

Primary Media N.V.

Business Plan

API Development and Integration

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1. Confidentiality statement

- This document is confidential and owned by Primary Media N.V., the sub-licensee for non-exclusive offshore games of chance and wagering, under application No. 8048/JAZ (hereafter referred to as "Primary Media" or "the Company"). Primary Media is presently in the process of acquiring a license with the Gaming Control Board. It contains privileged and proprietary information that must not be disclosed or discussed with any individuals or entities outside of Primary Media and the Curacao Gaming Control Board without written authorization from both parties..

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

- Primary Media is registered under the regulations of Curacao and seeks authorization to conduct offshore games of chance and betting on a non-exclusive basis. The organization operates under various brand names and domains exclusively owned by Primary Media.

<https://blazingchip.com/>

- In 2024, the formation of a new regulatory body, the Gaming Control Board, is in progress. The endeavor to obtain government licensing is currently underway.



- Primary Media is wholly owned by Vasilii Oreshkin.
- Vasilii Oreshkin is a dynamic professional with extensive experience in marketing, sales, and leadership roles. Currently serving as the Chief Marketing Officer at KAVERTO LTD in Cyprus, he excels in budget management, KPI tracking, and implementing cutting-edge strategies. Previously, as CEO of KAVERTO MEDIA LIMITED in Malta, Vasilii demonstrated strategic prowess by steering organizational vision and overseeing operational success. His background also includes senior sales management positions at Voronez Frakht LTD, where he honed his skills in network development, negotiations, and team coordination. With a proven track record of driving growth and fostering innovation, Vasilii is a valuable asset to any organization.

As a CMO at KAVERTO LTD, Evgenii has unparalleled knowledge of all underlying processes of the project, which gives her an edge in guiding the company to success as a CEO.





Vasilii Oreshkin

Date of birth: 08/05/1987 | **Gender:** Male | **Phone number:** (+356) 99943865 (Mobile) | **Email address:** ovipostbox@gmail.com | **Skype:** ovifors | **Address:** Malta (Work)

• WORK EXPERIENCE

01/05/2022 – CURRENT Cyprus
CMO KAVERTO LTD

- Keep the marketing budget in check
- Track KPIs on a regular basis and present reports
- Stay up to date with the latest technology
- Stay up to date with the latest best practices
- Attend marketing conferences and educational programs
- Set marketing goals and objectives
- Plan, implement and manage marketing strategy
- Contribute to the overall growth of the company
- Review and manage content marketing strategy

04/2019 – CURRENT Malta
CEO KAVERTO MEDIA LIMITED

- Creating, communicating, and implementing the organization's vision, mission, and overall direction
- Leading the development and implementation of the overall organization's strategy
- Soliciting advice and guidance, when appropriate, from a Board of Directors
- Formulating and implementing the strategic plan that guides the direction of the business or organization.
- Overseeing the complete operation of an organization in accordance with the direction established in the strategic plans
- Evaluating the success of the organization in reaching its goals
- Representing the organization for civic and professional association responsibilities and activities in the local community, the state, and at the national level
- Participating in industry-related events or associations that will enhance the CEO's leadership skills, the organization's reputation, and the organization's potential for success.

28/06/2015 – 30/03/2019
SENIOR SALES MANAGER VORONEZ FRAKHT LTD.

- making a sales network-control of the existing sales network-conducting commercial negotiations with key customers in the interests of the Firm-HR management-planning and coordination of sales managers-strategic planning and supervision

Address Bryansk, Russia

20/03/2012 – 28/06/2015
MANAGER VORONEZH FRAKHT LTD

- business development-strategy development-search for new business development opportunities-HR management-coordination and management of teams

Address Bryansk, Russia

19/11/2011 – 15/03/2012
CHIEF MARKETING OFFICER MENAKOM LTD

- The team collectively boasts over 15 years of experience in both IT and iGaming industries. Primary Media is primarily dedicated to offering a comprehensive selection of casino games from top-tier developers with valid licenses in respected jurisdictions.
- Originally intending to function as a B2C operator, Primary Media underwent strategic shifts due to changing market dynamics, fierce competition, and internal deliberations. Consequently, the company evolved into a gaming aggregator.
- Compliance with regulations set by the Gaming Control Board (GCB) and other

relevant legislation, including General Data Protection Regulations and Anti-Money Laundering Regulations, is a top priority for Primary Media. This commitment is reinforced by robust internal controls that surpass industry standards.

- In its pursuit to enhance its iGaming portfolio, Primary Media has established partnerships with reputable experts based in Europe. Operating under a Curacao sub-license, Primary Media engages in B2B online casino operations within authorized jurisdictions.
- Prioritizing simplicity and customer satisfaction, Primary Media seeks to capture a significant market share by delivering exceptional and user-friendly services. While profitability remains a key objective, Primary Media advocates for responsible gaming and emphasizes stringent security measures alongside its entertainment offerings.
- The decision to seek licensure from Curacao underscores Primary Media's commitment to operating within a respected jurisdiction characterized by comprehensive regulatory frameworks and reasonable tax structures. The accessibility and responsiveness of Curacao regulators align with Primary Media's values as it ventures into the remote B2B gaming sector.

The website utilizes a variety of marketing tools and strategies, coupled with customized marketing offers, to attract a significant customer base. Ensuring legal compliance across different jurisdictions is a priority, with thorough consideration given to ensure that all marketing initiatives align with relevant regulations.

3. Objectives

- Primary Media is actively pursuing strategies for market development and penetration to accelerate its growth and establish a prominent position within the gaming industry.
- Our primary objective currently is to secure a Sub-license for non-exclusive offshore games of chance and wagering (No. 8048/JAZ), which will enable Primary Media to offer iGaming products to our customers. In this dynamic market landscape, our overarching goal is to cultivate a strong reputation as a trusted entity within the gaming sector. Additionally, while acknowledging the significant investment required, we are committed to achieving profitability within the initial two years of operation.
- Central to our approach is prioritizing customer satisfaction by providing a stable gaming environment and delivering personalized services promptly through our dedicated team. Our services are meticulously designed to be user-friendly, featuring streamlined processes, while ensuring unwavering compliance with regulatory standards.

4. 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 established 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 Primary Media

- The iGaming industry presents a dynamic and continuously evolving landscape, demanding adaptability from gaming aggregators like Primary Media. Globally, the iGaming sector is witnessing rapid expansion, with new aggregators entering the market to capitalize on opportunities.
- In Europe, the market is characterized by fragmentation, with various jurisdictions such as the UK, France, Italy, Spain, Sweden, and Denmark implementing legislation to regulate their respective markets. This necessitates operators and aggregators targeting European markets to obtain multiple licenses to serve players from these regions.
- Despite encountering economic challenges, the industry remains resilient. Despite reports of a global recession, the iGaming sector continues to demonstrate robustness and growth. Steady expansion is anticipated, driven by factors such as increasing smartphone penetration, improved internet accessibility, and evolving consumer preferences.



Sources:

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

6. Curacao

Our company is dedicated to acquiring a Sub-license (NQ 8048/JAZ) to capitalize on non-exclusive offshore gaming and betting opportunities, thus solidifying our presence in the iGaming Market. In addition to our internal strengths, such as our proficient and dynamic team, obtaining the Curacao sub-license provides several external advantages:

- **Credibility and Trustworthiness:** Curacao's esteemed reputation in the iGaming industry lends credibility and trustworthiness to our operations.
- **Reliable Hosting Infrastructure:** Exceptional hosting infrastructure in Curacao ensures reliable and efficient online gaming services for our customers.
- **Access to Skilled Professionals:** Curacao boasts an abundance of skilled professionals in the iGaming sector, facilitating the recruitment of top talent to enhance our operations.
- **Competitive Corporate Tax Rates:** Competitive corporate tax rates in Curacao offer cost efficiencies, allowing us to allocate resources effectively for business growth and development.
- While this list is not exhaustive, it highlights the reasons why many new operators and aggregators opt for Curacao as their preferred iGaming hub

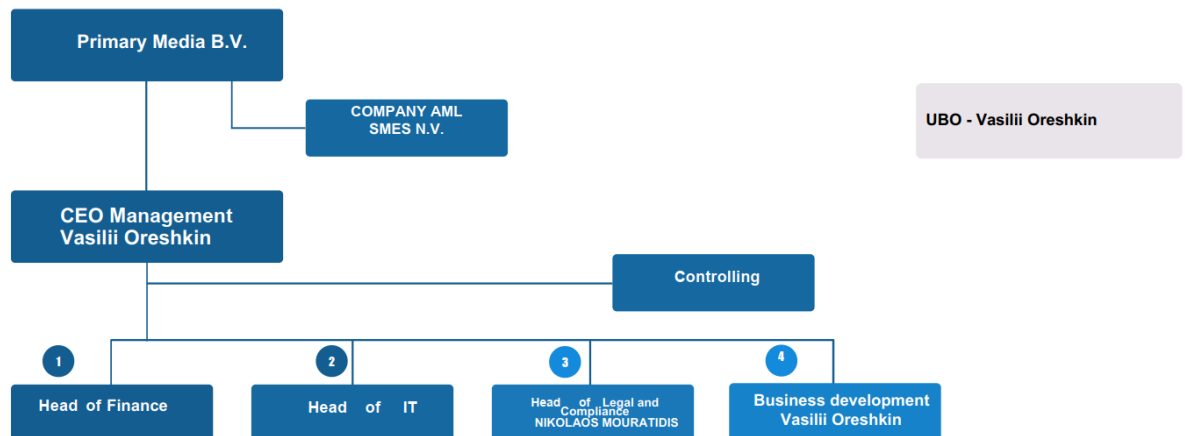
7. Company Structure

The CEO, who also serves as the sole shareholder of the Operator, is deeply engaged in daily operations and plays a pivotal role in decision-making processes. Effective delegation of strategies and decisions to different departments ensures streamlined decision-making and reduces bottlenecks. Legal matters are managed internally by specialized departments and officers.

Department Heads hold primary accountability for decision-making within their domains, while final approval authority lies with the CEO. Critical roles, like Head of Finance and Head of IT are presently vacant and undergoing internal recruitment. Preference is given to candidates with extensive experience in online casino operations.

Company control structure

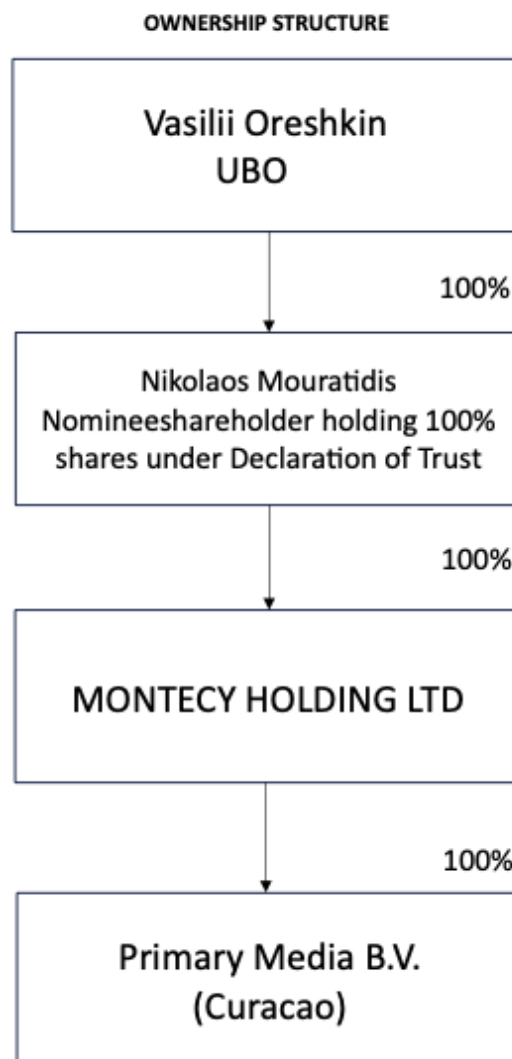
Primary Media B.V., a company incorporated under the laws of Curaçao with registration number 153138 and registered address at Dr. H. Fergusonweg, 1, Curacao



- Currently, the company employs a staff of approximately 40 individuals and plans

to increase its workforce in line with business growth. Additionally, we plan to tap into the knowledge and skills of iGaming experts from Europe to fill various roles. Their expertise and commitment are crucial for advancing our position in the industry.

- Primary Media's management team, led by the owner, comprises both in-house employees and outsourced professionals as needed. Our goal is to form a comprehensive team capable of meeting all human resource needs under the GCB license.
- Here is a simplified diagram outlining Primary Media's ownership structure:



8. The Range of Products We Provide

- At Primary Media, our core expertise lies in crafting bespoke platform solutions tailored to bolster the operations of partner businesses, a service we term the "Aggregation Solution." This innovative platform acts as a hub for consolidating Third-Party content, or "Third-Party Software," and presenting it collectively within a unified solution for our clients. Operating strictly within the B2B realm, our revenue hinges largely on the performance, volume, and popularity of the Third-Party Software distributed.
- The Aggregation Solution is designed with a singular aim: to seamlessly integrate diverse software offerings and efficiently organize them within the platform. This entails structuring the Third-Party Software in accordance with specific rules and standards meticulously implemented across the technical framework of the Aggregation Solution.

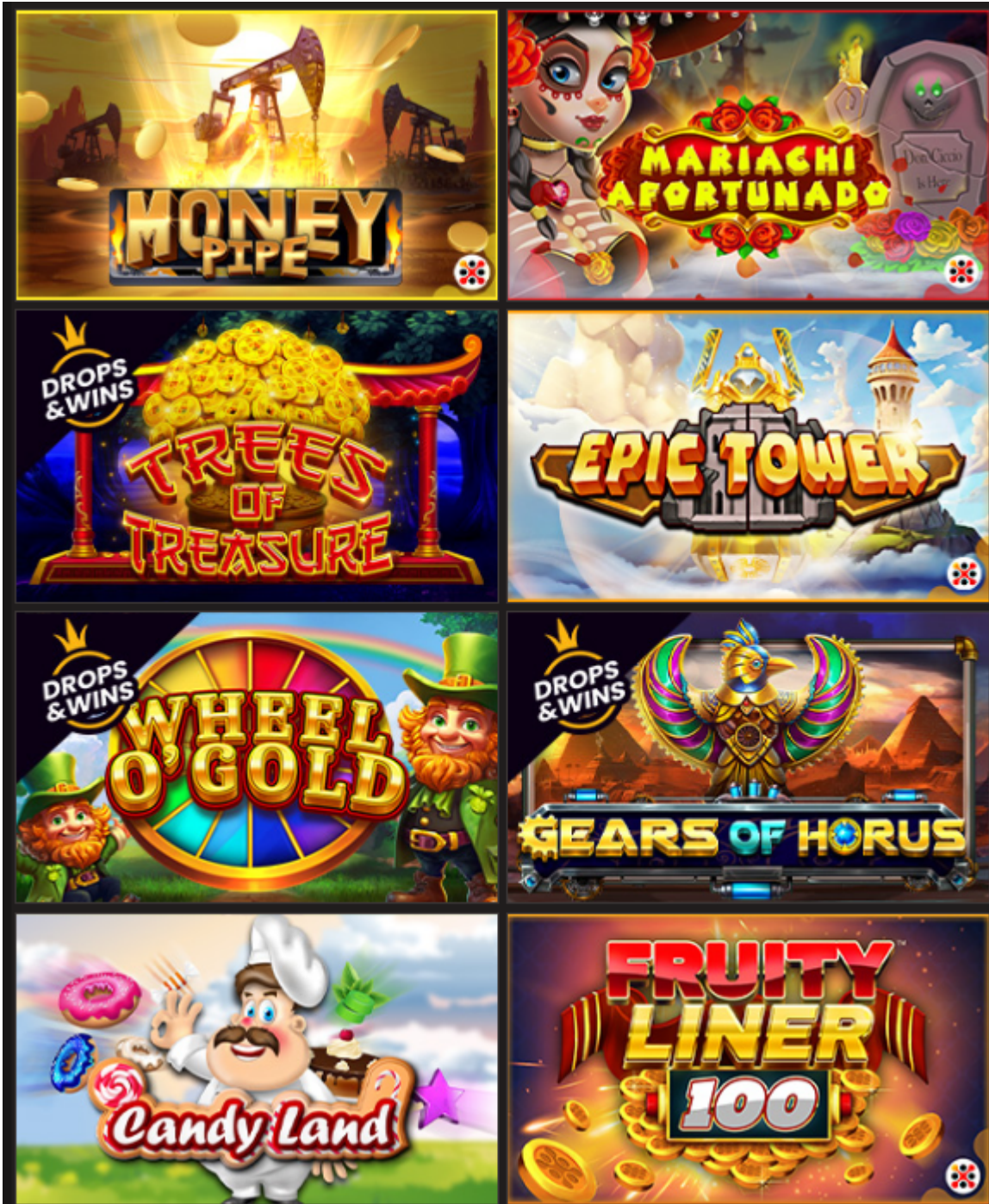
8.1 Technical Implementation Strategy

- In our technical operations, transparency and efficiency are paramount. We primarily rely on API connections to link the Aggregation Solution with our diverse partners supplying their software. These API connections play a dual role: enabling seamless integration of partner software into the Aggregation Solution and delivering the aggregated software to our clients through a single, streamlined connection.
- Each partner receives dedicated server space and access credentials to our technical platform. Furthermore, comprehensive technical support is provided to all partners, including Software Providers and Clients, ensuring prompt assistance is readily available whenever required, without any additional charges

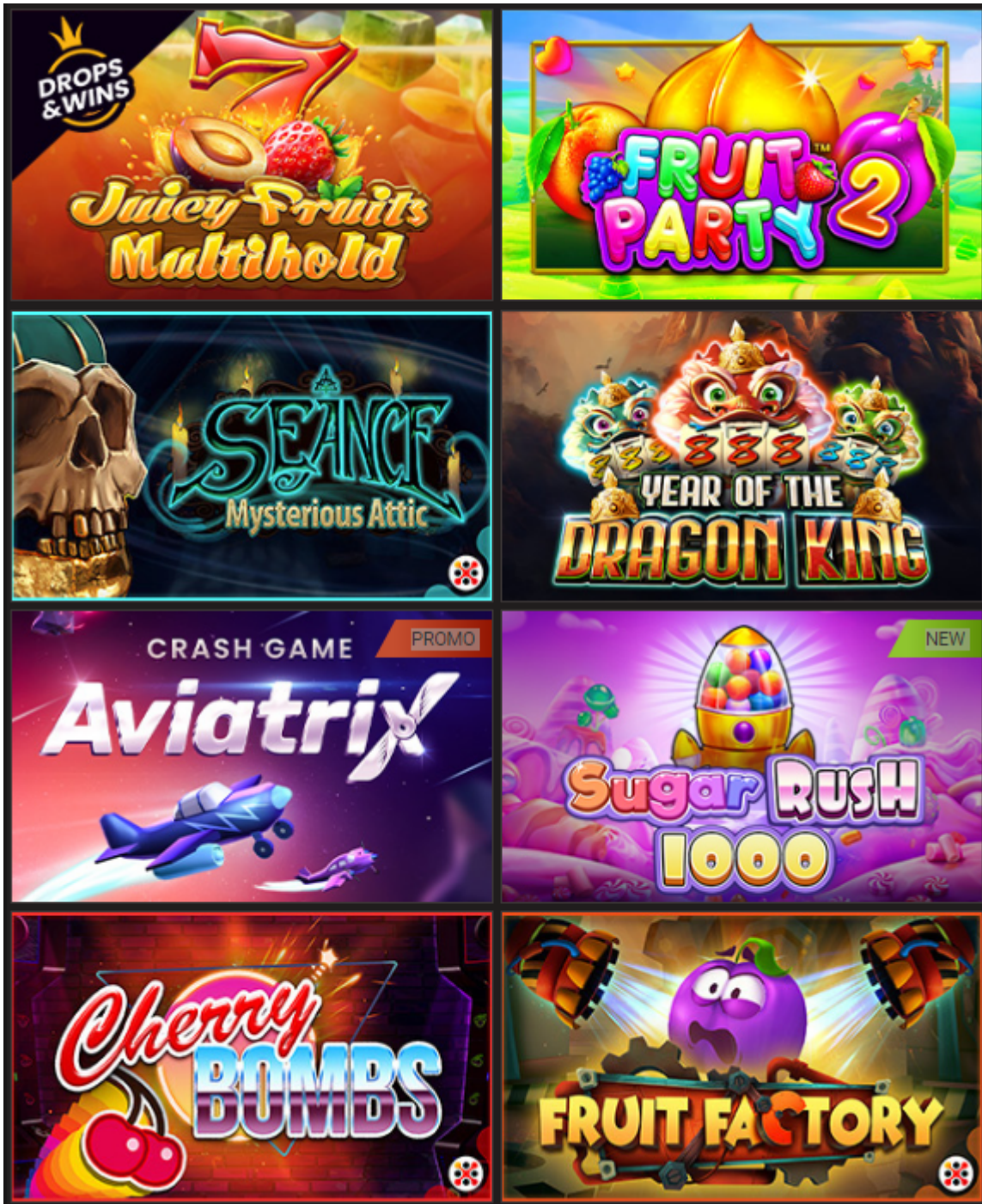
8.2 Supplier Partnerships and Material Dependencies

- The main game suppliers are:
 AVIATRIX
 BARBARA BANG
 MANCALA
 PRAGMATIC PLAY
 RED EAGLE
 SLOTEGRATOR
 TADA GAMING
 THUNDERSPIN
 TVBET
 ZEUSPLAY

- We collaborate with a wide range of suppliers, each renowned for their certified games and stellar industry reputation. Furthermore, our Software License Agreements with these suppliers are designed to encourage them to prioritize player-friendly games that are free of bugs. By maintaining high-quality standards, both parties benefit, fostering mutual alignment inherently serves their best interests, ensuring mutual alignment

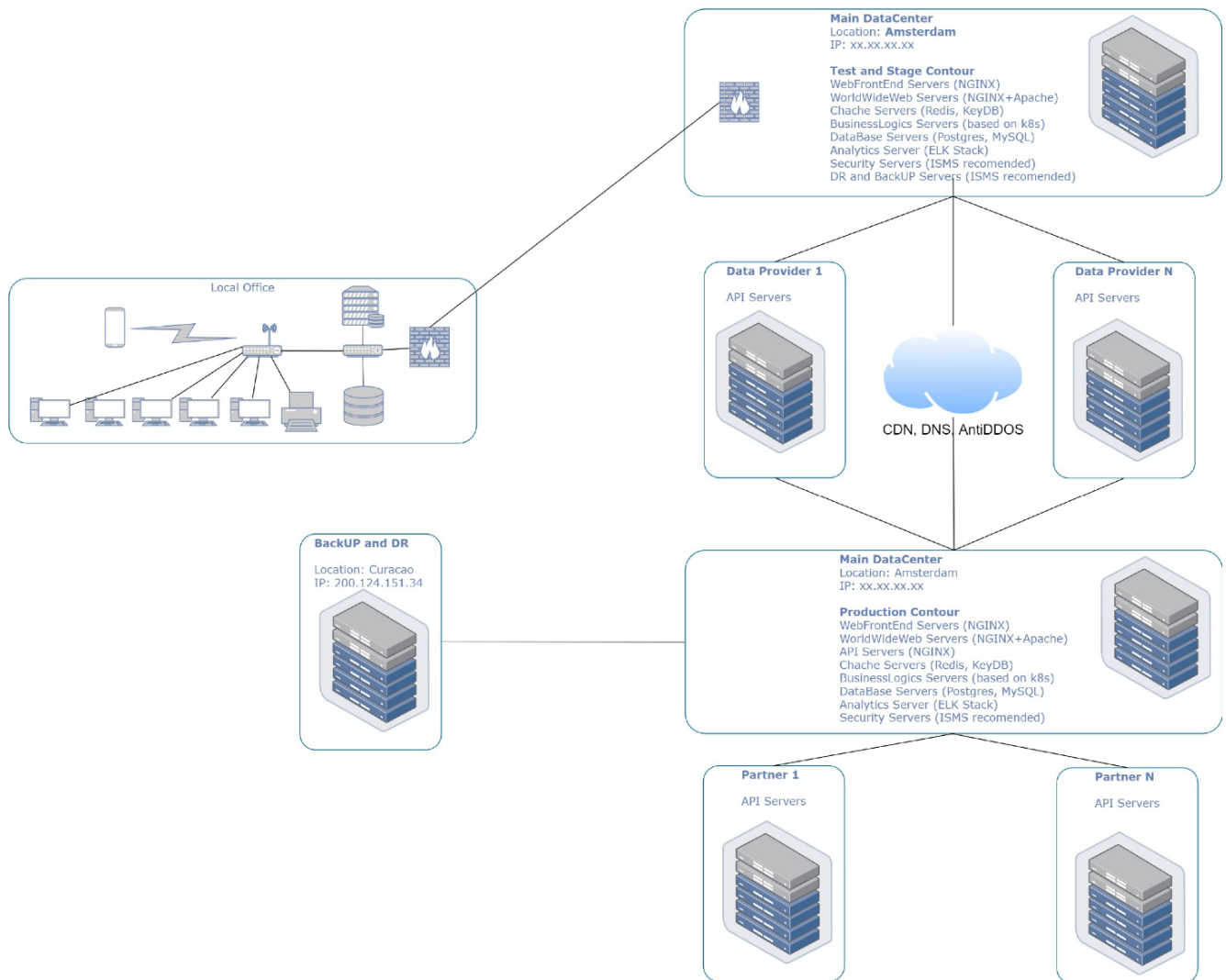






9. Technical Setup

A high-level schematic of the infrastructure is shown below



With a robust disaster plan and resilient infrastructure in place, we effectively minimize implementation risks. Our platform integrates protocols for data backup and restoration, alongside redundant server systems, preempting service interruptions and mitigating data loss. Regular testing and refinement of the disaster plan are essential to remain proactive against evolving threats and technological advancements, ensuring its efficacy during crises.

Collaboration with cybersecurity experts and regulatory authorities offers invaluable insights and guidance, enhancing the disaster preparedness of online casino platforms. This collaboration not only fortifies operational security but also instills customer confidence in the platform's reliability and security measures.

10. Marketing Approach

Drawing upon extensive marketing experience spanning diverse industries, with over 15 years of specialized focus on the gambling sector, the Primary Media team possesses a wealth of skills crucial for success:

- Marketing expertise
- Business acumen
- Comprehensive market understanding
- Proficiency in software development
- Primary Media's core strategies are centered on achieving growth and securing market share. Consequently, the company is dedicated to investing in building a capable team capable of realizing these objectives.

Our goal is to forge partnerships with eligible B2C operators, ensuring compliance with relevant regulations in each jurisdiction. We undertake thorough assessments of legal frameworks and conduct financial feasibility studies to ensure viability.

We prioritize assembling a team of highly knowledgeable individuals within the gaming industry, providing rigorous training and ongoing guidance to deliver exceptional service.

Strategic objectives include expanding our client base among licensed B2C operators, targeting a growth trajectory from approximately 20 by the end of 2024 and eventually reaching 50 clients within three years. To achieve this, we plan to onboard leading game providers from various jurisdictions, offering clients unparalleled diversity and reliability.

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

Marketing costs	2024 - 2025, EUR per month	2026 - 2027, EUR per month
	60 000	78 000
Total:	60 000	78 000

As a B2B enterprise, our Company prioritizes marketing through events, exhibitions, referrals, and networking. Consequently, a substantial portion of our marketing budget is allocated to participating in recurring industry fairs such as ICE, iGB, SBC, SiGMA, Global Gaming Expo, among others. These events provide invaluable opportunities to showcase our solutions, forge partnerships, and stay abreast of industry trends and developments.

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		
2	Software fee	25 000	27 500
3	Accounting	5 000	5 500
4	Hosting	3 000	3 300
5	Office rent	1 500	1 650
	Total	34 500	37 950

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	3 000	15 000	9 000	11 700
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	20 000	100 000	60 000	78 000
5	Legal support	10 000	40 000	25 000	32 500
	Total	39 000	187 000	113 000	146 600

12.3 Staff

No	Position	Number of people	Salary	Total per month	Total per month
1	Director (COO)	1	2 200	2 200	2 420
2	Marketing manager	1	1 600	1 600	1 760
3	Business development manager	1	1 700	1 700	1 870
4	Sales manager	1	1 500	1 500	1 650
5	Employee	2	1 400	2 800	3 080
	Total	6		9 800	10 780

12.4 Indicators

Name of the index	Value of the index
Sum of proceeds (SP), EUR	10785000,00
Net average operational receipts per month (NAOR), EUR	299583,33
Net profit for the project period, EUR	4434919,29
Average profitability for the project period (net profit to proceeds)	41%
ROI	70%
EBT	4808131,00
Sum of proceeds (SP), EUR	10785000,00

12.5 Tax

TAXATION Territorial tax system	2024
DOMESTIC DIRECT COSTS	241 200
TOTAL DIRECT COSTS	623 700
NET PROFIT	834 300
TAX BASE	322 644
PROFIT TAX(22%)	70 982

TAXATION Territorial tax system	2025
DOMESTIC DIRECT COSTS	321 600
TOTAL DIRECT COSTS	831 600
NET PROFIT	1112 400
TAX BASE	430 192
PROFIT TAX(22%)	94 642

TAXATION Territorial tax system	2026
DOMESTIC DIRECT COSTS	287 760
TOTAL DIRECT COSTS	868 560
NET PROFIT	2255 640

TAXATION Territorial tax system	2027
DOMESTIC DIRECT COSTS	71 940
TOTAL DIRECT COSTS	212 190
NET PROFIT	578 910
TAX BASE	196 271
PROFIT TAX(22%)	43 180

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	25 000	225 000	300 000
Salary	Domestic	Direct	9 800	88 200	117 600
Management services	Domestic	Direct	9 000	81 000	108 000
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	60 000	540 000	720 000
Accounting	External	indirect	5 000	45 000	60 000
Office rent	Domestic	indirect	1 500	13 500	18 000
Legal support	External	indirect	25 000	225 000	300 000
TOTAL				1460700	1947600

INCOME	1m-2024	9m-2024	12m-2025
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Primary Media N.V.

TOTAL		2295000	3060000
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INCOME

2024	2295000
2025	3060000
2026	4332000
2027	1098000

2026-2027

Expense		Type	1 m 2026-2027	12 m 2026	3m 2027
License fee	Domestic	Direct	0	0	0
Hosting	Domestic	Direct	3 300	39 600	9 900
Software fee	External	Direct	27 500	330 000	82 500
Salary	Domestic	Direct	10 780	129 360	32 340
Management services	Domestic	Direct	9 900	118 800	29 700
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	66 000	792 000	198 000
Accounting	External	indirect	5 500	66 000	16 500
Office rent	Domestic	indirect	1 650	19 800	4 950
Legal support	External	indirect	27 500	330 000	82 500
TOTAL				2076360	519090

INCOME	1m-2024	12 m 2026	3m 2027
TOTAL		4332000	1098000

12.7 Result

Plan	36 month
Income	10785.000,00
Expenses	6350.080,71
Net profit	4434.919,29

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	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000
Salary	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800
Management services	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000
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

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Advertising- Marketing costs	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000
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	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500
Legal support	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000
Profit tax									70 982				
TOTAL	162 300	181 673	157 300	157 300	157 300	157 300	157 300	157 300	228 282	157 300	157 300	157 300	157 300

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	255000	255000	255000	255000	255000	255000	255000	255000	255000	255000	255000	255000	255000

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	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	27 500	27 500	27 500	27 500
Salary	9 800	9 800	9 800	9 800	9 800	9 800	9 800	9 800	10 780	10 780	10 780	10 780
Management services	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 000	9 900	9 900	9 900	9 900
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
	60 000	60 000	60 000	60 000	60 000	60 000	60 000	60 000	66 000	66 000	66 000	66 000

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Advertising- Marketing costs												
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	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 500	1 650	1 650	1 650	1 650
Legal support	25 000	25 000	25 000	25 000	25 000	25 000	25 000	25 000	27 500	27 500	27 500	27 500
Profit tax								94 642				
TOTAL	181 673	157 300	157 300	157 300	157 300	157 300	157 300	251 942	173 030	173 030	173 030	173 030

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	255000	255000	255000	255000	255000	255000	255000	255000	306000	366000	366000	366000

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	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500
Salary	10 780	10 780	10 780	10 780	10 780	10 780	10 780	10 780	10 780	10 780	10 780
Management services	9 900	9 900	9 900	9 900	9 900	9 900	9 900	9 900	9 900	9 900	9 900
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
	66 000	66 000	66 000	66 000	66 000	66 000	66 000	66 000	66 000	66 000	66 000

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Advertising- Marketing costs											
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	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650	1 650
Legal support	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500	27 500
Profit tax								164 408			43 180
TOTAL	197 403	173 030	173 030	173 030	173 030	173 030	173 030	337 438	173 030	173 030	216 210

Income	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
TOTAL	366000	366000	366000	366000	366000	366000	366000	366000	366000	366000	366000

13. Policies and Procedures

13.1 KNOW YOUR CUSTOMER

The KYC (Know Your Customer) policy comprises procedures and guidelines crafted to verify and authenticate client identities. Its purpose is to combat financial crimes like money laundering, terrorist financing, and fraud. The primary objective is to equip casinos with accurate information about their patrons and their financial transactions. Implementing KYC fosters trust and ensures compliance with regulatory requirements, thus mitigating the risks associated with illicit activities in the financial sector

13.2 ANTI-MONEY LAUNDERING

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

13.3 DATA PRIVACY

A Data Privacy Policy outlines an organization's practices for collecting, using, retaining, and securing individuals' personal data. Its aim is to comply with data protection laws and safeguard the privacy rights of customers and employees. By establishing clear protocols for handling sensitive data, the policy aims to reduce the risk of data breaches and unauthorized access, while promoting transparency and accountability in data management practices.

Furthermore, B2C operators are encouraged to develop and uphold additional policies, such as those concerning responsible gaming, dispute resolution, and customer service. These policies should align with their obligations and regulatory requirements.

13.4 INTERNAL POLICIES

Human Resources Policy: This policy governs all aspects of the employee lifecycle, including recruitment, onboarding, performance evaluation, training and development, diversity and inclusion initiatives, disciplinary procedures, and termination protocols.

Financial Policy: This policy outlines the organization's financial management practices, including budget allocation, expense control, financial reporting standards, auditing procedures, procurement guidelines, and adherence to accounting principles.

Communication and Social Media Policy: This policy establishes guidelines for both internal and external communication channels, including rules for email usage, social media engagement, interactions with the media, and representation of the organization's brand.

Information Security Policy: Dedicated to protecting sensitive data, this policy encompasses data handling protocols, cybersecurity measures, password management guidelines, and strategies for preventing and responding to data breaches.

Internal Policies complement external policies, with the latter undergoing annual review and updates. Internal policies are subject to ongoing creation, modification, and termination as necessary to align with organizational needs and best practices.

14. Risk Management

Legal Environment Oversight (Responsible: Head of Legal):

The legal landscape surrounding online gambling is ever-evolving, demanding constant vigilance. Keeping all departments abreast of legal updates ensures staff awareness of the shifting landscape. Collaboration among legal, compliance, and operations departments fosters a holistic understanding of legal obligations and enables efficient implementation. 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 can result in severe penalties, legal consequences, or cessation of operations.

Mitigation: The Operator currently holds 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. Differences in gambling laws and enforcement practices between borders pose challenges in maintaining compliance and may require significant legal resources.

Mitigation: Establish strategic alliances with local entities, legal advisors, or industry associations 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 risks. Stay informed about regulatory changes and enforcement trends by monitoring updates from regulatory bodies and legal advisories.

Political and Public Perception: Public sentiment towards gambling can influence regulatory policies and public discourse. Negative publicity 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 on responsible gambling practices and advocate for awareness of support services for problem gambling. Monitor online and offline platforms for discussions and proactively address any negative perceptions or feedback through targeted communication strategies.

Technical Risks (Responsible: Technical): Technical risks encompass infrastructure maintenance, platform integration, cybersecurity, and data security. The technical department is tasked with 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 crucial to safeguard against cyber threats such as hacking, data breaches, and malware attacks. Continuous monitoring for potential security threats and prompt incident response 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.

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.