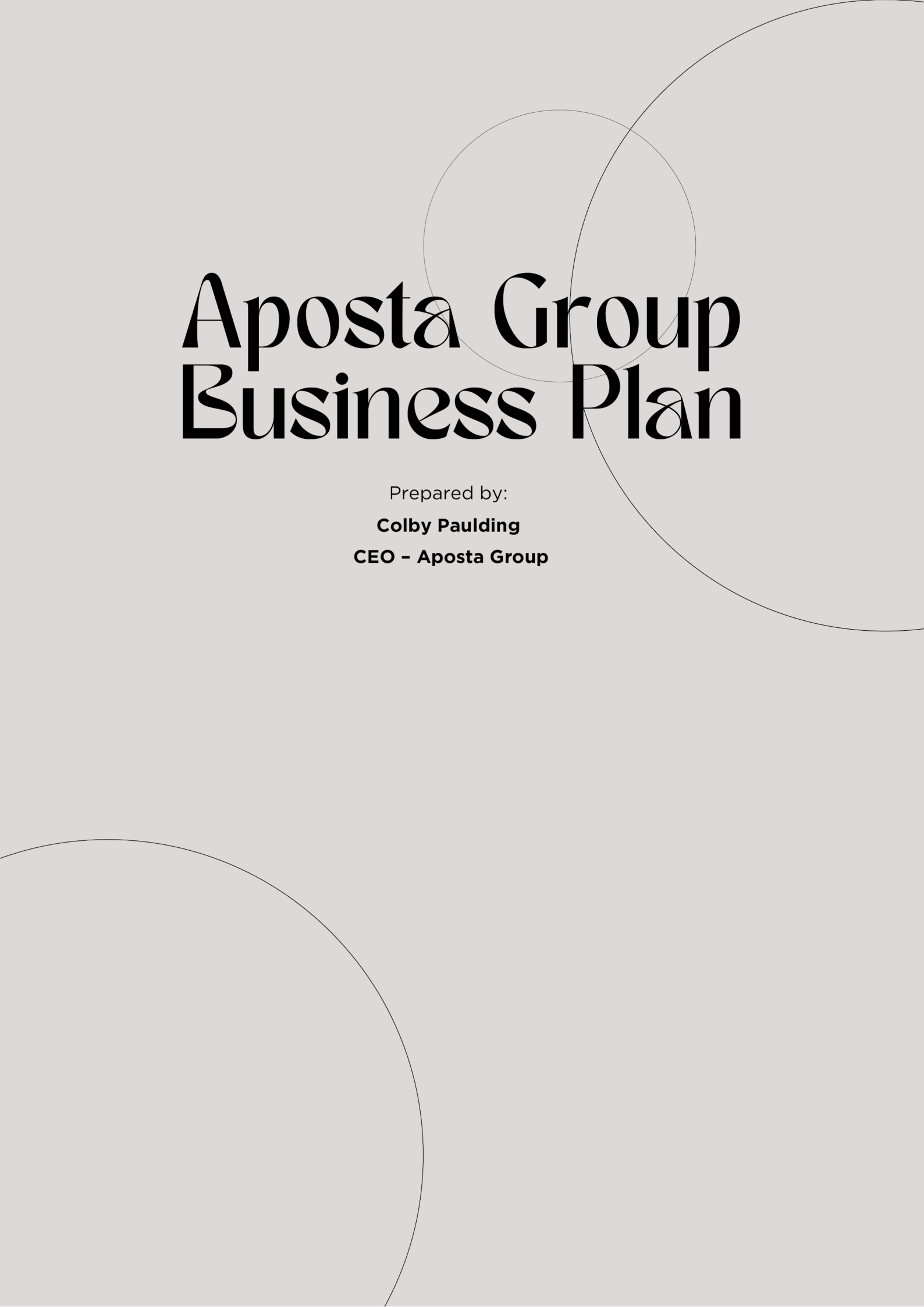




Aposta Group Business Plan

Prepared by:

Colby Paulding

CEO – Aposta Group

Introduction

Licensee

Aposta N.V ("Aposta") will be a company incorporated in Curacao.

Aposta will apply to obtain a sub-licence (IP-Agreement) from Antillephone NV in 2023, and operate B2C under several brands across multiple jurisdictions worldwide.

One of the key considerations for selecting Curacao as the licence jurisdiction was that it covers most gambling activities under a single licence. The benefit of this was that we could get to market with multiple products without having to obtain multiple licences initially.

Furthermore, for a proof of concept in overseas markets Curacao has a low cost of entry compared to other international licences. This helps in taking a disciplined approach to rolling out international expansion without the need to have huge initial capital contribution.

It was noted that Curacao also has a streamlined application process which means that we could obtain approval within a shorter period compared to other jurisdictions.

URLs

The following URLs are currently for consideration by Aposta group, including sub URLs (Country specific)

- www.123casino.com
- www.777casino.com
- www.apostabet.com
- www.apostacasino.com

These URLs will all point at different front end applications of our chosen platform. All of the players will be transacting with the single entity and all bets will be recorded into a singular ledger with a brand split. Aposta will leverage a singular back-end for all of its brands.

Organisational Structure

- Aposta Group – Curacao holding company
- Aposta – Curacao Sub-licensee company
- Aposta Malta – Intermediate holding company
- Aposta Cyprus – Payments company
- Aposta Philippines – Philippines BPO
 - Trading
 - Customer Service
 - Marketing
 - Compliance
 - Accounting and Finance

The enclosed structure chart describes the relationship between entities.

Introduction

Strategic Advisory

Aposta group has engaged EM Group Malta to assist with compliance and corporate services. This strategic engagement is aimed at streamlining industry best practice in the I-Gaming space.

Aposta has also engaged Addisons Law firm based out of Sydney Australia to advise on all aspects of its operations, including licencing and market research.

Regulatory Compliance

Aposta group is aware of changing regulation particularly regarding a need for more stringent AML/CTF and KYC compliance. EM Group Malta will assist with market access advice and assist with ensuring our AML/CTF and KYC policies are in line with our licence requirements.

Once licensed, Aposta will appoint a Chief Financial Officer and Chief Compliance Officer and compliance team to undertake all necessary compliance activities including AML/CTF, KYC and AVS.

Restricted Jurisdictions

Aposta will ensure under its Curacao sub-licence that it restricts access from its websites from customers who reside in prohibited jurisdictions.

These prohibited countries currently include:

- Australia
- Aruba
- Belgium
- Bonaire
- Curacao
- Dutch West Indies
- France
- Netherlands
- Saba
- Singapore
- Statia
- St Martin
- USA

Management Team & Experience

Chief Executive Officer

Colby Paulding

Betdeluxe PTY LTD: 2019 - Current

PointsBet PTY LTD: 2017 - 2018

Your Best Bet PTY LTD: 2012 - 2016

Chief Commercial Officer

Noah Rose

Oncourse Victorian Rails Bookmaker: 2018 - Current

Noah Rose - Trading as Betdeluxe: 2019 - Current

Professional Horse Racing Trader: 2010 - 2018

Chief Product Officer

Michael Horne

Black Steam Technology: 2020 - Current

Chief Product Officer, Ladbrokes: 2018 - 2020

Racing Manager, Ladbrokes: 2017 - 2018

Risk Manager, Ladbrokes: 2016 - 2017

Operations Manager, BetHQ: 2014- 2016

Racing Manager, Betstar: 2008 - 2014

Chief Marketing Officer

Shannon Groome

Marketing Director, BetDeluxe: 2020 - Current

Head of Client Growth, MK Media Australia: 2015 - 2020

Commercial Manager, Kruzey Wagering Affiliate: 2015 - 2020

Chief Technology Officer

Jegan Siva

Chief Technical Officer, Black Stream (Amused Group): 2020 - Present

Principle Engineer, FanDuel (Flutter Group): 2019 - 2020

Principle Engineer, Bet Easy (Stars Group): 2017 - 2019

Philippines Country Manager

Jonas Diego

Head of Studio, BetMGM: 2020 - 2022

Studio Manager, Entain: 2016 - 2020

Description of the games to be offered

Aposta Group looks at leveraging a range of different products across the platform. We are looking at targeting specific games and sports into different markets depending on the demographic of the market that we are targeting.

- Slots
- Live Dealer Games
- Table Games
- Fishing Games
- Jackpot Games
- Sports Bookmaker

We are looking at leveraging respected and recognised game providers. The following game providers are currently being considered by Aposta and the individual game offering will be subject to a market-by-market consideration.

1spin4win
1x2gaming
alg
amatic
atmosphera
authentic
belatra
infin
bsg
booming
epicmedia
elk
egt
endorphina
evolution
everymatrix

evoplay
ezugi
groove
gameart
gamebeat
gamzix
habanero
hollegames
igtech
isoftbet
kagaming
kalamba
lucky
luckystreak
mrslootty
mancala

mascot
netgame
netent
nolimit
nucleus
onlyplay
wizard
pipa
platipus
playngo
playtech
pragmaticexternal
pushgaming
oryx
softswiss
slotegrator

swintt
relax
quickfire
quickfire
quickspin
Redtiger
spinomenal
slotmill
smartsoft
spribe
thunderkick
tomhorn
truelab
wazdan
yggdrasil
zillion

Further to the above game providers we are looking at leveraging a Sports/Bet Radar Managed trading solution for all our sporting needs. This solution from Bet Radar will cover both pre-match and live betting options.

Information on where the payment processing will take place and which providers will be contracted

Payment processing will occur in Cyprus and the engagement will be through our Cyprus payments company Aposta Cyprus.

Currently we are exploring the merchants for whom we will integrate within Cyprus. We intend to accept both Fiat and Crypto as payment methods.

Currently exploring Crypto business banking solutions with the following:

Gemini Crypto Business account

- Gemini is a New York trust company that is regulated by the New York State Department of Financial Services (NYDFS) and the New York Banking Laws for capital reserve, cybersecurity, and banking compliance standards.

Binance business account

- Binance is one of the world's largest cryptocurrency infrastructure providers
- Founded in 2017 in China, but later moved its headquarters after the government's restrictions of cryptocurrency. Trading. Now based with headquarters in the Cayman Islands and Mahé in the Seychelles.

Blockfi business account

- Founded in 2017
- Based in New Jersey, USA, with regional offices in Singapore, Poland and Argentina

Coinbase Pro business account

- Coinbase is a UK company regulated by the UK Financial Conduct Authority.
- The company which operates Coinbase and GDAX in the U.S is Coinbase, Inc. It is licensed to engage in money transactions in most U.S. jurisdictions.

Kraken business account

- Founded in 2011 California
- The largest bitcoin exchange in volume, and also trades fiat currencies (US\$, CA\$) and other major cryptocurrencies

Luno Business Account

- Luno started in South Africa in 2011, currently operating as a subsidiary of Digital Currency Group in 43 countries, with branches in London, Sydney, Singapore.

Information on where the customer support will take place and if applicable, which providers will be contracted

Aposta will engage its related entity, Aposta Philippines, for all Customer Support. This will come in the form of Live Chat, Emails, Telephony and social media responses.

Aposta Philippines will be responsible for escalating serious issues relating to fraud, AML, finance and other high-ticket items to central management based in Australia.

CRM solutions are currently being analysed however it is the view that one CRM that captures all the brands will be utilised for managing all different channels of communication. This will help with operational efficiency as well as providing a clear audit log for any audit considerations.

Information on the proposed marketing activities of the company and if applicable will providers will be contracted. Description of what activities will be performed where, who the contact persons are etc.

Initial market penetration will be through leveraging affiliate networks in each of the target regions. We will leverage the marketing team in Aposta Philippines to build connections with affiliate networks globally.

One of the core focuses will be to leverage influencer marketing at a regional area to promote the brand and offer affiliate commissions / revenue sharing to these influences.

Our marketing team will build out in advance of obtaining the licence and go live affiliate websites to gather traffic and build long term SEO. We believe that these affiliate networks powered by influencer content and gaming news will help our long-term SEO strategy whilst keeping up with the latest shifts in i-Gaming trends.

Curacao License Consideration

The driving consideration for a Curacao gaming license was the ability to access multiple markets under a singular license. The licensing process in the I-gaming market is complex and cumbersome to a new market entrant like Aposta. Our research suggests that leveraging a Curacao gaming license to penetrate multiple markets simultaneously will give us a fast to market model whilst reducing our capital expenditure.

The maturity of the Curacao regulator was one driving factor behind the consideration, with Curacao gambling license been issued since 2002, Aposta believes that it provides a more stable framework then the emerging regulatory bodies.

The simplicity of the Curacao gambling laws makes it significantly easier for a new market entrant like Aposta to navigate through. This single licence allows Aposta to operate a online casino and sportsbook without requiring multiple licences. This will enable our business to grow and understand whether we should explore further regulatory licenses in jurisdictions beyond what a Curacao gaming licence can provide.

It is also worth noting that the low tax regime currently in Curacao was a consideration that will allow Aposta to grow its presence in the i-Gaming markets. Noting that our preliminary research and consultation with Addisons Sydney identified that there is likely to be changes in the current tax regime soon.