

BUSINESS PLAN 2024 - 2026

Bluebell B.V.

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I. Executive Summary:

Founded in 2010, Bluebell B.V. has established itself as a premier destination for responsible online gambling enthusiasts worldwide. We deliver an exceptional customer experience while prioritizing player safety and responsible gambling practices. With over a decade of experience in the industry, Bluebell B.V. has consistently delivered a secure, entertaining, and responsible gambling environment for its users.

Bluebell B.V. offers a diverse range of gambling products and services, including casino games, sports betting, and live dealer games. Our commitment to innovation, customer satisfaction, and regulatory compliance has positioned us as a trusted leader in the online gambling market.

Driven by a mission to provide unparalleled gaming experiences, Bluebell B.V. invests heavily in cutting-edge technology, robust security measures, and a talented team of professionals. Our user-centric approach, coupled with strategic partnerships and continuous investment in customer satisfaction, has fueled our growth and success over the years.

As we look to the future, Bluebell B.V. remains dedicated to upholding the highest standards of integrity, transparency, and responsible gambling practices. With a solid foundation, stringent compliance measures, a loyal customer base, and a clear vision for innovation and leveraging cutting-edge technology, we are poised to capitalize on emerging opportunities and maintain our position as a leading player in the dynamic and competitive online gambling industry.

II. Financials

At Bluebell B.V., we have developed a profitable and sustainable business model that generates steady revenue streams from our existing operations¹. Leveraging these revenue sources, we can fund expansion, innovation, and strategic initiatives to propel our growth trajectory.

Year ended 31 December	2024	2025	2026
	Euro	Euro	Euro
Sport Revenue	29,382,904	30,852,049	32,394,651
Casino Revenue	35,912,438	37,708,060	39,593,463
Cost of Sales	11,753,161	12,340,820	12,957,861
Gross profit	53,542,180	56,219,289	59,030,253
GP %	82.0%	82.0%	82.0%
Expenses			
<i>Expenses</i>			
Payment providers charges	11,100,208	11,655,218	12,237,979
Gaming Tax	3,264,767	3,428,005	3,599,406
Casino Royalties	4,309,493	4,524,967	4,751,216
Customer Support	1,957,500	1,957,500	1,957,500
Office costs	180,000	180,000	180,000
Professional Fees	300,000	300,000	300,000

¹ Financial Statement 2023 as Source of Funds from own cash flow

Tools Costs	516,000	516,000	516,000
Sport Data and Feeds	1,931,500	1,989,445	2,049,128
Fraud and Payments Services	705,500	705,500	705,500
Marketing and Affiliates	5,510,000	5,510,000	5,510,000
Trading Services	780,000	845,400	912,762
IT Costs	7,929,000	8,166,870	8,411,876
Other costs	3,891,500	4,008,245	4,128,492
Total Expense	42,375,468	43,787,151	45,259,859
Net Income	<u>11,166,712</u>	<u>12,432,138</u>	<u>13,770,394</u>

III. Bluebell's Business Model

Bluebell B.V. is an integral part of the Red Chime group². Alongside Pallando B.V. and Lunaria B.V., Bluebell B.V. operates as a licensed Curacao operator within the group, currently under the master license of C.I.L. Curacao Interactive Licensing N.V. These licensed operators receive comprehensive support services from other entities within the Red Chime group, streamlining operations and enhancing efficiency. Moreover, Red Chime group has two more subsidiaries undergoing a licensing process in other reputable jurisdictions, Olorin Services in Isle of Man and Uxone in Estonia.

All the entities within the Red Chime group have their roles and functions, notably acting as either the licensed operator or a service provider to the licensed operator (of which one soon to be a licensed B2B service provider). The strengths of this inter-company outsourcing yet within the same group lies in the alignment of interests and objectives, fostering synergy and collaboration. With shared ownership, there is a natural incentive for entities within the group to work together harmoniously, leading to smoother operations and cohesive decision-making processes, particularly with a single UBO. This centralized oversight allows the licensed operators in particular to consistently adhere to regulatory requirements. Additionally, shared resources and expertise within the group can facilitate more robust compliance programs and proactive risk management strategies, ultimately enhancing the reputation and credibility of Red Chime and its subsidiaries within the industry.

Bluebell B.V. operates a business-to-consumer (B2C) model, providing online gambling services directly to users through our own platform.

Bluebell B.V. has a loyal customer base and continues catering to these players via a comprehensive and dedicated account management team.

We have assigned dedicated account managers that provide personalized and tailored support to our customers with a long-standing relationship with Bluebell B.V. We provide them personalized

² Organizational Structure of the Red Chime Group

service, communicate pro-actively about attractive offers, conduct regular account analysis, if needed resolve problems instantly, and monitor the player behaviors and report on such if needed. We make sure our customers are incentivized, making this key in our CRM strategy.

We believe that this formula is the success of retaining our customers and attracting new ones (through word-of-mouth). We are able to anticipate our customers' needs and deliver an exceptional entertaining experience on our brands.

This also allows us to utilize targeted marketing campaigns, monitor the effectiveness of our affiliate partnerships and referral programs which are in place to attract new customers to our brands.

IV. Products and Services

Bluebell B.V. offers a comprehensive suite of online gambling products and services, including:

Casino Games: A wide selection of classic and modern casino games, including slots, table games, and live dealer games.

Sports Betting: Betting opportunities on a variety of sports events worldwide, with live betting options and competitive odds.

Bluebell B.V. has a successful partnership with Evolution, Pragmatic Play, NetEnt, Microgaming, PlaynGo, Betsoft, YGG Drasil, Red tiger Gaming, Hacksaw Gaming and Relax Gaming.

V. Banking, Fraud Detection, and Management

Bluebell B.V. maintains a mixed banking approach which involves holding multi-currency accounts with several financial institutions to meet the diverse needs of the company and to optimize financial flexibility, minimize currency risk, and enhance operational efficiency in managing funds across different currencies and banking relationships.

Bluebell B.V. works with reputable licensed financial institutions to offer secure options for deposits and withdrawals. We make use of advanced fraud detection and management systems to detect and prevent fraudulent activities on our platform ensuring our funds and those of our players are safeguarded.

VI. Payments

Bluebell B.V. offers multiple payment methods to cater to the diverse needs of our users, including:

- 1) Credit Cards Solutions
- 2) E-Wallets
- 3) Bank Transfer Solutions
- 4) Crypto Solutions
- 5) Voucher Solutions.

We ensure secure and seamless payment processing through encryption protocols, SSL certificates, and PCI DSS compliance to protect user financial information and facilitate smooth transactions.

At the moment of signing this document, registered players on Bluebell B.V.'s platform can make deposits and withdrawals via nine payments service providers and one payment gateway.

Our payments department continually manages Bluebell B.V.'s relationship with our payments partners ensuring that the company remains compliant with the terms and conditions imposed by these financial institutions on Bluebell B.V. as a merchant. Bluebell B.V. also actively seeks new licensed, compliant and credible payments partners allowing us to align with the goal of enhancing customer experience, expanding market reach, managing risks, and staying competitive in the ever-evolving landscape of e-commerce and business transactions.

VII. Compliance Policies & Procedures

Bluebell B.V. is committed to upholding the highest standards of regulatory compliance and responsible gambling practices. Our compliance policies and procedures are further detailed in our elaborate compliance manual³.

Our compliance procedures are based on a risk-based approach to effectively identify, assess, and mitigate potential risks associated with our operations. This approach allows us to allocate resources efficiently, prioritize high-risk areas, and tailor our compliance measures to address specific threats and vulnerabilities. Our risk-based compliance procedure encompasses the following key components:

- 1) Risk Assessment
- 2) Risk Mitigation Strategies
- 3) Compliance Monitoring and Review
- 4) Training and Awareness
- 5) Continuous Improvement

We have an appointed Compliance Officer in Curaçao who is supported by a team of legal, regulatory and compliance officers within the group and locally by third parties compliance professionals. Bluebell B.V. is registered with the FIU of Curaçao.

VIII. Privacy and Data Protection

Bluebell B.V. has policy enabling the staff to adhere to strict data protection laws and regulations to safeguard customer privacy and protect sensitive player information, including GDPR and the Curacao law in accordance with the Landsverordening bescherming persoonsgegevens PB 2010 no. 84. Our adherence to data protection principles is integral to maintaining the trust and confidence of our customers and ensuring the security and confidentiality of their personal data.

Our approach to data protection encompasses the following key elements:

- 1) Lawful, Fairness, and Transparency of Data Collection and Processing
- 2) Data Minimization and Accuracy
- 3) Data Security, Integrity, and Confidentiality
- 4) Data Storage Limitations, Retention and Disposal
- 5) Data Subject Rights

³ Red Chime group compliance manual

- 6) Data Transfer and International Compliance
- 7) Data Protection Governance and Accountability

IX. Responsible Gambling

Through these responsible gambling measures, Bluebell B.V. strives to create a safe, transparent, and socially responsible gaming environment that prioritizes player protection, well-being, and enjoyment. We are committed to continuous improvement in our responsible gambling practices and remain vigilant in our efforts to mitigate the potential risks associated with gambling while promoting positive gaming experiences for our customers.

Our initiatives and written procedures⁴ encompass the following:

- 1) Player Education and Awareness
- 2) Self-Exclusion and Time-Out Options
- 3) Deposit Limits and Responsible Gaming Tools
- 4) Age Verification and Player Verification
- 5) Support and Assistance
- 6) Collaboration and Stakeholder Engagement

X. Customer Complaints

We have a dedicated customer support team to address user inquiries, resolve complaints, and provide timely assistance with any issues or concerns.

By prioritizing compliance, security, and player welfare, Bluebell B.V. aims to build trust and credibility among users and regulatory authorities, ensuring sustainable growth and long-term success in the online gambling industry.

XI. Brands and URLs

Bluebell B.V. operates the following brands and accompanied URLs:

Superbahis

URL: superbahis.com

Betboo

URL: betboo.com

Anadolu Casino

URL: anadolucasino.com

Each brand provides a seamless and immersive experience tailored to the specific market. This segmentation allows for targeted marketing strategies, brand differentiation, and enhanced user

⁴ Red Chime Guidebook – Player Protection and Company Obligations

engagement across multiple online channels. We have enclosed an overview of the mirror sites/ aliases available for each brand⁵.

XII. Customer Account Management & Player Funds

Customer account management and the handling of player funds is carried out by entities within our group (sister companies), ensuring transparency, security, and regulatory compliance. Our dedicated account management team oversees customer accounts, including KYC verification, account maintenance, and customer support.

Player funds are held in segregated accounts managed by our group finance staff, providing an additional layer of protection for player funds⁶. We have implemented strict controls and monitoring mechanisms to ensure the integrity and security of player funds.

XIII. IT Infrastructure

Bluebell B.V. as an integral part of Red Chime group requires that the company's information assets are properly safeguarded against breaches of confidentiality, integrity and availability and by utilizing selected protective measures deliver compliance to legal and regulatory obligations. As a result the IT infrastructure of Red Chime group makes use of cloud technology by utilizing cloud-based solutions and it also hosts its servers in datacenters in Isle of Man and the Republic of Ireland. By doing this, Bluebell B.V. can ensure a stable, secure, and resilient environment that supports the company's objectives and enables business growth and innovation.

In order to achieve our objectives, the following attributes will at all times be in place with respect to matters of information assurance.

Information security policy, objectives, activities and improvements will be aligned with the business objectives and organizational culture of Red Chime group and towards meeting the requirements of ISO/IEC27001 and ISO27002, the internationally recognized Code of Practice for Information Security Management.

A risk-based approach to information security will be maintained, enabling informed decisions on information security risk to be made by those authorized whilst ensuring that budget and resources are focused appropriately. These security initiatives will meet the following objectives in order of priority:

- 1) Prevention of potential incidents via the identification and reduction of security risks
- 2) Detection of incidents to reduce potential damage
- 3) Containment of the impact of security incidents
- 4) Recovery from incidents via prompt remedial action and the prevention of reoccurrence.

Information security will be promoted at all levels of the business through comprehensive awareness, training and competency development.

⁵ List of mirror sites/ aliases per brand

⁶ Confirmation letter of our segregated player funds account

Bluebell B.V. actively supports information assurance initiatives, ensuring it remains abreast of risks to information assets and champion the continual improvement of information security at the company to achieve the following objectives:

- 1) A secure technology architecture will be established and maintained.
- 2) Effective information security policies and procedures will be established and maintained ensuring that:
 - a. Information Assets are protected according to the requirements and objectives of both internal and external interested parties.
 - b. Confidentiality of information will be assured.
 - c. Integrity of information will be maintained.
 - d. Customer security requirements will be achieved. It is the company's aim to ensure that customers have confidence in our information security and are safe in the knowledge that we are responsive to their security concerns.
 - e. Business requirements for availability will be met, ensuring vital information is available when and where it is needed and the organization is positioned to continue business in the event of unforeseen events.
 - f. Breaches of security both actual and suspected will be reported and investigated.
 - g. Classification and ownership of information assets will be applied.
 - h. Country, regulatory and legislative requirements for Security will be met, including compliance with the security standards mandated via International Gaming Licenses, UK Data Protection Act 1998, applicable and equivalent European Data Protection Directives and international privacy Regulations.
 - i. The specific security standards mandated by Payment Card Brands under the Payment Card Industry Data Security Standards for the protection of cardholder data (PCI-DSS) will be achieved and maintained.

At Bluebell B.V. we continue to invest in a robust IT infrastructure so that we can leverage technology effectively, our businesses can improve in efficiency, agility, and competitiveness, ultimately driving growth and success.

XIV. In Conclusion

In conclusion, Bluebell B.V. remains dedicated to setting the highest standards of excellence in the online gambling industry. Through our commitment to regulatory compliance, responsible gaming practices, and customer satisfaction, we strive to create a safe, transparent, and enjoyable gaming environment for our customers.

With a decade of experience and a track record of success, Bluebell B.V. is well-positioned to navigate the dynamic and competitive landscape of the online gambling market. Our focus on innovation, technology, and continuous improvement allows us to adapt to evolving user needs, regulatory requirements, and industry trends.

Signed in Willemstad on March 28, 2024

Sincerely,

DocuSigned by:

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Elaine Behr

Managing Director