



Business Plan

DB-Bet

SPORT TECH N.V.

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1. EXECUTIVE OVERVIEW

1.1. PROJECT SYNOPSIS

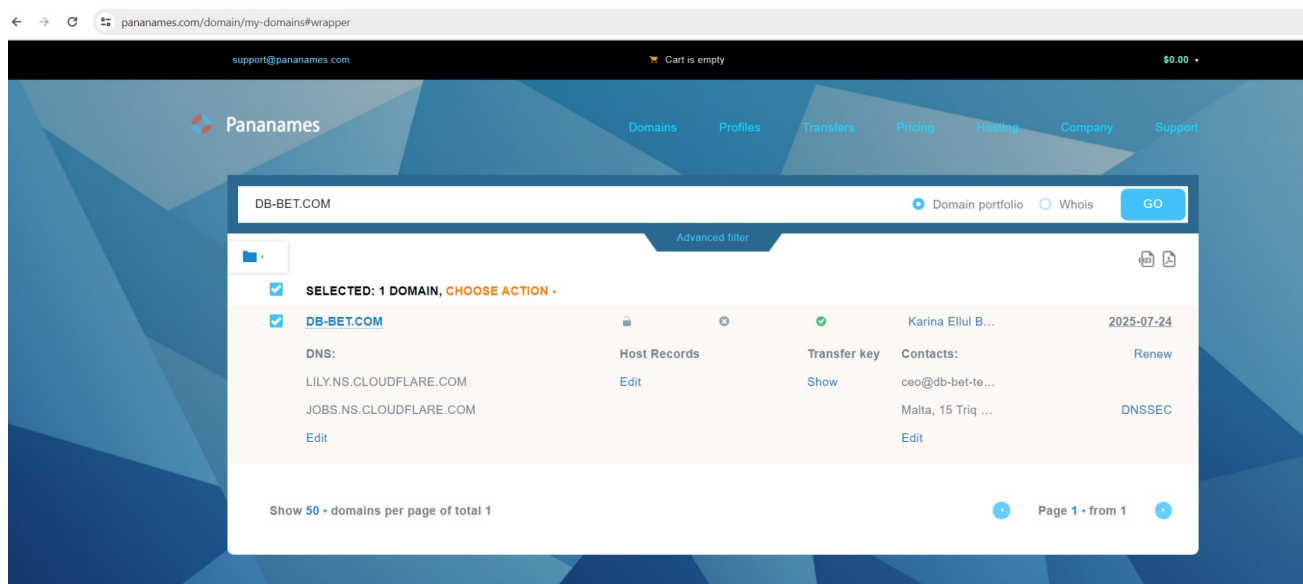
DB-BET operates under the Antillephone N.V license -8048/JAZ2016-046. The domain name is DB-Bet.com, and the platform aims to feature an array of games from various providers to enhance the online gaming experience. The list of game providers includes:

- AVIATRIX
- BARBARA BANG
- MANCALA
- PRAGMATIC PLAY
- RED EAGLE
- SLOTEGRATOR
- TADA GAMING
- THUNDERSPIN
- TVBET
- ZEUSPLAY

The project entails establishing a company that offers technologically enhanced online games to captivate players, drawing on the expertise gained from seven previously established casinos involving the founders of this new gaming platform.

In terms of financial security, a safety net is provided in the form of a security payment. If, for any internal or objective reasons, the online casino faces closure, this security payment is returned to the casino owners. However, during the operational phase of the online casino, it remains unused, serving as a deposit in the event of winning the jackpot. This approach ensures minimal losses for the stakeholders involved.

The website is under construction. The domain is DB-Bet.com, held and operated by a Curacao company SPORT TECH N.V.



Starting in 2024, a Gaming Control Board will be established as the regulatory authority. The process of applying for the government license is currently underway.



Company Overview:

Our commitment lies in creating an unparalleled gaming experience that not only entertains but also encourages responsible and mindful play.

Vision:

At DB-Bet, we envision a global gaming landscape where innovation aligns with responsibility, fostering a harmonious space for players to explore, compete, and connect. Our goal is to act as a catalyst for positive change within the gaming industry, establishing benchmarks for excellence and ethical gaming practices.

Mission:

Guided by our core tenets, our mission at DB-Bet encompasses:

- Innovative Gaming Experience: Pioneering cutting-edge technologies and

imaginative game design to offer a diverse portfolio that captivates and excites players.

- Core Responsibility: Advocating responsible gaming through proactive measures, educational initiatives, and partnerships with organizations dedicated to creating a safe gaming environment.
- Player-Centric Commitment: Placing our players at the forefront by delivering personalized experiences, responsive customer support, and an unwavering dedication to continuous improvement based on player feedback.
- Global Inclusivity: Breaking down barriers and creating a global gaming community that transcends borders, welcoming players from all corners of the world.

Goals:

- Unrivaled Entertainment: Striving for excellence in delivering not just games but experiences that engage, challenge, and entertain our players.
- Innovation Leadership: Aspiring to lead the industry in innovation, setting new standards, and surprising players with unique gaming experiences that push the boundaries of what's possible.
- Community Enrichment: Contributing positively to the community by supporting charitable initiatives, championing responsible gaming causes, and actively engaging with local communities.
- Sustainable Prosperity: Achieving sustainable growth by balancing financial success with ethical business practices, environmental stewardship, and an unwavering commitment to the well-being of our players.

1.2. UBO BACKGROUND

KARINA ELLUL BONICI is CEO & Founder of DB-BET since 2022, Karina is responsible for directing strategic initiatives to achieve the company's vision and aligning them with organizational goals. This involves proactively identifying, assessing, and managing risks for sustainable success while seizing opportunities.

Previously, as Head of Customer Support and Affiliate Marketing at FLESH LOTO LLC in Malta and Ukraine from 2016 to 2022, Karina played a key role in creating, communicating, and implementing the organization's vision, mission, and overall direction. She led the

development and implementation of the company's strategy, solicited advice from the Board of Directors, and formulated strategic plans to guide business operations.

Prior to that, Karina worked at BDO in Malta from 2011 to 2016, where she promoted the Maltese tourist industry and facilitated intercultural exchange. Additionally, her experience as a Sales/Customer Care Representative at HOLIDAY MALTA from 2004 to 2011 involved assisting and promoting Malta to foreign tour operators and agents, contributing to the growth of the tourism sector in the region.

Drawing from her prior role as Head of Customer Support and Affiliate Marketing at FLESH LOTO LLC, Karina boasts an unparalleled understanding of the project's operations. This extensive expertise equips her with a unique advantage in effectively guiding the company towards success in her position as CEO.



Karina Ellul Bonici

CMO  Malta

Work Experience

- CEO & Founder**
DB-BET (2022 - PRESENT)
Directing strategic initiatives to actualize the company's vision, aligning with organizational goals.
Proactively identifying, assessing, and managing risks for sustainable success and seizing opportunities.
- Head of Customer support and affiliate marketing**
FLESH LOTO LLC (2016 - 2022), Malta, Ukraine
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 the 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.
- BDO**
Holiday Tourism MALTA (2011-2016)
Promoting the Maltese tourist industry and intercultural exchange.
- Sales/Customer Care Representative**
HOLIDAY MALTA (2004 - 2011)
Assisting and promoting Malta during foreign Tour Operators/Agents visits, educational programmes, in order to promote the tourism sector in Malta.

Education History

University of Malta
1998 - 2000
Diploma in Diplomatic Relations

Latvia State University
1981 - 1983
Foreign Language Faculty

Certification

2000 - "Meeting Success" - Malta
1996 - Office Computer Practice
1995-1996 - Intermediate Spanish
1992-1993 - "Guides and Couriers"
1985 - Tourist guide course, Malta

1.3. GAME CATALOG

Main types of casino games:

- Type 1 – Games of Chance (RNG-based games such as slots and casino table games)
- Type 2 – Betting (including live betting and virtual-sports betting)
- Type 3 – Live Dealer Games
- Type 4 – Pooled-prize games (such as lotteries and parimutuel)
- Type 5: Promoting peer-to-peer games (such as sport-exchange, bingo and poker)

1.4. SOCIAL IMPACT OF THE PROJECT

The total amount of taxes paid by the company, both as a taxpayer and a tax agent, throughout the project duration, is projected to reach 8,380.0 thousand euros.

The company is expected to have a workforce of 6 employees in total.

1.5. PROJECT METRICS

The project's economic viability has been substantiated through the computation of conventional financial indicators employed in project analysis.

Table 1. Indicators Overview

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	156 455
Sum of proceeds (SP), EUR	4 284 809
Net average operational receipts per month (NAOR), EUR	25 926
Net profit for the project period, EUR	844 796
Average profitability for the project period (net profit to proceeds	19,72%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	360 714
Average Rate of Return of investments (ARR)	12,26%
Return on investment (ROI)	440%
Profitability index (PI)	2,3

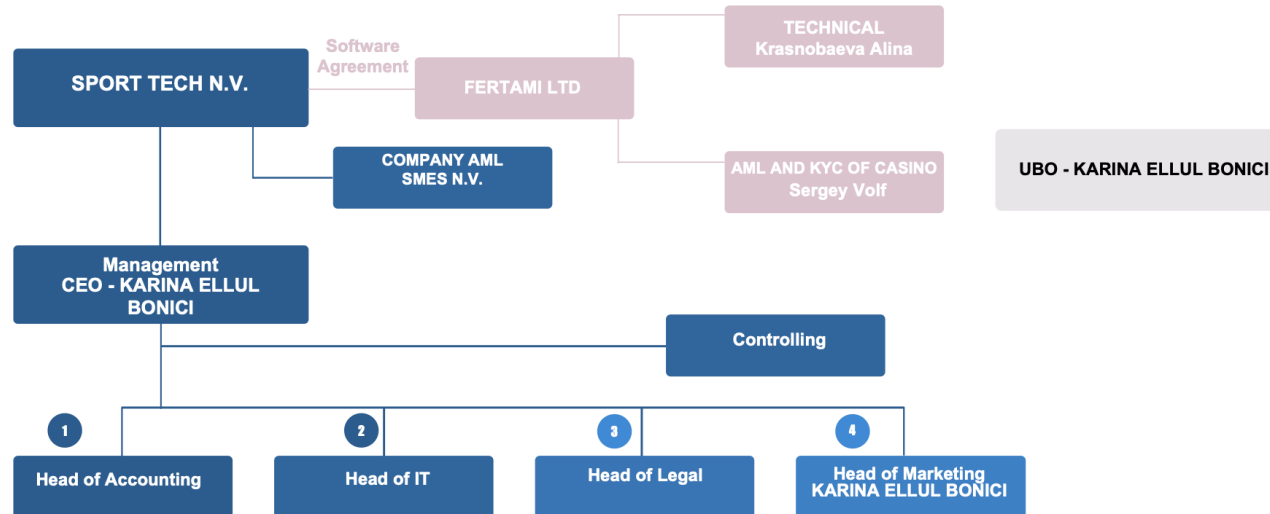
Internal rate of return (IRR)	94,77%
Pay back period of the project in whole (PBP), incl. financing scheme	17 months
	1,42 years

2. COMPANY STRUCTURE

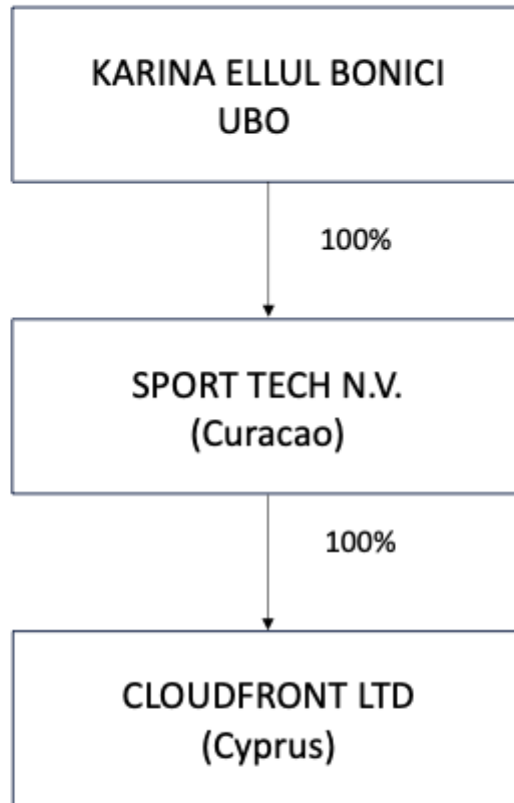
UBO serves as both the CEO and the sole shareholder of the Operator, actively involved in the daily operations of the business. She entrusts strategies and decision-making directly to departments and functions, fostering versatility in decision-making processes and preventing deadlocks. Legal support is handled internally by relevant departments and officers. Department heads primarily make decisions, which are then ratified by the CEO for finalization. Head of Accounting, Head of IT and Head of Legal are yet to be hired. In-house hiring is prioritized over outside hiring, and the experience in an operational online casino is a critical requirement.

Company control structure

SPORT TECH N.V., a company incorporated under the laws of Curaçao with registration number 163475 and registered address at Dr. H. Fergusonweg, 1, Curacao



OWNERSHIP STRUCTURE



3. FINANCIAL SUMMARY

3.1. FINANCIAL PROJECTIONS FOR YEARS 1-3

Table 2. First-Year Cash Flow

	Total for 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 156 455	- 142 655	-	-	- 13 800	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 142 655	- 142 655	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 649	-	-	-	- 11 649	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 151	-	-	-	- 2 151	-	-	-	-	-	-	-	-
Cash flow - OPERATING	933 338	-	-	-	-	- 42 940	- 2 203	- 10	2 290	236	6 694	- 36 325	9 464
Proceeds	4 284 809	-	-	-	-	27 808	34 203	37 751	41 542	41 128	50 542	57 855	65 760
Income from clients	4 284 809	-	-	-	-	27 808	34 203	37 751	41 542	41 128	50 542	57 855	65 760
Expenses total	- 3 351 471	-	-	-	-	- 70 747	- 36 406	- 37 762	- 39 252	- 40 892	- 43 848	- 94 180	- 56 296
Direct costs	- 2 598 729	-	-	-	-	- 59 424	- 25 083	- 26 438	- 27 929	- 29 569	- 31 372	- 40 857	- 43 039
Advertising costs	- 1 181 618	-	-	-	-	- 23 520	- 13 552	- 14 907	- 16 398	- 18 038	- 19 841	- 21 826	- 24 008
Additional staff costs	- 975 000	-	-	-	-	-	-	-	-	-	-	- 7 500	- 7 500
License fees	- 138 111	-	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 304 000	-	-	-	-	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500
Indirect costs	- 486 347	-	-	-	-	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 53 323	- 11 323
Accounting	- 119 680	-	-	-	-	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740
Office equipment maintenance	- 90 667	-	-	-	-	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-

Office rent	- 42 667	-	-	-	-	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333
Legal support	- 109 333	-	-	-	-	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417
Taxes	- 266 396	-	-	-	-	-	-	-	-	-	- 1 153	-	- 1 934	- 1 934
Profit tax	- 266 396	-	-	-	-	-	-	-	-	-	- 1 153	-	- 1 934	- 1 934
Cash flow - FINANCING	- 92 640	142 655	-	-	13 800	42 940	2 203	10	-	-	1 430	36 325	- 2 400	- 2 400
Co-investor's investment	237 933	142 655	-	-	13 800	42 940	2 203	10	-	-	-	36 325	-	-
Refunds to co-investor	- 330 573	-	-	-	-	-	-	-	-	-	1 430	-	- 2 400	- 2 400

CASH FLOW OF THE PROJECT	684 244	-	-	-	-	-	-	-	2 290	236	5 264	-	7 064	7 064
progressive total (cash balance)	684 244	-	-	-	-	-	-	-	2 290	2 526	7 790	7 790	14 854	14 854

Table 3. Second-Year Cash Flow

	Total for 3 years	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 156 455	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 142 655	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 649	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 151	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	933 338	14 590	20 538	32 098	40 351	24 093	44 923	46 005	45 097	42 668	47 818	12 922	48 872
Proceeds	4 284 809	74 733	84 999	102 725	114 265	126 281	129 631	132 066	139 481	144 977	152 725	158 666	163 969
Income from clients	4 284 809	74 733	84 999	102 725	114 265	126 281	129 631	132 066	139 481	144 977	152 725	158 666	163 969
Expenses total	- 3 351 471	- 60 143	- 64 461	- 70 627	- 73 913	- 102 188	- 84 708	- 86 060	- 94 383	- 102 309	- 104 907	- 145 743	- 115 097
Direct costs	- 2 598 729	- 45 440	- 48 081	- 50 986	- 51 945	- 84 805	- 61 449	- 62 497	- 71 075	- 79 687	- 80 832	- 89 511	- 90 725
Advertising costs	- 1 181 618	- 26 409	- 29 050	- 31 955	- 32 914	- 33 901	- 34 918	- 35 966	- 37 044	- 38 156	- 39 301	- 40 480	- 41 694
Additional staff costs	- 975 000	- 7 500	- 7 500	- 7 500	- 7 500	- 15 000	- 15 000	- 15 000	- 22 500	- 30 000	- 30 000	- 37 500	- 37 500
License fees	- 138 111	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 304 000	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500
Indirect costs	- 486 347	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 53 323	- 11 323
Accounting	- 119 680	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740
Office equipment maintenance	- 90 667	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 42 667	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333

Legal support	- 109 333	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417
Taxes	- 266 396	- 3 380	- 5 057	- 8 318	- 10 646	- 6 060	- 11 935	- 12 240	- 11 984	- 11 299	- 12 752	- 2 909	- 13 049	
Profit tax	- 266 396	- 3 380	- 5 057	- 8 318	- 10 646	- 6 060	- 11 935	- 12 240	- 11 984	- 11 299	- 12 752	- 2 909	- 13 049	
Cash flow - FINANCING	- 92 640	- 4 194	- 6 276	- 10 322	- 13 210	- 7 520	- 14 811	- 15 189	- 14 871	- 14 021	- 15 824	- 3 610	- 16 193	
Co-investor's investment	237 933	-	-	-	-	-	-	-	-	-	-	-	-	
Refunds to co-investor	- 330 573	- 4 194	- 6 276	- 10 322	- 13 210	- 7 520	- 14 811	- 15 189	- 14 871	- 14 021	- 15 824	- 3 610	- 16 193	

CASH FLOW OF THE PROJECT	684 244	10 396	14 262	21 776	27 141	16 573	30 113	30 816	30 226	28 647	31 994	9 312	32 680
progressive total (cash balance)	684 244	25 250	39 512	61 288	88 429	105 002	135 115	165 931	196 157	224 804	256 799	266 111	298 790

Table 4. Third-Year Cash Flow

	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 156 455	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 142 655	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 649	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 151	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	933 338	45 508	40 240	42 255	36 373	17 941	39 876	49 467	54 218	64 342	68 933	45 087	71 916
Proceeds	4 284 809	160 907	162 941	166 852	168 178	170 328	183 027	196 817	211 946	226 509	241 527	252 637	262 033
Income from clients	4 284 809	160 907	162 941	166 852	168 178	170 328	183 027	196 817	211 946	226 509	241 527	252 637	262 033
Expenses total	- 3 351 471	- 115 399	- 122 702	- 124 597	- 131 805	- 152 387	- 143 151	- 147 349	- 157 728	- 162 168	- 172 594	- 207 550	- 190 117
Direct costs	- 2 598 729	- 91 976	- 100 764	- 102 091	- 110 958	- 136 739	- 121 316	- 122 809	- 131 848	- 133 432	- 142 564	- 144 245	- 159 245
Advertising costs	- 1 181 618	- 42 945	- 44 233	- 45 560	- 46 927	- 48 335	- 49 785	- 51 278	- 52 817	- 54 401	- 56 033	- 57 714	- 57 714
Additional staff costs	- 975 000	- 37 500	- 45 000	- 45 000	- 52 500	- 52 500	- 60 000	- 60 000	- 67 500	- 67 500	- 75 000	- 75 000	- 90 000
License fees	- 138 111	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 304 000	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500	- 9 500
Indirect costs	- 486 347	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 11 323	- 51 323	- 11 323
Accounting	- 119 680	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740	- 3 740

Office equipment maintenance	- 90 667	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833	- 2 833
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	-	40 000	-
Office rent	- 42 667	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333	- 1 333
Legal support	- 109 333	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417	- 3 417
Taxes	- 266 396	- 12 100	- 10 614	- 11 183	- 9 524	- 4 325	- 10 512	- 13 217	- 14 557	- 17 412	- 18 707	- 11 982	- 19 549	
Profit tax	- 266 396	- 12 100	- 10 614	- 11 183	- 9 524	- 4 325	- 10 512	- 13 217	- 14 557	- 17 412	- 18 707	- 11 982	- 19 549	
Cash flow - FINANCING	- 92 640	- 15 015	- 13 171	- 13 877	- 11 818	- 5 367	- 13 044	- 16 401	- 18 064	- 21 607	- 23 214	- 14 868	- 24 258	
Co-investor's investment	237 933	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 330 573	- 15 015	- 13 171	- 13 877	- 11 818	- 5 367	- 13 044	- 16 401	- 18 064	- 21 607	- 23 214	- 14 868	- 24 258	

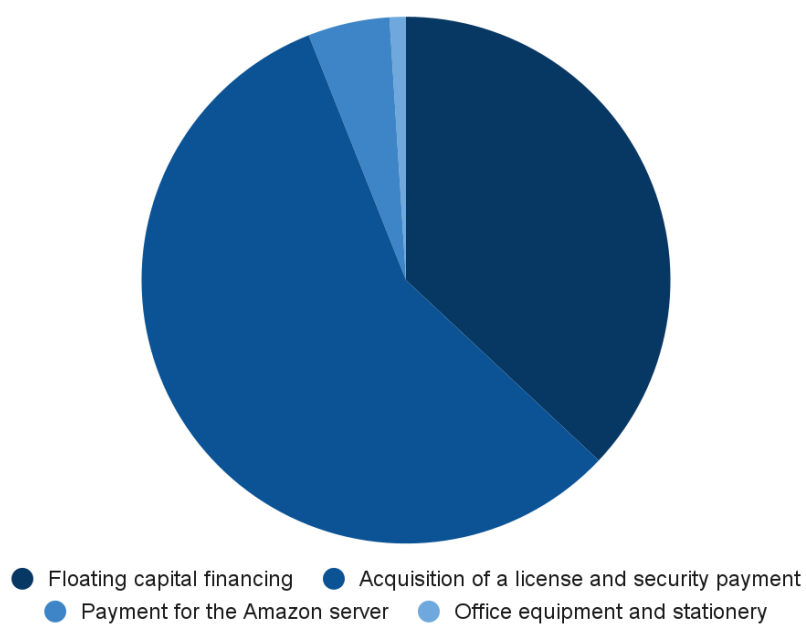
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CASH FLOW OF THE PROJECT	684 244	30 493	27 068	28 378	24 555	12 574	26 832	33 067	36 154	42 735	45 719	30 220	47 658	
progressive total (cash balance)	684 244	329 283	356 352	384 730	409 285	421 860	448 692	481 758	517 913	560 647	606 366	636 586	684 244	

3.2. INVESTMENT STRUCTURE: CATEGORIZATION OF INVESTMENTS, ANTICIPATED EXPENDITURES, ATTRIBUTION, AND SOURCE OF FUNDS

The project requires a financial resource of 237.9 thousand euros.

Diagram 1. Investments Structure



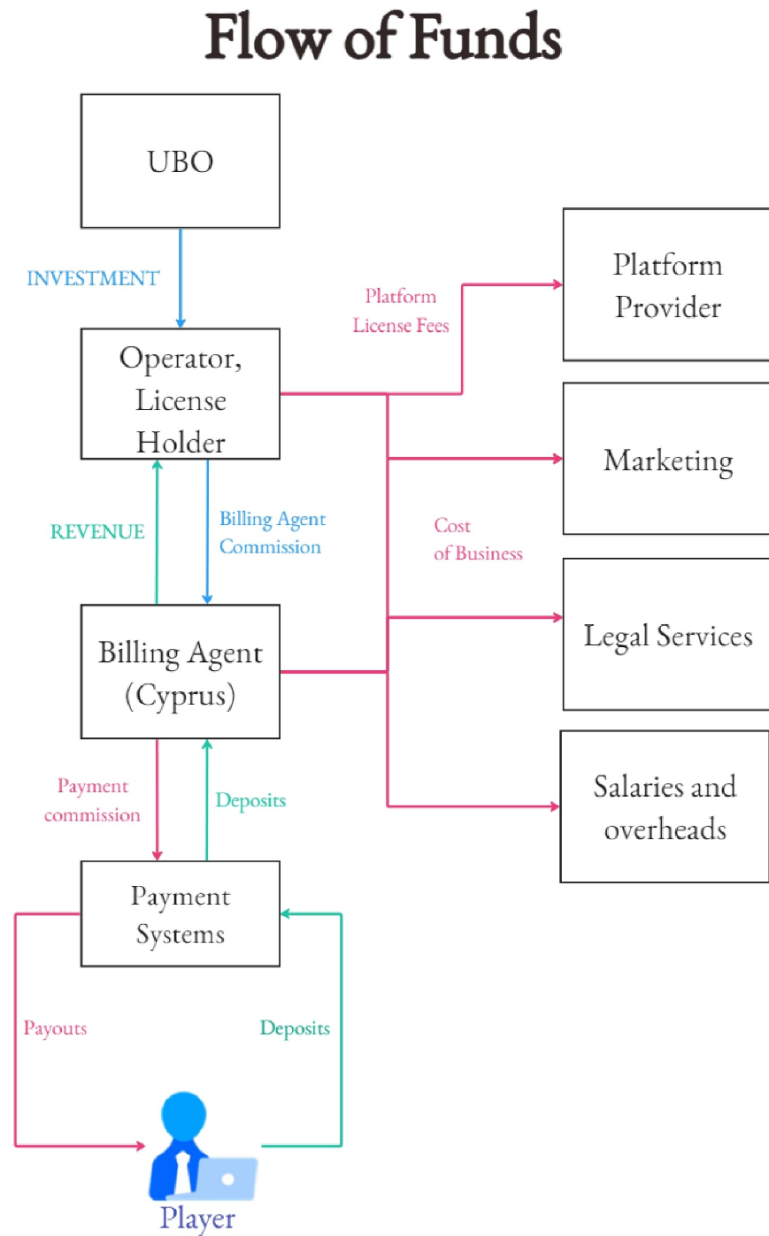
The project is expected to be funded by the investor. The total payments to the investor over the project duration are estimated to be 330.5 thousand euros.

Type of initial investments - funds provided directly by the Ultimate Beneficial Owner.

Upon launch - profits generated directly from operations.

3.3. FLOW OF FUNDS SCHEMATIC

The cost of business for the project includes license fees to the Platform provider, Web-marketing, Service fees to employees and legal fees to fiduciary service providers.



4. PRODUCTS & SERVICES

4.1. REGISTRATIONS AND OPENING OF AN ACCOUNT

The screenshot displays the DBbet website interface. At the top, there's a navigation bar with categories like SPORTS, LIVE, GAMES, SLOTS, PROMO, LIVE CASINO, ESPORTS, BINGO, and MORE. A user profile icon labeled 'Crystal' is on the right. Below the navigation bar, a large banner for 'FREE BET GIVEAWAY' is visible, featuring a basketball and a trophy. To the left, a sidebar shows 'Recommended' and 'Top competitions' sections. The main content area displays a list of matches under the 'China Championship' section, including teams like Guangzhou Long-Lions, Jiangsu Dragons, Liaoning Flying Leopards, and others, along with their scores and betting odds. On the right, a 'REGISTRATION' sidebar is open, showing options for 'One-click' and 'By phone' registration, a country selection (Russia), a currency selection (Euro), and a 'REGISTER' button. Below the registration options, there's a '100% BONUS ON YOUR 1ST DEPOSIT' offer and a 'BET SLIP' section.

REGISTRATION

One-click By phone

Russia

Euro (EUR)

Promo code (if you have one)

REGISTER

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

By clicking this button you confirm that you have read and agree to the Terms and Conditions and Privacy Policy of the company, consent to the processing of your personal information and confirm that you are of legal age.

100% BONUS ON YOUR 1ST DEPOSIT

BET SLIP MY BETS

YOUR BETS

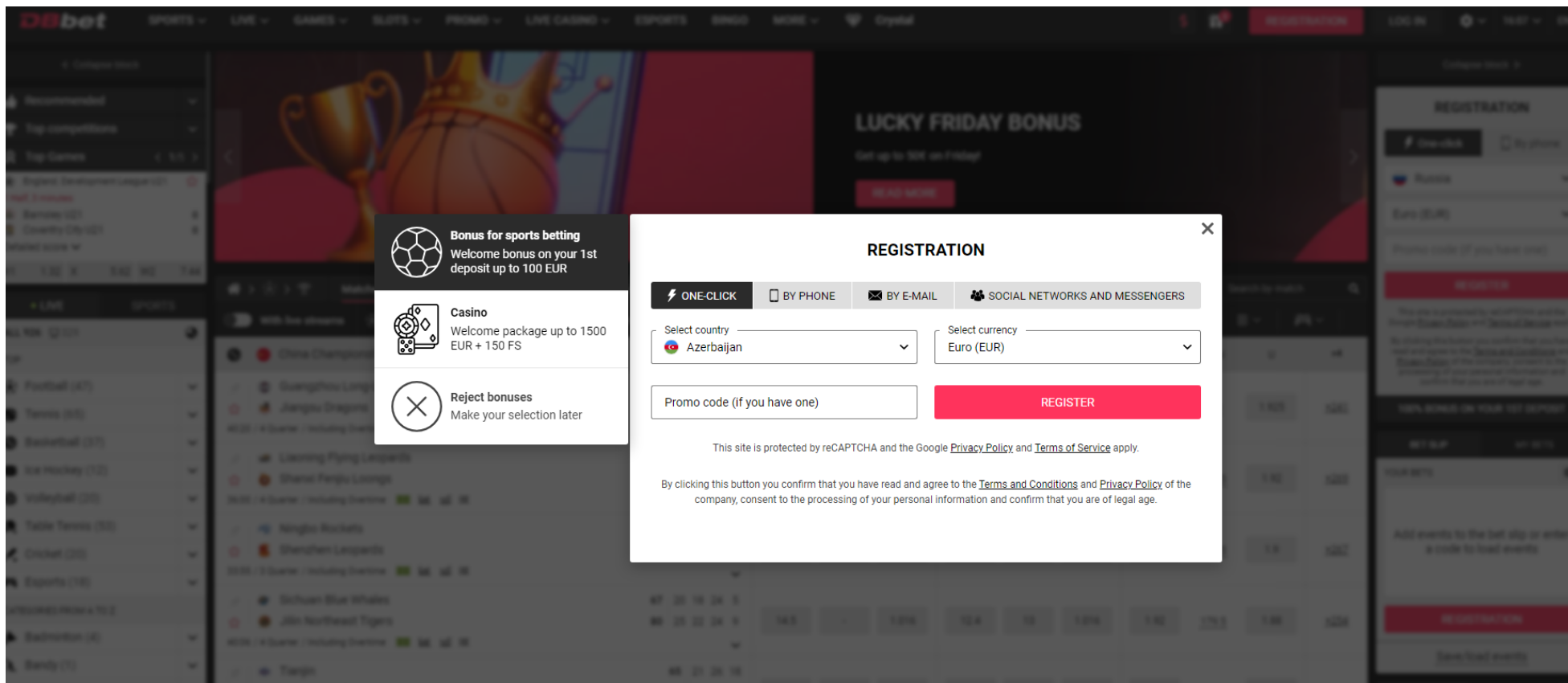
Add events to the bet slip or enter a code to load events

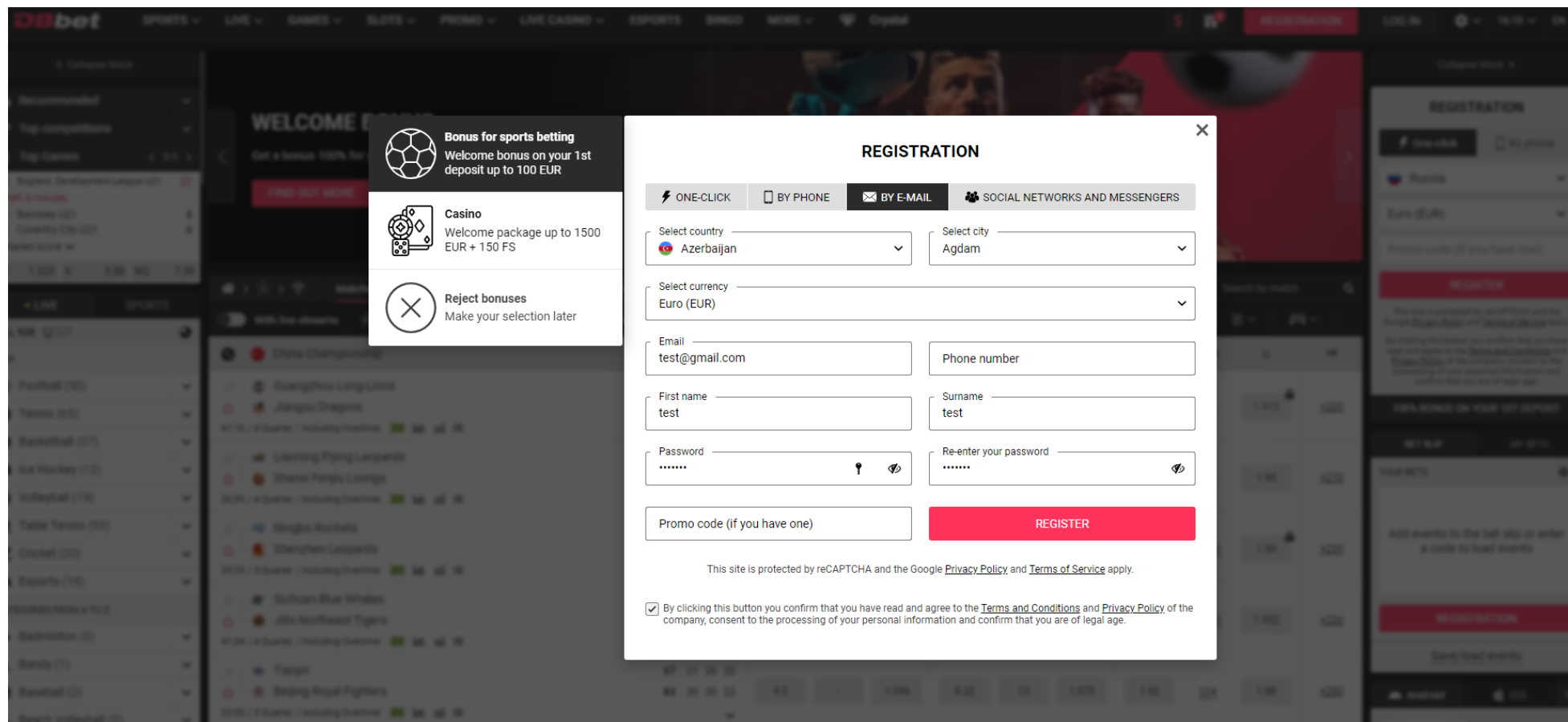
REGISTRATION

Save/load events

Android iOS

Match	Score	1	Team Wins	2	1	X	2	0	Total	U	+4
Guangzhou Long-Lions vs Jiangsu Dragons	86 27 27 23 9	-	-	-	-	-	-	1.94	184	1.864	+245
Liaoning Flying Leopards vs Shanxi Fenjiu Loongs	85 30 27 28	1.31	-	3.46	1.3	13	3.85	1.92	223.5	1.88	+267
Ningbo Rockets vs Shenzhen Leopards	70 27 25 18	5.1	-	1.168	4.54	13	1.225	1.88	203.5	1.92	+271
Sichuan Blue Whales vs Jilin Northeast Tigers	67 20 18 24 5	14.5	-	1.016	12.4	13	1.016	1.905	181	1.895	+257
Tianjin vs Beijing Royal Fighters	63 21 26 16	5.42	-	1.15	5.58	13	1.168	1.92	218.5	1.88	+279





DBbet

SPORTS

LIVE

GAMES

SLOTS

PROMO

LIVE CASINO

ESPORTS

BINGO

MORE

Crystal

Main account (EUR)
0

MAKE A DEPOSIT

16:12

EN

test
test12@gmail.com

1/5

Bonus points
0

Main account (EUR)
0

ACCOUNT

Deposit

Withdraw funds

Bet history

Transaction history

EXTRA

Invite friends

DBbet Casino Loyalty Program

Bonuses and gifts

Customer Support

Become an agent

PROFILE

Personal profile

Security

Account settings

Personal profile

Fill in the empty fields to take advantage of the enhanced features of the website.

Fill in profile 54%

Account

Account number
822605167

Password

Registration date
19/03/2024

Contacts

Phone

Email
test12@gmail.com

Personal info

Surname
test

Country
Azerbaijan

First name
test

Permanent registered address

Patronymic

Date of birth

Place of birth

Type of document

SAVE

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

4.2. LOG IN AND LOGOUT

The screenshot displays the DBbet website interface. The top navigation bar includes links for SPORTS, LIVE, GAMES, SLOTS, PROMO, LIVE CASINO, ESPORTS, BINGO, MORE, and a Crystal logo. On the right, there are buttons for REGISTRATION, LOG IN, and a settings icon, along with the time 16:18 and language EN.

On the left sidebar, there are sections for Recommended, Top competitions, and Top Games. The Top Games section shows a match between England, Development League U21 and Barnsley U21, with a score of 1-0.

The main content area features a navigation bar with tabs for Matches, Recommended, Upcoming events, 1st period, and 2nd period. Below this, there is a section for China Championship matches. The first match is between Guangzhou Long-Lions and Jiangsu Dragons, with a score of 97-72. The second match is between Jiangsu Dragons and an unnamed team, with a score of 24-19.

On the right sidebar, there is a registration form. It includes a "One-click" button, a "By phone" button, a dropdown menu for selecting a country (Russia is selected), a dropdown menu for selecting a currency (Euro (EUR) is selected), a field for a promo code, and a "REGISTER" button. Below the form, there is a disclaimer about the site being protected by reCAPTCHA and the Google Privacy Policy and Terms of Service.

Match	1st period	2nd period	Total	U	+4
Guangzhou Long-Lions	27	27	54		
Jiangsu Dragons	19	15	34		

4.3. TERMS AND CONDITIONS/ RULES AND PROCEDURES

DBbet

SPORTS ▾

LIVE ▾

GAMES ▾

SLOTS ▾

PROMO ▾

LIVE CASINO ▾

ESPORTS

BINGO

MORE ▾

Crystal

\$

1

REGISTRATION

LOG IN

 ▾

16:19 ▾

EN ▾

About us

Contacts

Terms and Conditions

Payments

How to place a bet

Cookie Policy

AML Policy

KYC Policy

Dispute Resolution

Responsible Gaming

General rules

Search

SHOW ALL

1. General Terms and Definitions

2. General Terms

3. General betting rules ▾

4. Types of bets ▾

5. Restrictions on Inclusion of Certain Outcomes

6. Live Betting

7. Deposits and Withdrawals

8. Refund Policy

9. Match Results, Dates and Starting Times, Dispute Resolution

10. Rules on sports ▾

11. Available Markets (Outcomes)

12. Extra bets

13. Examples ▾

14. Totalizator 15-TOTO ▾

15. Toto «Correct score» ▾

16. Totalizator football-TOTO ▾

17. TOTO «Ice Hockey»

18. TOTO «Basketball»

19. TOTO «FIFA»

20. Esports TOTO ▾

21. TOTO F

1. General Terms and Definitions

The following Betting Rules pertaining to the bookmaker DBbet (hereinafter referred to as the Rules) stipulate the manner of accepting bets, paying winnings and resolving disputes, as well as the specific features of certain bets on certain sports. These Rules shall govern any other relations between the bookmaker DBbet and the customer.

These Rules shall apply to betting on the website and at db-bet.com betting facilities.

Bet	- is a risk-driven agreement for potential winnings entered into between the customer and the bookmaker under the established Rules, where the fulfillment of such agreement is conditioned by an event whose outcome is yet to be determined. Bets are accepted on the conditions offered by the bookmaker.
Outcome	- is the result of the event (events) on which the bet was placed.
Customer	- is an individual placing a bet with the bookmaker on an outcome.
Bet Cancellation	- is an outcome on which the bet is not settled and winnings are not paid. As per the Rules, in the event of "bet cancellation", an arrangement between the bookmaker and the customer shall be deemed unconcluded and the stake shall be refunded.
Regular Time	- is the duration of the match subject to the regulations of the relevant sport, including time added by the referee. Regular time does not include extra time, overtime(s), penalty shootouts, etc.

All the terms and conditions of this Agreement as well as any matters pertaining to this agreement, including without limitation to matters of interpretation or disputes shall be governed by the applicable Laws of the Curacao.

4.4. OBLIGATIONS AS A PLAYER

4. The right to access and/or use the Website (including any or all of the products offered through the Website) may be considered illegal in certain countries (including, for example, the USA, the United Kingdom, Cyprus, the Netherlands, etc.). We do not intend for our Website to be used for sports betting, gambling or other purposes by people who reside in countries or jurisdictions in which such types of activity are illegal. The list of explicitly forbidden territories is: Aruba, Australia, Bonaire, Curacao, France, Iran, Iraq, Netherlands, Saba, Spain, St Maarten, Statia, U.S.A or the U.S.A dependencies, United Kingdom.
5. The fact that our Website is available in such a country and/or jurisdiction or that it can be displayed in the official language of any of those countries cannot be considered official authorization or legal grounds for using our Website and depositing funds into your account or withdrawing your winnings. The availability of the Website does not mean that it contains any proposals, incitement or invitation to use or subscribe to betting, gambling or any of the other services in any jurisdiction where such activity is illegal.
6. You are responsible for determining whether your accessing and/or use of the Website is compliant with applicable laws in your jurisdiction and you warrant to us that gambling is legal in the territory where you reside. When opening an account and/or using our Website you must make sure that your actions are legal in the territory in which you reside. You also guarantee and agree that you have received legal advice before registering on our Website. If we become aware that you are a resident in a country where the use of our Website is considered illegal, we will have the right to close your account and refund any remaining balance on your account at the moment of its closure (after the deduction of any winnings credited after your most recent deposit was made).
7. The bookmaker shall be entitled to refuse bets from customers who fail to abide by these Rules. The bookmaker reserves the right to refuse to accept a bet of any type from any customer should they violate social standards of conduct and public order.
8. The bookmaker reserves the right to refuse to accept a bet from any individual without giving a reason.
All bets shall be settled based on the data provided by the processing center.
9. Winnings shall be paid to the bettor within 30 (thirty) calendar days from the date of official publication of the results of the latest event on the bet slip.

4.5. PAYOUTS

The screenshot shows the DBbet website interface. The top navigation bar includes links for SPORTS, LIVE, GAMES, SLOTS, PROMO, LIVE CASINO, ESPORTS, BINGO, MORE, and Crystal. The left sidebar contains links for About us, Contacts, Terms and Conditions, Payments, How to place a bet, Cookie Policy, AML Policy, KYC Policy, Dispute Resolution, and Responsible Gaming. The main content area is titled 'General rules' and lists various rules. The '7. Deposits and Withdrawals' section is highlighted, detailing the process for depositing and withdrawing funds, including minimum odds, processing times, and security measures.

General rules

- 3. General betting rules
- 4. Types of bets
- 5. Restrictions on Inclusion of Certain Outcomes
- 6. Live Betting
- 7. Deposits and Withdrawals**
- 8. Refund Policy
- 9. Match Results, Dates and Starting Times, Dispute Resolution
- 10. Rules on sports
- 11. Available Markets (Outcomes)
- 12. Extra bets
- 13. Examples
- 14. Totalizator 15-TOTO
- 15. Toto «Correct score»
- 16. Totalizator football-TOTO
- 17. TOTO «Ice Hockey»
- 18. TOTO «Basketball»
- 19. TOTO «FIFA»
- 20. Esports TOTO
- 21. TOTO Free
- 22. Main sources of information
- 23. Calculation of «Accumulator» and «System» bets

7. Deposits and Withdrawals

1. There are various ways of depositing and withdrawing funds from the Customer's account. All deposit and withdrawal methods can be found in the "Payments" section.
2. If withdrawal requests are processed 24/7. It can take up to seven (7) business days to process the request depending on chosen payment method. Please note that withdrawals may experience a slight delay due to the identity verification process. In the case of a withdrawal being made for the first time, a large withdrawal or changes being made to payment options, we may take additional security measures to ensure that you are the rightful recipient of the funds.
3. The DBbet Security Service is entitled to:
 - decline cash withdrawal requests if deposits were made through e-payment systems.
 - refuse any withdrawal should the deposit or withdrawal amounts be inconsistent with bets placed (the Customer must place bets with stakes which add up to the sum of all deposits and the bets must have odds of at least 1.1). Permitted withdrawal amounts shall be calculated based on the amount of the bets placed from any given deposit.
 - refuse any withdrawal if the betting account is misused. In this case your account must be verified before withdrawal can take place.
4. The DBbet Security Service does not recommend Customers:
 - transfer funds from one payment system to another;
 - deposit and withdraw funds without placing bets;
5. You can only withdraw funds using the same payment details that were used for depositing funds into your account. If you use different methods to make a deposit, withdrawals should be proportionate to the deposits made using any particular method.
6. DBbet may refuse withdrawals via payment systems or in cash and offer a bank transfer as a substitute.
7. **ATTENTION!** The administration does not recommend making deposits using someone else's electronic wallet.
8. The administration has the right to return funds to the holder of such electronic wallet without prior notification.
9. In certain circumstances and in respect to certain customers DBbet may decide not to reimburse service charges imposed by payment systems on deposits or withdrawals, which DBbet usually reimburses.
10. If the user doesn't abide by the rules of the Company (doesn't follow it's Terms and Conditions, doesn't place a bet before withdrawal etc) the Company reserves a right to decline such withdrawal.

4.6. WITHDRAWING

Withdrawals can be made using the payment methods specified below, as follows: FIAT - provided that the deposit was made in FIAT and CRYPTO - provided that the deposit was made in cryptocurrency.

The screenshot shows the DBbet website interface for the 'Deposit' section. The top navigation bar is the same as in the previous screenshot. The left sidebar is also the same. The main content area is titled 'Deposit' and shows a dropdown menu for 'Azerbaijan'. Below this, there are tabs for 'All methods', 'Bank cards', 'E-wallets', 'Payment systems', and 'Cryptocurrency'. The 'All methods' tab is selected, displaying a grid of payment methods with their respective logos, minimum deposit amounts, and 'Deposit' buttons.

Deposit

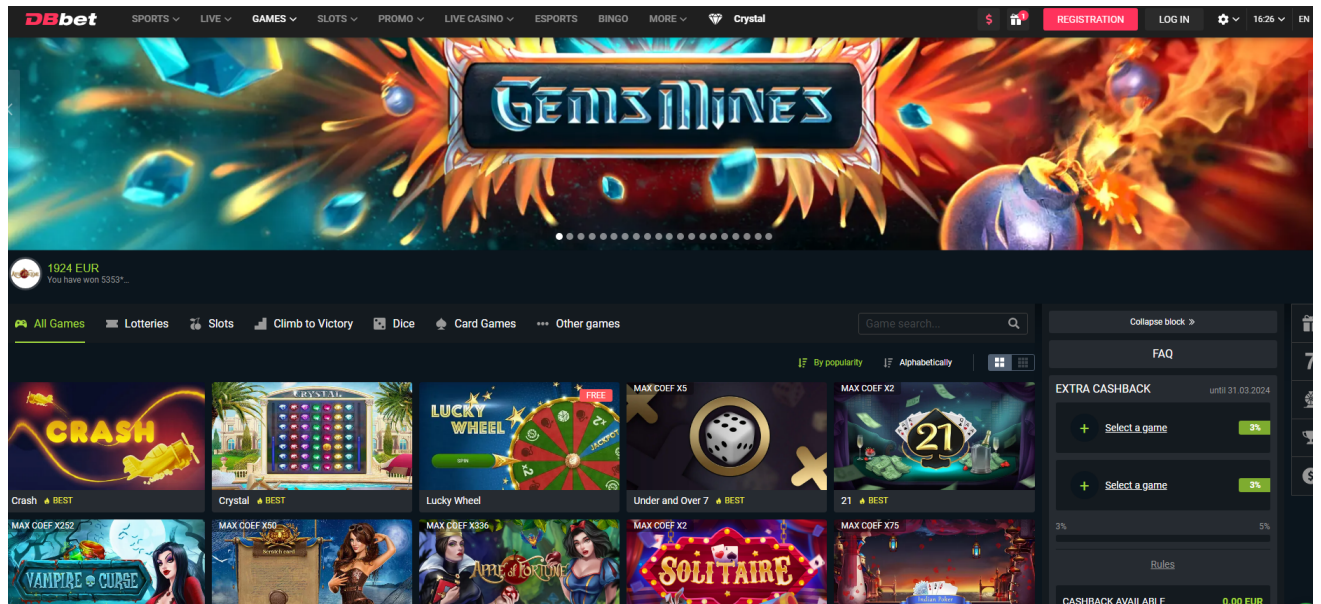
Select a payment system to top up your account

Azerbaijan

All methods

Method	Minimum	Maximum	Fees	Action
Bitcoin	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Ethereum	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Solana	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
TRON	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Bitcoin Cash	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Ethereum Classic	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
XRP	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Litecoin	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Dogecoin	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Dash	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
Monero	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit
ZCash	50.00 RUB, 1.00 USD, 1.00 EUR, 4.50 TRY	1.00 USD, 1.00 EUR, 4.50 TRY	No fees, instant	Deposit

4.7. LIST OF GAMES



5. KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1. PLATFORM DESCRIPTION

The critical supplier for the project is Fertami Ltd. - the supplier of the software platform. Fertami Ltd, a company registered under the laws of the Republic of Cyprus under registration number HE 413010 (“Fertami”) has developed the Unionsoft Platform (“Platform”) - a software solution for betting companies with 24/7 stream of data and technical support. The Platform provides betting website operators with a reliable software solution designed to deliver high performance and security. Built on advanced technologies, it offers a diverse range of features, including real-time data updates, support for multiple types of bets, huge selection of sports and flexible customization options.

Platform specifications

General specifications

The Platform’s structure

The functional structure of the Platform includes the following modules:

- a) the option to register as a customer
- b) the option to log in and reset the password
- c) the option to make deposits and withdrawals
- d) the option to place bets
- e) the option to view betting history
- f) the option to view deposit history
- g) the option to receive bonuses
- h) the option to view bonus history
- i) the option to contact the customer support team
- j) the option to self-exclude
- k) the option to place limits on deposits
- l) deployment of two-factor authentication
- m) deployment of secret phrase authentication
- n) databases and tables of real events containing established statistics or dynamic odds
- o) service for obtaining odds on events through an API
- p) service for tracking customer money – records of deposits, bets, and withdrawals

- q) service for integrating the Platform with the payment services of other third-party providers through an API
- r) service for notifying customers about a future event, changes, adverts, and marketing for promotions by email, text message and pop-up message on mobile devices
- s) tool for protecting and restricting access and assigning competences to Fertami's employees (BackOffice) and displaying an employee's level of access in their profile
- t) profiles for the technical service departments of remote operating units (B2C) including the department structure, information about the SLA and the serviced business units of the operator or affiliates
- u) technical support service including the systems for logging in, registration, and recording and resolving questions and problems from service contractors when using email services or live communication
- v) display of short messages to customers (primarily the status of their account and customer legal compliance)
- w) the option for customers to put forward and discuss customer ideas to improve the platform's services and install new services, and the option to introduce ratings
- x) document management – files received from customers – loading files and exchanging them with colleagues securely, tagging, the option to add comments and information about users that downloaded files, version control
- y) cookie service – storage and sharing of useful links to various online resources, customer recommendations and content on the basis of information accumulated about a customer, improvement and suggestions for customers to make using the platform easier and more efficient
- z) responsible gaming service – a service for customers to set up their own limits and self-exclude with the option to customize these to suit the different requirements of the various jurisdictions
- aa) Anti-fraud and AML service – the option to connect third-party resources through an API from government bodies in different jurisdictions to verify customers when they register and if they engage in suspicious activity
- bb) service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals

- cc) voting service – the opportunity for customers to vote for the operator’s various marketing or informational promotions posted and sent to customers through the Platform’s services
- dd) service for issuing ratings – mechanisms for determining the activity and popularity of Platform users and creation of reports on VIP customers

Compatibility with related platforms

The Platform is compatible with third-party betting platforms and individual slots, casino, corporate back-office portal sufficient for general navigation and information research, a payment system aggregator, and a customer support module.

The Platform also supports:

- a) marketing modules from third parties
- b) integration with the business solutions including CMS, CRM, and BackOffice
- c) integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- d) integration with additional structures providing prior verification services on customers, KYC, AML, fraud prevention, and PEP lists to help the operator decide whether to accept certain users
- e) provision of API for several modules
- f) integration with system managing access to information resources for providing the betting odds.
- g) integration with AWS and other data storage services that have security certificates and are located within the EU.

Ergonomic features

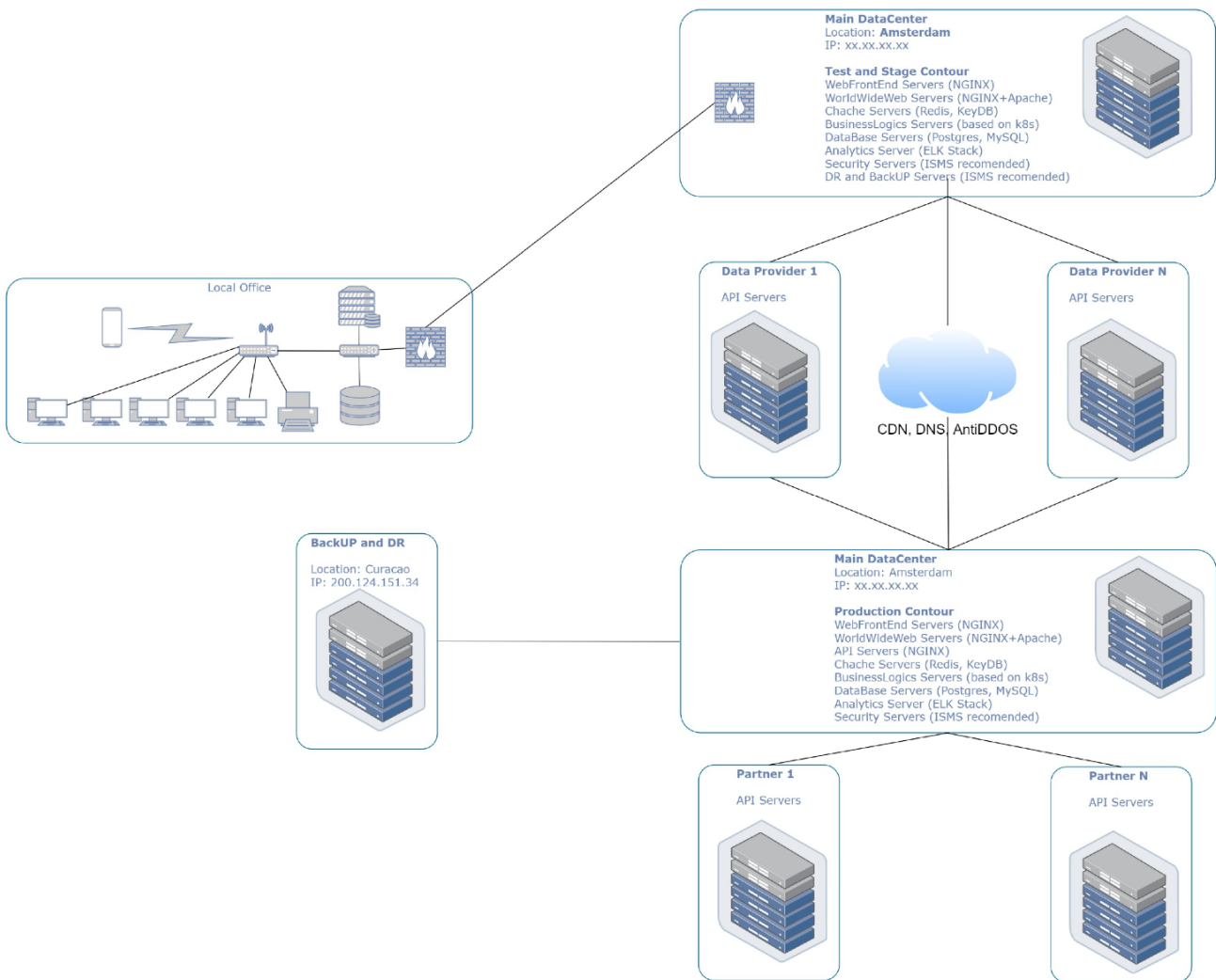
It is possible to modify the Platform’s interface according to the developed and agreed designs.

The Platform supports access from the following mobile platforms:

- a) iOS
- b) Android
- c) Windows

The Platform supports adaptive web design (or an adaptive user interface) capable of carrying out W3C CSS3 requests with a changing proportion grid and also support flexible changes to image proportions.

The platform is firmly established, with a comprehensive disaster plan and strong infrastructure in place, minimizing associated risks. Implement protocols for data backup and restoration, such as redundant server systems, to mitigate service disruptions and data loss. Regular testing and updating of the disaster plan are essential to address evolving threats and technology. Collaborating with cybersecurity experts and regulatory bodies can offer valuable guidance in enhancing online casino platforms' disaster preparedness, bolstering both operations and customer trust.



5.2. PAYMENT SERVICE PROVIDERS

Another essential group of suppliers comprises payment service providers. We ensure seamless payment processing by partnering with some of the most reputable PSPs operating within the relevant jurisdictions. Payment service provider (at the connection/planning stage): Flutterwave, Paygames, BigIdea, Pion, RoyalPay, SticPay.



flutterwave



RoyalPay

Similarly, our approach to banking services involves a stringent compliance framework to minimize the risk of losing bank services. Utilizing 2 to 3 banks concurrently offers protection against inherent banking risks. Diversifying our banking relationships not only strengthens our negotiating position but also enhances resilience in our financial infrastructure. This proactive strategy not only safeguards against disruptions but also promotes stability and longevity in our financial operations.

5.3. LEGAL AND CORPORATE SERVICE PROVIDERS

Within the realm of legal and corporate service providers, there exist numerous seasoned professionals well-versed in the intricacies of gambling. These experts aid us in adhering to all regulatory, payment, and banking protocols, ensuring comprehensive compliance.

6. RISK EVALUATION AND MANAGEMENT

Every department monitors its own risks daily.

6.1. RISK ASSESSMENT

Internal reviews occur annually across all risk categories by the Audit Committee, consisting of the Head of IT, Head of Legal, and Head of Finance. External assessments are performed every three years to ensure an independent evaluation of business and financial matters.

Regular audits are carried out on the platform, its software providers, infrastructure, and financial health. The Audit Committee reviews and maintains the risk register quarterly, in addition to daily departmental communications.

Annual mandatory financial audits are conducted for all companies within the organizational structure.

6.2. RISK OVERVIEW

6.2.1. Legal Environment (Supervised by: Head of Legal): Given the dynamic nature of online gambling laws, consistent vigilance is crucial. Timely notifications regarding legal modifications can be shared throughout departments, guaranteeing all employees stay informed about the shifting legal framework in online gambling. The legal department collaborates closely with other units, including compliance and operations, to ensure a thorough grasp of legal obligations and facilitate seamless implementation procedures. Sustaining transparent communication channels with regulatory agencies and industry groups underscores our dedication to adhering to online gambling legal standards.

- **Legal Compliance and Licensing:** Establishing and managing an online casino necessitates obtaining licenses from pertinent regulatory bodies across different jurisdictions. Regulatory standards can significantly differ between jurisdictions, and non-compliance with licensing obligations can lead to substantial fines, legal repercussions, or even the cessation of operations.

Risk reduction: The Operator presently operates under the Antillephone NV license No. 8048/JAZ and is in the process of seeking a new GCB license.

- **Data Security and Privacy Regulations:** Online casinos gather and handle

extensive volumes of sensitive customer information. Adhering to data protection laws like the EU's General Data Protection Regulation (GDPR) is imperative to prevent penalties and uphold customer confidence.

Risk reduction: Gather and handle solely the essential personal data required for delivering gambling services, ensuring data is not retained beyond its necessity. Establish and enact a data breach response strategy to promptly address and alleviate the consequences of data breaches, including protocols for informing data subjects and pertinent supervisory authorities within specified timelines. Embed privacy by design and default principles in the creation of new products, functionalities, or services, integrating privacy aspects into the design and development process from the outset.

- **Navigating Regulatory Hurdles Across Borders:** Operating in numerous jurisdictions can subject online casinos to intricate regulatory landscapes and legal ambiguities. Disparities in gambling regulations and enforcement strategies between borders can present obstacles to compliance, often necessitating substantial legal expertise and resources.

Risk reduction: Forge strategic alliances with indigenous enterprises, legal consultants, or industry consortia in target jurisdictions to glean insights into local regulations, streamline regulatory procedures, and foster rapport with regulatory entities. Conduct exhaustive due diligence on prospective business collaborators, affiliates, suppliers, and other external stakeholders to confirm their adherence to regulatory mandates and mitigate potential compliance hazards in the casino's cross-border ventures. Remain abreast of alterations in gaming regulations and enforcement methodologies in target regions by consistently monitoring regulatory amendments, industry literature, and legal advisories.

- **Regulatory Oversight:** Regulatory bodies may undertake investigations or audits to verify compliance with gambling regulations. Enforcement actions, including fines, license withdrawal, or legal actions, can carry significant repercussions for iGaming operators found to contravene regulatory stipulations.
- **Risk reduction:** Undertake routine internal audits and evaluations of compliance protocols, operational practices, and procedures to pinpoint instances of non-compliance, evaluate risks, and enact preemptive corrective

measures. Foster transparent communication avenues with regulatory bodies, industry affiliations, and other pertinent stakeholders to cultivate partnerships, solicit advice on compliance issues, and promptly resolve queries or apprehensions. Uphold meticulous documentation and archives of compliance endeavors, encompassing policies, protocols, training resources, audits, and enforcement actions, to substantiate compliance endeavors and facilitate regulatory inquiries or investigations.

6.2.2. Management of Regulatory Risks (Supervised by: Compliance Officer):

Regulatory risks concerning Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance are paramount considerations for businesses across various sectors, notably in financial and gambling industries. The organization's AML&KYC department assumes responsibility for upholding adherence to relevant laws and regulations aimed at preventing money laundering and terrorist financing. This department is charged with establishing robust policies and procedures to authenticate customer identities, monitor transactions for suspicious activities, and promptly report any anomalies to appropriate authorities. Non-compliance with AML&KYC regulations entails severe penalties, including fines, reputational harm, and potential criminal charges. Hence, strict compliance with these regulations is imperative to mitigate regulatory risks and uphold the organization's integrity and reputation. The AML&KYC department plays a pivotal role in overseeing compliance endeavors, conducting risk assessments, and implementing necessary controls to minimize the organization's exposure to regulatory risks. Furthermore, ongoing training and educational initiatives are regularly provided to employees to ensure their alignment with evolving AML&KYC requirements and best practices. In essence, effective management of regulatory risks associated with AML&KYC compliance necessitates a proactive and comprehensive approach, with the AML&KYC department serving as a cornerstone in the organization's compliance framework.

- **Adherence to Compliance and Anti-Money Laundering (AML) Regulations:** Online casinos are mandated to uphold rigorous compliance protocols to deter money laundering, terrorist financing, and other unlawful practices. Inadequate implementation of AML controls can lead to regulatory sanctions, reputational harm, and legal ramifications.

Risk reduction: Create a comprehensive AML policy delineating protocols for customer due diligence, transaction monitoring, and reporting of suspicious activities. Ensure alignment of this policy with regulatory mandates and industry benchmarks. Conduct frequent training and awareness initiatives for casino personnel to educate them on AML regulations, recognizing red flags indicative of suspicious conduct, and their responsibilities in thwarting money laundering and terrorist financing endeavors.

6.2.3. Infrastructure Risks (Supervised by: Head of IT): Infrastructure maintenance, platform integration, cybersecurity, and data security. The technical department is responsible for ensuring regular infrastructure maintenance to minimize downtime and mitigate technical risks associated with hardware or software failures. Implementing and updating cybersecurity protocols and technologies is a priority for the technical department 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 core 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, allowing the technical team to proactively address potential risks before they escalate.

- **Data Security:** Unauthorized access to customer information, comprising personal details and financial data, may result in identity theft, fraud, and legal consequences.
- **Risk reduction:** Deploy multi-layered cybersecurity protocols incorporating firewalls, intrusion detection systems, and encryption mechanisms. Consistently update software and security patches to rectify vulnerabilities and safeguard against emerging threats.

6.2.4. Financial Risks (Supervised by: Head of Finance): Financial risks are inherent in all business operations and necessitate careful management to ensure sustainability and advancement. As the individual accountable for financial matters, the Head of Finance assumes a pivotal role in identifying, assessing, and mitigating these risks. They are responsible for instituting robust financial controls, monitoring cash flow, and optimizing capital allocation to minimize exposure to such risks. Moreover, they collaborate closely with other departments to devise and implement financial strategies aligned with organizational

objectives. Through proactive risk management measures and strategic planning, the Head of Finance endeavors to safeguard the company's financial well-being and enhance shareholder value. Regular financial analysis and reporting are indispensable for recognizing emerging risks and opportunities, facilitating prompt adjustments to financial strategies.

- **Taxation:** Taxation policies pertaining to online gambling vary considerably among jurisdictions and can substantially affect the profitability of iGaming operators. Shifts in tax regulations or unforeseen tax obligations can present financial risks to casino operators.

Risk reduction: Consult with tax professionals, accountants, and legal specialists well-versed in international taxation to ensure adherence to local tax laws and regulations. Utilize tax treaties and agreements between nations to alleviate double taxation and optimize tax planning approaches. These treaties may offer provisions for tax credits, exemptions, or reduced tax rates for cross-border transactions. Maintain precise financial records, robust accounting systems, and accurate tax filings to comply with local tax laws and regulations in every jurisdiction where the casino operates. This encompasses timely submission of tax returns, tax payments, and adherence to reporting obligations.

- 6.2.5. **Litigation Risks (Supervised by: Client Service):** Risks associated with customer service practices. Ensuring alignment of customer service protocols with relevant laws and regulations serves to mitigate the potential for litigation stemming from regulatory non-compliance. Customer Service devises clear communication policies to effectively manage customer expectations, thereby reducing the chances of misunderstandings and potential legal disputes. Thorough documentation of customer interactions and resolutions is imperative for mitigating litigation risks, as it provides evidence of adherence to service standards and facilitates amicable dispute resolution. Customer Service periodically evaluates and enhances its procedures based on feedback and performance metrics to address recurring issues and minimize the risk of customer dissatisfaction leading to litigation. Cultivating a culture of transparency and accountability within the customer service team fosters trust with customers and diminishes the likelihood of disputes arising from perceived unfairness or ambiguity. Establishment of clear escalation protocols ensures prompt resolution of unresolved customer issues by the appropriate management levels, preventing

grievances from escalating into potential litigation.

- **Promotion of Responsible Gaming:** Regulatory authorities frequently require casino operators to advocate responsible gambling and institute measures to deter problem gambling behaviors. Non-compliance with responsible gaming regulations can result in regulatory penalties and harm to the operator's reputation.
- **Risk reduction:** Integrate self-exclusion tools enabling players to voluntarily exclude themselves from gambling activities for a designated duration. Ensure these tools are readily accessible and prominently featured on the casino's website and gaming platforms. Provide players with the ability to set customizable deposit limits and timeouts on their accounts to manage their gambling habits and prevent excessive play. These limits should be adjustable and enforceable to ensure adherence. Utilize data analytics and monitoring tools to pinpoint players displaying signs of potential gambling issues, including patterns in frequency and amount of wagers. Implement appropriate interventions and support resources for these players as necessary

6.3. RISK OF POTENTIAL CAPITAL EROSION

- 6.3.1. In the initial phase, there might be potential financial losses related to registration fees, rent, and office equipment. If the online casino shuts down due to internal or other valid reasons, the security deposit is refunded to the casino owners. However, it's crucial to keep this amount untouched during the casino's operation, reserving it exclusively as a jackpot-winning deposit. This measure aims to minimize losses effectively.

Risk reduction: Drawing upon a combined experience of 15 years within the online casino industry among the founders and co-owners, along with the seasoned managerial guidance of the project mentor, the project is strategically poised to minimize risks linked with market entry to the utmost degree.

7. POLICIES AND PROCEDURES

7.1. KNOW YOUR CUSTOMER

The Know Your Customer (KYC) policy comprises procedures and protocols designed to verify and validate the identities of clients. Its aim is to thwart financial crimes such as money laundering, terrorist financing, and fraud by ensuring that casinos possess precise information about their patrons and their financial transactions. By implementing KYC measures, casinos foster trust, adhere to regulatory mandates, and diminish the risks associated with unlawful activities in the financial sector.

7.2. ANTI-MONEY LAUNDERING

The primary objective of an Anti-Money Laundering (AML) policy is to impede the unlawful process of disguising the origins of money acquired through criminal endeavors. AML policies and procedures are formulated to identify and discourage money laundering, terrorist financing, and other illicit financial activities within financial institutions.

7.3. DATA PRIVACY

The purpose of a Data Privacy Policy is to delineate how an organization gathers, utilizes, stores, and safeguards the personal data of individuals. It aims to ensure adherence to data protection regulations, uphold the privacy rights of customers and employees, and foster trust among stakeholders. By articulating precise guidelines and procedures for managing sensitive data, the policy endeavors to minimize the potential for data breaches, unauthorized access, and misuse of personal information. Ultimately, it seeks to promote transparency and accountability in data management practices.

7.4. RESPONSIBLE GAMING

The purpose of a Responsible Gaming Policy is to encourage safe and balanced gambling behaviors while addressing the risks linked to excessive or problematic gambling. It delineates measures and guidelines to shield players from the adverse effects of gambling addiction, such as financial distress, mental health challenges, and social difficulties. By furnishing resources for self-exclusion, establishing limits on gambling activities, and extending support to those seeking assistance, the policy strives to cultivate a responsible

and enduring gambling milieu, safeguarding the welfare of players and upholding the integrity of the gaming sector.

7.5. TERMS OF USE

The Terms of Use policy for an online casino delineates the guidelines, regulations, and conditions that users must follow when accessing the platform. It encompasses aspects such as user obligations, account administration, payment processes, conflict resolution, and adherence to relevant laws and regulations. By consenting to these terms, users affirm their comprehension of the regulations governing their engagements with the casino, thus guaranteeing transparency, equity, and legal conformity in all facets of the gaming journey.

7.6. SELF-EXCLUSION

This describes the procedure by which individuals can voluntarily exclude themselves from engaging in gambling activities on the platform for a designated period, often to regulate their gambling habits or address issues related to addiction.

7.7. DISPUTE RESOLUTION

This section outlines the procedures and mechanisms accessible for resolving conflicts or disputes that may emerge between the casino and its users, typically delineating steps for escalation and resolution.

7.8. FAIRNESS & RNG TESTING METHODS

This section addresses the fairness of games provided by the casino, affirming their randomness and impartiality, often highlighting the utilization of Random Number Generators (RNGs) and the procedures employed to assess and confirm their fairness.

7.9. ACCOUNTS, PAYOUTS & BONUSES

This section elaborates on account management protocols, payout methods, and the stipulations pertaining to bonuses, encompassing wagering prerequisites and limitations.

7.10. BETTING RULES

This section furnishes precise rules and regulations governing betting activities on the platform, covering game-specific guidelines, maximum and minimum bet amounts, and any

supplementary terms for various types of bets.

7.11. INTERNAL POLICIES

Human Resources Policy: This encompasses policies related to recruitment, orientation, performance assessment, training and growth, diversity and inclusivity, disciplinary measures, and termination protocols.

Financial Policy: This covers guidelines concerning budgeting, expenditure management, financial reporting, audit procedures, procurement practices, and adherence to accounting standards.

Communication and Social Media Policy: This establishes protocols for internal and external communication channels, including email usage, social media guidelines, media interactions, and branding protocols.

Information Security Policy: This outlines measures for safeguarding sensitive information, including data management procedures, cybersecurity strategies, password administration, and protocols for averting data breaches.

Internal policies are primarily aimed at supporting external policies. While the latter undergo only annual review and updates, the former are subject to continuous creation, modification, and termination as needed.

7.12. The necessity to implement and uphold these policies stems from our intention to sustain long-term operations, particularly considering the initial investment. Our strategy entails operating for a minimum of three years under the GCB license, with renewal contingent upon achieving investment returns and project KPIs, as indicated in our financial projections.

7.13. To adhere to the adopted policies and procedures, the project draws upon necessary expertise and manpower from a variety of sources, both internally and externally. The Ultimate Beneficial Owner (UBO) brings a blend of experience in gambling and IT, making her an ideal overseer. Key departments such as Legal, IT, Human Resources, and Finance possess significant expertise in managing large gambling operations

sustainably. Moreover, jurisdictions like Curacao and Cyprus offer abundant opportunities for engagement with advisors, experts, and independent auditors. The GCB aids operators by offering guidance and support in policy development. This collaborative effort ensures that operators can customize their policies to comply with regulatory requirements and industry norms. By leveraging the expertise and resources of the GCB, operators can establish robust and effective policies that foster compliance and integrity within the gambling sector. Additionally, the GCB provides ongoing support and updates to help operators adapt their policies to evolving regulations and emerging challenges. In summary, the assistance provided by the GCB empowers operators to establish and uphold a robust framework for responsible gambling practices.

8. MARKET ANALYSIS

8.1. REVENUE AND TURNOVER ANALYSIS

In 2020, the global online casino industry experienced significant success, attributed to the COVID-19 pandemic and increased self-isolation. The gambling market's revenue in many countries grew by a third compared to 2019, highlighting the resilience and potential of the online casino business model.

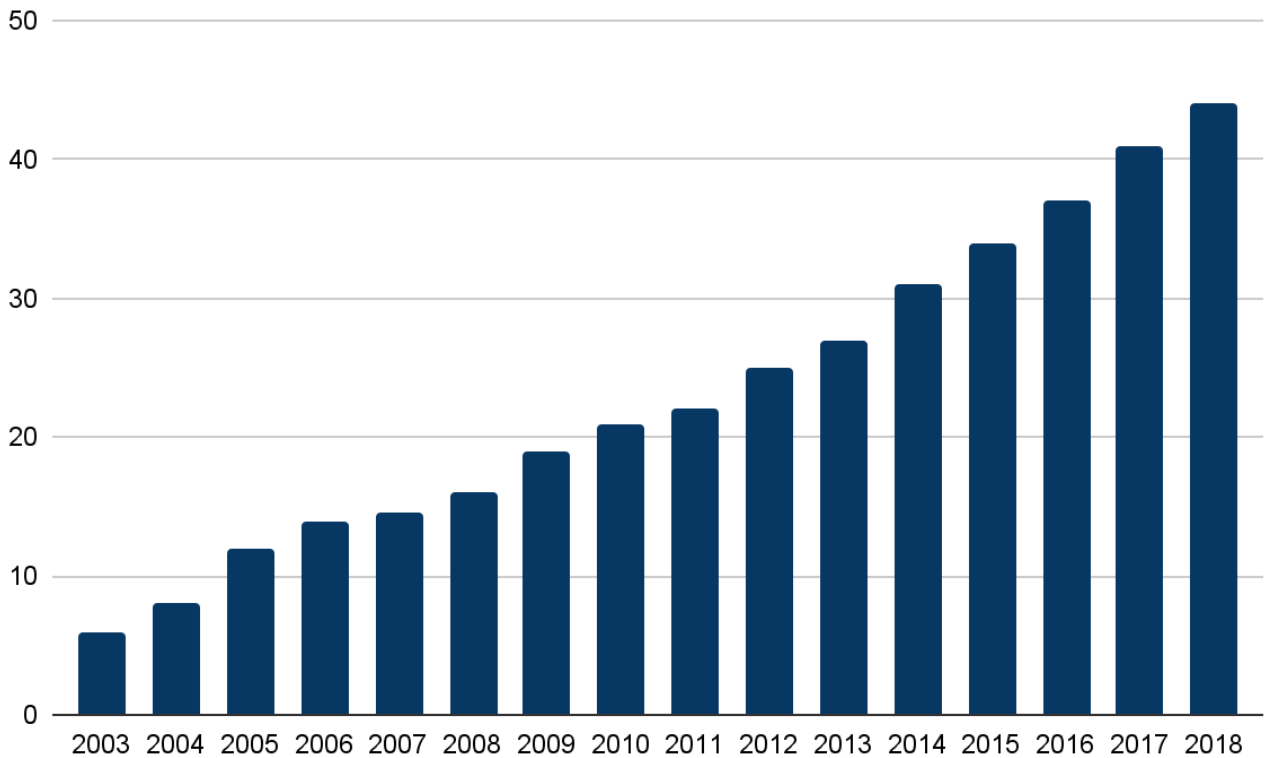
Over the last few years, 85 countries worldwide have legalized online gambling, with online betting and slot machines contributing to 70% of the total income in internet gambling. The popularity of online gambling stems from its diverse offerings and a user-friendly gaming experience without restrictions. Notably, the UK, China, Austria, Germany, and Italy lead in generating substantial revenue from online slot machines.

Research conducted by Juniper indicates that the turnover from online gambling betting is projected to reach \$950 billion by 2024 and is anticipated to continue growing. The study emphasizes the increasing shift of gambling activities to the online space, with mobile applications displaying the highest activity. The use of mobile phones for placing bets is consistently on the rise.

While there is a general trend toward regulating national gambling markets, some countries are moving in the opposite direction by considering the prohibition of online and mobile gambling. Currently, the global online gambling market constitutes 13% of the total global legal gambling market, with this percentage continually increasing.

According to a study by the American Gaming Association, approximately 85 countries have officially permitted online gambling.

Diagram 2. Global Online Gambling Revenue

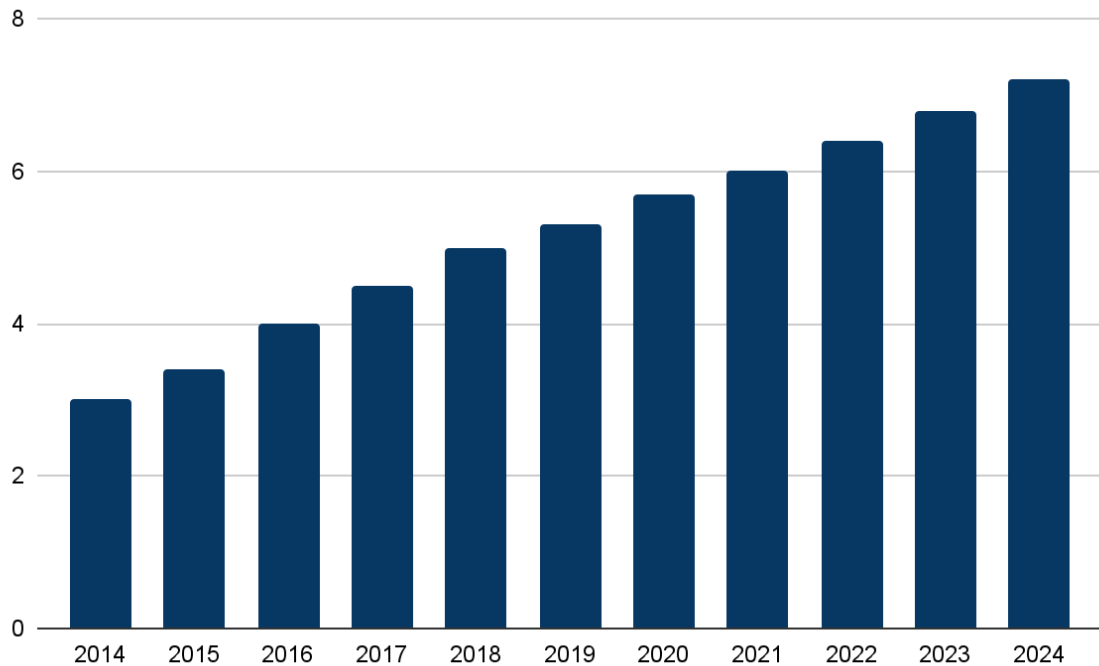


Gross Gaming Revenue (GGR) serves as a crucial financial metric, providing insights into the overall revenue generated by a gambling establishment. This parameter becomes instrumental in monitoring the global trends in the behavior of gambling enthusiasts.

BV1sion conducted a comprehensive overview of the online casino market for the year 2019, offering predictions for the GGR market. In 2019, the GGR reached \$5.3 billion, demonstrating an increase from \$5 billion in the previous year (2018). Projections indicate a continual growth trajectory, with expectations of GGR reaching \$5.7 billion in the current year (2020) and further escalating to \$7.2 billion by the year 2024. These forecasts underscore the ongoing expansion and profitability of the online casino industry.¹

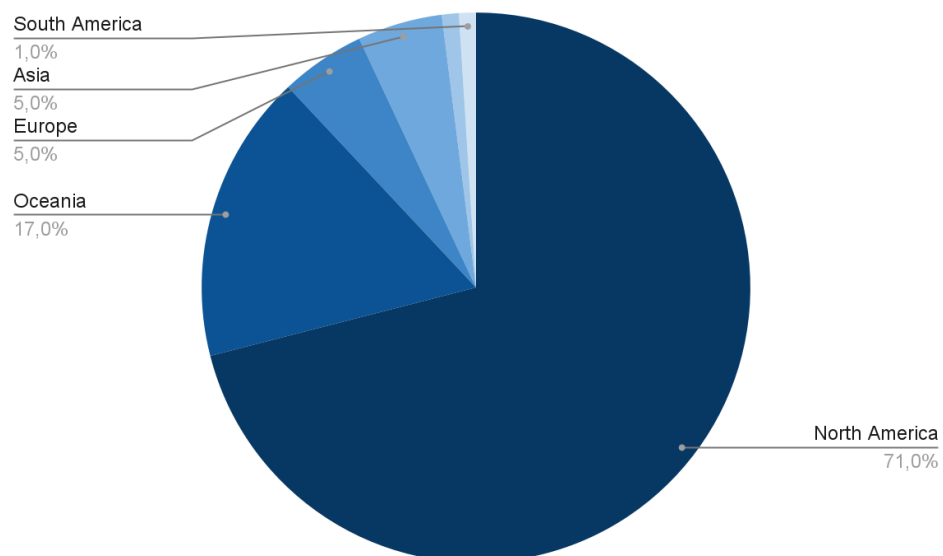
¹ <https://3snet.co/news/2020-forecasts-gambling/>

Diagram 3. Forecasted Gross Gaming Revenue



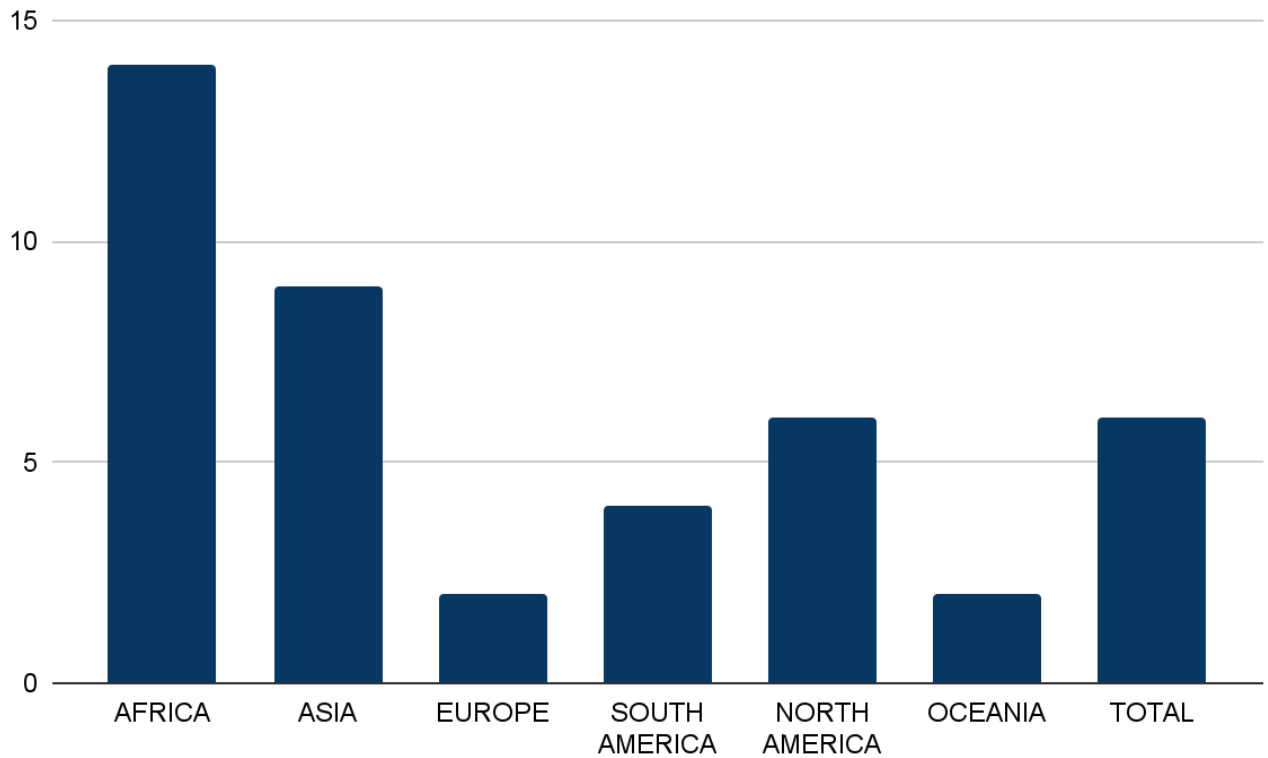
Meanwhile, Oceania, encompassing regions like Fiji, New Zealand, Polynesia, and New Guinea, demonstrated a robust influence, contributing to 17% of the global Gross Gaming Revenue (GGR) in 2019. This notably surpassed the figures for Asia and Europe, standing at 5%.

Diagram 4. Regional Structure of Gambling Income



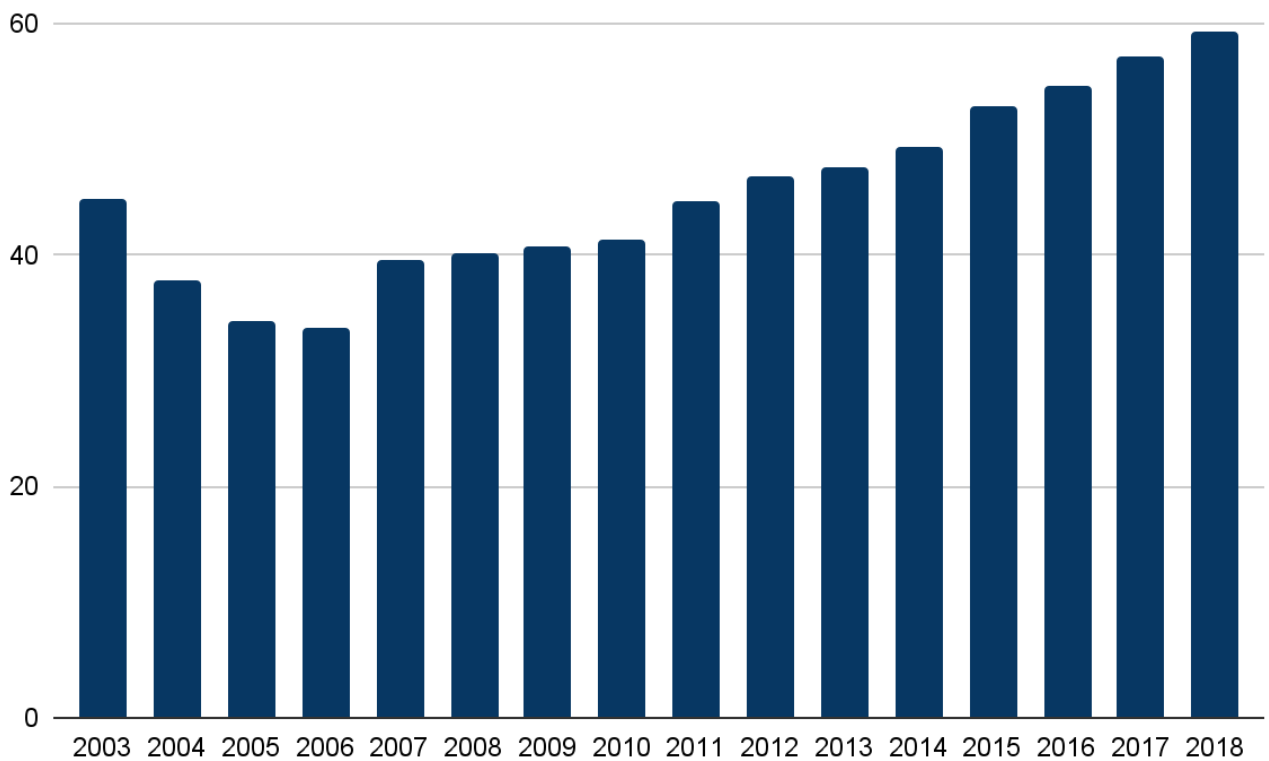
In 2019, Africa exhibited the highest growth rate at 14% Year over Year (YoY), outpacing the relatively modest growth observed in Europe.

Diagram 5. Growth in Gross Income by Region



Discussions have also revolved around streamlining regulations. Online gambling operators within the European Union currently face the obligation of obtaining licenses in multiple countries with distinct licensing requirements. A more unified approach is considered preferable for these operators. The proliferation of compliance requirements leads to redundant infrastructure and costs, contributing to unnecessary administrative burdens on regulators.

Diagram 7. "White Market" Share in Online Gambling Revenue



From 2003 onwards, the market has witnessed an average annual growth rate of 23%. Betting, casino, and poker have emerged as dominant elements in this trajectory. The increasing popularity of online gaming is fueled by factors like the widespread availability of the Internet, the opening of new markets, and the inclusion of diverse player demographics.

8.2. EMERGING PLAYER SEGMENTS

Since 2004, there has been a remarkable increase of over 80% in the number of female Internet users aged 18 to 74, compared to a 60% increase among men. Although online gambling initially appealed mostly to young men, its popularity is now expanding among women and older individuals.

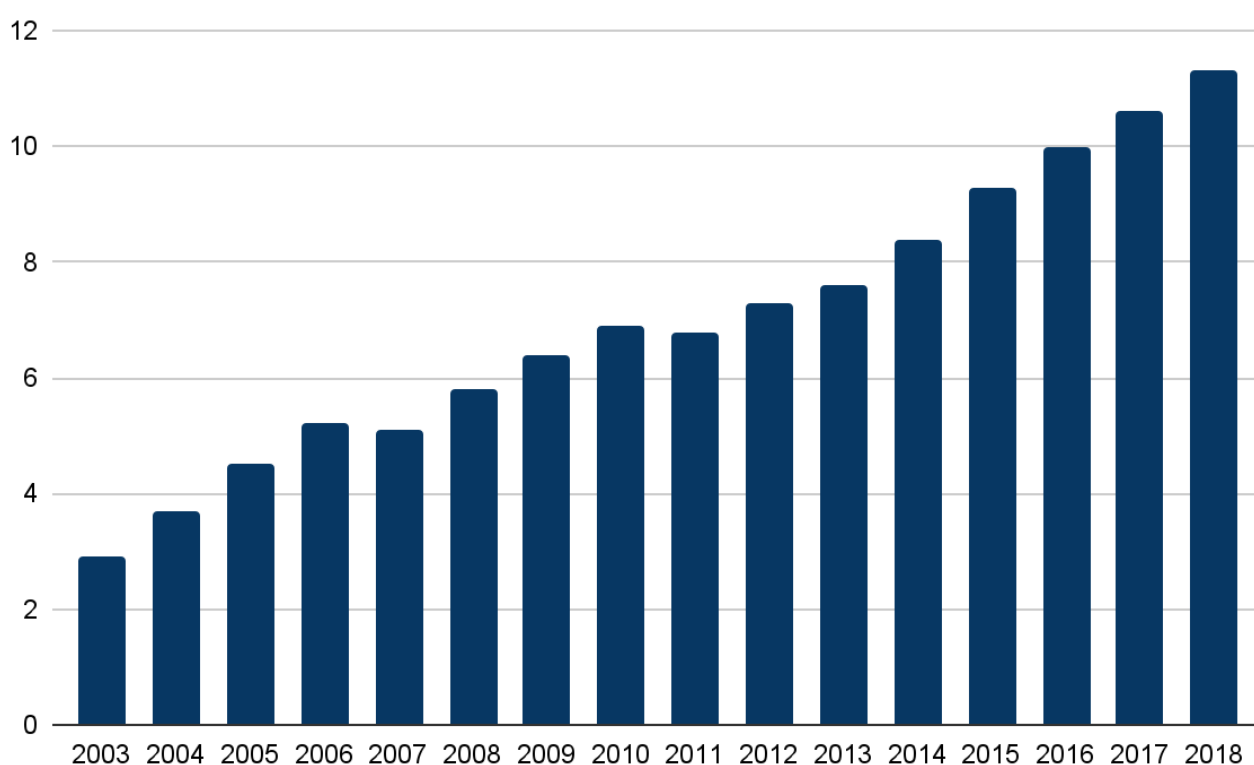
Diverse player demographics have varying preferences and motivations for playing. Some engage in online gambling for entertainment, others for monetary gains, and some for relaxation. It is crucial for operators and developers to stay attuned to these preferences. As the Internet continues to proliferate in society, the once-clear image of the average male

player, aged 25 to 35, is becoming more nuanced.

According to a GP Bullhound study, women constituted 43% of all online gamblers in 2009. While bingo remains their preferred segment, women engage in different gaming directions. Research indicates distinct play behavior patterns between men and women. Women tend to play for longer durations with lower bets, while men play more frequently, bet higher amounts, and have shorter gaming sessions.

The increasing popularity of bingo can be attributed to its social aspect, offering players the opportunity to relax within a social community.

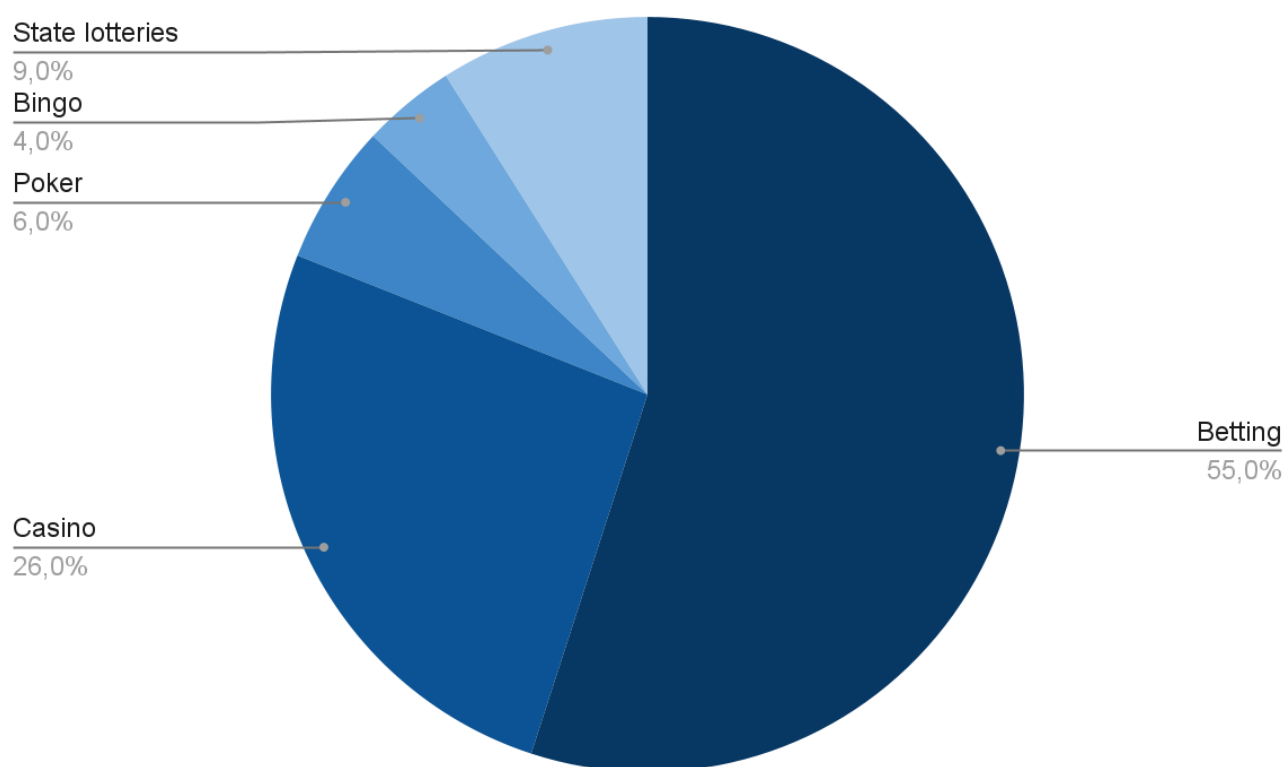
Diagram 6. Online Gambling Income Share from Total Gambling Income



It's noteworthy that the prevalent forms of remote gambling today include traditional casino games, various betting options, and poker variations. The popularity of specific online gambling types is often influenced by gender dynamics. The bingo sector is anticipated to experience substantial growth, primarily due to an increasing interest from women in the iGaming industry.

Despite this, online gambling continues to be more popular among men, with a particular inclination among young males. Women also exhibit a keen interest in playing, but they tend to opt for simpler games like lotteries and slots. These distinctions can be attributed to societal gender roles—betting, casino games, and skill-based games are traditionally associated with male audiences, while women typically lean towards playing for enjoyment rather than seeking an adrenaline rush.

Diagram 9. Online Gaming Revenue by Type



8.3. ONLINE CASINO TRENDS

The year 2020 emerged as remarkably successful for online casinos worldwide, attributed to the global pandemic and increased self-isolation. The entire online gambling market experienced a notable one-third surge in revenue compared to the preceding year. Interestingly, during the 2008 financial crisis, online casinos were minimally impacted, showcasing the resilience of this business model.

Technological advancements are significantly shaping the gaming market, with a particular focus on the burgeoning mobile gambling sector. The competition will be fierce, allowing

only the most exceptional innovations to thrive and enhancing the overall quality of mobile gambling experiences for users.

Underlying technical changes, such as improvements in mobile data transmission speed, may not be overtly noticeable to end-users but will seamlessly occur in the background. Meanwhile, substantial and distinctive enhancements will be readily apparent.

A major breakthrough anticipated is the integration of virtual reality into online gambling. With the evolution of technologies like Microsoft HoloLens, HTC Vive, and Playstation VR, video slots and other online games are poised to offer a more spectacular and immersive experience than ever before.

Virtual Reality Integration

Recent advancements in virtual reality (VR) technology have paved the way for an authentic recreation of the emotions and physiological sensations associated with a real casino experience. Utilizing VR glasses, individuals can now virtually navigate through meticulously reconstructed gambling establishments, engage with dealers, and place bets at various gaming tables.

Key players in the gaming industry, including Microgaming, Novomatic, NetEnt, Lucky VR, Topgame Technology, and others, are actively involved in developing VR games. Notably, Microgaming showcased a virtual roulette game at the ICE Totally Gaming conference last winter, demonstrating the feasibility of virtual reality and highlighting its promising future in the gambling sector.

NetEnt is also actively exploring VR technologies, offering visitors to online gambling exhibitions the opportunity to experience their Jack and the Bean Tree slot machine. The impressive realism of the virtual journey garnered appreciation from both players and industry competitors.

Novomatic, a pioneer in implementing VR technology in online gambling, emphasizes the main advantages of realistic online games, including full immersion in gameplay, heightened emotions surpassing real-life experiences, accessibility from any location with an internet

connection, and captivating and diverse storylines.

The concept of integrating virtual gameplay into social networks has gained traction, and it is anticipated that this idea will soon be realized. The ongoing efforts of these industry leaders underscore the transformative impact of VR on the future of online gambling.

Social Games With Slot Machines

Social gambling is becoming increasingly popular, and a recent review of Microgaming's Castle Builder 2 slot highlights the evolution of gameplay with advancements in spinning reels and betting.

The allure of social gambling lies in its heightened dynamism and addictiveness compared to traditional slot machines. These games enable players to choose a playable character and navigate distinct paths based on the character's traits. Moreover, characters are encouraged to develop by accumulating experience, skills, and achievements, resulting in more favorable conditions for gameplay. In contrast to conventional slot machines, where winning combinations solely yield monetary rewards, in social gambling, they provide essential resources for progressing within the game.

Given the escalating demand for slot machines with social gaming features, numerous developers are actively involved in creating such games. The latter half of 2019 witnessed the release of several innovative products in this category.

Progressive Poker Jackpot With Live Dealers

Many gamblers gravitate towards slot machines featuring a progressive jackpot, viewing it as an opportunity to secure a substantial cash prize. This trend is gradually extending to poker, with Evolution Gaming leading the way by introducing the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em!

With an initial jackpot size of 1,000,000 euros, the cumulative nature of the prize means it grows in tandem with player activity. Todd Haushalter, Evolution Gaming's Product Director, highlighted the potential for the jackpot to soar to an incredible €30,000,000. The prospect of playing poker with such a monumental prize at stake undoubtedly adds an extra

layer of excitement. The game also features a second-level jackpot with lower fixed payouts.

Considering the appeal of progressive jackpots, other developers in the live online casino games sphere are contemplating the inclusion of similar enticing features for players.

Live Games

Live dealer games have experienced a surge in popularity over the past year, marking just the beginning of their successful trajectory. Anticipated for the upcoming year is a further boost in the popularity of live games, particularly in tandem with virtual reality (VR) technology. Developers have ambitious plans to craft even more realistic games, enhancing functionality, and are set to establish new studios for live broadcasting of games in real time. This convergence of live gaming and VR promises an immersive and dynamic gaming experience for enthusiasts.

Skill Games

Contemporary players increasingly value not only luck but also their individual skills in gaming. This inclination has spurred numerous providers to develop platforms that feature strategy games, requiring players to apply specific skills. The appeal of such skill games is on the rise, hinting at their potential for substantial popularity in the near future.

Gamification

This concept involves the integration of game dynamics and thinking into marketing strategies to engage audiences and address marketing challenges. Gamification is poised to emerge as a novel trend in the gambling industry, offering new missions, competitions, bonus programs, and rewards to entice and engage gamblers.

Entertainment Content

Online casino operators are dedicated to retaining users on their platforms, employing various strategies. In addition to chat features, they now integrate special sections offering valuable non-game content such as movies, TV series, music videos, and TV shows. Furthermore, online casinos will provide plot details for many slots to enhance the overall

user experience.

Big Data Integration

A notable trend for the current year involves the incorporation of Big Data technology in the online gambling industry. This technology facilitates the collection and storage of extensive data, proving to be essential for the industry's progress. With the capacity to analyze and organize vast datasets, games will efficiently tailor themselves to the interests and requirements of the target audience.

Mergers And Acquisitions

Experts predict such rapid growth in the gambling market that its volume is expected to surpass \$60 billion by 2024. Therefore, in 2021, gambling companies are anticipated to expand and boost their capital.

Messenger Platforms

The ever-evolving opportunities presented by mobile internet continue to captivate players. While social networks and traditional phone communication were once in trend, convenient instant messengers have now taken the lead.

Slotegrator has taken a keen interest in this trend and has developed its own Telegram casino. The integration of the gaming platform into the messenger enables users to indulge in gambling on their smartphones whenever they desire.

Individual Slots

Crafting custom slots tailored to specific requests is set to become a prominent offering among top online casino services. The creation of unique slots will empower operators to secure a competitive edge in the market and enhance brand recognition to the fullest extent.

Cryptocurrency Integration

Cryptocurrencies are renowned for their significant advantages, such as anonymity,

convenience, minimal fees, and the absence of legal prohibitions. Due to these features, they are expected to emerge as one of the most popular means of payment in the realm of online gambling. Alongside bitcoin, other currencies like litecoin, dogecoin, ethereum, ripple, monero, zcash, and more are predicted to gain traction.

Nevertheless, the current use of cryptocurrencies by customers is causing concerns, as it is often associated with the gray financial market and potential legal issues. Therefore, at the initial stage, it is not advisable to engage in settlements with clients using cryptocurrency.

Security Landscape In Online Gambling

Embracing new technologies necessitates exploring innovative solutions to address security concerns. The prevalence of Distributed Denial of Service (DDoS) attacks has increased in recent times, causing significant damage to online bookmaker sites. Even major operators, such as Britain's William Hill, known for their meticulous attention to security, fell victim to hacker provocations. The services of this operator experienced instability last fall, resulting in significant losses despite generating revenue of 5 million per day.

In 2019, a substantial portion of gambling operators' investments was allocated towards enhancing security measures.

Increasing Female Participation

The trend of a rising number of female gamblers in online casinos was identified as early as 2015, and it continues to gain momentum. Research indicates that women prefer to engage in gambling activities on personal devices and in private settings. This offers more flexibility and avoids potential ridicule from male players.

The most active female gamblers are under the age of 35, although older women are also open to occasionally trying their luck on slot machines, roulette wheels, or card games.

Specialized online casinos designed for women have already started to emerge, with some operators launching advertising campaigns specifically targeting female players.

8.4. MARKET PROJECTIONS

Research company Juniper projects that the turnover in the online gambling segment will reach \$950 billion by 2021, and the trend is expected to continue its growth. This projection was made even before the pandemic. The study suggests a shift toward online gambling, particularly through mobile applications, with a constant increase in bets made via mobile phones.

Despite a general trend toward the regulation of national gambling markets, a few countries are moving toward a complete ban on online and mobile gambling. The global online gambling market already represents over 13% of the total global legal gambling market, with expectations for continuous growth.

Niche revenue in online gambling is anticipated to reach \$65 billion by 2021, and the niche itself is expected to undergo changes and reforms based on market dynamics.

Technological advancements in the gambling industry are actively shaping the landscape, including classic slots, video slots, and virtual reality (VR) gambling. The influx of a younger generation of players is driving companies to meet evolving demands, leading to developments such as esports betting and skill-based games.

The Asian market, being the largest globally in terms of volume, continues to witness growing demand for gambling. In 2019, there was a trend toward softening regulations, with an increasing number of countries legalizing online betting and casinos. This trend has extended into 2020, presenting new opportunities for the industry. In Africa, the online gambling market is in a phase of rapid development and growth. The main challenge lies in the lack of regulation for casino activities in most countries, although they are not explicitly prohibited at the legislative level. The full potential of this market is expected to unfold over time.

9. FINANCIAL OUTLOOK

9.1. INVESTMENT STRATEGY

Investment Structure And Milestones

The project necessitates a total investment of 237,9 thousand euros. The allocated funds will be strategically distributed across various areas of financing, including:

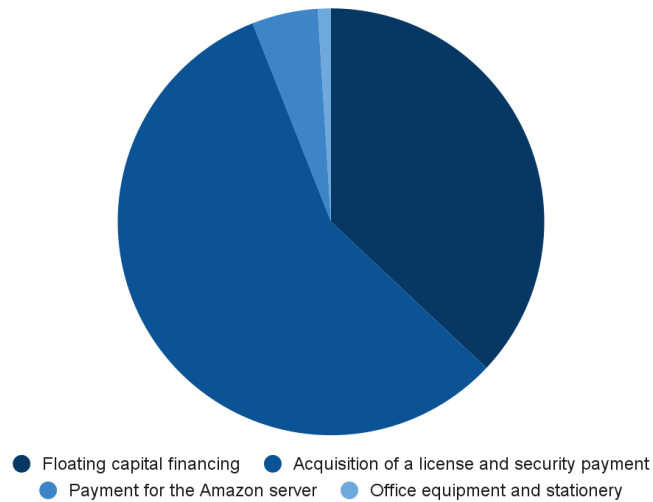
- acquisition of a license and security payment;
- payment for the server "Amazon";
- purchase of office equipment, stationery;
- floating capital financing.

Table 5. Investment Budget Breakdown

No	Name	Value
1	Acquisition of a license and security payment	142 655
2	Payment for the Amazon server	11 649
3	Office equipment and stationery	2 151
4	Floating capital financing	81 478
Invested capital total (actual need for cash)		237 933

The predominant portion of investment expenditures is attributed to obtaining a license and the security payment, constituting approximately 57%.

Diagram 7. Investment Cost Structure



The overall project implementation span is 36 months (3 years).

The investment period, leading up to the project launch, spans 0.3 years. Throughout the project implementation, the following steps must be undertaken:

- first stage: acquisition of a license and security payment;
- second stage: payment for the Amazon server;
- third stage: purchase of office equipment, stationery;

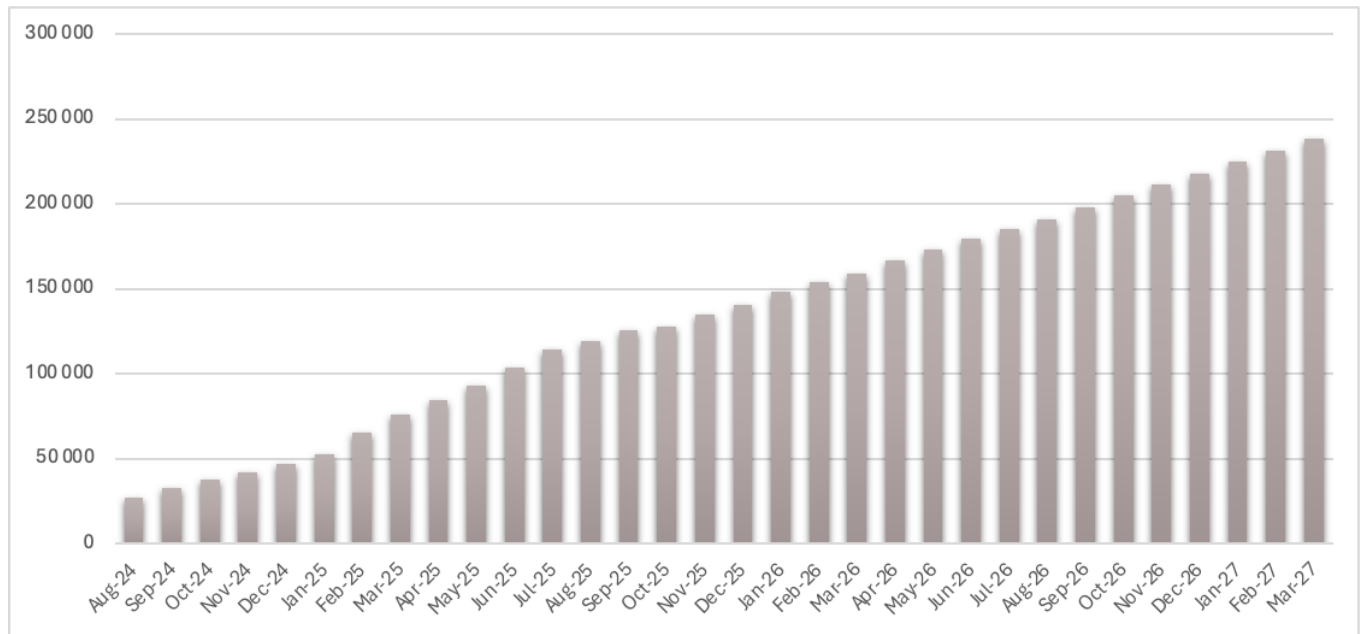
A phased work schedule with a financing schedule is presented in the table below

9.2. STRATEGY FOR REVENUE GENERATION

Revenue Streams

In the context of this project, the goal is to generate revenue by offering online casino services.

Diagram 8. Sales and Direct Costs Dynamics



The overall proceeds for the project duration (3 years) is projected to reach 4,284.8 thousand euros. A comprehensive plan outlining income generation and the financing of direct costs is detailed in the table below.

Diagram 9. Dynamics of income and net profit in Euros

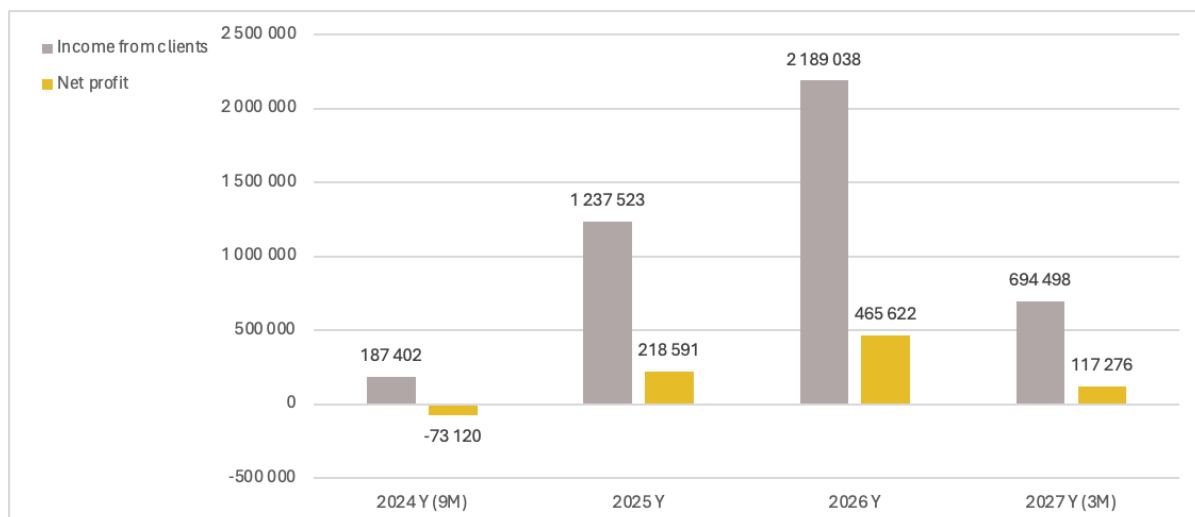


Table 6. Income and Direct Cost Projection

		Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Physical indicators						
Total number of clients		107 862	4 592	30 795	53 439	19 036
Number of new clients		70 244	4 274	21 617	33 844	10 509
Number of current clients		37 618	319	9 178	19 595	8 527
Proceeds		4 284 809	182 433	1 223 314	2 122 865	756 197
Income from clients		4 284 809	182 433	1 223 314	2 122 865	756 197
Direct costs		2 603 829	173 543	671 233	1 312 999	446 054
Advertising costs		1 181 618	86 415	365 988	557 754	171 461
Additional staff costs		975 000	0	142 500	592 500	240 000

Salary		304 000	47 500	114 000	114 000	28 500
License fees		143 211	39 628	48 745	48 745	6 093
Indirect costs		486 347	56 617	177 880	177 880	73 970
Accounting		119 680	18 700	44 880	44 880	11 220
Office equipment maintenance		90 667	14 167	34 000	34 000	8 500
Hosting		124 000	0	42 000	42 000	40 000
Office rent		42 667	6 667	16 000	16 000	4 000
Legal support		109 333	17 083	41 000	41 000	10 250

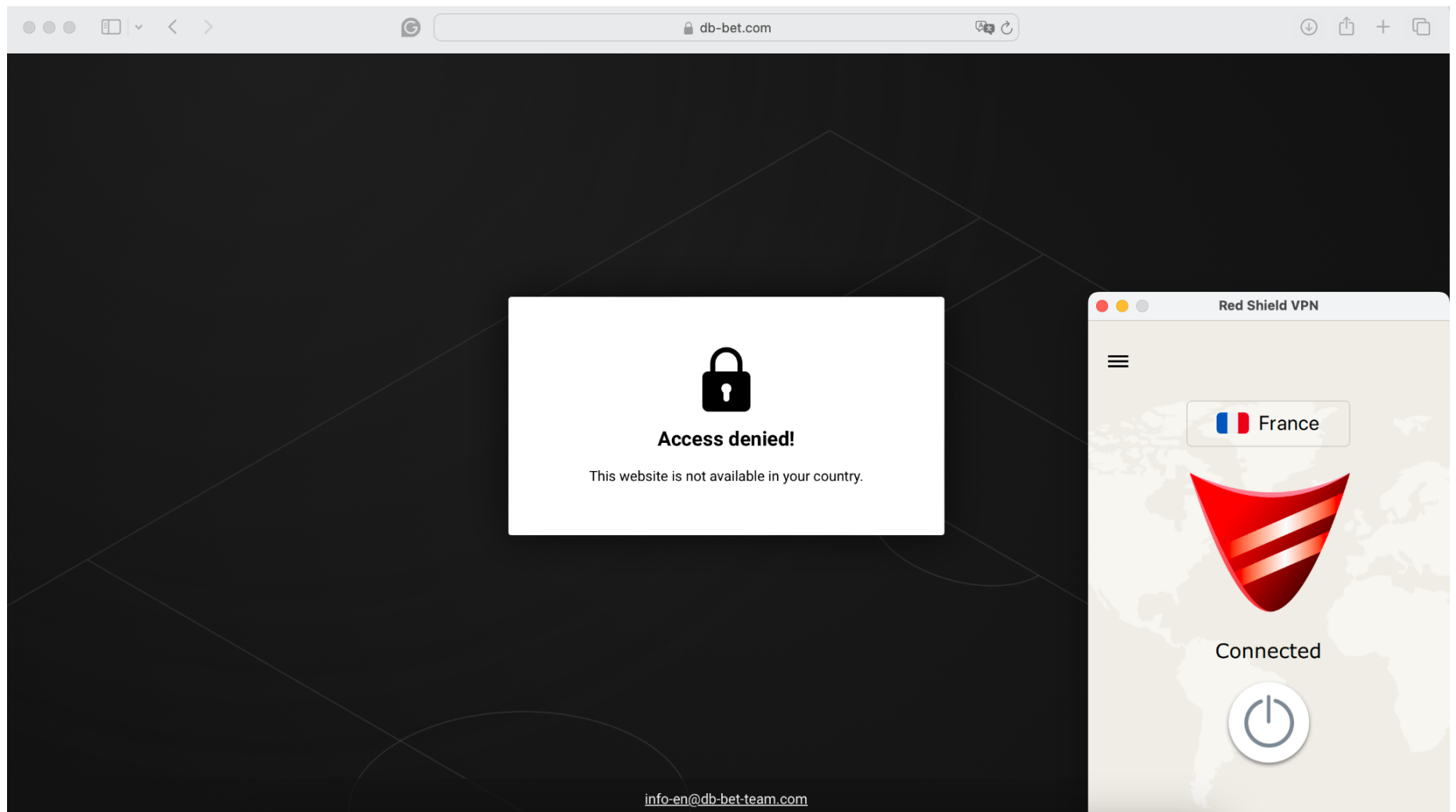
9.3. MARKETING PLAN

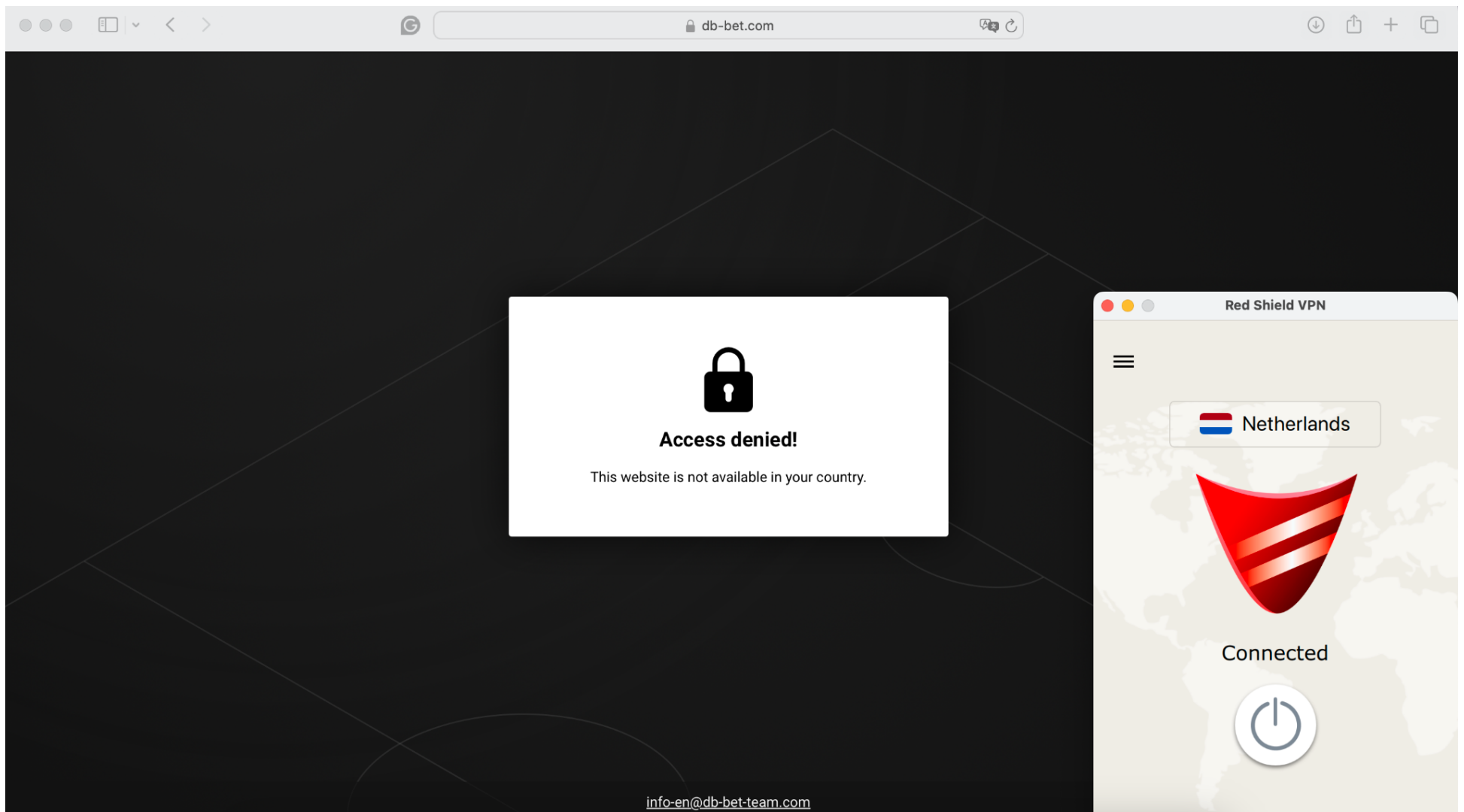
9.3.1. Executive Overview:

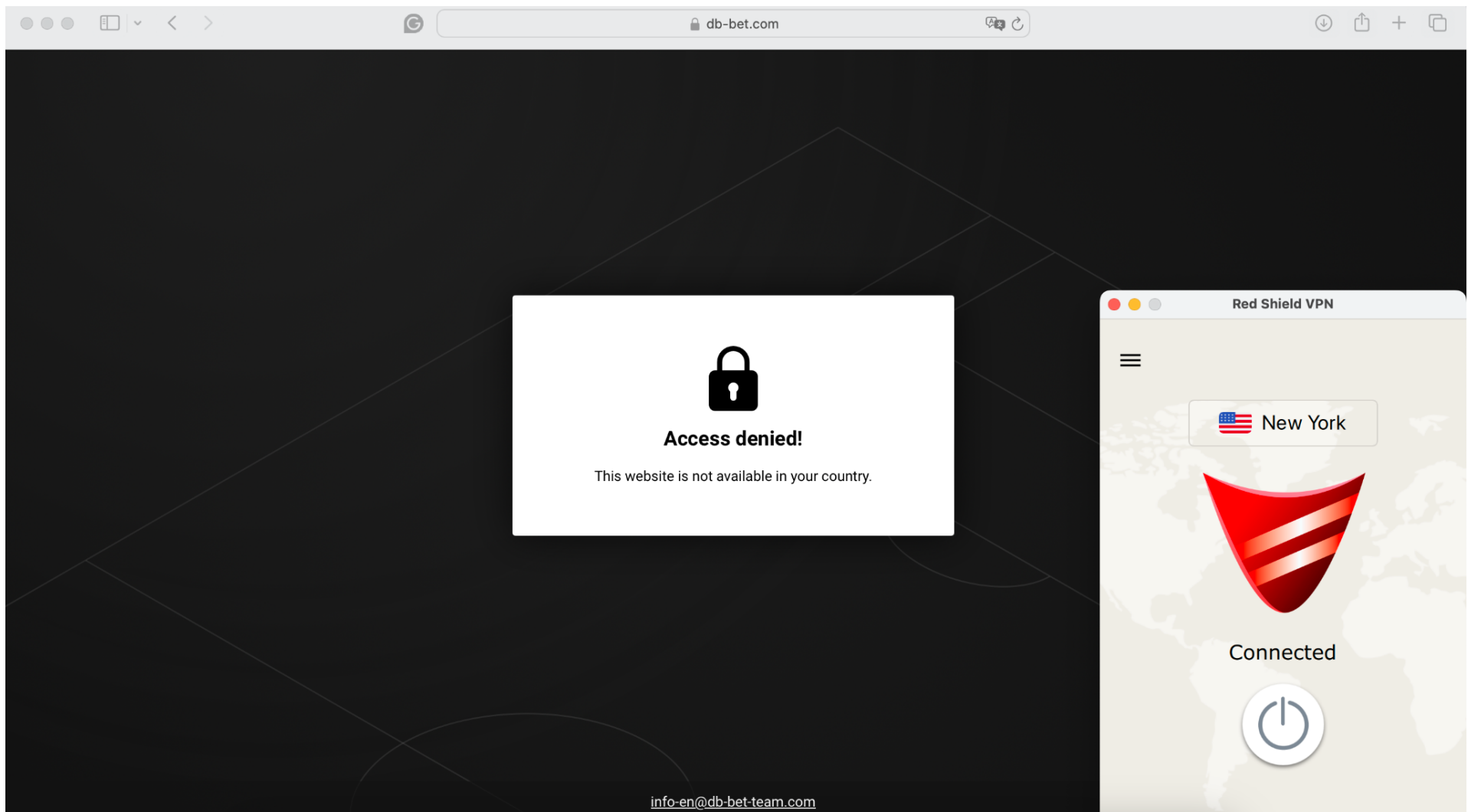
DB-Bet caters to individuals aged 18 and above, offering an engaging and responsible gaming experience. This comprehensive marketing plan outlines strategies to build brand resonance, captivate the target audience, and boost sales through innovative and ethically-driven initiatives.

9.3.2. Target Audience:

- Demographics: Primarily adults aged 18 and older, with a focus on the 22-35 age group.
- Geographics: India, Indonesia, Canada (except Ontario), Finland.
- Geoblock: USA, France, The Netherlands, The Dutch Caribbean Island: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.







- Psychographics: Attracting tech-savvy enthusiasts, gaming aficionados, and those valuing a commitment to responsible gaming principles.

9.3.3. Marketing Strategies:

a. Brand Elevation:

- Craft a compelling brand narrative emphasizing QuantumPlay Connect's commitment to reshaping the gaming landscape through innovation, excitement, and responsible gaming.
- Position QuantumPlay Connect as a hub for groundbreaking technology, diverse gaming experiences, and a thriving global gaming community.

b. Digital Realm Mastery:

- Enhance the website for an intuitive user experience, ensuring seamless navigation across diverse platforms.
- Leverage social media platforms for targeted advertising, captivating content distribution, and community-building initiatives.

c. Content Odyssey:

- Implement a content strategy with engaging blog posts, interactive tutorials, and exclusive insights from developers to foster community and sustained player engagement.
- Forge partnerships with gaming influencers and content creators to amplify QuantumPlay Connect's reach.

d. Responsible Gaming Advocacy:

- Integrate responsible gaming messages seamlessly within marketing materials and gaming interfaces.
- Incorporate features like session duration reminders, spending limits, and voluntary self-exclusion tools to empower players.

9.3.4. Sales Journey:

a. Launch Excitement:

- Introduce captivating launch promotions and exclusive bonuses to attract early adopters.
- Employ strategically timed limited-time offers to create urgency and anticipation.

b. Strategic Alliances:

- Establish strategic alliances with gaming affiliates, influencers, and synergistic brands to enhance visibility and broaden the audience.

- Launch an enticing affiliate program to motivate third-party promotion.

c. Data-Driven Refinement:

- Use analytics tools to gain insights into player behavior, preferences, and the effectiveness of acquisition channels.
- Implement data-driven optimizations in marketing strategies, targeting precision, and overall user experience.

d. Customer Harmony:

- Deploy an agile Customer Relationship Management (CRM) system to personalize communications, promotions, and offers based on individual player preferences.
- Utilize targeted email marketing campaigns for personalized promotions and real-time updates.

9.3.5. Evaluation Metrics:

- Continuously monitor key metrics, including customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.
- Conduct periodic reviews and make agile adjustments based on performance analytics.

9.4. PROJECT EXPENDITURES

The following types of costs were identified in this project:

- fixed costs;
- variable costs.

Fixed Costs

Staffing and salary

As per the staffing table, the anticipated workforce comprises 5 individuals, each with a standard workload and an average monthly salary of 1500 euros.

Remuneration for all company employees is intended to be based on hourly wages initially. Subsequently, a system of financial incentives, including bonuses, is planned for development.

Table 7. Staffing Table with Salaries, Euro

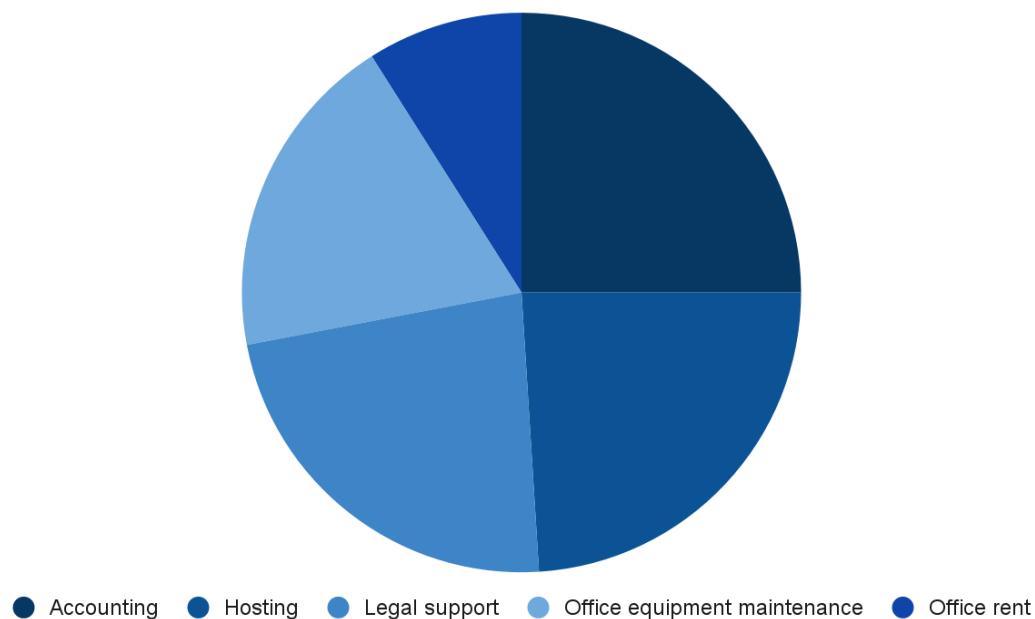
№	Position	Number of people	Salary	Total per month
1	Director	1	2 100	2 100
2	Site developer	1	1 500	1 500
3	Designer	1	1 500	1 500
4	Advertising specialist	1	1 600	1 600
5	Employee	2	1 400	2 800
	Total	6		9 500

An additional 5 staff members will be hired for every 6,000 new clients. The associated cost of additional personnel is reflected in the variable costs.

Table 8. Fixed Costs, Euro

№	Item of expense	Total per year
1	Accounting	44 880
2	Office equipment maintenance	34 000
3	Hosting	42 000
3	Office rent	16 000
4	Legal support	41 000
	Total	177 880

Diagram 12. Structure of Fixed Costs



Variable Costs

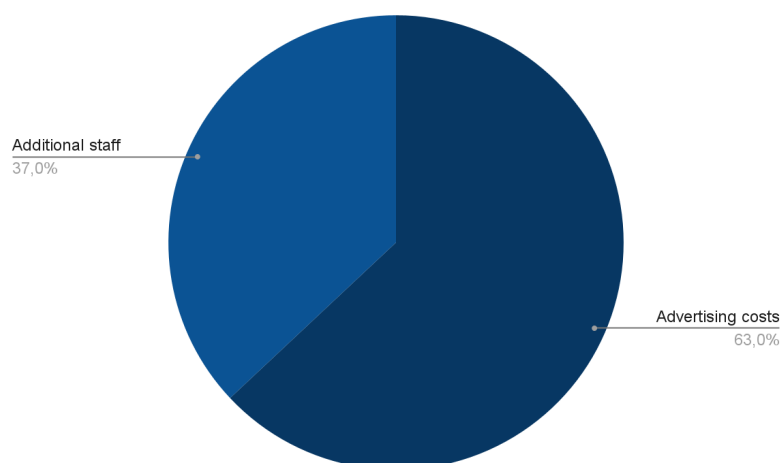
Direct production costs

A complete list of current variable costs is presented in the table below.

Table 9. Variable Costs, Euro

№	Item of expense	Per unit, total	Calculation base
1	Advertising costs	16	for 1 client
2	Additional staff costs	1 500	for 1 person

Diagram 10. Structure of Variable Costs



Taxes

Taxes of the company as a tax subject

The total amount of accrued and paid taxes for the project period will be including:

Profit tax – 266.3 thousand euros.

9.5. FINANCIAL STRATEGY

Attraction of Investment Resources Conditions

Financial Resource Requirements and Financing Structure

The financial resource requirement for the project is 237.9 thousand euros.

The financing of this project is planned to be carried out through investment from an external investor. The investor's capital contribution will amount to 237.9 thousand euros (100%).

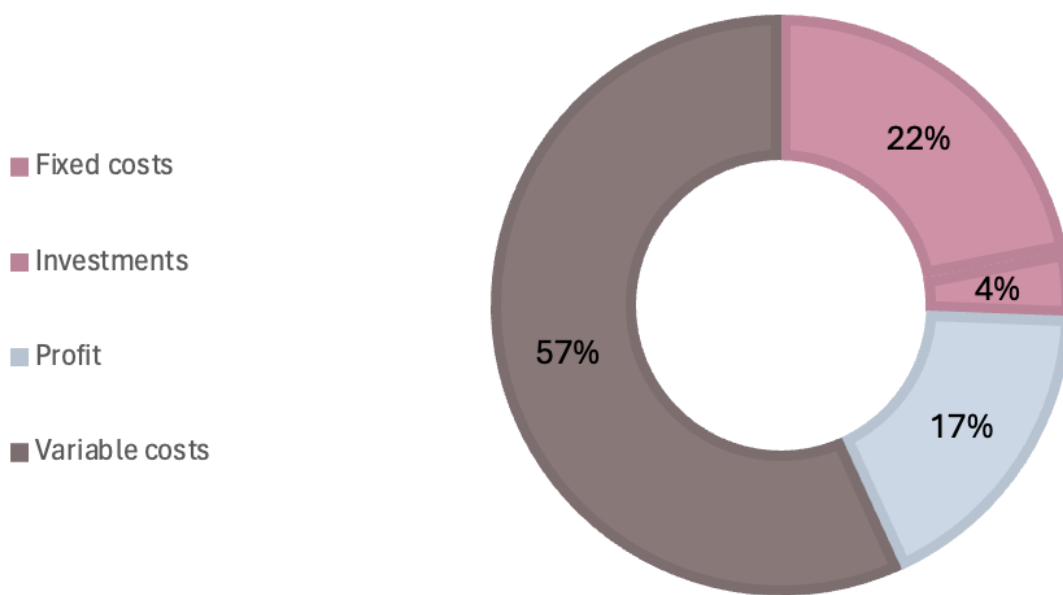
The total amount of payments to the investor over the project's duration is projected to be 330.5 thousand euros.

Cash Flow Plan Indicators

The negative cash flow comprises the following key components:

- Variable costs: Advertising costs 16 for 1 client; Additional staff costs 1500 for 1 person
- Fixed costs: 177.8 thousand euros (EUR)
- Taxes: 266.3 thousand euros (EUR)

Diagram 13. Distribution Structure of Sales Proceeds to Costs and Profit



Financial Performance Assessment

The project has a calculation horizon of 36 months (3 years), with an investment period lasting 3 months (0.3 years) until the project launch. The working period, post-launch, spans 33 months (2.7 years).

Financial indicators were calculated using a discount rate. Over the entire project implementation, total sales proceeds are projected to reach 4,284.8 thousand euros. The total cost for the project period is estimated at 3,351.4 thousand euros.

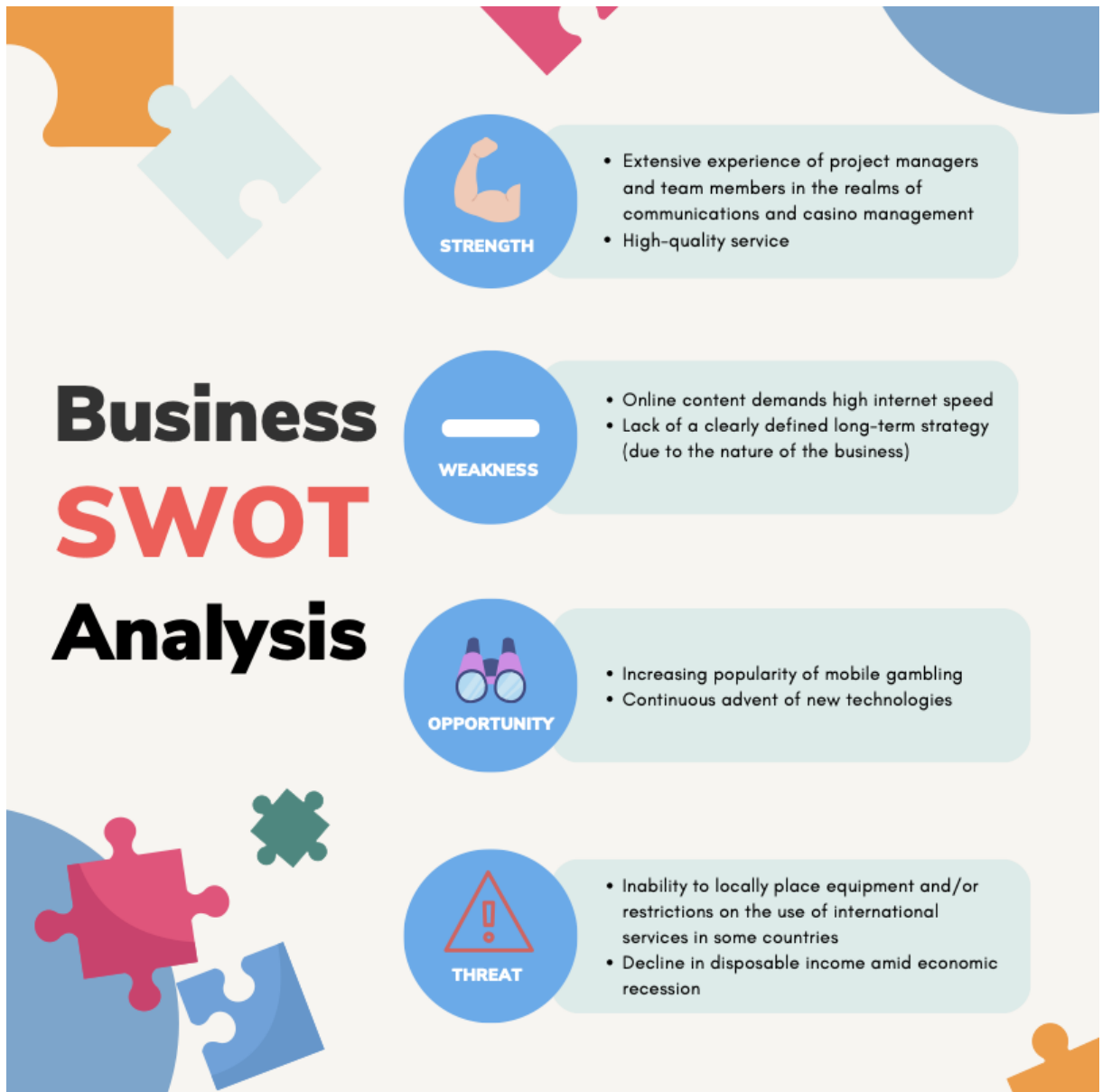
Upon completion of the project, the net profit is expected to reach 844.7 thousand euros.

Table 13. Financial and Investment Indicators

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	156 455
Sum of proceeds (SP), EUR	4 284 809
Net average operational receipts per month (NAOR), EUR	25 926
Net profit for the project period, EUR	844 796
Average profitability for the project period (net profit to proceeds	19,72%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	360 714
Average Rate of Return of investments (ARR)	12,26%
Return on investment (ROI)	440%
Profitability index (PI)	2,3
Internal rate of return (IRR)	94,77%
Pay back period of the project in whole (PBP), incl. financing scheme	17 months
	1,42 years

SWOT Analysis

Table 14. SWOT Analysis



10. ASSUMPTIONS AND PARAMETERS

10.1. ASSUMPTIONS

General Assumptions

The computation is performed using fixed prices. The assumption is that, going forward, the increase in income and expenses will be proportionate and will affect all market participants equally.

The residual value of the project's assets at the conclusion of the billing period is not taken into account in the comprehensive analysis of the project's indicators. This omission is based on the expectation that the enterprise will not be closed, participants will not exit, and assets will not be sold.

10.2. PROJECT PARAMETERS

Planning Horizon and Calculation Step

A planning duration of 36 months (3 years) was selected to facilitate an analysis of project payback under varying initial parameters (sensitivity analysis). This timeframe also encapsulates the period required for the recovery of the majority or all of the invested funds (investments).

Concurrently, the project's investment phase, leading up to its launch, spans 3 months (0.3 years). Subsequently, the operational phase of the project, commencing from the launch date, extends over 33 months (2.7 years).