

Business Plan of JMS Investment Group N.V.

1. The Company

JMS Investment Group N.V. (“JMS”) is a company incorporated in Curacao.

2. Purpose

JMS exists to provide an online sportsbook and casino and will target a small group of jurisdictions. JMS has an existing licence from Curacao e-Gaming and is now seeking to transition to a licence from the Curacao Gaming Control Board.

3. Regulatory and Compliance Controls

JMS will not accept customers from the USA, UK, France, Netherlands Antilles and others jurisdictions with a domestic gambling licence regime. JMS will not accept customers from high risk jurisdictions as defined by the Financial Action Task Force (FATF), including without limitation, North Korea, Iran, and Syria. JMS will also not accept customers from Russia or Russian-occupied territories of Ukraine.

JMS will not accept minors (under 18 years of age) as customers. JMS will adhere to all regulatory requirements of its licence in Curacao.

4. Owner

The ultimate beneficial owner of JMS is Mr. Cem Sisman who directly owns 100% of the issued shares in the company.

5. Key Individuals

The key individuals running the business are:

- Cem Sisman – CEO and Technology
- Alper Soylemez - Operations and Compliance

6. Company Ownership Structure

Please see “JMS - Group Structure Chart – April 2024”

7. Company Control Structure

As Mr. Cem Sisman is the sole UBO of JMS, Mr. Sisman has control of the company.

8. Service Providers

JMS will receive payments from a payment provider called Jeton Wallet.

JMS shall hold accounts with an electronic money institution (EMI) called Valletta Pay which shall be used hold customer balances.

9. Marketing

JMS will market its services primarily through existing contacts of high volume customers,

as well as through some online SEO. JMS will not carry out any major advertising campaigns – e.g. TV, radio, print, billboards advertisements. JMS will target customers who wish their gambling to remain private and so this form of brash marketing is off-putting to those customers who shall be key to the success of the business.

10. Finances

(1) Investment schematic showing type of investments, projected costs, explanation and the source of wealth

JMS is profit-making and shall use its existing revenues to continue the operations of the gambling website and pay for the costs of licensing with the regulator in Curacao.

(2) Financial estimation for the first, second and third year,

2023-2024	7-10 Million Euros
2024/2025	10- 15 Million Euros
2025/2026	15-20 Million Euros

(3) Description of money flows including billing agents used/payment processors

Customers deposit funds into JMS via Jeton Wallet, and customer winning are paid from those payment providers and then any remaining funds (where customer losses exceed customer winnings) are settled into JMS's bank account. Funds shall be used to pay suppliers such as casino-game providers, staff costs, contractors and other operational costs.