

Paloma Media B.V. Confidential Business Plan



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1. Introduction

This confidential three-year business plan serves to support Paloma Media B.V.'s (the Company) application for an Online Gambling License from the Gaming Control Board of Curaçao. This document contains private information that may not be divulged or discussed with anyone outside the aforementioned organizations without written consent from Paloma Media B.V.. The information contained herein shall be limitedly and exclusively used for the purpose it is being provided, that is, the issuance of a remote gaming license.

2. Company Overview

Paloma Media B.V., incorporated in Curaçao, seeks to establish a business-to-customer (B2C) remote gambling operation through its platform, www.thunderpick.com. The website offers a diverse array of games of chance and sports betting, delivering premium online gaming experience marked by aesthetic appeal and user-friendly interfaces on both desktop and mobile devices.

2.1. Background

Paloma Media B.V. was formed to capitalize on the growing demand for online gaming services, leveraging the combined expertise of its management team. The goal is to set up a new brand that would be introduced to the online gambling market comprising a team of industry professionals with wide experience in product development, back and front-end development, marketing and online and land-based gambling.

The ultimate beneficial owner, Mr. Andriy Pakholok, possesses a strong track record in the online gaming sector with prior successful ventures in related businesses.

2.2. Proprietary Intellectual Property

We will strive to offer innovative next generation of products and ensure we maintain the platform up to date with the latest casino and live casino games by constantly following up with the latest developments in the Gaming Industry.

We aspire to promote a thrilling gambling experience consequently our user experience will be a priority. We will look to expand our team to employ experienced individuals who are enthusiastic about the industry and that are in line with our vision.

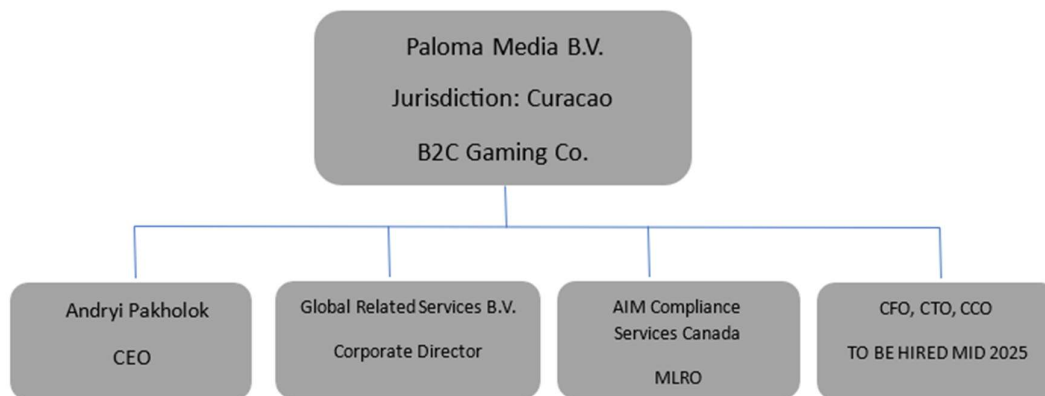
Paloma Media B.V. combines proprietary technology and strategic partnerships to create a competitive edge. Unique features include a high-performing eCommerce solution tailored for player management and reporting, alongside exclusive contracts with leading game content providers.

Due to the competitive nature of the industry the management have outlined the concepts for new products/features which do not currently exist in the market and we will seek to maintain a Brand that is fresh based on the current trends in the industry.

Our extensive experience and knowledge of our target markets puts us ahead of most of our competitors as we know the market well and we have allocated sufficient funding to promote our product.

3. Company Management Structure

The team behind Paloma Media B.V. has been operating in the respective industries for several years with leading operators in the market and brings a wealth of experience and expertise to this venture.



Where positions remain unfilled, the intended recruitment process will be initiated within three (3) months of licensing approval, with candidates evaluated based on industry experience and qualifications.

4. Financial Projections

We have made a financial plan to accurately report our costs. The growth is an estimate and depends on the minimum fees and GGR % of the games. As the Company is already operational, the projections are based on our known expenses.

	2025	2026	2027
Administrative & General Expenses	USD 150,000.00	USD 165,000.00	USD 170,000.00
Marketing	USD 60,000.00	USD 65,000.00	USD 70,000.00
IT and other operating expenses	USD 30,000.00	USD 33,000.00	USD 37,000.00
Total Expenses	USD 240,000.00	USD 263,000.00	USD 277,000.00

Total Gross Profit from Gaming	USD 375,000.00	USD 415,000.00	USD 430,000.00
Net Profit	USD 135,000.00	USD 152,000.00	USD 153,000.00

5. Business Growth Strategy

5.1. Intended Funding

Funding will be secured through an intercompany loan agreement with the UBO.

5.2. Market Growth and Sustainability Plans

In Year 1, Paloma Media B.V. will focus on establishing its presence in Curaçao. Years 2 and 3 will emphasize market expansion through:

- Increasing jurisdictional focus
- Introducing additional product verticals
- Launching additional brands

Further, the Company's marketing strategy will focus on the following:

- We will reach the large databases that we will supply by means of communication tools such as SMS, WhatsApp, Telegram, E-mail, and make our name heard. Our call center team will actively deal with feedback and questions continuously.
- We will use social media effectively, create social media accounts and Telegram accounts that many people follow, and create a large audience of followers with various promos.
- We will appear effectively in places such as forums websites with active player groups in it (previously productive platforms).
- We will agree with the publishers that broadcast casino games from channels such as YouTube, Discord to record videos of the games performed in our site. We will agree with them with a payment fee or as an affiliate.
- We will do SEO work on the words searched by this group of players effectively and this will continue continuously. At the same time, we will put our backlinks on the created sites.
- We will try to agree with the affiliates that can bring customers to our sites with our own terms.
- We will give the best service in the market with our experienced staff based on 100% customer satisfaction.

5.3. Overview of Excluded Markets

Excluded markets include but are not limited to:

- Aruba
- Australia
- Austria
- Belgium

- Bonaire
- Check Republic
- Curacao
- France
- Germany
- Greece
- Lithuania
- Saba
- Sint Eustatius
- Spain
- The Netherlands
- United States of America

6. Key Suppliers and Material Dependencies

6.1. Key Suppliers Overview

Supplier Name	Services
Markor Technology	Offers B2C technology solutions and services.
Lucid Media Marketing	Offers B2B vendor management services.

6.2. Risk Management

Paloma Media B.V. will manage supplier risks through performance checks, ongoing collaboration, and redundancy plans to ensure uninterrupted service.

7. Risk Evaluation and Management

Paloma Media B.V. adopts a Risk-Based Approach (RBA) to effectively address Money Laundering and Terrorist Financing in the context of online casinos. Guided by the recommendations set forth by the Financial Action Task Force (FATF), Paloma Media B.V. is committed to fostering a shared understanding of the RBA, which includes outlining key principles for its implementation and promoting best practices tailored to various risk factors.

Paloma Media B.V. employs a rules-based framework to evaluate whether a risk-based strategy should be implemented, taking into consideration specific risks associated with money laundering and terrorist financing, as well as the size and nature of the activities in the jurisdictions where the company operates. This

assessment also encompasses the location of the customer base and the origin of its customers.

The company pays particular attention to jurisdictions that have enacted anti-money laundering and counter-terrorism financing (AML/CFT) measures, while also recognizing that some designated jurisdictions may lack the necessary experience to effectively implement a robust risk-based approach.

A fundamental aspect of Paloma Media B.V.'s strategy is to assess each country's capacity to identify and comprehend the money laundering and terrorist financing risks they face. This enables the company to allocate resources effectively, focusing on areas with the highest risk levels.

Paloma Media B.V. is dedicated to continuously enhancing its AML/CFT measures to align with the identified risk levels across all relevant domains of its operations, thereby reinforcing its commitment to the risk-based approach (RBA).

8. Legal and Governance Framework

The company is managed by a single statutory director – Global Related Services B.V., who is crucial in providing guidance and ensuring that all operational aspects comply with relevant regulations.

The Compliance Officer is responsible for overseeing the company's compliance with regulatory standards and ensuring that all applicable regulations are thoroughly followed.

The Compliance Officer and the Director work together to create and implement all necessary policies and procedures, guaranteeing that the company operates in full alignment with Curacao's regulatory framework. Matters reserved to board/UBOs include commercial/marketing strategies and large-scaled campaigns, matters concerning financial strategies and day-to-day operational management decisions.

The Compliance Officer keeps up-to-date with new regulations and works closely with the Director to conduct regular meetings, ensuring the company remains informed and adaptable to changing regulatory conditions in Curacao.

9. Target KPIs and Business Objectives

Key performance indicators (KPIs) include:

- Player retention rates
- Gross gaming revenue (GGR) targets
- Return on investment (ROI)

The long-term objective is to establish Paloma Media B.V. as a reputable online gambling provider, recognized for its diverse gaming offerings.

10. Policies and Procedures

The company formulates its policies and procedures internally, collaborating closely with the Legal and Compliance departments to ensure a thorough strategy that meets legal and regulatory standards.

The Gaming Control Board (GCB) is promptly notified of any changes to maintain compliance with regulatory obligations.

During the creation of policies and procedures, the company verifies that designated personnel possess the necessary qualifications for their roles. For example, the Anti-Money Laundering (AML) department takes the lead in drafting the AML and CFT policy, with the completion of the document being a joint effort between the Legal and AML departments to guarantee a comprehensive and competent outcome.

The Responsible Gambling Officer is responsible for initiating the development of the Responsible Gambling Policy and Procedures, which reflect the Company's fundamental values and prioritize socially responsible marketing and player protection. After this, the Legal and Compliance departments take charge of finalizing the policy to ensure it complies with all applicable guidelines and regulations.

Both the AML Officer and the Responsible Gambling Officer possess the necessary expertise in their fields to effectively draft and implement the company's policies and procedures.

11. Dispute Resolution

Post-licensing, the GCB will receive copies of all player complaints, ensuring compliance with obligations and fostering a fair dispute resolution process.