

NEROBLANKO TECH B.V.

BUSINESS PLAN

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Created and approved by:	
Confidentiality level	Restricted

CONFIDENTIALITY STATEMENT

This Business Plan is a confidential document of Neroblanko Tech B.V. – B2C licence applicant (herein referred to as 'Neroblanko Tech' or 'the Company'). It contains confidential and/or proprietary information.

1. OVERVIEW

We live in an increasingly digital age. People discuss metaverses, video conferencing software has become more prominent as the result of the pandemic, streaming services are on the rise. Generally speaking, we see a clear tendency and demand among people of different nations and cultural backgrounds toward time preservation through the use of the Internet.

Nowadays people tend to give preference to on-demand services, rather than actually physically be present somewhere in order to consume content or get entertained. The iGaming market nowadays is flooded with similar offers. But quantity never equals quality, it is a well-known fact that applies to online games just as much as to any other means of entertainment.

On the one hand, not all operators and aggregators seek to maintain the high quality of services they provide. Additionally, a lot of sites operate without a real license, which in our opinion is at the very least unethical toward players, and it has a negative impact on the industry as a whole.

Here is what would allow Us to succeed:

- ✓ **A wide variety of game applications.** Apart from usual slots we will provide players with sports betting vertical, roulette and other types of card and live games.
- ✓ **Advanced bonus system.** Bonuses will be an integral part of the gameplay. A staggered system of privileges allows to increase player's loyalty to the product.
- ✓ **24/7 technical support,** allowing players to get answers to any questions 24/7. Our staff has qualified specialists who will always help both a beginner and an experienced player with any question.
- ✓ **Availability on both PC and mobile devices.** Website mobile version is adopted for smartphones and tablets in order to maximize the quality of experience.
- ✓ **Close attention to AML/CFT compliance.**

Our unique online casino project – **Ivybet** – is almost ready to launch.

What We offer to our Players:

- ✓ a myriad of different slots of all colors and visual delights
- ✓ interactive games that make time fly by being extremely engaging and delightful;

- ✓ poker rooms for those that trust their skill, roulette for the lucky and a number of other card games for the picky;
- ✓ bets on classic sports, cybersports and virtual sports that test your luck and wit with satisfying monetary rewards;
- ✓ mobile applications in order to provide quality experience on mobile devices on the tip of your fingers.

Online gambling is a hobby, sometimes even a lifestyle for some. Yet, for each of every single player it starts with the very first experience, which shapes his/her attitude toward gambling for the rest of his/her life. If the player has bad experience the first time he/she plays, the gambling community might lose a member that never returns. If enough people have bad experiences because of bad actors in the industry, the general consensus toward gambling might shift within the society.

Ivybet is about that gambling experience we all love. The experience when all your concerns disappear, time halts, and you are in the zone. Not only that, but you receive back. Not only your winnings, but bonuses too - an integral part of the gameplay. We offer a staggered system of privileges that increases player loyalty to the product.

We believe gambling operators define experience within the industry, and it is our responsibility to make sure the experience is nothing short of joyful for any player that interacts with us. We plan to polish the product until there is no way forward for it, but to the hearts of gamblers around the world. Our team will carefully monitor loyalty of our players and swiftly resolve all issues. Customer satisfaction is what will separate us from the others.

Our primary goals are:

- ✓ continually improve our player retention rate;
- ✓ have new player sign ups continuously;
- ✓ increase the level of customer satisfaction with the platform.

2. BUSINESS OBJECTIVES

2.1. EXECUTIVE SUMMARY

Neroblanko Tech is seeking to adopt strategies of market development and market penetration to enhance its growth and presence in the gaming market. As part of its ongoing strategy, Neroblanko Tech is seeking to enter new markets with a Curacao B2C gaming license.

Neroblanko Tech's current goal is to initially operate under a license issued by Curacao, followed by securing more licences from different jurisdictions such as Canada, Malta or Germany. With the Curacao license, the target markets will consist of countries where there are no explicit restrictions on operations. These include several countries within the European Union and the European Economic Area, as well as countries in the LATAM region (Peru, Brazil, Mexico, Chile, Kenya, Nigeria, Montenegro, Ireland, Albania, India). Within these markets, we aim to become a well-

trusted and well-regarded entity within the gaming industry. Another objective is that, albeit known that the investment is material, the operation becomes a profitable one within the first year of operation.

Another important objective for Neroblanko Tech is that we offer a good quality service in terms of design that reach and exceed the players' expectations as well as following a non-aggressive, non-invasive method of advertising the company's product. We want players to come to our website because they genuinely enjoy their experience with us. From an operational perspective, our aim is to develop and implement data analytics to develop and ultimately improve risk management effectiveness, resulting in better management and attaining better results for us, as all player wins would be adequately covered, allowing a good profit margin for the company.

We aim to be customer-focused, providing players with a stable gaming entertainment environment and fast personalised services through the customer support team. Services are simple to use with minimal bureaucratic processes, however not at the expense of becoming non-compliant. Hence due diligence requirements are being stated as part of the Terms & Conditions and players' accounts will be blocked, and players disallowed from playing if they fail to comply with the requirements as prescribed by law.

In order to achieve our index of success we would apply the skills of our UBO – Ms. Azganush Mkrtchyan with a unique blend of skills in strategic development, project management and gaming sector operations. Ms. Mkrtchyan is known for a keen ability to improve business processes, foster client relationships, and drive growth.

Neroblanko Tech is set to generate profit by the end of its first year of operation and become a stable business in three years' time from the start of the product launch.

2.2. BUSINESS MODELS

Key partners: 1. Curacao-based iGaming experts 2. B2B game aggregators 3. B2B game developers 4. Payment service providers 5. Data Centres 6. Cloud provider	Resources: 1. Creative and competent staff 2. High-quality gambling content	Valuable offers: 1. Accessibility 2. Convenience 3. Risk mitigation 4. Customer-oriented approach 5. Wide selection of casino games	Client interaction: 1. Remote support 2. Personal support 3. Community 4. Personal offers 5. Collective improvement of products	Client segment: 1. Players via affiliates 2. Casino players 3. Internet users
	Key business activities: 1. Branding 2. Service development 3. Developing of the loyalty program 4. New customer engagement and customer retention		Sales channels: 1. Advertising in social media 2. Advertising in internet and printed magazines 3. Affiliate programs 4. Direct sales	
Expenses: 1. Hosting colocation rental 2. IGaming platform improvement 3. Commissions of games provider 4. License fees 5. Staff costs		Source of income: 1. Gross gaming revenue		

2.3. THREE-YEAR FINANCIAL PROJECTIONS

Based on our approximated estimates, Ivybet is expected to maintain a healthy financial standing over the next five years. This financial plan outlines financial development of the project. Initially, the project is funded by a \$50,000 contribution from the UBO. Subsequently, once the license is obtained, Ms. Mkrtchyan is planning to add additional funding in the amount of \$50,000, thus bringing the total to a healthy amount of \$100,000. Also, additional funding is planned starting from Month 3 to finance subsequent advertising campaigns. The UBO is expected to get repaid as the cash flow generated from operations would be sufficient to cover it. Additionally, the project will finance its growth through the cash flow itself.

It is assumed that our running costs are approximately between \$60,000 and \$70,000 per month, which include staff compensation, hosting, software costs and other fixed costs. Such a wide price range is due to revenue fluctuations and hence the varying royalties we would have to pay for the software. Based on our estimations, we need at least 200 active players a day that deposit an average of 10 dollars each to reach the break-even point. The target is expected to be easily met and the number of players to be much greater than the break-even point. We believe that our Product is likely to easily reach and maintain profitability. Ivybet is expected to break even in the second month of operations.

Profitability is expected within the first year of operations. Profits are expected to increase over the next two years, as our customer base is established. The following table shows the projected profit and loss calculated to a lower side of the expectations for the next five years. The table does not include pay-outs to players.

P&L: 36 months plan

	Year 1	Year 2	Year 3
	€	€	€
Revenue			
Revenue from casino	7 447 896	9 052 964	11 003 934
Player winnings from casino	6 479 670	7 876 079	9 573 423
Gross gaming revenue	968 226	1 176 885	1 430 511
	13%	13%	13%
Direct costs			
Marketing and other support service fee	540 000	648 000	777 600
Compliance Contribution	15 516	18 860	22 925
Total direct costs	555 516	666 860	800 525
Net profit	412 710	510 025	629 986
	43%	43%	44%
Administrative costs			
Compliance audit fee	-	5 000	-
Annual licensee fee	66 000	66 000	66 000
Financial statements audit fee	5 000	5 000	5 000
Rent	10 000	10 000	10 000
Personnel cost	70 000	70 000	70 000
Utilities	9 996	9 996	9 996
Marketing fees	30 000	30 000	30 000
Legal and professional fees	25 000	25 000	25 000
Bank charges	15 000	15 000	15 000
Other costs	9 000	9 000	9 000
Total Administrative costs	239 996	244 996	239 996
Profit before tax	172 714	265 029	389 990
Corporate tax	3 454	5 301	7 800
Net income	169 260	259 729	382 191

Balance sheet: 36 months plan

		Year 1	Year 2	Year 3
		€	€	€
ASSETS				
Cash		504 804	657 971	852 468
Funds held on behalf of the players		231 525	281 420	342 068
Accounts receivables		-	-	-
Total current assets		736 329	939 391	1 194 536
TOTAL ASSETS		736 329	939 391	1 194 536
LIABILITIES AND EQUITY				
LIABILITIES				
Current liabilities		262 263	311 765	374 798
Players liabilities		231 525	281 420	342 068
Dividend payable		169 260	259 729	382 191
Current tax due		3 454	5 301	7 800
Total liabilities		666 502	858 214	1 106 856
EQUITY				
Shareholders contribution		5 000	5 000	5 000
Retained earnings:		-	-	-
<i>Retained earning B/F</i>		-	-	-
<i>Net income</i>		169 260	259 729	382 191
<i>Dividend declared</i>		- 169 260	- 259 729	- 382 191
Total equity		5 000	5 000	5 000
TOTAL LIABILITIES AND EQUITY		671 502	863 214	1 111 856

Cash flow: 36 months plan

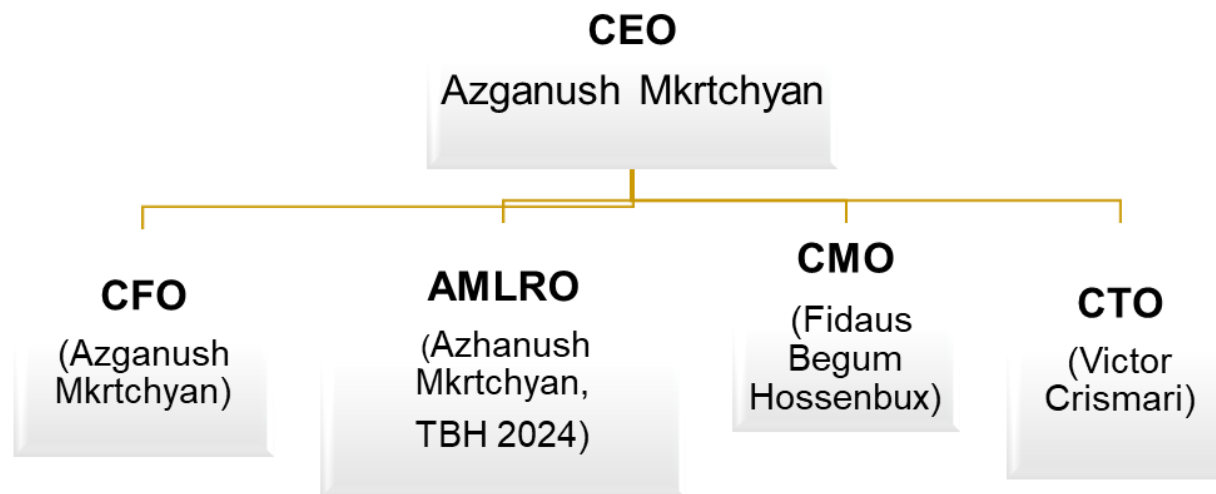
		Year 1	Year 2	Year 3
		€	€	€
Cashflows from operating activities				
Net profit before taxes		172 714	265 029	389 990
Movement in trade receivables		-	-	-
Movement in players liabilities		231 525	49 895	60 648
Movements in trade payables		262 263	49 502	63 033
Tax payments		-	3 454	- 5 301
Dividends paid		-	169 260	- 259 729
Cash generated from operating activities		666 502	191 712	248 642
Cashflow from investing activities				
Fixed assets		-	-	-
Cash generated from/ (used in) investing activities		-	-	-
Cashflow from financing activities				
Shareholders contribution		5 000	-	-
Cash generated from/ (used in) financing activities		5 000	-	-
Cash movements		671 502	191 712	248 642
Funds held on behalf of the players		- 231 525	- 49 895	- 60 648
Beginning balance		-	439 977	581 794
Cash at period/ year end		439 977	581 794	769 788

See the attached overleaf for more information.

3.COMPANY STRUCTURE

3.1. MANAGEMENT

Neroblanco Tech's company management structure is depicted in the chart below:



Growth and market share are Neroblanko Tech's main strategies and consequently, the Company will invest in growing a team who will be capable of achieving the desired objectives.

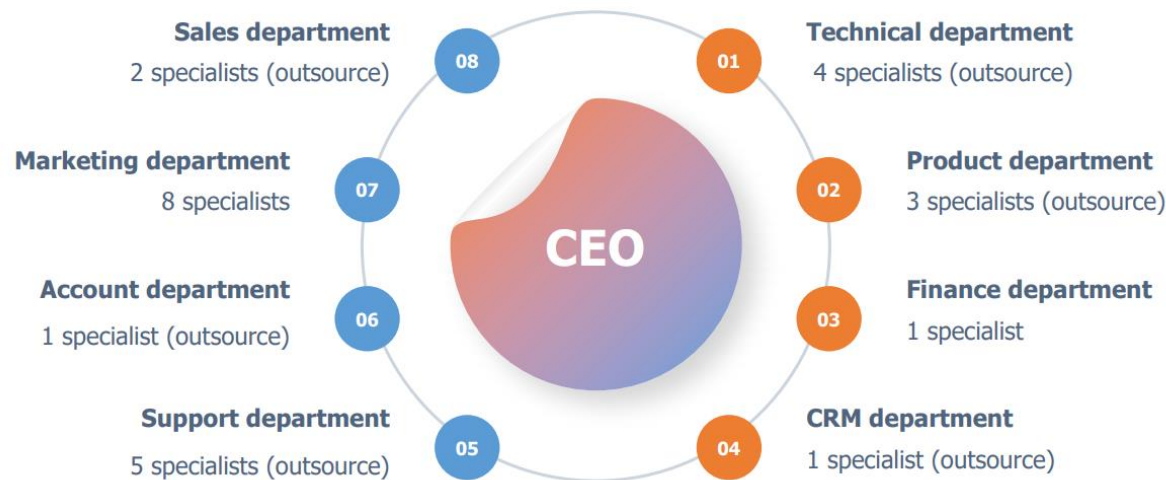
During the initial phase of Neroblanko Tech, financial support will be directly provided by the UBO, who is committed to investing up to 100.000 USD to establish a firm foundation for the business to thrive. If necessary, the UBO is prepared to secure additional funding through a loan to ensure the company's smooth take-off. Once the critical Curacao gaming license is obtained, a pivotal shift in our financial strategy will occur. At that point, the business aims to become self-sustainable, channelling the profits generated from our operational activities back into the company. This approach not only ensures operational continuity but also signifies our unwavering resolve to emerge as a "big player" in the iGaming industry.

According to our estimations, obtaining license, hiring staff, setting up infrastructure and preparing payment gateways for the interactive platform website usually takes 3-4 months. The last stage is the launch of the project itself. By the end of the fourth month, we plan to begin optimization of the entire work in order to make sure the project runs as efficiently as possible.

Once everything launched and optimized, we will focus on our main goal – to **provide a high-quality product with 24/7 availability.**

In total, the company will have up to 15 employees. The number of employees will increase gradually as the business continues to grow. Compliance-related functions will be designated to experienced iGaming experts. Their guidance and further commitment to grow with our company is an essential component to solidifying our progress in the industry.

Neroblanko Tech Management Team will be headed by the Company's UBO and CEO – Ms. Azganush Mkrtchyan, and will be made up of employees working within the Company and outsourced if required. The goal is to eventually have a fully operational team required to operate under the Curacao gaming license.



Essential functions will be undertaken by the designated personnel from Neroblanko Tech, whilst some of the compliance-related roles may be outsourced from reputable firms or individuals.

3.2. LEGAL & GOVERNANCE FRAMEWORK

At the very beginning, legal work will be outsourced to MIT Lawyers; subsequently, the company plans to form its own inhouse legal department from highly qualified specialists in the field of gambling law, financial monitoring and AML/CFT.

Neroblanco Tech legal department is planned to be responsible for conducting KYC procedures, ensuring AML/CTF regulations compliance, validating transactions, keeping essential documents for the lawful conduct of business, as well as resolving disputes, thereby maintaining a high level of reputation for our online platform.

Policies

and

procedures

Legal Advisors is also responsible for drafting the essential policies and procedures to maintain efficient and lawful operation of the Ivybet. The Company is going to adopt the following policies:

- Terms and Conditions
- Responsible Gaming Policy
- Self-Exclusion Policy
- KYC Policy
- AML Policy
- Dispute Resolution Policy
- Privacy Notice
- Cookie Notice

All the aforementioned documents will be displayed on the Ivybet website so that they can be accessed by our Players.

4. KEY SUPPLIERS

The Platform in use combines multiple systems and subsystems cumulatively representing a product offered to the company's clients for the latter to run online gaming businesses.

4.1. SET UP

Neroblanco Tech shall be utilising a rented platform, developed, and owned by Velund Investment Ltd. for all player management, under the brand SLOTEGRATOR. The platform provider will conduct all necessary tests on the system to ensure that its security, stability and expected performance are maintained. Rollback functionalities will always be available to enable a quick return to a previous system state in the event that any unexpected behaviour is experienced after releasing software.

The games being offered by Neroblanco Tech are casino games, where players place bets against the house, which games are provided by other licensed B2B critical supply providers and are not owned by Neroblanco Tech.

4.2. GAMES – TYPE 1

The Neroblanco Tech Gaming Platform will feature a suite of casino games from highly reputable and licensed casino game developers. All games will be integrated through an aggregator, game providers are all certified and have a good reputation in the market

4.2.1. Slotegrator (Amatic, BGaming, Endorphina, Platipus, Tom Horn Gaming)

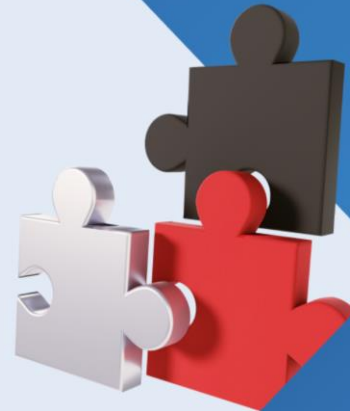
<https://slotegrator.pro/apigrator.html>

APIgrator online casino game integration

Enrich your casino platform with over 15,000 certified games from over 100 licensed game developers with APIgrator – our unified solution for fast gambling software integration.

Free consultation

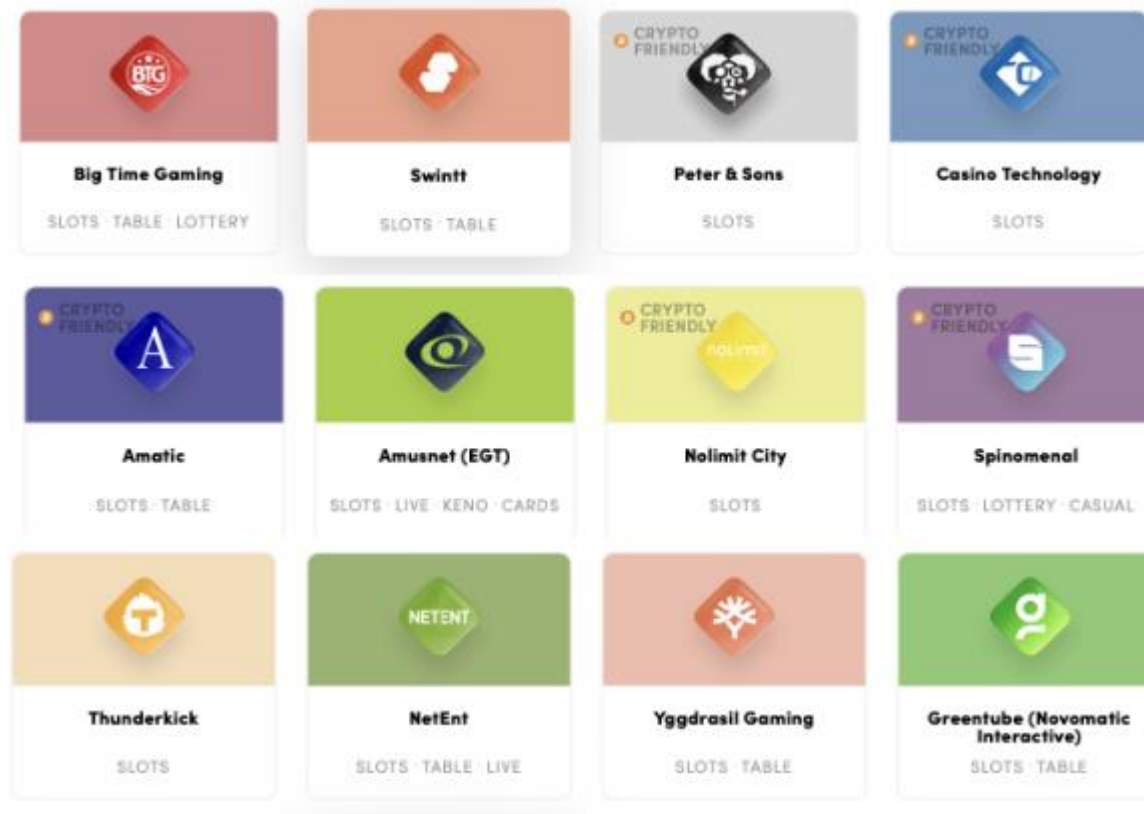
By clicking this button, you agree to our [Terms of Service](#) and [Privacy Policy](#).



4.2.2. SOFTSWISS

<https://www.softswiss.com/games/>





4.3. ONLINE PLATFORM – [HTTPS://IVYBET.IO](https://ivybet.io)

The web portal is based on CMS built-in which can be administered by the content administrator. A player will be required to register an account before he can access the full range of casino games. Other features include:

User Registration and Profile Management

- Account Creation: Secure sign-up process with verification (e.g., email confirmation, CAPTCHA).

User Profile Management:

- Personal Information: Securely store and manage personal details.
- Contact Information: Options to update email, phone number, etc.
- Payment Methods: Integration of various payment options (credit/debit cards, e-wallets, etc.).
- Document Upload: For identity verification, in line with KYC regulations.

Financial Transactions and Wallet

- Single Wallet System:
 - Transaction History: View past deposits, withdrawals, wins, and losses.
 - Balance Check: Real-time wallet balance display.
 - Deposit Funds: Secure deposit methods.
 - Withdrawal Requests: Compliance with AML policies.

Gaming Experience

- Game Access:
 - Real Money Play: Games available for betting with real money.
 - Bonus Play: Options to play with bonus or promotional credits.
- Game Fairness and Compliance: Ensuring all games meet regulatory standards for fairness.

Personalization and Communication Preferences

- Notification Settings:
 - Internal Email System: For in-portal communication.
 - Personal Email Notifications.
 - SMS Alerts.
- Privacy Settings: User control over data sharing and privacy.

Responsible Gaming

- Features for Responsible Gaming:
 - Self-Exclusion Options: Temporary or permanent account deactivation.
 - Deposit Limits: Daily, weekly, or monthly deposit limits.

- o Access to Responsible Gaming Resources.

Compliance with Kahnawake Legislation and EU Best Practices

- Regulatory Adherence:
 - o Licensing: Compliance with the Kahnawake gaming regulations.
 - o Player Protection: Measures to prevent underage and problem gambling.

Data Protection: Adherence to GDPR for data privacy and security.

Regular Audits and Certifications:

- Game Fairness: Regular audits by independent bodies (e.g., eCOGRA).
- Security Certifications: SSL encryption, firewalls, and other cybersecurity measures.

Additional Considerations

- Customer Support: 24/7 support via chat, email, and phone.
- Multi-Language Support: Catering to a diverse user base.
- Mobile Compatibility: Ensuring the website is mobile-friendly or offering a dedicated app.
- Marketing and Promotions: Compliance with advertising standards and bonus terms clarity.

Technical Infrastructure

- Scalability: Robust and scalable content management system.
- Integrity: Protection of user data and transaction records.

Responsible Gaming

Our website shall offer our players all the necessary functionalities related to responsible gaming applicable legislation and best EU practices.

Responsible Gaming and Compliance:

- The website is designed to adhere to the necessary functionalities required by the responsible gaming legislation.

- Additionally, the platform conforms to best practices established within the European Union (EU). This means that the features and guidelines on the website meet the highest standards of player safety and ethical gaming set by the EU.

Betting Limits:

- Players have the flexibility to determine their own betting limits. This puts them in control, allowing them to decide the maximum amount they wish to bet.
- This feature is particularly useful for players who want to keep their gambling habits in check and prevent excessive spending.

Account Deactivation:

- The system offers players the capability to deactivate their accounts temporarily or permanently.
- Once an account is deactivated, subsequent logins are prohibited. This means that players can't access their accounts until they decide to reactivate (if they've chosen a temporary deactivation).

Setting Deposit, Wager, and Loss Limits:

- Right after a player registers an account and logs in for the first time, they are given the immediate option to set limits on deposits, wagers, and potential losses.
- These limits can be defined for various timeframes, such as daily, weekly, or monthly, providing players with the flexibility to customise their gaming experience.
- By providing these options, the website ensures that players have the tools to manage and monitor their spending habits effectively.

Uniformity Across All Games:

- The aforementioned limits (bet, deposit, wager, and loss) are uniformly applicable across all games featured on the website.
- This means that if a player sets a limit for one game, the same limit will automatically apply to other games as well, ensuring consistency in the player's experience.

Continued Access to Limit Settings:

- Players can adjust their limits whenever they want. The functionalities to modify these settings are always accessible on the platform.
- This ensures that players have ongoing control over their gaming behaviour and can make necessary adjustments based on their individual circumstances.
- In essence, the website prioritises player safety, responsible gaming, and user autonomy, ensuring that players have the necessary tools and functionalities to have a controlled and enjoyable gaming experience.

4.4. BACK OFFICE SYSTEM

The back office is a web-based tool for the administration and management of the gaming system.

Only the Neroblanko Tech staff will have access to the back office and the appropriate teams from our outsourcing partners. The employees have restricted access to the back-office modules and data according to their job roles.

INFORMATION SECURITY

1. Access to the back office is strictly through HTTPS (SSL) encrypted connection.
2. Submitted data on the web server uses encryption to support a high level of security and prevent unauthorised access.
3. All sensitive data that is stored in the database is encrypted to prevent unauthorised access.
4. The System will provide strong authentication at the Web server
5. The trusted subsystem model will be used, and per-user authorization will occur within the application.
6. User access and permission roles on module pages on the Web server will be controlled with authorization. Permissions within the database will be controlled by a user-defined role.

SCALABILITY

The system is built around loosely coupled components that exchange data through well designed APIs. The communication is secured and encrypted. The system is based on distributed architecture which allows vertical and horizontal scaling.

AVAILABILITY

All applications in the infrastructure for the Gaming System are deployed on a minimum of 2 servers and behind a load balancer to maintain high availability.

4.4.1. User Management and Access Controls

ACCESS CONTROL

Each action that exists in the system as well as the display field is mapped to specific privilege. All existing modules or functionalities also have specific privileges. For the user to be able to see or use specific action he must have the appropriate privilege, in one of the roles assigned to him.

4.4.2. Record logs, changes to games and audit requirements

All changes to player information and the player wallet will be permanently logged. Details including the timestamp and the respective user who carried out the change will form part of the logged information.

The system in use has the functionality to flag high betting volumes or high value winnings by a specific player. Flagged accounts will be investigated to ensure that there are no anomalies in the system or errors in the games that might have led to the high value winnings.

The system is tracking each action taken in the system with the following information:

1. Username;
2. Timestamp;
3. Action;
4. Changes made; and
5. Auto time outs.

4.4.3. Platform modules

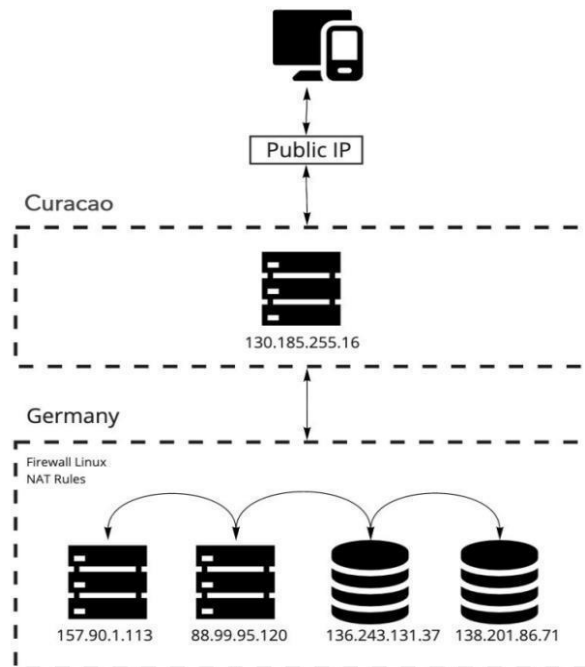
The system will contain the following sections:

1. Roles and access management;
2. Player management;
3. Management of player Segments;
4. Fraud Management;
5. Cashier (payments and transactions);
6. Bonuses;
7. Email templates management;
8. Responsible gambling/gaming;

- 9. Game management; and
- 10. Dashboards and reports.

5. TECHNICAL SETUP

A high-level schematic of the infrastructure is shown below:



Production servers

All servers required for gaming operations are physically hosted at the Hetzner data centre in Nuremberg, Germany, although they are managed remotely by the IT administrators. These currently consist of a web and queuing server, application server, and 2 database servers. The database server acting as the slave, together with the server located in Curacao are both a real-time replication of the master database, and therefore also act as a backup server in case the master database would crash or have any data which becomes corrupted.

Replication server in Curacao

Player data, game and financial transactions shall be replicated on the physical server that is hosted at the Netshop ISP data centre located in Curacao. To eliminate possible lag issues, a direct MySQL replication service will be set up between the production database at the Hetzner datacentre in Germany and the server located in Curacao. All the relevant data will be replicated on the server located in Curacao.

Security details

The Hetzner data centre provides all the necessary security through its firewalls, anti-DDOS, and continuous monitoring systems. All servers are constantly monitored via admin-software focusing on the proper use, temperature, and any failures. The server rooms both in Germany and Curacao are equipped with all necessary cameras, temperature devices, fire protection equipment and other security related features. Both data centres are ISO/IEC:27001 certified.

6. TARGET KPI AND BUSINESS OBJECTIVES

6.1. MARKETING STRATEGY

Target customers



The Company's aim is to reach out to players across our target regions. We understand that there may be some relevant imposed regulations in those target regions. The company will consider the legal requirements of each jurisdiction and will only target players in jurisdictions where the Curacao licence is accepted. Apart from legal requirements compliance, we will also perform a financial feasibility to gauge its viability.

Neroblanko Tech's intention is to initially start off with the website in the English language, but considerations for translation of the same website and platform to other key languages is being considered especially because of the array of jurisdictions, where players will be reached out to. Marketing considerations by jurisdictions will also be catered for.

The marketing will be targeted to different age groups and utilising different marketing promotions, offers and bonuses to attract the various types of players. Neroblanko Tech will ensure that no form of marketing is deemed to be attractive for underage players. What's more, Services provided by Neroblanko Tech N.V. will be strictly marketed for adults only. The aim is to attract players having the largest disposable income as well as prospective players that are attracted to this type of entertainment. We will align our marketing targets to those age group of 30+ years old, which according to our research has the most disposable income.

Neroblanko Tech wants to do things right and not only wants to have the licence but it also wants to ensure its prospective players, that the company will not defraud them, but neither will they allow their players to defraud the company or other players,

through irregular manipulations that would disadvantage other players and / or Neroblanko Tech. We will ensure adequate measures and controls that will manage such risks and any issues arising.

Our manpower will be carefully selected to comprise very knowledgeable persons about the gaming industry. We plan to provide them with adequate training and guidance to ensure that the service that they provide is second to none.

To boost our player database, we will adapt a suitable affiliate system. Independent affiliates will bring new players for a fee. The affiliates will be provided with their personal cabinet and an affiliate link, which allows the connection of players to the affiliate. An affiliate will get a fee for each registration, deposit or bet depending on a revenue share program. The company will also encourage player feedback through customer support to better understand what the players desire in their experience with Neroblanko Tech. Any complaints received, will also be logged, investigated, and even acted upon as soon as possible to ensure the best service to players.

7. RISK EVALUATION AND MANAGEMENT

In today's rapidly evolving digital landscape, effective risk evaluation and management are paramount to the success and sustainability of any platform. Recognizing this, our comprehensive approach to risk evaluation and management encompasses a wide array of strategies and technologies designed to identify, assess, mitigate, and monitor potential risks across various dimensions of our operation. This multifaceted approach ensures not only the resilience and reliability of our platform but also fosters trust among users, stakeholders, and regulatory bodies.

Our risk management framework integrates advanced technological solutions, industry best practices, and strategic partnerships to address a broad spectrum of risks, including system security threats, operational vulnerabilities, financial uncertainties, and compliance challenges. By leveraging the capabilities of leading service providers like Slotegrator and SUMSUB, along with integrating powerful tools such as QuickBooks for financial management, we establish robust defenses against potential threats and ensure compliance with international standards and regulations.

Key components of our risk evaluation and management strategy include:

Risk Assessment

Objective:

The primary objective of our Risk Assessment strategy is to identify, evaluate, and manage potential risks that could impact our operations, reputation, financial stability, and compliance obligations. This comprehensive approach ensures the resilience and sustainability of our platform.

Methodology:

Our Risk Assessment methodology encompasses a systematic process for identifying potential threats to our business, including but not limited to cybersecurity threats, operational disruptions, legal and compliance risks, and market fluctuations. We employ both qualitative and quantitative analysis techniques to evaluate the likelihood and impact of these risks, prioritizing them based on their potential effect on our business objectives.

Third-Party Integration:

We have partnered with SUMSUB, a leading provider of KYC and anti-fraud solutions, to bolster our risk assessment capabilities. This integration allows us to:

- Conduct thorough customer identity verification to mitigate fraud risk and ensure compliance with global anti-money laundering (AML) and KYC regulations.
- Leverage advanced analytics and machine learning technologies to detect and prevent fraudulent activities in real-time.
- Enhance our customer due diligence processes, providing a secure and trustworthy platform for our users.

Risk Mitigation Strategies:

Our risk mitigation strategies are tailored to address the identified risks effectively. These include:

- Implementing robust cybersecurity measures to protect against data breaches and cyber-attacks.
- Establishing comprehensive operational procedures and backup plans to ensure business continuity in the event of disruptions.
- Regularly updating our legal and compliance frameworks to stay ahead of regulatory changes.
- Diversifying our market presence to reduce the impact of market fluctuations.

Monitoring and Review:

Continuous monitoring of our risk landscape and the effectiveness of our mitigation strategies is vital. We conduct regular risk assessments to identify emerging threats and review our risk management policies and procedures to ensure they remain effective and aligned with our business objectives.

Our proactive and comprehensive Risk Assessment strategy is integral to our platform's success. By identifying potential risks early, integrating cutting-edge solutions like SUMSUB, and implementing effective mitigation strategies, we ensure the sustainability, security, and compliance of our operations, thereby safeguarding our customers and our business.

System security

Our platform's system security is designed to protect against a wide array of digital threats, ensuring the integrity, confidentiality, and availability of our users' data. Recognizing the importance of robust security measures, we incorporate advanced technologies and best practices, including a strategic partnership with Slotegrator, to safeguard our operations.

Core Security Measures

- **Encryption:** We implement strong encryption protocols for data at rest and in transit, ensuring that all user and operational data is protected against unauthorized access and breaches.
- **Access Control:** Utilizing multi-factor authentication (MFA) and role-based access control (RBAC), we restrict access to sensitive information and critical system components, ensuring that only authorized personnel can perform sensitive operations.
- **Firewalls and Intrusion Detection Systems (IDS):** Our deployment of state-of-the-art firewalls and intrusion detection systems acts as a first line of defense, monitoring and blocking potentially malicious traffic and activities.
- **Regular Security Audits and Penetration Testing:** To identify vulnerabilities and strengthen our defenses, we conduct periodic security audits and penetration testing, leveraging external experts to simulate attack scenarios.

Slotegrator Integration

- **Enhanced Data Protection:** Through our partnership with Slotegrator, we enhance our platform's security capabilities. Slotegrator's solutions are integrated into our system, providing advanced tools for data protection, including secure backup and replication services.

- **Backup and Replication:** Slotegrator aids in implementing robust backup and replication strategies. This ensures operational data is regularly backed up and replicated across multiple secure locations, enabling swift recovery and maintaining service continuity in case of data loss or system failures.
- **Disaster Recovery Planning:** With Slotegrator's support, our disaster recovery planning is strengthened, ensuring comprehensive preparation for various scenarios. This includes rapid data recovery and system restoration capabilities, minimizing downtime and operational disruption.
- **Compliance and Security Standards:** Leveraging Slotegrator's platform ensures our security measures meet industry compliance standards, including GDPR, PCI DSS, and more, providing an additional layer of regulatory assurance.

Continuous Improvement and Monitoring

- **Employee Training:** Recognizing the critical role of human factors in system security, we conduct ongoing employee training on security best practices and emerging threats, fostering a culture of security awareness.
- **Continuous Monitoring:** Our security operations center (SOC) continuously monitors system activity, employing advanced threat detection tools to identify and respond to threats in real-time.
- **Adaptation to Emerging Threats:** We are committed to staying ahead of the curve by adopting the latest security technologies and adapting our strategies to counter emerging threats.

Our comprehensive system security strategy, enhanced by our partnership with Slotegrator, demonstrates our unwavering commitment to safeguarding our platform and users. By implementing rigorous security measures, complying with international standards, and promoting a culture of security awareness, we ensure a secure and reliable environment for our users.

Implementation of an administrative panel for efficient management and oversight.

Objective

To further enhance the management and oversight capabilities of our platform, we are implementing an advanced administrative panel, incorporating key functionalities and services provided by Slotegrator. This integration aims to streamline operations, bolster security, and provide comprehensive insights into platform performance and user activities.

Features and Functionalities

- **Slotegrator Integration:** Leveraging Slotegrator's robust API, our administrative panel will seamlessly interact with Slotegrator's suite of tools and services. This integration enables enhanced user management, financial transactions oversight, and access to a wide range of gaming content and services.
- **Real-Time Monitoring and Alerts:** With Slotegrator's support, the panel will offer real-time monitoring of platform operations, including gaming activities, financial transactions, and security alerts. Administrators can promptly address any issues, ensuring uninterrupted and secure platform performance.
- **Comprehensive User Management:** The panel will facilitate detailed management of user accounts, leveraging Slotegrator's advanced KYC and AML compliance tools. Administrators can activate, suspend, or modify user accounts, ensuring a safe and compliant gaming environment.
- **Configurable System Settings:** Administrators can easily configure system settings to adapt to changing business needs and regulatory requirements, all within Slotegrator's framework. This includes game offerings, payment methods, and security settings.
- **Enhanced Reporting and Analytics:** Utilizing Slotegrator's analytics capabilities, the administrative panel will provide deep insights into user behavior, financial performance, and operational efficiency. These analytics support data-driven decision-making and strategic planning.

Implementation Strategy

- **Customized Development with Slotegrator:** The panel will be custom-developed to ensure full compatibility and integration with Slotegrator's platform, tailored to our specific operational requirements.
- **Security and Compliance Focus:** Development will prioritize security, with robust encryption and access controls to protect sensitive data and comply with industry standards, leveraging Slotegrator's compliance expertise.
- **Scalability and Flexibility:** Designed for scalability, the panel will accommodate future growth and the integration of additional Slotegrator services as our platform evolves.
- **Training and Empowerment:** Our team will receive comprehensive training on utilizing the panel, enhanced by Slotegrator's support and resources, to maximize operational efficiency and user satisfaction.

Expected Outcomes

- **Streamlined Operations:** Integration with Slotegrator significantly enhances our operational capabilities, enabling more efficient management and oversight of all platform aspects.

- **Superior Management Insight:** The administrative panel will provide unparalleled visibility into platform dynamics, supported by Slotegrator's extensive data analytics and reporting tools.
- **Enhanced Compliance and Security:** By incorporating Slotegrator's compliance and security solutions, the panel ensures our platform operates within regulatory parameters and maintains the highest security standards.

The implementation of an administrative panel integrated with Slotegrator is a pivotal step in advancing our platform's management and oversight capabilities. This strategic initiative will streamline operations, enhance security, and provide comprehensive insights, driving our platform's success and ensuring a superior user experience.

Financial Controls and audit

Our platform's financial controls and auditing capabilities are designed to ensure accuracy, compliance, and transparency in all financial transactions and reporting. Integrating Slotegrator's advanced platform functionalities with external accounting software like QuickBooks, we aim to establish a robust financial management system that supports real-time financial oversight, comprehensive reporting, and streamlined audit processes.

Slotegrator Integration for Enhanced Financial Management

- **Automated Financial Calculations:** Leveraging Slotegrator's platform, our system automates complex financial calculations, including payouts, commissions, and bonuses. This automation reduces human error and ensures accurate financial transactions.
- **Real-Time Financial Reporting:** Slotegrator's integration provides access to real-time financial data, enabling timely insights into financial performance, trends, and potential issues. This immediacy is crucial for dynamic financial management and decision-making.
- **Customizable Financial Settings:** Our administrative panel, powered by Slotegrator, allows for the customization of financial settings, including payment thresholds, commission rates, and bonus structures. This flexibility ensures our financial operations can adapt to changing market conditions and business strategies.

External Accounting Software Integration

- **QuickBooks Integration:** To further enhance our financial controls, we integrate with QuickBooks, a leading accounting software. This integration facilitates seamless financial tracking, expense management, and payroll processing, complementing our internal financial controls with comprehensive external accounting capabilities.
- **Audit Trail and Compliance:** The combination of Slotegrator's platform and QuickBooks provides a detailed audit trail of all financial transactions. This transparency is essential for internal audits, regulatory compliance, and financial integrity.

Financial Controls and Audit Procedures

- **Continuous Monitoring and Reconciliation:** Our financial team continuously monitors and reconciles financial transactions, ensuring they match with user activities and system records. This ongoing oversight is crucial for early detection of discrepancies and preventive action.
- **Regular Financial Audits:** Conducting regular internal and external audits, we assess the effectiveness of our financial controls, identify areas for improvement, and ensure compliance with accounting standards and regulatory requirements.
- **Security and Fraud Prevention:** Financial data security is paramount. Our integration with Slotegrator and QuickBooks includes advanced security measures, such as encryption and access controls, to protect against unauthorized access and financial fraud.

Training and Support

- **Employee Training:** We provide comprehensive training for our financial team on both Slotegrator's platform and QuickBooks, ensuring they are proficient in using these tools for effective financial management and reporting.
- **Vendor Support:** Ongoing support from Slotegrator and QuickBooks ensures we remain updated on the latest features, security practices, and compliance requirements, further strengthening our financial controls.

By integrating Slotegrator's platform capabilities with QuickBooks, we establish a robust framework for financial controls and audit. This approach not only enhances our financial management and reporting accuracy but also ensures compliance with regulatory standards and industry best practices. Through continuous monitoring, regular audits, and a commitment to security, we maintain the highest standards of financial integrity and transparency, supporting our platform's growth and sustainability.

Onboarding processes and procedure of Know Your Customer (KYC) verification.

Objective

The objective of our onboarding processes and KYC verification procedures is to ensure a seamless, secure, and compliant user onboarding experience. By integrating SUMSUB, a leading KYC and identity verification service, we aim to enhance our platform's security, adhere to regulatory compliance standards, and minimize the risk of fraud.

Onboarding Processes

- **User Registration:** Our user-friendly registration process is designed to capture essential information while ensuring a smooth and efficient onboarding experience. This process is supported by SUMSUB's streamlined verification workflow, which guides users through the necessary steps for identity verification.
- **Automated Identity Verification:** Integrating SUMSUB's technology enables us to automate the identity verification process. SUMSUB's advanced algorithms and machine learning capabilities facilitate the rapid and accurate verification of documents and biometric data, significantly reducing the time and resources required for manual reviews.
- **Compliance with Global Standards:** SUMSUB's platform is designed to comply with international regulatory requirements, including Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards. This ensures that our platform adheres to the highest compliance standards across different jurisdictions.

KYC Verification Procedure

- **Document Verification:** Users are required to submit government-issued identification documents, which SUMSUB's system verifies for authenticity. This includes checks for document validity, tampering, and consistency with user-provided information.
- **Biometric Analysis:** SUMSUB's biometric analysis technology compares the user's live selfie with the photo ID provided, ensuring the person creating the account is the rightful owner of the submitted documents.
- **AML Screening:** SUMSUB's platform performs real-time screening against global watchlists, sanction lists, and PEP (Politically Exposed Persons) databases. This process helps in identifying and mitigating potential risks associated with money laundering and terrorist financing.
- **Ongoing Monitoring:** Continuous monitoring of user activities is conducted to detect and prevent fraudulent behavior. SUMSUB's platform facilitates the ongoing analysis of user transactions and behaviors, flagging any suspicious activities for further investigation.

Integration Benefits

- **Enhanced Security:** By leveraging SUMSUB's comprehensive verification services, we significantly enhance the security of our platform, protecting against identity fraud and ensuring that only verified users gain access.
- **Regulatory Compliance:** Our integration with SUMSUB ensures that we meet rigorous compliance standards, reducing the risk of regulatory penalties and building trust with our users and partners.
- **Streamlined User Experience:** SUMSUB's efficient verification process minimizes friction during onboarding, providing users with a quick and straightforward path to accessing our platform's features and services.

Conclusion

The integration of SUMSUB into our onboarding and KYC verification processes establishes a robust framework for user authentication and regulatory compliance. This strategic approach not only enhances our platform's security and integrity but also ensures a seamless onboarding experience for our users, fostering trust and promoting long-term engagement.

8. SWOT ANALYSIS

STRENGTHS

We indicate such key points of our
strengths:

1

Expertise.

We have more than 10 years of experiences in the spheres of Gambling, Marketing, CRM.

2

Team.

We have a highly qualified team of specialists.

3

Platform.

We developed a very comfortable, high-technical and cutting edge platform for our users.

4

Retention.

Thoughtful and interactive approaches to attracting and retaining customers.

5

Partnership network.

We have a huge network of partners with a full range of possibilities to promote our brand.



WEAKNESSES

1

New brand.

Our brand currently is not known on the market.

2

Payment solutions.

We still haven't enough payments providers to become the most user-comfortable platform.

3

Competitors.

It's not an innovative solution that's why there are a lot of competitors in this market.

4

Trust.

It's possible that first 6 months we will have difficulties with clients attraction because of lack of trust in our company.

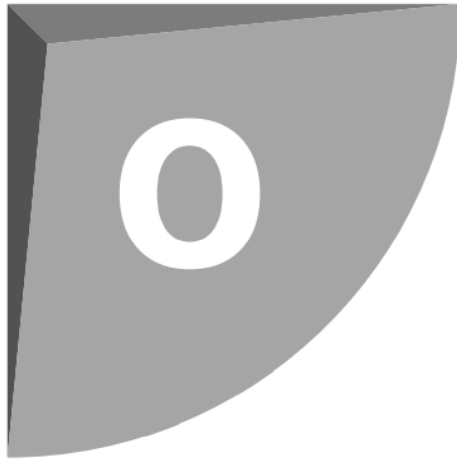
5

Regulations.

This business is highly dependent on legal regulations in the country of license and legal changes in target markets.



W



OPPORTUNITIES

1

New markets.

From time to time countries in which gambling is illegal now are changing their legislation. That can give us new opportunities.

2

Competitors.

It's an usual situation that some companies are shut down and this increase our chances to take a bigger part of the market.

3

Grows.

This market is actively growing each year (approximately 10% per year).

4

New solutions.

We actively working to attract new payment and game providers, that increase the popularity of the Company.

5

New partners.

We unstoppable working to spread our business network. Each our new partner it's a big step in our success story and can bring a huge profit for a company.

THREATS

1

Competitors.

Big and famous brands on the market it's the main risk for a new business.

2

Regulations.

Some target countries can prohibit such activity or local regulators can make some negative changes.

3

Problems with partners.

Periodically game and payment providers are stopping providing their services.

4

Crises.

Global financial crises
Technological crises that can make it difficult to access the Internet.

5

Technical developments.

Utilization of artificial intelligence algorithms.
Cybersecurity issues.
Fraudulent activities

