

TRINITY GAMING N.V.

Business Plan 2024

B2B Software Aggregator



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1. Overview of Business Products and Services/Brands

Trinity Gaming N.V. (the Company), established in accordance with the laws of Curacao, is an emerging player in the online gaming and wagering industry. Operating under the brand name and domain **e-boo.bet**, Trinity is carving out its niche in the competitive online gambling market. The domain e-boo.bet is registered under Trinity's name, signifying its commitment to establishing a strong and recognizable brand presence.

As a **B2B provider**, Trinity specializes in delivering cutting-edge software solutions for online casinos. These solutions include a comprehensive suite of tools and technologies designed to enhance the user experience, ensure robust security, and provide seamless integration with existing casino platforms. Trinity's offerings are tailored to meet the diverse needs of online gambling operators, helping them deliver engaging and reliable gaming experiences to their users.

At the same time, the Company does not engage into handling payments or player accounts, which makes it possible for the management to keep it small, more versatile and adaptive in terms of technology, financing its own operations and compliance (see further below).

Proprietary Intellectual Property

Trinity's proprietary IP lies in its advanced software solutions that power online casinos. These technologies include state-of-the-art algorithms for random number generation, sophisticated user interface designs, and secure transaction processing systems. The company's IP portfolio ensures that its products remain at the forefront of technological innovation, offering unparalleled performance and reliability to its clients.

History and Formation

Trinity was founded with a clear vision of leveraging technological advancements to revolutionize the online gambling industry. The company's formation was driven by a team of seasoned professionals with extensive experience in IT and business strategy. This foundation has enabled Trinity to rapidly scale its operations and establish itself as a trusted name in the market.

Leadership and Unique Competitive Edge

Viacheslav Tsytserra, the UBO (Ultimate Beneficial Owner) and CEO of Trinity, brings over two decades of expertise in IT leadership and business strategy. Tsytserra has been instrumental in shaping the company's vision and direction since its inception in 2024. His leadership is characterized by a deep understanding of technology and a commitment to fostering positive relationships with stakeholders.

Background of Viacheslav Tsytserra:

- **Current Role:** CEO & Founder of Eboobet in Limassol, Cyprus
 - **Responsibilities:** Guiding company vision and direction, stakeholder relations, informed business decisions for sustainable growth.

- **Previous Experience:**

- **Head of IT at Netwave LLC (2015-2024):** Directed strategic technology initiatives, managed IT projects, implemented cybersecurity measures.
- **Head of Technical Support Department at Softblues:** Developed a deep understanding of technical operations and customer support.
- **Systems Analyst at Infopulse:** Gained comprehensive knowledge of system analysis and IT infrastructure.

Unique Features and Competitive Edge

Trinity's competitive edge is rooted in several key features:

1. **Technological Innovation:** The company's commitment to developing state-of-the-art software solutions ensures that it remains at the cutting edge of the online gambling industry.
2. **Experienced Leadership:** With Viacheslav Tsytsura at the helm, Trinity benefits from strategic insights and leadership that drive sustainable growth and innovation.
3. **Customer-Centric Approach:** Trinity focuses on creating exceptional user experiences, which helps its clients attract and retain customers.
4. **Strong Brand Identity:** Operating under the e-boo.bet brand, Trinity has established a recognizable and trusted name in the market.
5. **Regulatory Compliance:** By seeking authorization for non-exclusive offshore gaming, Trinity positions itself to operate flexibly within a compliant and secure framework.

Product Section

Trinity Gaming N.V. provides a software license to B2C operators. The list of games included in the license agreement comprises titles from BarbaraBang and Mancala, such as Shiny Fruity Seven 5 Lines, Shiny Fruity Seven 5 Lines Deluxe, Rocket Bang, Juicy Fruits Scratch B, and over 20 other engaging games. These games are designed to attract and retain players with their engaging gameplay.

Business Model

Trinity Gaming N.V. operates as a software aggregator, purchasing games from developers like BarbaraBang and Mancala and supplying them to B2C operators and other B2B resellers and distributors. The business model begins with Trinity Gaming N.V. entering into software distribution agreements with game developers such as BarbaraBang and Mancala. Under these agreements, Trinity Gaming N.V. acquires the rights to distribute their games.

Following these agreements, Trinity Gaming N.V. enters into software license agreements with B2C operators and B2B resellers and distributors. In these agreements, Trinity Gaming N.V. licenses the games to its Clients, who then integrate the software into their own platforms. The agreement grants the operators a non-exclusive, royalty-bearing license to use the software, sub-license it to end-users, and integrate it into their platforms.

Revenue streams include the difference between the license fees paid to game providers for purchasing the games on the one hand and the license fees received from selling these games to B2C operators and other B2B resellers and distributors on the other hand. This margin represents Trinity Gaming N.V.'s profit.

This partnership model allows B2C operators and other B2B resellers and distributors to access high-quality, diverse content that attracts users and increases revenue. Trinity Gaming N.V. benefits from expanding its market reach and user base through these strategic partnerships and platform integrations.

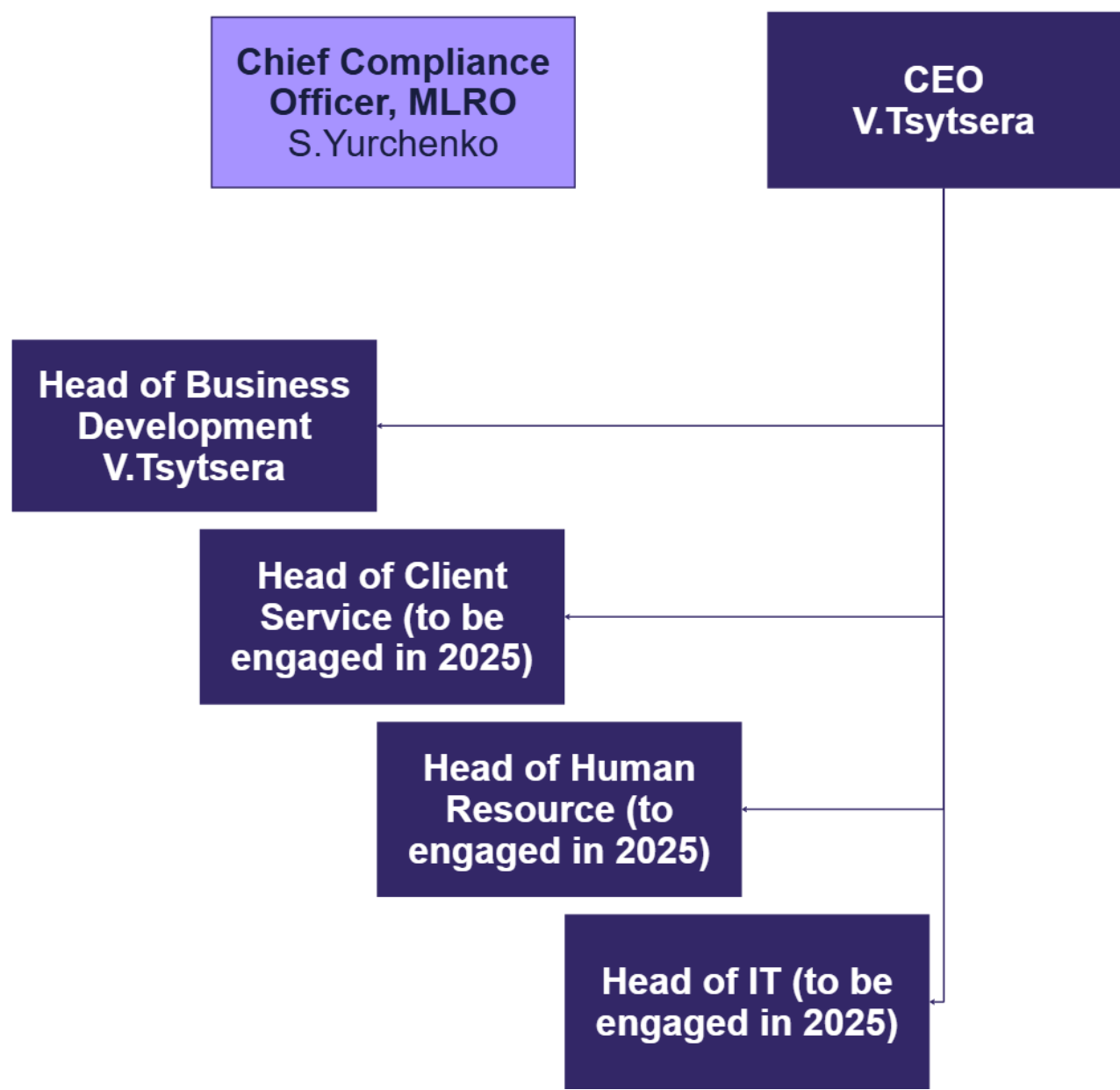
Sources of Finance

Essentially the business model makes use of the proportional coverage of expenses. The major expense throughout the business year is the software usage fees paid to game providers calculated as a percentage of the GGR, and it is paid from the license fees paid to the Company by its clients based again on the GGR share with added profit margin. Thus, the minimum cost of business is always covered.

The initial costs needed to launch the project (like GCB License fees) are covered by the UBO. Further on extra liquidity is sourced from the following:

- net profit made by the company - no dividends are planned for the first 3 years of operation,
- short-term loans from financial institutions - in the case of liquidity gaps in times of high outstanding receivable accounts
- additional capital injections from the UBO.

2.Management Structure, Key Management Roles And Reporting Lines



ORGANIZATIONAL CHART **TRINITY GAMING N.V.**



3.Business Forecasts for 3 Years.

3.1.Projections for First Year

	Total for 3 years	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Cash flow - INVESTING	- 68 003	- 55 251	- 3 751	- 3 751	- 5 251	-	-	-	-	-	-	-	-
Technological Infrastructure	- 45 000	- 45 000	-	-	-	-	-	-	-	-	-	-	-
Cybersecurity	- 3 000	- 1 500	-	-	- 1 500	-	-	-	-	-	-	-	-
Office equipment and stationery	- 5 000	- 5 000	-	-	-	-	-	-	-	-	-	-	-
Marketing and Promotion	- 15 003	- 3 751	- 3 751	- 3 751	- 3 751	-	-	-	-	-	-	-	-
Cash flow - OPERATING	2 425 052	- 19 000	- 3 500	- 3 500	- 3 500	- 98 880	- 87 602	- 69 246	- 21 644	- 1 860	48 740	38 740	57 744
Proceeds	18 118 110	-	-	-	-	61 600	129 536	181 984	253 704	338 800	404 800	404 800	459 096
Income	18 118 110	-	-	-	-	61 600	129 536	181 984	253 704	338 800	404 800	404 800	459 096
Expenses total	- 15 693 058	- 19 000	- 3 500	- 3 500	- 3 500	- 160 480	- 217 138	- 251 230	- 275 348	- 340 660	- 356 060	- 366 060	- 401 352
Direct costs	- 13 253 572	- 19 000	- 3 500	- 3 500	- 3 500	- 78 940	- 135 598	- 169 690	- 203 808	- 259 120	- 307 020	- 307 020	- 342 312
License fee	- 141 500	- 19 000	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500
Hosting	- 105 600	-	-	-	-	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300
Software fee	- 11 776 772	-	-	-	-	- 40 040	- 84 198	- 118 290	- 164 908	- 220 220	- 263 120	- 263 120	- 298 412
Salary	- 307 200	-	-	-	-	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600
Management services	- 400 000	-	-	-	-	- 5 000	- 5 000	- 5 000	- 5 000	- 5 000	- 10 000	- 10 000	- 10 000
Technical support	- 522 500	-	-	-	-	- 17 500	- 30 000	- 30 000	- 17 500	- 17 500	- 17 500	- 17 500	- 17 500
Indirect costs	- 1 867 280	-	-	-	-	- 81 540	- 81 540	- 81 540	- 71 540	- 81 540	- 49 040	- 59 040	- 59 040
Office equipment and stationery	- 48 000	-	-	-	-	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500
Advertising-Marketing costs	- 874 000	-	-	-	-	- 38 000	- 38 000	- 38 000	- 28 000	- 38 000	- 18 000	- 28 000	- 28 000
Accounting	- 176 000	-	-	-	-	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500
Office rent	- 49 280	-	-	-	-	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540
Legal support	- 720 000	-	-	-	-	- 35 000	- 35 000	- 35 000	- 35 000	- 35 000	- 22 500	- 22 500	- 22 500

3.2.Projections for Second Year

	Total for 3 years	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Cash flow - INVESTING	- 68 003	-	-	-	-	-	-	-	-	-	-	-	-
Technological Infrastructure	- 45 000	-	-	-	-	-	-	-	-	-	-	-	-
Cybersecurity	- 3 000	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 5 000	-	-	-	-	-	-	-	-	-	-	-	-
Marketing and Promotion	- 15 003	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	2 425 052	- 2 022	62 086	91 932	74 833	114 590	99 938	19 564	101 021	114 590	47 634	79 590	100 859
Proceeds	18 118 110	372 240	471 504	556 776	535 800	535 800	493 936	469 504	497 032	535 800	535 800	535 800	596 568
Income	18 118 110	372 240	471 504	556 776	535 800	535 800	493 936	469 504	497 032	535 800	535 800	535 800	596 568
Expenses total	- 15 693 058	- 374 262	- 409 418	- 464 844	- 460 967	- 421 210	- 393 998	- 449 940	- 396 011	- 421 210	- 488 166	- 456 210	- 495 709
Direct costs	- 13 253 572	- 285 856	- 350 378	- 405 804	- 384 670	- 384 670	- 357 458	- 341 578	- 359 471	- 384 670	- 384 670	- 397 170	- 436 669
License fee	- 141 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500
Hosting	- 105 600	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300
Software fee	- 11 776 772	- 241 956	- 306 478	- 361 904	- 348 270	- 348 270	- 321 058	- 305 178	- 323 071	- 348 270	- 348 270	- 348 270	- 387 769
Salary	- 307 200	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600
Management services	- 400 000	- 10 000	- 10 000	- 10 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000
Technical support	- 522 500	- 17 500	- 17 500	- 17 500	- 5 000	- 5 000	- 5 000	- 5 000	- 5 000	- 5 000	- 5 000	- 17 500	- 17 500
Indirect costs	- 1 867 280	- 57 040	- 59 040	- 59 040	- 36 540	- 36 540	- 36 540	- 36 540	- 36 540	- 36 540	- 36 540	- 59 040	- 59 040
Office equipment and stationery	- 48 000	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500
Advertising-Marketing costs	- 874 000	- 26 000	- 28 000	- 28 000	- 18 000	- 18 000	- 18 000	- 18 000	- 18 000	- 18 000	- 18 000	- 28 000	- 28 000
Accounting	- 176 000	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500
Office rent	- 49 280	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540
Legal support	- 720 000	- 22 500	- 22 500	- 22 500	- 10 000	- 10 000	- 10 000	- 10 000	- 10 000	- 10 000	- 10 000	- 22 500	- 22 500

3.3.Projections for Third Year

	Total for 3 years	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Cash flow - INVESTING	- 68 003	-	-	-	-	-	-	-	-	-	-	-	-
Technological Infrastructure	- 45 000	-	-	-	-	-	-	-	-	-	-	-	-
Cybersecurity	- 3 000	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 5 000	-	-	-	-	-	-	-	-	-	-	-	-
Marketing and Promotion	- 15 003	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	2 425 052	55 731	130 680	134 758	74 674	158 900	134 753	58 701	172 771	193 900	79 126	228 900	261 052
Proceeds	18 118 110	651 420	681 772	793 422	862 400	862 400	793 408	758 912	802 032	862 400	862 400	862 400	954 264
Income	18 118 110	651 420	681 772	793 422	862 400	862 400	793 408	758 912	802 032	862 400	862 400	862 400	954 264
Expenses total	- 15 693 058	- 595 689	- 551 092	- 658 664	- 787 726	- 703 500	- 658 655	- 700 211	- 629 261	- 668 500	- 783 274	- 633 500	- 693 212
Direct costs	- 13 253 572	- 472 323	- 492 052	- 577 124	- 621 960	- 621 960	- 577 115	- 542 193	- 570 221	- 609 460	- 609 460	- 596 960	- 656 672
License fee	- 141 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500	- 3 500
Hosting	- 105 600	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300	- 3 300
Software fee	- 11 776 772	- 423 423	- 443 152	- 515 724	- 560 560	- 560 560	- 515 715	- 493 293	- 521 321	- 560 560	- 560 560	- 560 560	- 620 272
Salary	- 307 200	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600	- 9 600
Management services	- 400 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000	- 15 000
Technical support	- 522 500	- 17 500	- 17 500	- 30 000	- 30 000	- 30 000	- 30 000	- 17 500	- 17 500	- 17 500	- 17 500	- 5 000	- 5 000
Indirect costs	- 1 867 280	- 59 040	- 59 040	- 81 540	- 81 540	- 81 540	- 81 540	- 59 040	- 59 040	- 59 040	- 59 040	- 36 540	- 36 540
Office equipment and stationery	- 48 000	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500	- 1 500
Advertising-Marketing costs	- 874 000	- 28 000	- 28 000	- 38 000	- 38 000	- 38 000	- 38 000	- 28 000	- 28 000	- 28 000	- 28 000	- 18 000	- 18 000
Accounting	- 176 000	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500	- 5 500
Office rent	- 49 280	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540	- 1 540
Legal support	- 720 000	- 22 500	- 22 500	- 35 000	- 35 000	- 35 000	- 35 000	- 22 500	- 22 500	- 22 500	- 22 500	- 10 000	- 10 000

4. Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans.

Financial Strategy

Staff

Nº	Position	Number of people	Salary	Total per month
1	Director	1	2 400	2 400
2	Marketing manager	1	1 800	1 800
3	Business development manager	1	1 600	1 600
4	Sales manager	1	1 600	1 600
5	Employee	2	1 100	2 200
	Total	6		9 600

Indicators

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	226 000
Sum of proceeds (SP), EUR	18 118 110
Net average operational receipts per month (NAOR), EUR	78 005
Net profit for the project period, EUR	2 399 416
<i>Average profitability for the project period (net profit to proceeds)</i>	<i>13,24%</i>
Discounting rate (DR), %	18,00%
Net present value (NPV), EUR	691 201
Profitability index (PI)	3,1

Investment budget

Nº	Name	Value
1	Technological Infrastructure	45 000
2	Cybersecurity	3 000
3	Office equipment and stationery	5 000
4	Marketing and Promotion	15 000
Invested capital total (actual need for cash)		68 000

Marketing Strategy

As a B2B enterprise, our marketing strategy places a strong emphasis on participating in events, exhibitions, referrals, and networking. A significant portion of our marketing budget is dedicated to industry fairs such as ICE, iGB, SBC, SiGMA, and the Global Gaming Expo. These events provide valuable opportunities to showcase our products, connect with potential clients, and stay abreast of industry trends.

Strategic Focus and Growth

With over five years of specialized experience in the gambling sector, Trinity possesses a wealth of marketing expertise that spans various industries. Our core competencies include:

- **Marketing Strategies:** Developing and implementing effective marketing campaigns tailored to the online gambling industry.
- **Business Acumen:** Leveraging strong business insights to drive growth and profitability.
- **Market Insights:** Gaining in-depth understanding of market trends and consumer behavior.
- **Software Development:** Creating innovative and reliable software solutions for online casinos.
- **Strategic Execution:** Setting and achieving strategic goals to ensure long-term success.

Primary Strategic Focus

Trinity's primary strategic focus is on achieving growth and expanding our market presence. To accomplish this, we are dedicated to making significant investments in building a highly skilled team committed to realizing our objectives. Our approach includes:

- **Team Development:** Assembling a team of highly knowledgeable professionals from the gaming industry. Each individual will undergo a meticulous selection process and receive extensive training and support to ensure they are well-equipped to deliver exceptional service consistently.
- **Client Collaboration:** Collaborating with B2C operators and B2B resellers who are legally and technically eligible for our services, ensuring full compliance with relevant regulatory frameworks in each jurisdiction.
- **Financial Feasibility:** Conducting comprehensive financial feasibility assessments to guarantee the sustainability of our partnerships.

Growth Objectives

Our strategic plan outlines ambitious growth objectives, aiming to expand our client base significantly. We plan to increase the number of licensed B2C operators we serve from approximately 10 in 2025 to 40 by the end of 2027. Beyond this, we have further ambitions to reach 80 clients within the next two years. This growth trajectory will be fueled by:

- **Strategic Partnerships:** Forming alliances with major game providers from diverse jurisdictions, allowing us to offer unparalleled solutions in terms of both diversity and

reliability.

- **Marketing Investments:** Allocating substantial resources to marketing initiatives that enhance our visibility and attract new clients.

5. Who are the key suppliers and material dependencies?

Our primary game suppliers include [BARBARA BANG](#) and [MANCALA](#), with negotiations in progress with many others, all renowned for their certified games and stellar industry reputation. Our Software License Agreements with these suppliers are structured to incentivize the delivery of player-friendly and bug-free games. Maintaining high-quality standards is paramount for our suppliers, aligning with our commitment to providing exceptional gaming experiences.

Additionally, we continuously seek to expand our network and partnerships within the industry to ensure we stay at the forefront of innovation and quality. This proactive approach not only enhances our product offerings but also strengthens our position in the market.

6.The Business and the Risk Management Around their Loss or Interruption.

Introduction

For B2B resellers like Trinity the reliability and continuity of business processes are of paramount importance. Trinity examines the key aspects of the business and risk management related to losses or interruptions in operations and offers effective strategies to minimize them.

Business Features of Casino Software Providers

1. Technological Infrastructure

Trinity works with high-tech solutions, including servers, databases, game engines etc. The reliable and uninterrupted operation of this infrastructure is crucial for ensuring customer satisfaction and compliance with regulatory requirements.

2. Customer Support Services

Quality customer support is a key factor in retaining the trust of our b2b clients. Timely and effective resolution of issues related to integration of games helps Trinity maintain their loyalty and trust.

Risk Management

1. Risk Identification

The first step in risk management is identifying them. For casino software providers, the main risks include:

- Technical failures and equipment malfunctions
- Cyberattacks and data breaches
- Regulatory changes and non-compliance
- Financial risks related to transactions and fraud

2. Risk Assessment

Risk assessment involves analyzing the likelihood of their occurrence and the potential consequences for the business. This allows Trinity to prioritize risks and develop appropriate management strategies.

3. Risk Management and Mitigation

Technical Risks:

- Regular maintenance and upgrading of equipment
- Use of cloud technologies to enhance resilience
- Implementation of backup and data recovery systems

Cybersecurity:

- Use of modern protection systems against cyberattacks
- Employee training on cybersecurity basics

- Regular security audits and penetration testing

Regulatory Risks:

- Constant monitoring of legislative changes in operating countries
- Establishing relationships with legal consultants
- Implementation of control and compliance systems

Financial Risks:

- Implementation of transaction monitoring systems to detect suspicious activity
- Development of refund and compensation policies
- Use of technologies to protect financial data

Conclusion

Trinity's effective risk management requires a comprehensive approach and continuous improvement. Identifying, assessing, and mitigating risks are integrated into all business processes.

7. Risk Evaluation and Management.

In the highly dynamic and regulated online gambling industry, effective risk management is crucial for ensuring operational stability and regulatory compliance. Trinity employs a comprehensive risk management framework that encompasses risk assessment, mitigation strategies, audits, and oversight mechanisms. This holistic approach helps safeguard the company's assets, reputation, and long-term viability.

Risk Assessment

1. Identifying Risks:

Trinity begins its risk management process by identifying potential internal and external risks. This includes:

- Operational Risks: System failures, technical disruptions, and cybersecurity threats.
- Regulatory Risks: Changes in legal frameworks, compliance issues, and licensing requirements.
- Financial Risks: Market fluctuations, credit risks, and liquidity issues.
- Strategic Risks: Competitive pressures, market entry barriers, and technological advancements.
- Reputational Risks: Negative publicity, customer dissatisfaction, and brand erosion.

2. Risk Analysis:

Once identified, risks are analyzed to understand their potential impact and likelihood. This involves:

- Qualitative Analysis: Assessing the nature and potential consequences of each risk.
- Quantitative Analysis: Using data and statistical methods to estimate the probability and financial impact of risks.

3. Risk Prioritization:

Risks are then prioritized based on their potential impact and likelihood. High-priority risks receive immediate attention, while lower-priority risks are monitored regularly.

Risk Mitigation

1. Implementing Controls:

Trinity employs a range of controls to mitigate identified risks, including:

- Technical Controls: Robust cybersecurity measures, regular software updates, and data encryption.
- Operational Controls: Standard operating procedures, business continuity planning, and disaster recovery plans.
- Compliance Controls: Regular compliance checks, adherence to legal standards, and

employee training programs.

2. Risk Transfer:

Some risks are transferred to third parties through insurance policies or outsourcing specific functions to specialized vendors.

3. Risk Avoidance:

Where feasible, Trinity avoids high-risk activities that do not align with its risk appetite or strategic goals.

4. Risk Reduction:

Continuous efforts are made to reduce the likelihood and impact of risks through process improvements and proactive management.

Auditing and Oversight

1. Internal Audits:

Trinity conducts regular internal audits to ensure that risk management processes and controls are effective. These audits cover:

- Financial Audits: Reviewing financial statements, transactions, and internal financial controls.
- Operational Audits: Evaluating the efficiency and effectiveness of business operations and processes.
- Compliance Audits: Ensuring adherence to regulatory requirements and internal policies.

2. External Audits:

Independent external auditors are engaged to provide an objective assessment of Trinity's risk management framework. External audits focus on:

- Financial Health: Verifying the accuracy and reliability of financial reporting.
- Regulatory Compliance: Confirming compliance with relevant laws and regulations.
- Risk Management Practices: Evaluating the overall effectiveness of risk management strategies and controls.

Oversight Committees

1. Risk Management Committee:

This committee is responsible for overseeing the risk management framework. Its responsibilities include:

- Policy Development: Establishing risk management policies and procedures.
- Risk Monitoring: Regularly reviewing risk reports and dashboards.
- Decision-Making: Making informed decisions on risk mitigation strategies.

2. Audit Committee:

The audit committee works closely with internal and external auditors to ensure the integrity of financial reporting and compliance. Key functions include:

- **Audit Reviews:** Reviewing audit findings and recommendations.
- **Oversight:** Monitoring the implementation of audit recommendations and corrective actions.
- **Reporting:** Providing regular reports to the board of directors on audit outcomes and risk management.

3. Compliance Committee:

Focused on regulatory and compliance risks, this committee:

- **Monitoring Compliance:** Ensures ongoing compliance with regulatory requirements.
- **Policy Enforcement:** Oversees the implementation of compliance policies and procedures.
- **Training:** Conducts training sessions to keep employees updated on compliance issues.

Risk Registers

1. Centralized Risk Register:

Trinity maintains a centralized risk register that documents all identified risks, along with their assessment, mitigation strategies, and monitoring status. The risk register is a living document, regularly updated to reflect new risks and changes in existing risks.

2. Risk Ownership:

Each risk in the register is assigned an owner responsible for managing and mitigating that risk. Risk owners provide regular updates on the status of their risks and the effectiveness of mitigation measures.

3. Reporting and Review:

The risk register is reviewed periodically by the risk management committee, audit committee, and senior management. Regular reports are generated to provide insights into the risk landscape and the effectiveness of the risk management framework.

8. Legal and governance framework.

Single Director Oversight: At Trinity, the governance structure is streamlined, with a single director, Viacheslav Tsytsera, who also serves as the CEO and Ultimate Beneficial Owner (UBO). This centralized structure allows for direct and efficient oversight of the company's operations and strategic initiatives.

Interaction with Day-to-Day Decision Making

CEO's Role in Operations: In his dual roles as CEO and sole shareholder, Viacheslav Tsytsera actively manages the day-to-day operations of the business. His responsibilities include:

- **Overseeing Marketing Initiatives:** Guiding the development and implementation of marketing strategies to enhance brand visibility and market reach.
- **Devising Growth Strategies:** Identifying and capitalizing on growth opportunities across various sectors to drive the company's expansion.
- **Integrating Payment Systems:** Ensuring the integration of secure and efficient payment systems to facilitate smooth transactions.
- **Expanding into New Markets:** Leading efforts to penetrate new markets and establish a strong presence.

Delegation and Decentralization: Although the decision-making power is centralized with the CEO, strategies and responsibilities are delegated directly to departments and functions. This approach promotes agility, enabling quick responses to market changes and operational challenges, thereby eliminating potential bottlenecks.

Matters Reserved to the CEO/UBO

Strategic Decisions: Certain critical decisions are reserved for the CEO/UBO, including:

- **Major Strategic Initiatives:** Long-term strategic planning, significant investments, and potential mergers or acquisitions.
- **Financial Oversight:** Approval of budgets, financial statements, and large capital expenditures.
- **Corporate Governance:** Development and enforcement of corporate governance policies and compliance measures.
- **Risk Management:** High-level risk assessment and decision-making regarding risk mitigation strategies.

Deadlock Prevention

Eliminating Deadlock: The centralized governance structure under a single shareholder effectively prevents deadlocks. Viacheslav Tsytsera, as the sole decision-maker, ensures that decisions are made efficiently and swiftly, maintaining operational continuity and strategic alignment.

Legal Support and Advice

Internal Legal Departments: Trinity manages its legal needs internally through dedicated legal departments and officers. These teams are responsible for:

- **Compliance:** Ensuring adherence to all relevant laws, regulations, and industry standards.
- **Contracts and Agreements:** Drafting, reviewing, and managing legal contracts and agreements.
- **Dispute Resolution:** Handling any legal disputes or litigation that may arise.

Accountability: Department heads are accountable for making final decisions on legal matters, with the CEO/UBO providing oversight and approval as needed.

Meeting Structure and Policies

Invitations to Strategic Meetings: Although Trinity does not have a board of directors, strategic meetings often include key personnel such as:

- **Senior Management:** Heads of finance, marketing, operations, and legal departments.
- **External Advisors:** When necessary, external legal and financial advisors are invited to provide expert insights and recommendations.

9.Target KPIs and business objectives

Measuring Success

To measure the success of our business, we have identified several key performance indicators (KPIs) that align with our long-term objectives. These KPIs are designed to provide a comprehensive view of our performance across various aspects of the business, ensuring that we stay on track to achieve our goals.

1. **Revenue Growth:** Monitoring monthly and annual revenue to ensure steady growth, aiming for a 20% increase year-over-year.
2. **Client Acquisition:** Expanding the client base, with a target to increase the number of licensed B2C operators from 10 in 2025 to 40 by the end of 2026.
3. **Market Share:** Enhancing the market presence to capture a significant portion of the online gambling market, aiming for a 10% market share by 2026.
4. **Customer Satisfaction:** Maintaining a high level of client satisfaction, measured through regular feedback and a Net Promoter Score (NPS) of 8 or higher.
5. **Operational Efficiency:** Reducing operational costs as a percentage of revenue, targeting a decrease of 5% annually through process improvements and technological advancements.

Long-term Business Objectives

The long-term business objectives are focused on sustainable growth, market leadership, and financial stability. These objectives guide the strategic initiatives and resource allocation to ensure Trinity achieve the vision.

1. **Market Expansion:** Aggressively expand the market presence by entering new jurisdictions and forming strategic alliances with major game providers, aiming to serve 80 clients by 2028.
2. **Innovation and Technology:** Invest in cutting-edge technology and software development to offer innovative solutions that meet the evolving needs of the online gambling industry.
3. **Financial Performance:** Achieve an EBITDA margin of 15.88% and a net profit margin of 13.24% by the end of the project period. The aim for a net present value (NPV) of €691,201.
4. **Brand Recognition:** Build a strong brand presence by participating in key industry events, exhibitions, and networking opportunities. Allocate significant resources to marketing, with an annual budget ranging from €216,000 to €456,000.
5. **Operational Excellence:** Streamline operations to enhance efficiency and reduce costs. Implement a robust financial strategy to manage fixed and variable costs effectively, ensuring long-term financial health and stability.

Strategic Initiatives

To achieve these objectives, Trinity will undertake the following strategic initiatives:

1. **Team Development:** Assemble and train a highly skilled team of professionals from the gaming industry to deliver exceptional service and drive growth.
2. **Client Collaboration:** Work closely with B2C operators to ensure compliance with regulatory frameworks and achieve financial feasibility in all partnerships.
3. **Marketing Investments:** Focus on marketing strategies that enhance visibility and attract new clients, leveraging industry events and strategic partnerships.
4. **Technology Enhancement:** Continuously invest in technological advancements to stay ahead of industry trends and provide innovative solutions to our clients.

By focusing on these KPIs and long-term objectives, Trinity is committed to driving sustainable growth, achieving market leadership, and ensuring the financial stability of the business.

10.Policies and Procedures

Internal and External Implementation

Trinity's policies and procedures are a blend of internally developed frameworks and externally sourced expertise to ensure the highest standards of compliance and operational efficiency. This dual approach allows to leverage in-house knowledge while benefiting from external, specialized skills, ensuring that the operations remain robust and up-to-date with industry standards.

Internal Policies and Procedures

1. **Customer Due Diligence (CDD):** internally developed CDD policy ensures rigorous verification of client identities and ongoing monitoring of their activities. This process is designed to prevent fraud, money laundering, and other financial crimes by maintaining accurate and up-to-date client information.
2. **Human Resources Policy:** This policy covers all aspects of employee management, from recruitment and onboarding to performance evaluation and development. It also includes guidelines on diversity, inclusion, and disciplinary actions to foster a fair and productive workplace.
3. **Financial Management Policy:** This policy outlines procedures for budgeting, expense control, financial reporting, and auditing. It ensures compliance with accounting standards and promotes fiscal responsibility throughout the organization.
4. **Data Protection Policy:** Data protection policy details how Trinity collects, uses, stores, and protects personal data. It aims to comply with data protection laws, safeguard privacy rights, and build trust with stakeholders by reducing the risk of data breaches and unauthorized access.
5. **Information Security Policy:** This policy focuses on safeguarding sensitive information through robust cybersecurity measures, secure data handling practices, and effective password management. It aims to prevent data breaches and ensure the integrity of our information systems.

External Policies and Procedures

1. **Anti-Money Laundering (AML) Compliance:** Trinity partners with external experts to develop and update the AML policies. These experts bring specialized knowledge and an external perspective to ensure our procedures are comprehensive and effective in detecting and preventing illicit financial activities.
2. **Regulatory Compliance and Reporting:** External consultants assist in maintaining compliance with all relevant regulatory requirements and ensure timely reporting to regulatory bodies such as the Gaming Control Board (GCB). Their expertise helps us stay ahead of regulatory changes and maintain good standing with authorities.
3. **Risk Management and Audit:** Independent auditors conduct regular reviews of Trinity's financial and operational processes to identify risks and recommend improvements. This external validation enhances the credibility and reliability of our risk management

strategies.

Timelines and Commitment to GCB Updates

Trinity is committed to keeping the GCB fully informed of the compliance status and any significant changes to the policies and procedures. The timeline for policy review and updates includes:

1. **Annual Review:** All external policies undergo an annual review and update to ensure continued compliance with regulatory requirements and industry best practices.
2. **Quarterly Reports:** Trinity provides quarterly updates to the GCB on the compliance activities, including any changes to internal policies and the implementation status of external recommendations.
3. **Immediate Notification:** Any significant issues or changes in compliance status are reported to the GCB immediately to ensure transparency and proactive management.

Qualifications and Competency Assurance

The CEO is confident in the qualifications and competence of the individuals and entities responsible for developing and maintaining our policies and procedures. This confidence is based on:

1. **Expertise and Experience:** Trinity engages with professionals who have extensive experience in their respective fields, including legal, financial, and cybersecurity experts. Their proven track record in the industry ensures high-quality, reliable advice and support.
2. **Independence and Objectivity:** External consultants and auditors are chosen for their ability to provide an unbiased perspective, free from conflicts of interest. This independence is crucial for maintaining the integrity and effectiveness of our policies.
3. **Continuous Training and Development:** The internal teams receive ongoing training to stay current with industry developments and regulatory changes. This commitment to continuous improvement ensures that our internal procedures remain effective and compliant.

By combining internal strengths with external expertise, Trinity maintains a comprehensive and dynamic approach to policies and procedures, ensuring operational excellence and regulatory compliance.