board Meeting Participants:

- **Internal Experts:** Key department heads to present reports and participate in discussions.
- **External Consultants:** Independent experts and consultants to provide professional recommendations and opinions.
- **Legal Advisors:** In-house and external lawyers to provide legal consultations.

ESG Policy:

- **Environmental Responsibility:** Reducing the company's environmental footprint through the implementation of energy-saving technologies and waste minimization.
- **Social Responsibility:** Supporting charitable initiatives, ensuring equal opportunities for employees, and promoting their professional development.
- **Corporate Governance:** Ensuring transparency and accountability of company activities, adhering to high standards of corporate governance.

Hiring Employees

Initially, we will manage the business independently. In the future, we plan to hire a separate KYC officer and support staff. As the company grows, we also plan to attract a Compliance Director (CCO). As the company grows, we will increase the number of professionals, hiring them both full-time and part-time. We recognize that expansion and business development will require a combination of talented employees, vision, and creativity to accomplish all key tasks. We will organize the hiring process by attracting both young specialists as interns and experienced professionals to take the business to the next level. A careful selection approach will ensure the choice of only the best candidates.

Hiring Process:

- **Identifying Needs:** Determining the necessary number of positions, competencies, and qualifications.
- **Preparing Job Descriptions:** Developing and approving detailed job descriptions for each position.

- **Posting Vacancies:** Posting job ads on job sites, social networks, professional communities, and the company's website.
- **Resume Screening:** Initial screening of resumes to identify the most suitable candidates.
- **Initial Interview:** Phone or video interviews with selected candidates to assess their compliance with basic requirements.
- **Testing and Evaluation:** Additional tests and assessment activities (e.g., case interviews, psychological tests).
- **Management Interviews:** Organizing meetings of candidates with key company leaders.
- **Reference Checks:** Checking references and conducting background checks for any risks.
- **Job Offer:** Formulating and offering an employment contract to the most suitable candidate.
- **Onboarding:** Organizing the onboarding process and adaptation program for the new employee.

Hiring Schedule:

- **Week 1-2:** Identifying needs and preparing job descriptions for all positions.
- **Week 3-4:** Posting vacancies and collecting resumes for all positions.
- **Week 5-6:** Resume screening and initial interview for KYC Officer.
- **Week 7-8:** Testing and management interviews for KYC Officer.
- **Week 9:** Reference and background checks for KYC Officer.
- **Week 10:** Job offer and onboarding for KYC Officer.
- **Week 5-7:** Resume screening and initial interview for CCO.
- **Week 8-9:** Testing and management interviews for CCO.
- **Week 10:** Reference and background checks for CCO.
- **Week 11:** Job offer and onboarding for CCO.

3.Financial Projections (2025–2027)

Year	Monthly Wages	Monthly Marketing	Monthly Platform/Provider Commission	Monthly Total	Annual Total
2025	\$10,000	\$20,000	\$4,000	\$34,000	\$408,000
2026 (+30%)	\$13,000	\$26,000	\$5,200	\$44,200	\$530,400
2027 (+30%)	\$16,900	\$33,800	\$6,760	\$57,460	\$689,520

- **Initial Investment:** \$400,000 (already deployed to platform development, legal structuring, content acquisition, and launch operations).
- **Note:** These forecasts **do not include revenue**, which is expected to scale with marketing and affiliate expansion.

4. Growth and Market Penetration Strategy

Growth Strategy Overview:

- **Financial Plan:** Attracting investments to expand marketing campaigns and improve the technological platform.

Marketing Strategy:

- **Online Advertising:** Contextual advertising, SEO, social media campaigns.
- **Content Marketing:** Creating content to attract and retain users, SMM.
- **Email Marketing:** Regular newsletters with news and promotions.
- **Bonus System:** Regular development of bonus offers for clients.
- **Affiliate Marketing:** Attracting partners to advertise our brand through CPA and RevShare programs.

Geographical Expansion:

- **International Markets:** We will operate in all markets where licensing allows, after thorough legal review in each specific case. The main target jurisdictions are India, Bangladesh, Argentina, Malaysia, Indonesia, Chile, Brazil
- **Prohibited Countries:** Australia, Austria, Aruba, Belgium, Bulgaria, Bonaire, Hungary, Guadeloupe (FR), Germany, Greenland, Greece, Denmark, Ireland, Spain, Italy, Kazakhstan, Canada (Province of Ontario), Cyprus, Cocos (Keeling) Islands (AU), Curaçao, Latvia, Lithuania, Liechtenstein, Luxembourg, Malta, Martinique (FR), Netherlands, United Arab Emirates, Norfolk Island (AU), Christmas Island (AU), Heard Island and McDonald Islands (AU), Poland, Portugal, Puerto Rico (US), Romania, Saba, Saudi Arabia, Saint Barthélemy (FR), Saint Martin (FR), Sint Eustatius, Singapore, Sint Maarten (NL), Slovakia (EU), Slovenia (EU), United States of America, Finland, France, Croatia, Czech Republic, Switzerland, Sweden, Estonia.

5. Key Suppliers and Dependencies

Key Suppliers:

- **Game Providers:** Evopay, 100hp, InOut
- **Affiliate Program:** SoftSwiss, Slotegrator
- **Payments aggregators:** PayHost, PSPCube
- **Payment providers (direct integrations):** a-pay, eazy-pe, octopay, best-pay-24, gaming-pe, cashix, euphoria, spayz, payok, interkassa, decard, my-secure-pay, payoutex, xazurpay, star-pg, settlepay, unicaps, ismartpay, mac-pay, surepay, baofu, wells, pay-to-upi, cheezee-pay, hyperpay, directa24, plus-pe, glidexpay, direpay, dpay, zipzopay, astropay, monetix, payhere, payku, p2pay, hostapay, delta, rocketx, spicy-cash, pay-games.

Risks and Management:

- **Supplier Risks:** Possible service delays, quality issues.
- **Risk Management Measures:** Regular supplier audits, long-term contracts with clear terms, using multiple suppliers to diversify risks.

6. Target Key Performance Indicators (KPI) and Business Goals

Measuring Business Success:

Financial Indicators:

- **Revenue:** Total revenue from the company's core activities.

- **EBITDA:** Earnings before interest, taxes, depreciation, and amortization.
- **Net Profit Margin:** The ratio of net profit to total revenue.

Operational Indicators:

- **Number of Active Users:** The number of unique users actively using the platform during a specific period.
- **Number of New Paying Users:** The number of unique users who made a payment.
- **Average Revenue per User (ARPU):** The average revenue generated from one user over a specified period.
- **Customer Retention Rate:** The percentage of users who continue to use the platform over a given period.

Customer Satisfaction Indicators:

- **Customer Satisfaction Score (CSAT):** Assessing user satisfaction with the company's services based on surveys.
- **Net Promoter Score (NPS):** Indicator reflecting customers' willingness to recommend the company to their acquaintances.

Performance and Efficiency Indicators:

- **Page Load Time:** The average load time of the platform's web pages.
- **System Availability:** The percentage of time the platform is available to users without interruptions.

Long-Term Business Goals:

Market Growth and Geographical Expansion:

- **Increasing Market Share:** Aiming to increase market share in current markets by attracting new customers and retaining existing ones.
- **Entering New Markets:** Expanding the company's geographical presence by entering new regional markets and obtaining appropriate licenses.

Innovation and Technological Development:

- **Implementing New Technologies:** Investing in advanced technologies to enhance user experience and operational efficiency.
- **Developing New Products:** Creating and launching new products and services that meet users' needs and expectations.

Strengthening Brand and Reputation:

- **Increasing Brand Awareness:** Conducting marketing campaigns to increase brand awareness and strengthen the brand's image.
- **Ensuring High Customer Satisfaction:** Continuously improving service quality and maintaining high user satisfaction.

Social and Environmental Responsibility:

- **Adhering to ESG Standards:** Implementing and adhering to environmental, social, and corporate responsibility standards in the company's activities.
- **Supporting Social Initiatives:** Participating in social projects.

Financial Stability:

- **Achieving Sustainable Revenue Growth:** Ensuring stable revenue and profit growth for the company.
- **Optimizing Costs:** Reducing operational costs and improving resource management efficiency.

Launching New Brands and Games:

- **Developing and Launching Own Sports Betting Platform:** This will expand the range of services offered and attract a new audience, as well as develop new games for our customers.

7. Policies and Procedures

Developing Policies and Procedures:

- **Internal Development:** Core policies and procedures are developed by internal teams familiar with the company's operational processes and strategic goals. This includes risk management teams, lawyers, and compliance specialists.
- **External Development:** For independence and high expertise, some specialized procedures, such as information security audits or compliance assessments with international standards, are developed and conducted by external consultants and specialized companies.

Deadlines and Commitments for Informing GCB:

- **Implementation Deadlines:** Implementation of all policies and procedures is planned according to an approved schedule, including specific deadlines for each task.
- **Informing Commitments:** The company commits to regularly informing GCB about progress and any changes in policies and procedures.

Competence and Independence of Policy and Procedure Developers:

- **Qualification and Experience:** Internal teams consist of specialists with many years of experience in the gambling industry, risk management, and jurisprudence. External consultants and audit firms hold international certifications and recognition in the industry.
- **Independence and Lack of Conflict of Interest:** To ensure objectivity and the absence of conflicts of interest, external consultants and audit companies are selected on a competitive basis, considering their reputation and independence. Internal teams operate within strict ethical standards and corporate policies, excluding conflicts of interest.

Mandatory Audit/Review of Policies and Procedures:

GCB has the right to request an audit and review of submitted policies and procedures. Topxgo N.V. welcomes such measures and is ready to cooperate with appointed auditors to ensure full transparency and compliance with regulatory requirements.

Critical Suppliers and Risk Management:

Topxgo N.V. discloses information about suppliers critical to the gaming platform and business as a whole, including banking institutions and risk management systems:

- **Critical Suppliers:** The company collaborates with reliable and proven suppliers, such as payment systems, IT service providers, and software developers for games.

- **Risk Management:** To manage supplier-related risks, the company implements strict selection, monitoring, and performance evaluation procedures. Regular audits and reviews of contractual obligations and service quality are conducted. These measures help the company maintain a high level of reliability and compliance with regulatory requirements, ensuring sustainable development and risk minimization.