

Snowbark B.V.

Business Plan

API Development and Integration

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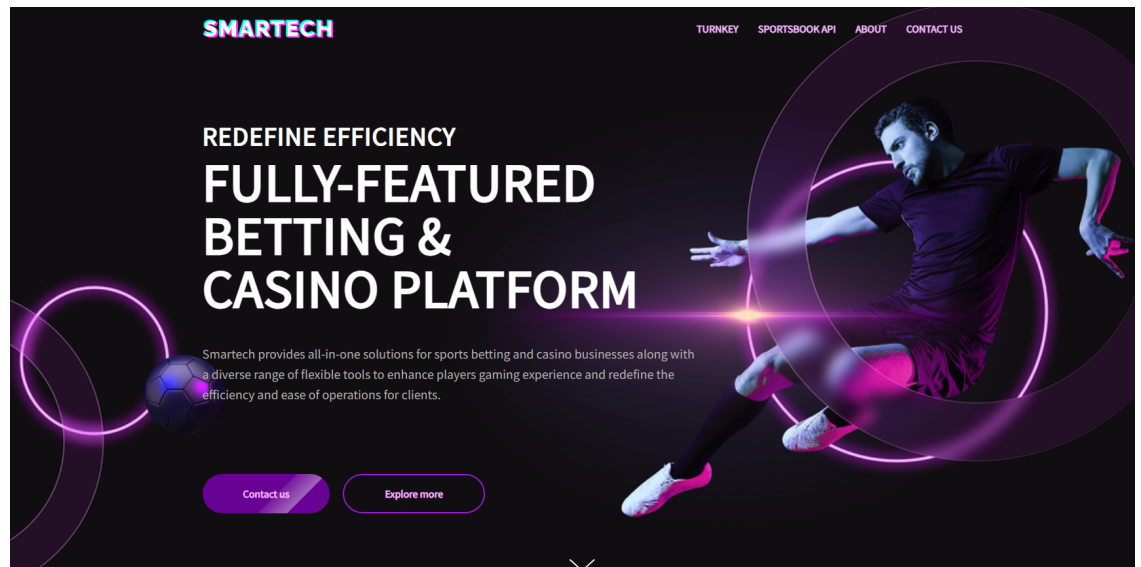
1. Confidentiality statement

- This document is the confidential property of Snowbark B.V., the sub-licensee for the non-exclusive offshore games of chance and wagering, No. 365/JAZ applicant (referred to herein as "Snowbark" or "the Company"), currently applying for a license with the Gaming Control Board. It contains privileged and proprietary information that may not be disclosed or discussed with any individuals or entities outside of Snowbark and the Curacao Gaming Control Board without written authorization from both parties.

2. Overview of Business Products, Services, and Brands:

- Snowbark is established under the laws of Curacao and seeks to obtain the right to operate non-exclusive offshore games of chance and wagering. The company operates under various brand names and domains owned by Snowbark itself.

smartech-platform.com



- Starting in 2024, a new regulatory body, the Gaming Control Board, will be established. The process of seeking government licensing is presently in progress.



- Snowbark is wholly owned by Roman Borodulia.
- Over the past decade, Roman Borodulia has held diverse roles in the tech industry, showcasing his expertise and leadership abilities. Currently serving as Head of Development at LLC "Obelis Limited" since May 2021, he oversees multiple

departments including Analytics, CRM, Information Security, and QA. Prior to this, he excelled as an SQL Manager, enhancing data management systems at the same company. At LLC "Navasard Limited" from April 2018 to November 2020, he spearheaded the development of a cutting-edge data management solution. Earlier roles include Leading Programming Manager at LLC "InSystem," where he revamped data analytics platforms, and Deputy Technical Director at LLC "BryanskSoft," overseeing various data-driven processes. Additionally, he's pursued personal projects, notably crafting a data management and optimization engine. This journey underscores his commitment to innovation and continuous learning in the ever-evolving tech landscape. As a Head of Development at LLC "Obelis Limited", Roman has unparalleled knowledge of all underlying processes of the project, which gives her an edge in guiding the company to success as a CEO.



PROFILE

Roman is a professional in high load data management systems, with technical background and deep BI expertise, including data operations under extreme levels of server capabilities.

GENERAL INFORMATION

Date of birth: 07/07/1982
Gender: Male
Marital status: Married
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Contact phone: +357 95766058
Address at the place of residence: 44 Visiliou Georgiou A, Flat 54, Azur Residents Complex, 4047 Germasogeia, Limassol, Cyprus

LANGUAGES

- Russian, fluent
 - English, pre-intermediate
-

SKILLS

- Database development and administration
- Database management system and algorithms

TECHNOLOGIES

- PostgreSQL, MySQL, MS SQL, clickHouse
 - Software Development: C#, C++, Java, Python
-

Activities over the past 10 years

May 2021 — present time

Place of work: LLC "Obelis Limited"

Description: starting from May 2021 - overseeing the Development direction of the company, acting as Head of Development, leading the departments of Analytics, CRM, Information Security, Data Monitoring and QA, System Administration, Servers Management.

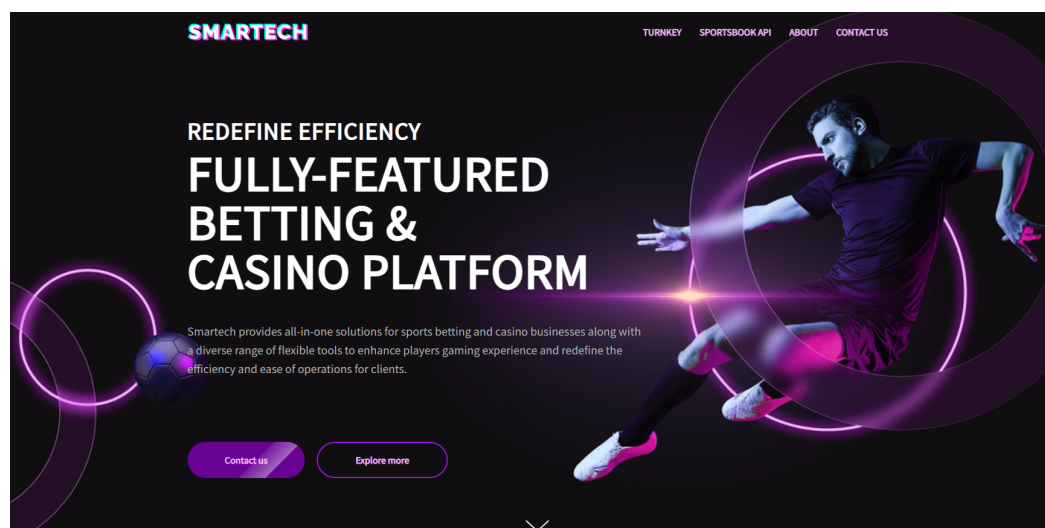
December 2020 — April 2021

Position: SQL Manager
Company: LLC "Obelis Limited"

Description: Improving the Data Management system of the existing working platform solution - including Data Analytics, BI engine and more data driven solutions.

- The team collectively possesses over 15 years of experience in both IT and iGaming industries. Snowbark primarily focuses on providing a comprehensive selection of casino games sourced from top-tier, reputable developers with valid licenses in respected jurisdictions.
- Initially aiming to operate as a B2C operator, Snowbark underwent strategic shifts due to evolving market dynamics, intense competition, and internal deliberations. Consequently, the company transitioned into a gaming aggregator.

- Snowbark is committed to adhering to regulations set by the Gaming Control Board (GCB) and other pertinent legislation such as General Data Protection Regulations and Anti Money Laundering Regulations, while maintaining robust internal controls to surpass industry standards.
- In enhancing its iGaming offerings, Snowbark has partnered with esteemed European-based experts in the field. Operating under a Curacao sub-license, Snowbark conducts B2B online casino operations within authorized jurisdictions.
- With a focus on simplicity and customer satisfaction, Snowbark aims to capture a significant market share by delivering an excellent and user-friendly service. While profitability remains a core objective, Snowbark advocates responsible gaming and prioritizes stringent security measures alongside entertainment offerings.
- Seeking licensure from Curacao reflects Snowbark's commitment to operating within a highly regarded jurisdiction with comprehensive regulatory frameworks and reasonable tax structures. The accessibility and responsiveness of Curacao regulators align with Snowbark's values as it embarks on its journey in the remote B2B gaming sector.



The website employs diverse marketing tools and strategies, along with tailored marketing offers, to attract a substantial customer base. Legal compliance in various jurisdictions is carefully considered to ensure all marketing efforts adhere to relevant regulations.

3. Objectives

- Snowbark is pursuing strategies for market development and penetration to bolster its growth and establish a prominent presence in the gaming industry.
- The primary goal currently is to secure a Sub-license for non-exclusive offshore games of chance and wagering (No. 365/JAZ), enabling Snowbark to offer iGaming products to customers. Within this market, our aim is to build a strong reputation as a trusted entity in the gaming sector. Additionally, while acknowledging the substantial investment involved, we aim to achieve profitability within the initial two years of operation.
- We prioritize customer satisfaction by delivering a stable gaming environment and prompt personalized services through our team. Our services are designed to be user-friendly with streamlined processes, while ensuring compliance remains a priority.

4. Our business models

Our business model revolves around monetizing the Aggregation Solution by generating margins through the resale of Third Party Software at a fixed price, while compensating the software owners at a lower rate. The pricing structure between the Aggregation Solution and Software Providers is based on a Revenue Share percentage. Similarly, our pricing model with clients is also structured on a Revenue Share basis. As the Aggregation Solution is in its initial growth phase, we are open to conducting business in all countries.

Key Partners: 1. Expert iGaming professionals based in Europe 2. Game providers and developers 3. Payment service providers 4. Data centers and cloud providers	Resources: 1. Skilled and creative personnel 2. High-quality gaming content	Valuable Offers: 1. Accessibility 2. Convenience 3. Risk Management 4. Customer-centric Approach 5. Diverse Range of Casino Games	Client Engagement: 1. Customer Support 2. Community Engagement 3. Collaborative Product Enhancement
	Key Activities: 1. Branding initiatives 2. Service development 3. Implementation of loyalty programs 4. Attracting and retaining new customers		Sales Channels: 1. Social media advertising 2. Online and print magazine advertisements 3. Affiliate programs 4. Direct sales
Expenses: 1. Office rental fees 2. Hosting and colocation expenses 3. Game provider commissions 4. Staff salaries		Source of Income: 1. Revenue Share	

5. The iGaming industry and Snowbark

- The iGaming industry is dynamic and constantly evolving, requiring gaming aggregators like Snowbark to adapt to new developments. Globally, the iGaming sector is expanding, with new aggregators emerging to capture market share. The European market is undergoing fragmentation, with additional jurisdictions like the UK, France, Italy, Spain, Sweden, and Denmark introducing legislation to regulate their markets. This necessitates operators and aggregators targeting European markets to obtain multiple licenses to accommodate players from these jurisdictions.
- Despite ongoing economic challenges, the industry remains resilient. Despite the continuous reports of global recession, the iGaming sector continues to thrive. Steady growth is anticipated, as detailed below:



Sources:

- <https://www.targo-consulting.co.il/wp-content/uploads/2019/01/Online-Gambling-Market-Analysis-Summary.pdf>

6. Curacao

Our company aims to secure a Sub-license (NQ 365/JAZ) to utilize non-exclusive offshore gaming and betting opportunities, enhancing our position in the iGaming Market. In addition to our internal strengths - such as our skilled and dynamic team - the Curacao sub-license provides external advantages, including:

- Curacao's esteemed reputation in the iGaming industry.
- Exceptional hosting infrastructure.
- Abundance of skilled professionals.
- Competitive corporate tax rates.

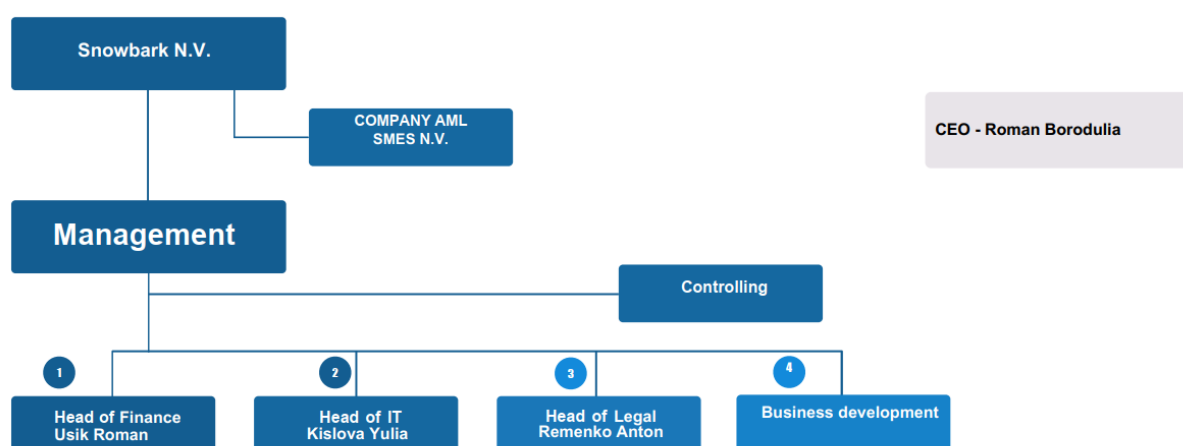
While this list is not exhaustive, it highlights why many new operators and aggregators opt for Curacao as their iGaming hub.

7. Company management structure

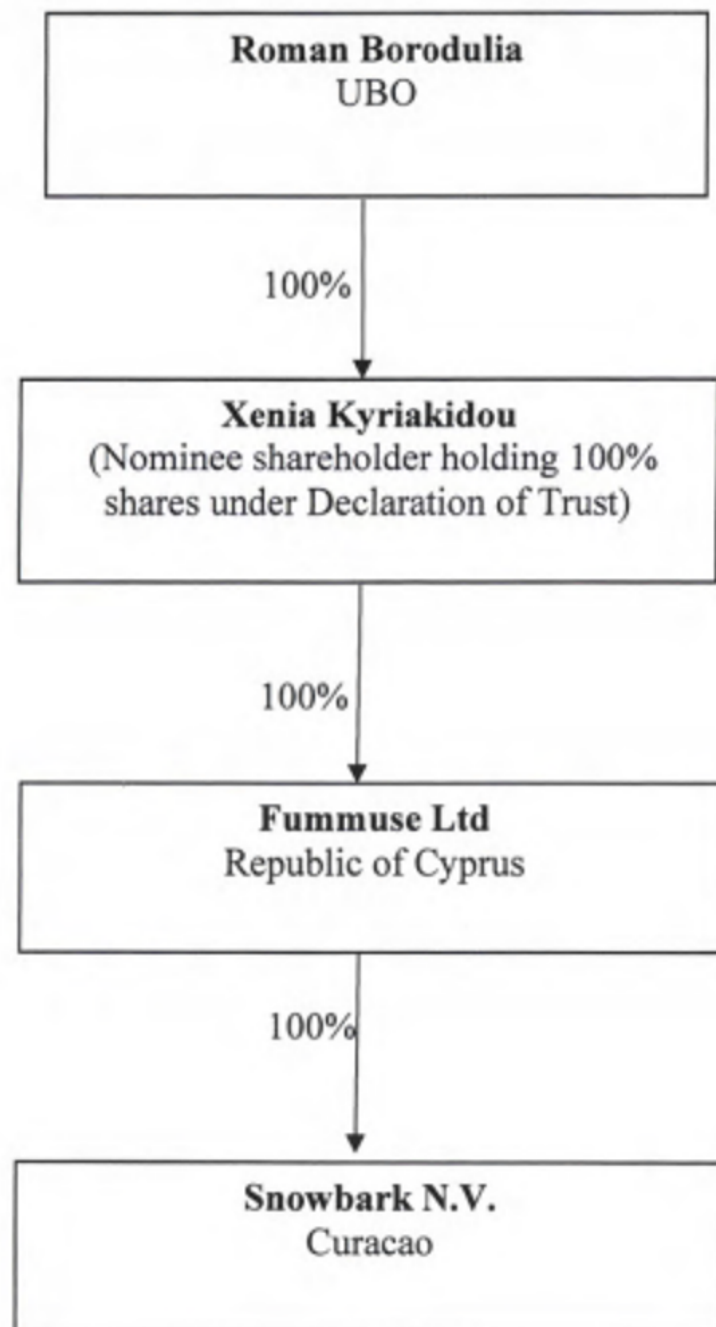
The CEO, who also serves as the sole shareholder of the Operator, actively engages in its daily operations. He directly delegates strategies and decisions to different departments, facilitating prompt decision-making and preventing bottlenecks. Legal support is managed internally by the respective departments and officers. Department Heads carry the primary responsibility for decision-making, with final approval resting with the CEO. Key positions, such as the Business development, are presently vacant and are being filled through internal recruitment, with preference given to candidates possessing significant experience in online casino operations.

Company control structure

Snowbark N.V., a company incorporated under the laws of Curaçao with registration number 155264 and registered address at Dr. H. Fergusonweg, 1, Curacao



- The company currently employs up to 40 individuals, with plans to expand as our business grows. Additionally, we may enlist the expertise of iGaming professionals based in Europe to fulfill various functions. Their guidance and ongoing commitment are integral to advancing our position in the industry.
- The management team at Snowbark is led by the owner and comprises both in-house employees and outsourced personnel as needed. Our aim is to establish a comprehensive team capable of managing all human resource needs under the GCB license.
- Snowbark's ownership structure is depicted simply in the diagram below:



8. Our Product

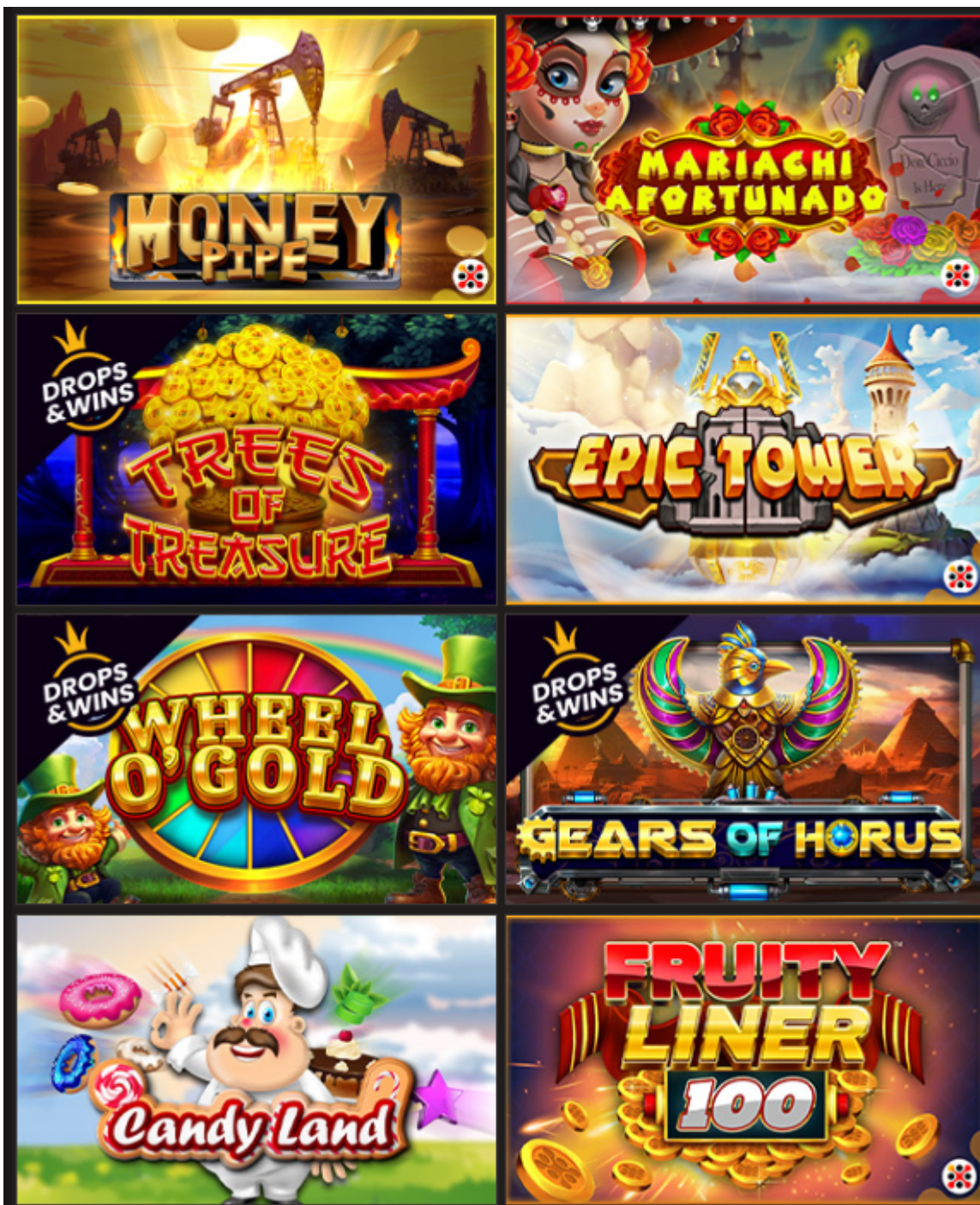
- Snowbark specializes in creating a platform solution tailored to support the operations of other businesses. Known as the "Aggregation Solution," this platform aggregates Third-Party content, also known as "Third-Party Software," and offers it collectively in a single solution to our clients. The Aggregation Solution operates exclusively as a B2B venture, meaning that the revenue of the business hinges greatly on the performance, volume, or popularity of the Third-Party Software being distributed.
- The primary objective of the Aggregation Solution is to seamlessly integrate various software and organize it efficiently within the platform. This involves arranging the Third-Party Software according to specific rules and standards implemented on the technical platform of the Aggregation Solution.

8.1 Technical implementation

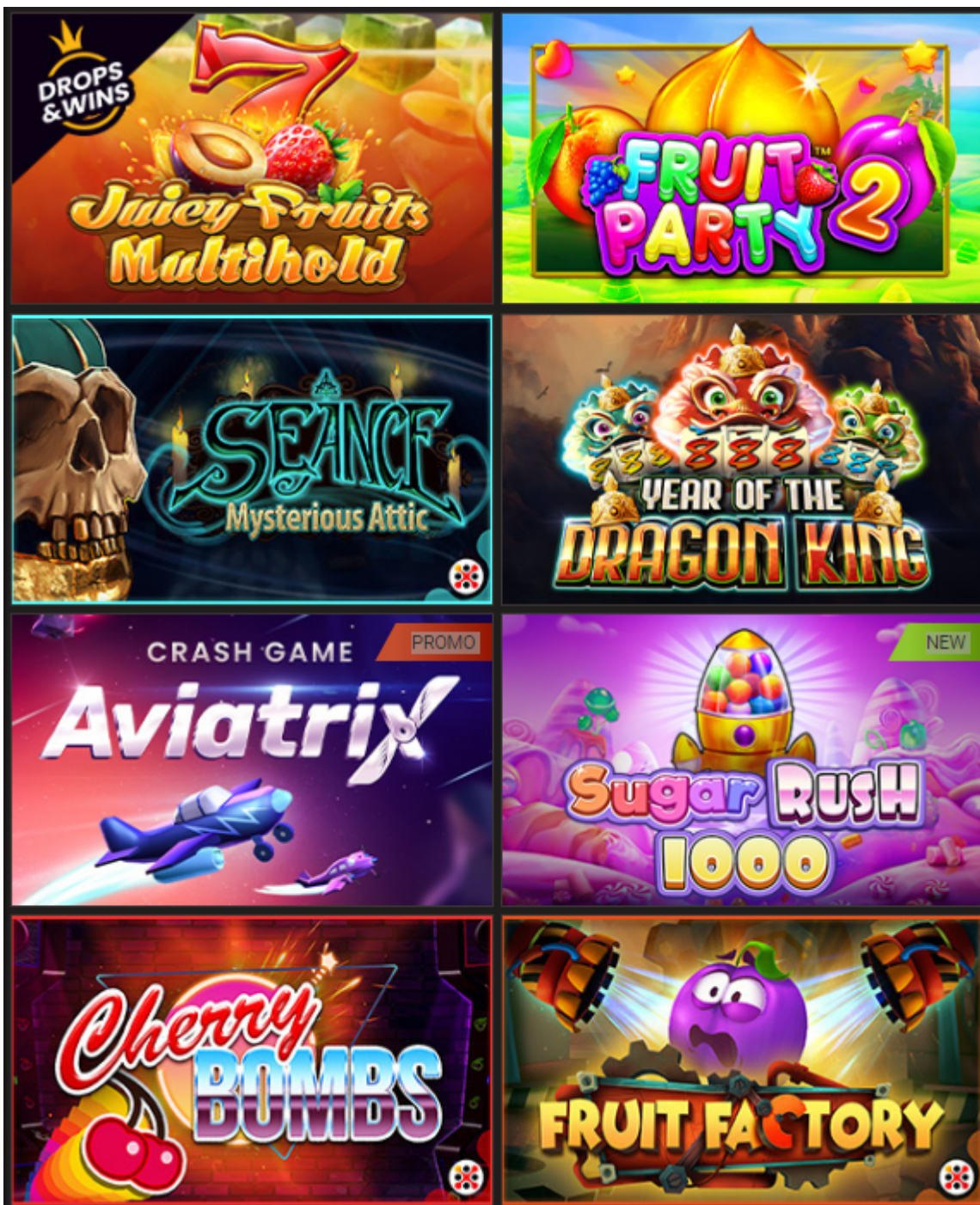
- The technical aspect of our business operates with utmost transparency, primarily relying on API connections between the Aggregation Solution and our various partners who supply their Software. These API connections serve a dual purpose: facilitating the integration of partner software into the Aggregation Solution and delivering the aggregated software to our clients in a seamless, one-time connection.
- Each partner is allocated server space and provided with the necessary access credentials to our technical platform. Furthermore, full-stack technical support is readily available to all partners, including Software Providers and Clients, at no additional cost whenever assistance is required.

8.2 Key Suppliers And Material Dependencies

- The main game suppliers are:
1X2 NETWORK EUROPE
AVIATRIX
BARBARA BANG
MANCALA
PRAGMATIC PLAY
RED EAGLE
RELAX GAMING
TOM HORN
TRIPLE CHERRY
ZEUSPLAY
- We collaborate with a multitude of suppliers, each of whom not only possesses certifications for their games but also enjoys stellar reputations within the industry. Furthermore, our Software License Agreements with these suppliers are designed to motivate them to prioritize player-friendly games that are free of bugs. Maintaining high-quality standards is inherently beneficial for them, aligning with their best interests.

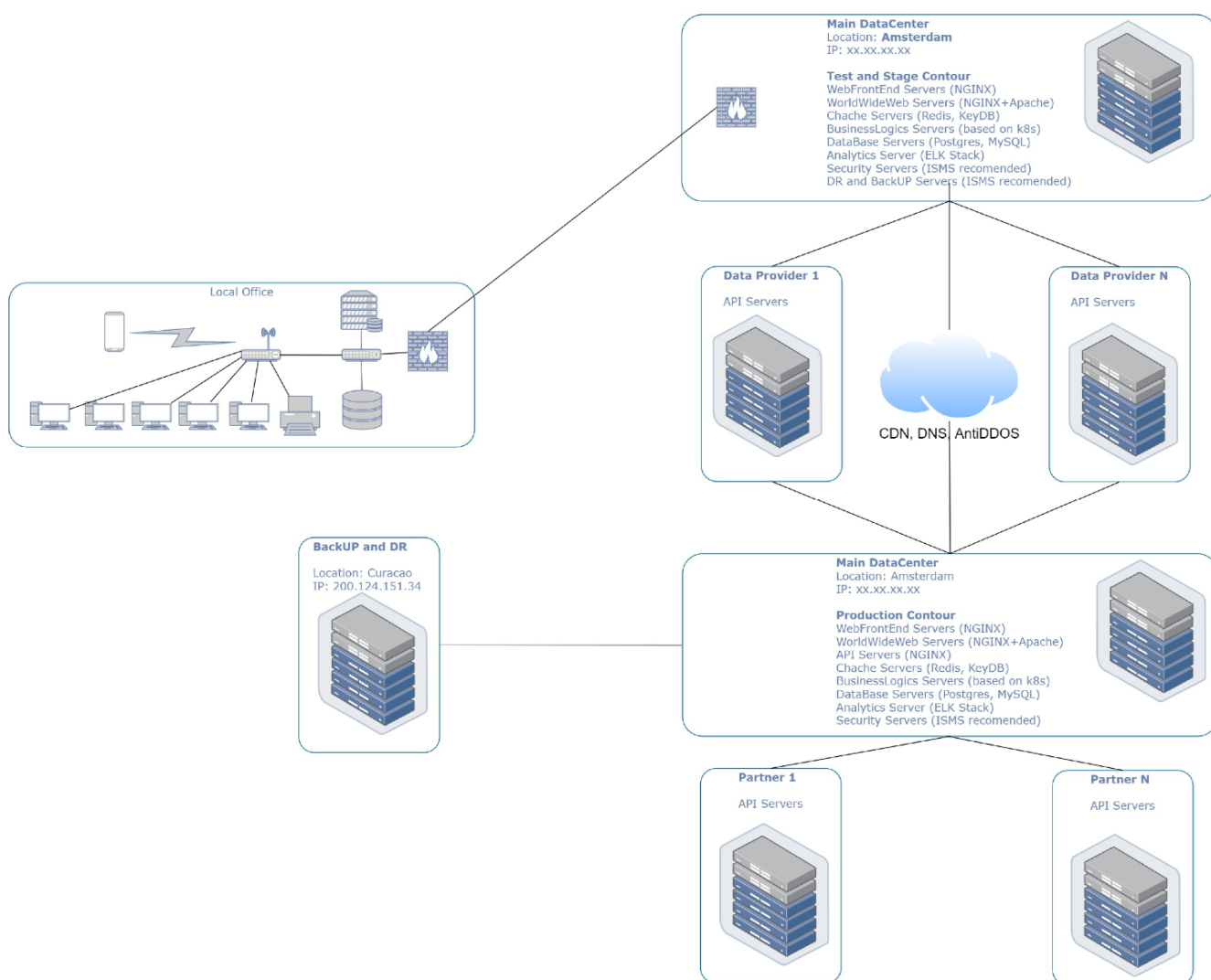






9. Technical Setup

A high-level schematic of the infrastructure is shown below



With a disaster plan in place and a resilient infrastructure, the risks associated with its implementation are kept to a minimum. The platform employs protocols for data backup and restoration, incorporating redundant server systems to forestall service interruptions and mitigate data loss. Regular testing and refinement of the disaster plan are essential to keep pace with evolving threats and technological advancements, guaranteeing its efficacy in times of need. Collaboration with cybersecurity experts and regulatory authorities yields invaluable insights and guidance, bolstering the disaster preparedness of online casino platforms and ensuring the security of both operations and customer confidence.

10. Marketing Strategy

With extensive marketing experience spanning across various industries, including over 15 years of specialized focus on the gambling sector, our team at Snowbark possesses a wealth of skills crucial for success:

- Marketing expertise
- Business acumen
- Comprehensive market understanding
- Proficiency in software development

Snowbark's primary strategies revolve around achieving growth and capturing market share. Consequently, the company is committed to investing in building a capable team capable of realizing these objectives.

Our objective is to establish partnerships with B2C operators eligible to receive our services in compliance with relevant regulations. We recognize the importance of adhering to legal requirements in each jurisdiction we operate in. Therefore, we undertake thorough assessments of legal frameworks alongside financial feasibility studies to ensure viability.

We prioritize assembling a team of highly knowledgeable individuals within the gaming industry. These professionals will undergo rigorous training and receive ongoing guidance to guarantee the delivery of exceptional service.

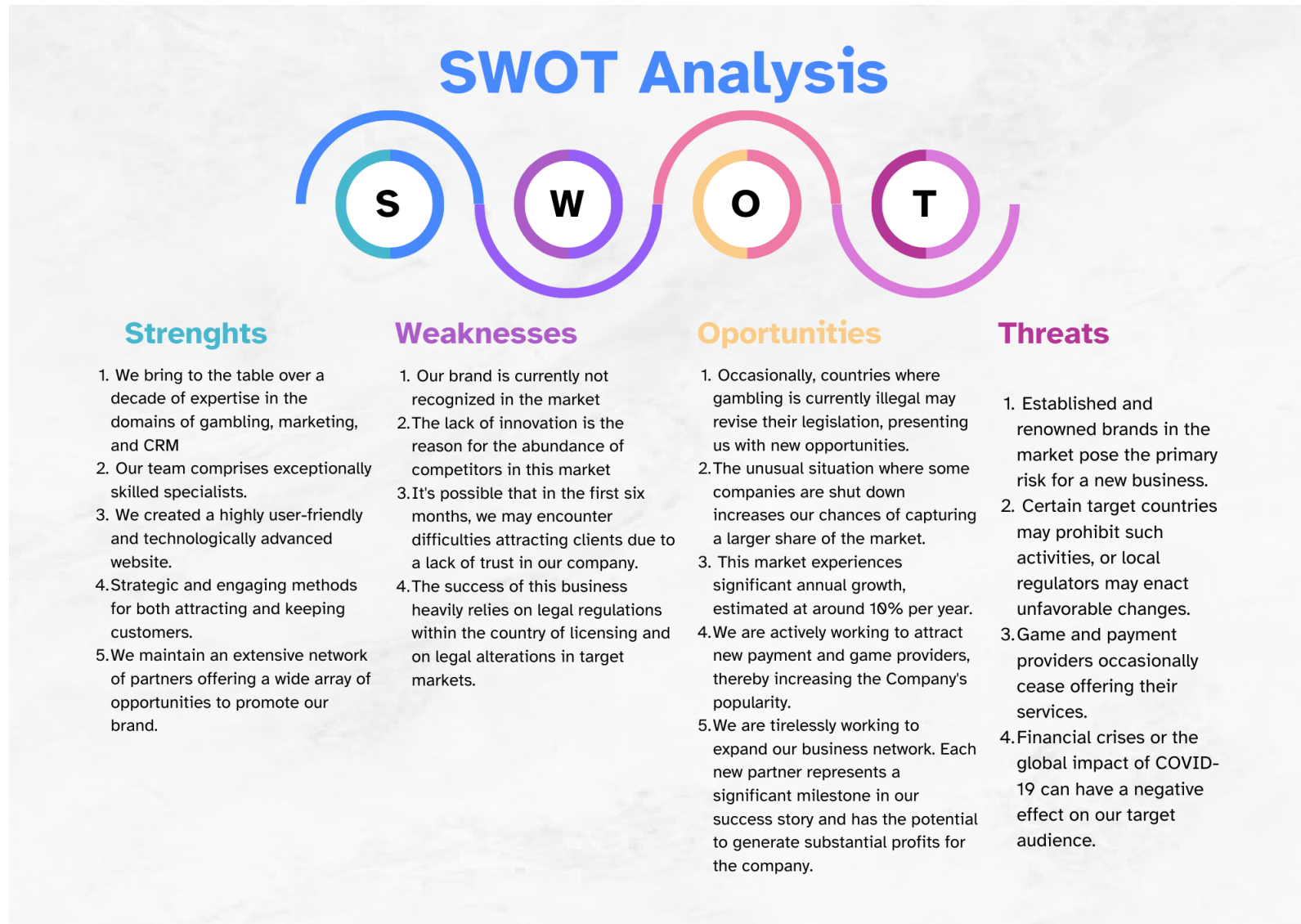
Our strategic goals include expanding our client base among licensed B2C operators. We aim to grow from approximately 55 clients in 2023 to 75 by the end of 2024 and eventually reach 125 clients within a three-year period. To achieve this, we plan to onboard leading game providers from various jurisdictions, enabling us to offer clients unparalleled diversity and reliability.

Outlined below is a breakdown of our planned marketing expenses for the next three years:

Marketing costs	2024 - 2025, EUR per month	2026 - 2027, EUR per month
	28 000	36 400
Total:	28 000	36 400

Being a B2B enterprise, the Company places significant emphasis on marketing through events, exhibitions, referrals, and networking. Hence, a substantial portion of the company's marketing budget is allocated towards participating in recurring industry fairs like ICE, iGB, SBC, SiGMA, Global Gaming Expo, among others.

11. SWOT Analysis



12. FINANCIAL PLAN

12.1 Fixed costs

Planned fixed costs are presented in the following table:

№	Item of expense	Total per month 2024-2025	Total per month 2026-2027
1	License fee	6 631	7 294
2	Software fee	600 000	660 000
3	Accounting	5 000	5 500
4	Hosting	3 000	3 300
5	Office rent	1 400	1 540
	Total	616 031	677 634

12.2 Variable costs

№	Item of expense	Total per month min	Total per month max	Total per month Avg2024-2025	Total per month Avg2026-2027
1	Management services	5 000	15 000	10 000	13 000
2	Technical support	5 000	30 000	17 500	22 750
3	Office equipment and stationery	1 000	2 000	1 500	1 650
4	Advertising- Marketing costs	18 000	38 000	28 000	36 400
5	Legal support	10 000	35 000	22 500	29 250
	Total	39 000	120 000	79 500	103 050

12.3 Staff

№	Position	Number of	Salary	Total per	Total per
		people		month	month
1	Director (COO)	1	2 200	2 200	2 420
2	Marketing manager	1	1 700	1 700	1 870
3	Business development manager	1	1 600	1 600	1 760
4	Sales manager	1	1 500	1 500	1 650
5	Employee	1	1 400	1 400	1 540
	Total	6		8 400	9 240

12.4 Indicators

Name of the index	Value of the index
Sum of proceeds (SP), EUR	31200 000
Net average operational receipts per month (NAOR), EUR	866 667
Net profit for the project period, EUR	4931 764
Average profitability for the project period (net profit to proceeds)	16%
ROI	19%
EBT	4973 131
Sum of proceeds (SP), EUR	31200 000

12.5 Tax

TAXATION Territorial tax system	2024
DOMESTIC DIRECT COSTS	237 600
TOTAL DIRECT COSTS	5795 100
NET PROFIT	879 300
TAX BASE	36 051
PROFIT TAX(22%)	7 931

TAXATION Territorial tax system	2025
DOMESTIC DIRECT COSTS	316 800
TOTAL DIRECT COSTS	7726 800
NET PROFIT	1172 400
TAX BASE	48 069
PROFIT TAX(22%)	10 575

TAXATION Territorial tax system	2026
DOMESTIC DIRECT COSTS	306 853
TOTAL DIRECT COSTS	8457 853
NET PROFIT	2291 267
TAX BASE	83 128
PROFIT TAX(22%)	18 288

TAXATION Territorial tax system	2027
DOMESTIC DIRECT COSTS	76 713
TOTAL DIRECT COSTS	2114 463
NET PROFIT	572 817
TAX BASE	20 782
PROFIT TAX(22%)	4 572

12.6 Balance

Expense		Type	1m-2024	9m-2024	12m-2025
License fee	Domestic	Direct	5 000	45 000	60 000
Hosting	Domestic	Direct	3 000	27 000	36 000
Software fee	External	Direct	600 000	5400 000	7200 000
Salary	Domestic	Direct	8 400	75 600	100 800
Management services	Domestic	Direct	10 000	90 000	120 000
Technical support	External	Direct	17 500	157 500	210 000
Office equipment and stationery	Domestic	indirect	1 500	13 500	18 000
Advertising- Marketing costs	External	indirect	28 000	252 000	336 000
Accounting	External	indirect	5 000	45 000	60 000
Office rent	Domestic	indirect	1 400	12 600	16 800
Legal support	External	indirect	22 500	202 500	270 000
TOTAL				6320700	8427600

INCOME	1m-2024	9m-2024	12m-2025
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Snowbark B.V.

TOTAL		7200000	9600000
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INCOME

2024	7200000
2025	9600000
2026	11520000
2027	2880000

2026-2027

Expense		Type	1 m 2026-2027	12 m 2026	3m 2027
License fee	Domestic	Direct	2 031	24 373	6 093
Hosting	Domestic	Direct	3 300	39 600	9 900
Software fee	External	Direct	660 000	7920 000	1980 000
Salary	Domestic	Direct	9 240	110 880	27 720
Management services	Domestic	Direct	11 000	132 000	33 000
Technical support	External	Direct	19 250	231 000	57 750
Office equipment and stationery	Domestic	indirect	1 650	19 800	4 950
Advertising- Marketing costs	External	indirect	30 800	369 600	92 400
Accounting	External	indirect	5 500	66 000	16 500
Office rent	Domestic	indirect	1 540	18 480	4 620
Legal support	External	indirect	24 750	297 000	74 250
TOTAL				9228 733	2307 183

INCOME	1m-2024	12 m 2026	3m 2027
TOTAL		11520 000	2880 000

12.7 Result

Plan	36 month
Income	31200 000
Expenses	26268 236
Net profit	4931 764

12.8 Three-year financial projections

Meeting income and net profit targets by the conclusion of the projection period serves as our primary key performance indicator (KPI).

Expenses for the first year, euro

Expense	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25
License fee	5 000	24 373											
Hosting	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000
Software fee	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000
Salary	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400
Management services	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000
Technical support	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500
Office equipment and stationery	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500
Advertising- Marketing costs	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000
Accounting	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000
Office rent	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400
Legal support	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500
Profit tax									7 931				
TOTAL	702 300	721 673	697 300	697 300	697 300	697 300	697 300	697 300	705 231	697 300	697 300	697 300	697 300

Income	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25
TOTAL	800000	800000	800000	800000	800000	800000	800000	800000	800000	800000	800000	800000	800000

Expenses for the second year, euro

Expense	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26
License fee	24 373											
Hosting	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 000	3 300	3 300	3 300	3 300
Software fee	600 000	600 000	600 000	600 000	600 000	600 000	600 000	600 000	660 000	660 000	660 000	660 000
Salary	8 400	8 400	8 400	8 400	8 400	8 400	8 400	8 400	9 240	9 240	9 240	9 240
Management services	10 000	10 000	10 000	10 000	10 000	10 000	10 000	10 000	11 000	11 000	11 000	11 000
Technical support	17 500	17 500	17 500	17 500	17 500	17 500	17 500	17 500	19 250	19 250	19 250	19 250
Office equipment and stationery	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 650	1 650	1 650	1 650
Advertising- Marketing costs	28 000	28 000	28 000	28 000	28 000	28 000	28 000	28 000	30 800	30 800	30 800	30 800
Accounting	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 000	5 500	5 500	5 500	5 500
Office rent	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 400	1 540	1 540	1 540	1 540
Legal support	22 500	22 500	22 500	22 500	22 500	22 500	22 500	22 500	24 750	24 750	24 750	24 750
Profit tax								10 575				
TOTAL	721 673	697 300	697 300	697 300	697 300	697 300	697 300	707 875	767 030	767 030	767 030	767 030

Income	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26
TOTAL	800000	800000	800000	800000	800000	800000	800000	800000	960000	960000	960000	960000

Expenses for the third year, euro

Expense	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
License fee	24 373										
Hosting	3 300	3 300	3 300	3 300	3 300	3 300	3 300	3 300	3 300	3 300	3 300
Software fee	660 000	660 000	660 000	660 000	660 000	660 000	660 000	660 000	660 000	660 000	660 000
Salary	9 240	9 240	9 240	9 240	9 240	9 240	9 240	9 240	9 240	9 240	9 240
Management services	11 000	11 000	11 000	11 000	11 000	11 000	11 000	11 000	11 000	11 000	11 000
Technical support	19 250	19 250	19 250	19 250	19 250	19 250	19 250	19 250	19 250	19 250	19 250
Office equipment and stationery	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650
Advertising- Marketing costs	30 800	30 800	30 800	30 800	30 800	30 800	30 800	30 800	30 800	30 800	30 800
Accounting	5 500	5 500	5 500	5 500	5 500	5 500	5 500	5 500	5 500	5 500	5 500
Office rent	1 540	1 540	1 540	1 540	1 540	1 540	1 540	1 540	1 540	1 540	1 540
Legal support	24 750	24 750	24 750	24 750	24 750	24 750	24 750	24 750	24 750	24 750	24 750
Profit tax								18 288			4 572
TOTAL	791 403	767 030	767 030	767 030	767 030	767 030	767 030	785 318	767 030	767 030	771 602

Income	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
TOTAL	960000	960000	960000	960000	960000	960000	960000	960000	960000	960000	960000

13. Policies and Procedures

13.1 KNOW YOUR CUSTOMER

The KYC (Know Your Customer) policy consists of procedures and guidelines designed to authenticate and validate client identities, aiming to combat financial crimes like money laundering, terrorist financing, and fraud. Its purpose is to ensure that casinos possess accurate details about their patrons and their financial transactions. Implementing KYC not only fosters trust but also ensures compliance with regulatory mandates, thereby reducing risks associated with unlawful activities in the financial sector.

13.2 ANTI-MONEY LAUNDERING

The primary objective of the Anti-Money Laundering (AML) policy is to prevent the concealment of funds obtained through criminal activities. AML policies are formulated to detect and deter money laundering, terrorist financing, and other illicit financial practices within financial institutions.

13.3 DATA PRIVACY

A Data Privacy Policy outlines how an organization collects, uses, retains, and secures individuals' personal data, aiming to comply with data protection laws and protect the privacy rights of customers and employees. By establishing precise protocols for managing sensitive data, the policy aims to minimize the risk of data breaches and unauthorized access, promoting transparency and responsibility in data management practices.

Additionally, B2C operators should establish and maintain other policies such as responsible gaming, dispute resolution, and customer service policies in accordance with their responsibilities and regulatory requirements.

13.4 INTERNAL POLICIES

Human Resources Policy: This policy covers recruitment, onboarding, performance evaluation, employee training and development, diversity and inclusion initiatives, disciplinary actions, and termination procedures.

Financial Policy: This policy outlines budget allocation, expense control, financial reporting practices, auditing protocols, procurement guidelines, and compliance with accounting standards.

Communication and Social Media Policy: This policy provides directives for internal and external communication platforms, including rules for email usage, social media conduct, media interactions, and brand representation.

Information Security Policy: This policy focuses on safeguarding sensitive data through data handling protocols, cybersecurity measures, password management practices, and strategies for preventing data breaches.

Internal Policies complement external policies, with the latter undergoing annual review and updates, while the former are subject to continuous creation, modification, and termination as necessary.

14. Risk Management

- 14.1 Legal Environment Oversight (Responsible: Head of Legal):** The online gambling legal framework is ever-evolving, demanding constant vigilance. Keeping all departments informed of legal updates ensures staff awareness of the changing landscape. Collaboration among legal, compliance, and operations departments ensures a comprehensive understanding of legal obligations and facilitates efficient implementation. Maintaining transparent dialogue with regulatory bodies and industry groups underscores our commitment to legal compliance in online gambling.
- Legality and Licensing:** Operating an online casino requires obtaining licenses from relevant regulatory bodies across various jurisdictions. Regulatory standards vary significantly between jurisdictions, and failure to comply with licensing criteria can result in severe penalties, legal consequences, or cessation of operations.
Mitigation: The Operator currently holds the Gaming Curacao license No. 365/JAZ and is in the process of applying for a new GCB license.
 - Cross-Border Regulatory Challenges:** Online casinos operating across multiple jurisdictions face complex regulatory landscapes and legal uncertainties. Discrepancies in gambling laws and enforcement practices between borders present challenges in maintaining compliance and may require significant legal resources.
Mitigation: Establish strategic alliances with local entities, legal advisors, or industry associations in target jurisdictions to gain insights into local regulations, navigate regulatory procedures, and build relationships with regulatory bodies. Conduct thorough due diligence on business partners, affiliates, vendors, and third parties to ensure compliance with regulatory standards and mitigate compliance risks in cross-border markets. Stay informed about regulatory changes and enforcement trends in target jurisdictions by regularly monitoring updates from regulatory bodies, industry publications, and legal advisories.
 - Political and Public Perception:** Public sentiment towards gambling can influence regulatory policies and public discourse. Negative publicity or public dissatisfaction with iGaming operators may lead to increased regulatory scrutiny and calls for stricter regulations.
Mitigation: Maintain transparency in business practices, regulatory compliance, and corporate governance to build trust among regulators, customers, and the public. Provide educational materials and resources to educate the public about the online casino industry, responsible gambling practices, and associated risks. Advocate for awareness of support services and helplines for problem gambling. Monitor online and offline platforms for discussions, reviews, and mentions of the online casino brand, and proactively address any negative perceptions or feedback through targeted communication and engagement strategies.
- 14.2 Technical Risks (Responsible: Technical):** Technical risks encompass infrastructure maintenance, platform integration, cybersecurity, and data security. The technical department is responsible for ensuring regular infrastructure maintenance to minimize downtime and mitigate risks associated with hardware or software failures. Prioritizing the implementation and updating of cybersecurity protocols and technologies is essential to protect against cyber threats such as hacking, data breaches, and malware attacks. Continuously monitoring for potential security threats and promptly responding to incidents are fundamental responsibilities of the technical department to mitigate risks and minimize the impact of cybersecurity breaches. Conducting periodic audits and security assessments helps identify vulnerabilities and weaknesses in the infrastructure, enabling the technical team to proactively address potential risks before they escalate.
- Data Security:** Unauthorized access to customer information, including personal and financial data, poses risks of identity theft, fraud, and legal consequences.
Mitigation: Implementing multi-layered cybersecurity protocols, including firewalls, intrusion detection systems, and encryption mechanisms, is crucial. Regularly updating software and security patches addresses vulnerabilities and provides protection against emerging threats.
- 14.3 Financial Risks (Responsible: Head of Finance):** Financial risks are inherent in all business operations and require meticulous management to ensure sustainability and growth. As the

individual responsible for overseeing financial matters, the Head of Finance plays a pivotal role in identifying, assessing, and mitigating these risks. Implementing robust financial controls, monitoring cash flow, and optimizing capital allocation are key responsibilities to minimize exposure to these risks. Collaborating closely with other departments, the Head of Finance develops and executes financial strategies aligned with organizational objectives. Through proactive risk management and strategic planning, they safeguard the company's financial health and enhance shareholder value. Regular financial analysis and reporting are essential for identifying emerging risks and opportunities, facilitating timely adjustments to financial strategies.

- **Taxation:** Taxation policies for online gambling vary widely across jurisdictions, impacting the profitability of iGaming operators. Changes in tax laws or unexpected tax liabilities pose financial risks to casino operators.

Mitigation: Seek guidance from tax professionals, accountants, and legal experts specializing in international taxation to ensure compliance with local tax laws and regulations. Utilize tax treaties and agreements between countries to mitigate double taxation and optimize tax planning strategies. Maintain accurate financial records, accounting systems, and tax filings to comply with local tax laws in each jurisdiction where the casino operates. This includes timely filing of tax returns, payment of taxes, and adherence to reporting requirements.