

Business Plan

Alev Casino

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1. Overview of the Business Products and Services/Brands

Background and History:

- Our iGaming project is Alev Casino.
- We aim to provide various online gambling services, including casino games, and virtual sports.

Unique Features and Competitive Edge: We are thrilled to highlight several distinctive features that set our iGaming project apart from the rest, ensuring an unparalleled experience for our users:

Innovative Games Portfolio: At the heart of our project is a collection of games from the best providers through our choice of the best gaming aggregators in the market.

Exceptional User Experience (UX): User satisfaction is our top priority. We have invested significant resources into creating an intuitive and user-friendly interface, ensuring that navigating our platform is not only effortless but also enjoyable. Our commitment to exceptional UX extends across all aspects of our iGaming project.

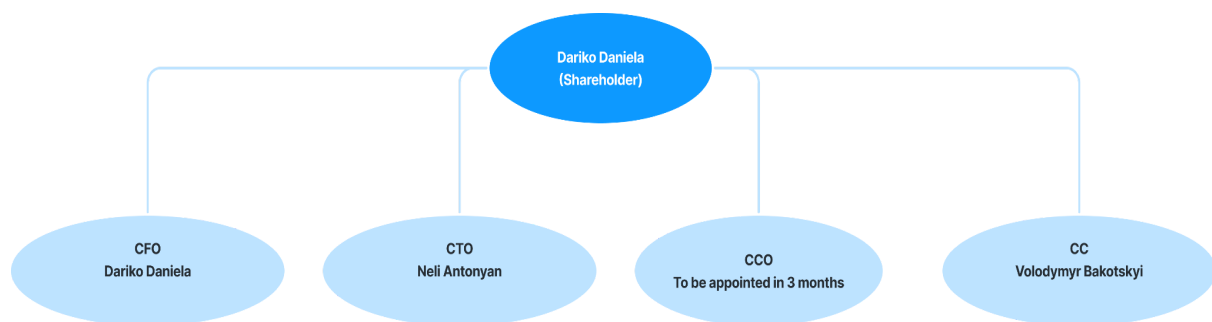
Personalisation Features: Recognizing that every user is unique, we plan to incorporate personalised features that tailor the gaming experience to individual preferences. From customisable avatars to personalised game recommendations, we strive to make every interaction on our platform feel tailor-made for the user. We plan to employ Zing Brain AI for additional personalisation of the player experiences.

Community Engagement: We understand the importance of community in the gaming world. Our project will foster a vibrant and engaged community through interactive forums, seamless social media integration, and exciting live events. Our dedicated forums will allow players to discuss strategies, share tips, and connect with fellow gaming enthusiasts. Integrating popular social media platforms ensures that users can easily share their achievements, engage in discussions, and stay updated on the latest happenings within our online casino community. Additionally, our curated live events, such as tournaments and challenges, offer players the

chance to interact in real-time, fostering a sense of camaraderie and friendly competition.

Security and Fair Play: Trust is paramount in the online gaming industry. Our project prioritises the highest security standards to protect user data and transactions. Additionally, we are committed to fair play, implementing robust measures to ensure a level playing field for all users.

2. Company Management Structure



Management Organogram:

- CEO: Dariko Daniela
- CFO: Dariko Daniela
- CTO: Nelli Antonyan
- CCO: to be appointed in 3 months
- Compliance Officer: Volodymyr Bakotskyi

Roles and Responsibilities:

1. CEO (Chief Executive Officer):

- Overall Leadership: The CEO is the top executive responsible for the overall leadership and strategic direction of the iGaming project.

- Vision and Strategy: Develops and communicates the company's vision, mission, and strategic goals.
- Stakeholder Relations: Manages relationships with investors, partners, and regulatory authorities.
- Decision-Making: Makes vital decisions and guides the management team.
- Risk Management: Identifies and manages strategic risks.
- Business Development: Explores opportunities for expansion, market growth, and new partnerships.
- Brand Ambassador: Represents the company to the public and industry.

2. CFO (Chief Financial Officer):

- Financial Strategy: Develops and oversees the financial strategy, budgeting, and planning.
- Financial Reporting: Manages financial reporting and accounting functions.
- Capital Allocation: Allocates financial resources efficiently.
- Risk Management: Identifies and mitigates financial risks.
- Investor Relations: Manages communication with investors and stakeholders.
- Compliance: Ensures financial compliance with regulatory requirements.
- Treasury Management: Manages cash flow, liquidity, and investments.

3. CTO (Chief Technology Officer):

- Technology Strategy: Develops the technology strategy and ensures alignment with the company's goals.
- Product Development: Oversees the development of iGaming platforms and games.

- Infrastructure Management: Manages IT infrastructure, data security, and scalability.
- Innovation: Drives technological innovation and keeps the company up-to-date with industry trends.
- Vendor Relations: Manages relationships with technology vendors and partners.
- Cybersecurity: Ensures the security of player data and the platform.
- Quality Assurance: Maintains high-quality standards for software and technology.

4. CCO (Chief Commercial Officer)

- Market Expansion: Drives business growth and market expansion strategies.
- Sales and Marketing: Oversees sales and marketing teams to acquire and retain players.
- User Acquisition: Manages user acquisition campaigns.
- Revenue Generation: Focuses on revenue optimization and diversification.
- Partner Relations: Manages relationships with affiliates, advertising partners, and other commercial stakeholders.
- Customer Experience: Ensures a positive user experience and handles customer relations.

5. Compliance Officer: Volodymyr Bakotskii

- Regulatory Compliance: Ensures that the iGaming project complies with all relevant gaming laws and regulations.
- Policies and Procedures: Develops, updates, and enforces company policies and procedures to maintain compliance.

- **Regulatory Reporting:** Handles reporting requirements to regulatory authorities.
- **Internal Auditing:** Conducts internal audits to ensure adherence to compliance standards.
- **Training and Education:** Provides training to employees on compliance matters.
- **Risk Assessment:** Assesses risks related to compliance issues and develops mitigation strategies.
- **Ethical Conduct:** Promotes ethical conduct and responsible gaming practices.

3. Business Forecasts for 3 Years

Please refer to Annex 1 for detailed Business Forecasts.

4. Business Growth Strategy and Market Share

Growth Strategy:

Our growth strategy is built upon a multifaceted approach around market expansion, user acquisition, and player retention. With a robust internal marketing team, high bonuses, and regular competition, we have the tools to drive our strategy effectively.

- **User Acquisition:** Our internal marketing team is at the forefront of our user acquisition strategy. Through targeted marketing campaigns, affiliate partnerships, and search engine optimisation (SEO), we aim to attract a broader audience of players. Our promotional activities, including lucrative bonuses and rewards, serve as powerful incentives to entice new users to join our platform.
- **Player Retention:** High bonuses and regular competitions are the pillars of our player retention strategy. We understand that retaining existing players is as critical as attracting new ones. Our competitive environment, filled with

exciting tournaments and valuable rewards, ensures players remain engaged and loyal to our platform.

- **Financial and Marketing Plans:** To support our growth strategy, we've outlined comprehensive financial and marketing plans. Our revenue forecasts, marketing expenditures, and return on investment (ROI) expectations are carefully detailed in our budgets. These plans provide a roadmap for allocating resources to various marketing channels and initiatives. Please refer to Annex 1.
- **Timelines:** Our growth strategy unfolds over specified timelines. Whether it's the launch of a new marketing campaign, the introduction of innovative gaming products, or the expansion into new markets, our strategy adheres to a well-defined schedule.

Excluded Markets:

While our objective is to expand our presence globally, there are markets we've chosen to exclude from our operations due to regulatory and compliance considerations. In line with international standards and regulations, we steer clear of markets that pose significant risks related to financial crimes and money laundering. This includes those blacklisted by organisations like the Financial Action Task Force (FATF).

Additionally, we acknowledge the distinct legal and regulatory frameworks of specific countries, and we've taken a cautious approach. The following markets will be excluded: Aruba, Austria, Bonaire, Curacao, France, Netherlands, Australia, UK, Spain, Saba, Statia, St. Martin, USA, and any other jurisdiction where gambling is considered illegal or blacklisted in accordance with the present license conditions of Gaming Curacao.

Marketing and Sales Strategy

Our marketing strategies will be directed toward achieving specific objectives that support the strategic goals of the organization. The truth is that all we do will be geared toward creating new market channels, increasing sales, and increasing our

market share. We will leverage on improving our services and facility to ensure that we win new clients and retain old ones.

Our marketing strategies will be consistent throughout the marketing mix and we will consider product improvement, promotion, and price. As part of our sales and marketing strategies, we will pay attention to the promotion of our casino and game centre to attract people to make use of our facility.

Our unique selling proposition is that we are well-positioned, people can easily access our facility, and our payment platforms are highly reliable. Some of the marketing and sales strategies that we will adopt are:

- Open our online casino with a big party;
- Promote our casino and game centre online via our official website and all available social media platforms;
- Initiate a marketing campaign with special welcome bonuses available throughout the launch period;
- Establish a stand at the upcoming SIGMA conference in 2024 (Dubai);
- Gamification: Leaderboards and Tournaments;

We will be consistent in delivering customer experiences to all our customers, making our first impression count positively to those making use of our casino for the first time.

We have worked with our branding and publicity consultants to help us map out publicity and advertising strategies that will help us walk our way into the heart of our target market.

Below are the platforms we intend to leverage to promote and advertise:

- Place adverts on electronic media platforms such as:
 - <https://casino.guru/>
 - <https://www.askgamblers.com/>

- Sponsor relevant community-based gaming or sports events and competitions.
- Leverage the internet and social media platforms like; Instagram, Facebook, Twitter, YouTube, Telegram to promote our brand.
- Contact corporate organizations, social clubs, and sports clubs by calling them up and informing them of our Company and the services we offer.
- Advertise our online casino on our official website and employ strategies that will help us pull traffic to the site.
- Sponsor a number of popular casino streamers on live streaming platforms such as youtube, kick and twitch.

Sustainability and Expansion Strategy:

The future of a business lies in the number of loyal customers with the capacity and competence of the employees, their investment strategy, and the business structure.

One of our primary goals in starting Alev Casino is to build a business that will survive off its cash flow without injecting finance from external sources once the business is officially running. We know that one of the ways of gaining approval and winning customers over in our online casino is to equip our facility with state-of-the-art games, online slots, live dealers and to make our facility highly secured.

Alev Casino will make sure that the right foundation, structures, and processes are put in place to ensure that our staff welfare is well taken care of. Our company's corporate culture is designed to drive our business to greater heights and training and re-training of our workforce is at the top burner.

A profit-sharing arrangement will be made available to all our management staff, and it will be based on their performance for ten years or more. If that is implemented, we can successfully hire and retain the best hands we can get in the industry; they will be more committed to helping us build the business of our dreams.

5. Key Suppliers and Material Dependencies

In the first steps, Alev Casino will work with certified lead gambling providers and games studios only. The games will be provided both via direct integration with game providers and via game integrators.

Thanks to this mixed approach, Alev Casino will have the possibility to provide users with a wide range of games immediately at the start and get good coverage in chosen regions.

Specificity of regions we are planning to focus on the following kind of games:

- Slots
- Bingo
- Blackjack
- Roulette
- Baccarat
- Live Casino

Taking the above into consideration, Alev Casino is planning to work with such gaming providers as:

Game providers:

1. Amatic
2. 3 Oaks Gaming
3. Belatra
4. Betsoft
5. BGaming
6. BigTime
7. Endorphina

8. Evolution
9. Evoplay
10. GameART
11. Gamzix
12. Habanero
13. Hacksaw Gaming
14. Igrosoft
15. Mascot Gaming
16. NetEnt
17. NoLimit City
18. Onlyplay
19. Platipus
20. Playngo
21. Playson
22. Pragmatic Play
23. Pragmatic Play Live
24. Push Gaming
25. Quickspin
26. Red Tiger Gaming
27. Relax

28. Spinomenal

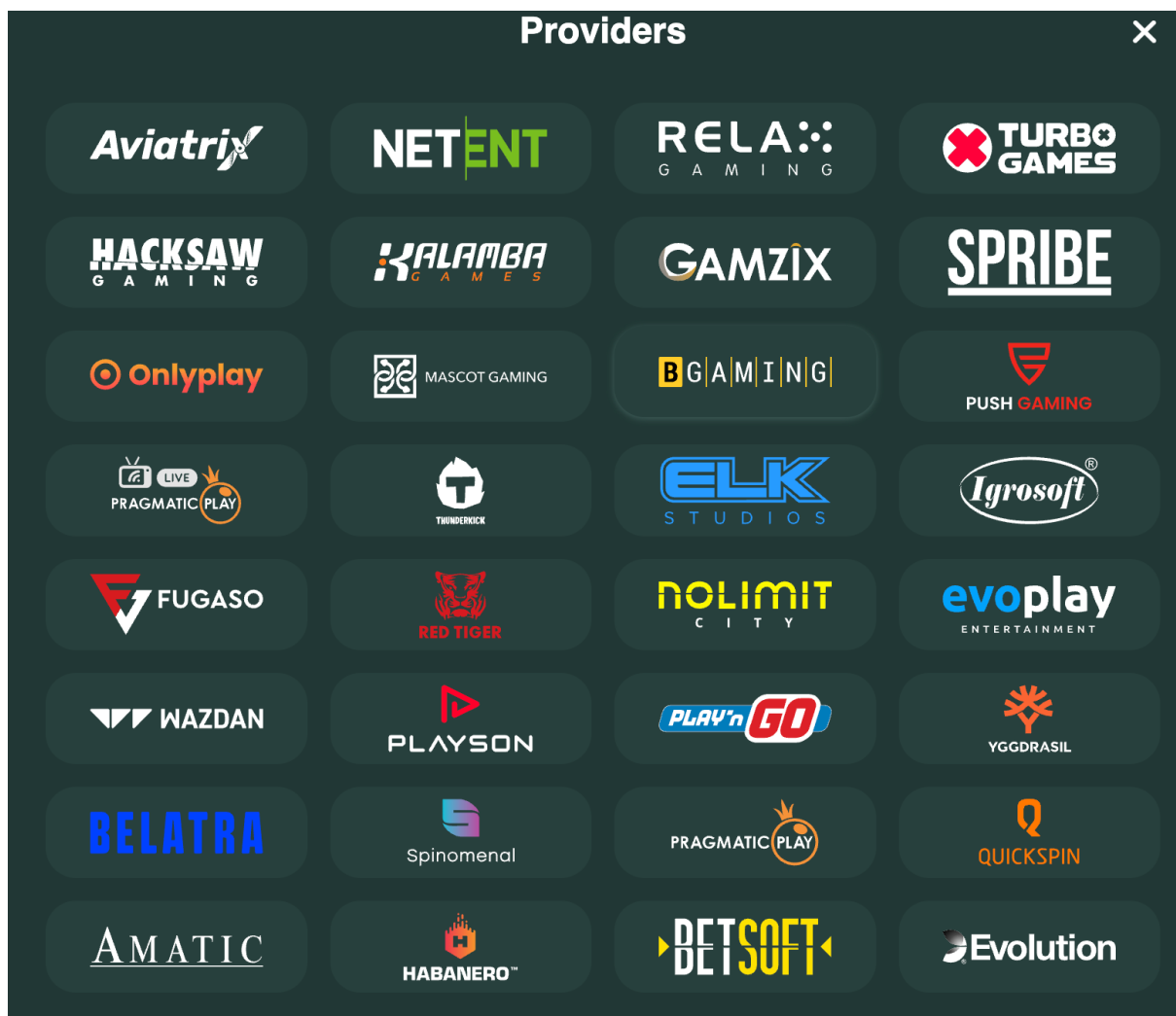
29. Smartsoft

30. Spribe

31. Thunderkick

32. Wazdan

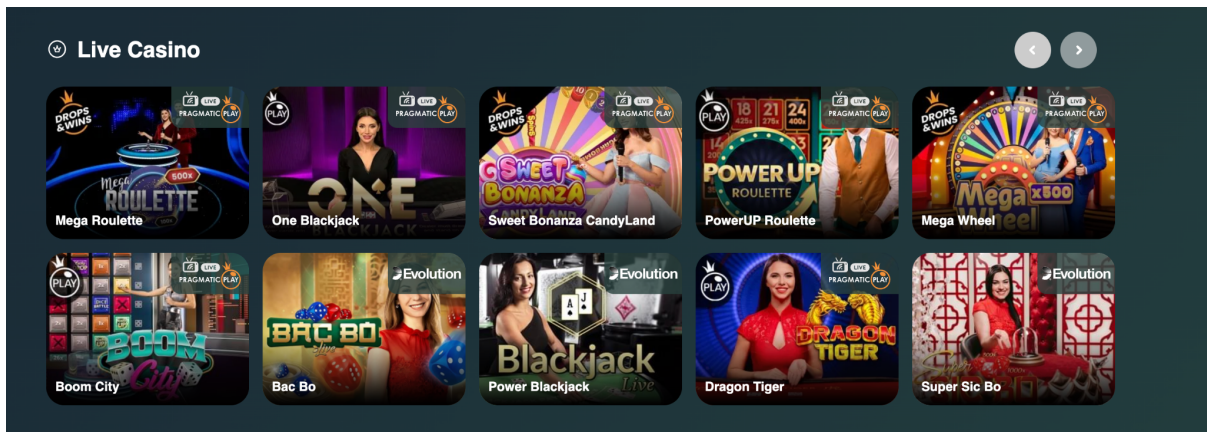
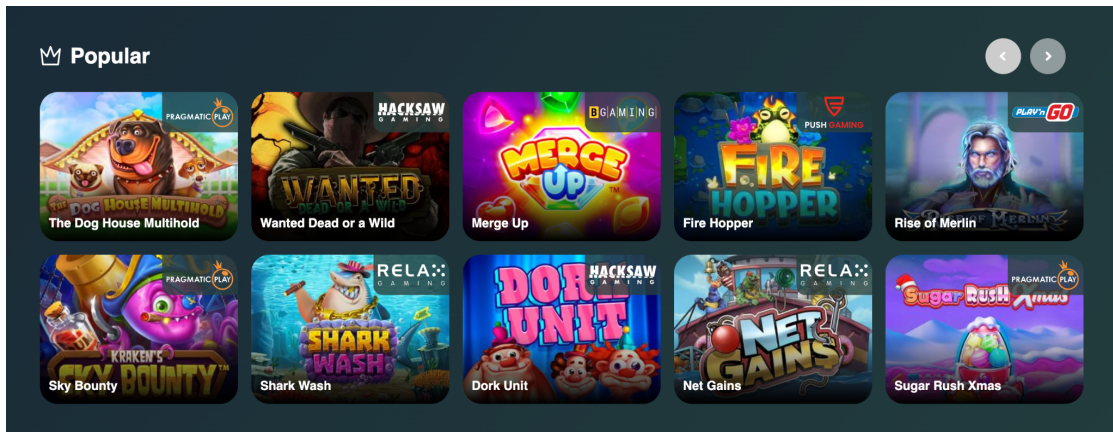
33. Yggdrasil



We also have preliminary agreements in place with the following platforms and game aggregators:

- SoftGamings

- SoftSwiss



Payment service providers:

PAPARA

Payfix

Online Banking

Skrill/Neteller

Piastrix

Monetix

In the first steps, we plan to provide the possibility to withdraw money via payment methods like Skrill, Neteller, PAPARE, etc. In the future, we are planning to expand the list of available payment methods.

6. Risk Evaluation and Management

We understand the risks that may arise due to AML legislation and therefore, we are establishing a unified compliance process for all of our new players. In order to create an account, the Player should fill out the registration form, which will consist of four steps and will contain the following information:

- Country
- Email
- Password
- Password Confirmation
- First Name
- Last Name
- Sex
- Nickname
- Date of birth
- Country
- Address
- Phone

At this stage, the form will be checked automatically by the restricted country list and age availability.

Register

Choose your Welcome Bonus

Selected

50%
+50 FS

For The 1st deposit -...

50% + 50 FS in the game to choose from: Wild Cash X9990, Aztec Ma...

☐ Proceed without welcome bonus

VISA

NETELLER

mastercard

Skrill

Interac

E-mail *

example@mail.com

Phone Code

+358

Phone number

Phone number

Password *

Password

Currency *

EUR

Country *

Finland

Promocode

Promocode

☒ I agree with [Terms and Conditions](#) and I confirm that I'm 18 years or older

Sign up

Already have an account?
[Login now](#)

Profile

General

Verification

Selfie with above mentioned document (Passport / ID)

Required

Drop file here or [browse](#) .png, .jpg, .gif, .pdf, .jpeg. Max size 4 MB

Confirmation of the address of residence

Required

Drop file here or [browse](#) .png, .jpg, .gif, .pdf, .jpeg. Max size 4 MB

Passport / ID / Driving licence

Required

Drop file here or [browse](#) .png, .jpg, .gif, .pdf, .jpeg. Max size 4 MB

The screenshot shows a user profile verification interface. The interface is divided into two main sections: 'General' and 'Verification'. The 'General' section on the left contains fields for E-mail, First name, Last name, Sex, Date of birth (Day, Month, Year), Country, City, Address, Postal code, PEP (Politically Exposed Person), and Phone. A yellow 'Verify' button is positioned next to the E-mail field. The 'Verification' section on the right contains three sub-sections: 'Subscriptions' with a toggle for 'Notifications via e-mail' (which is turned on), 'Security' with a 'Password' field and a 'Change' button, and 'Banking information' with an 'Add info' button. At the bottom of the 'Verification' section is a 'Google Authenticator' section with the text 'Protect your account and transactions. Not linked' and an 'Enable' button.

After account registration and email confirmation, the account will be temporarily blocked. It means that potential Players will have limited access to do some action inside the account once KYC and Age verification procedures have been approved.

For KYC and Age verification procedures, we are planning to use 3rd party provider like Onfido (onfido.com)

Risk Assessment:

Risks are a critical aspect of our gaming business, and we understand the importance of identifying, assessing, and managing them effectively. Our risk assessment process is rigorous and comprehensive, involving a combination of regular internal and external audits and evaluations.

- **Internal Audits:** We conduct regular internal audits to evaluate our operations and ensure compliance with internal policies and industry standards. Our dedicated internal audit team conducts these audits. They examine various aspects of our business, including financial controls, data security, and adherence to regulatory requirements.
- **External Audits:** External audits are carried out by independent audit firms that specialize in the iGaming industry. These firms provide an unbiased evaluation of our operations, financial records, and compliance with legal and

regulatory standards. We engage external auditors to ensure that our internal assessments are transparent and in line with industry best practices.

- **Methodologies:** Our risk assessment process involves the use of established methodologies and frameworks. These methodologies are designed to identify potential risks across different areas of our business, including but not limited to financial risks, operational risks, and compliance risks. We use quantitative and qualitative risk assessment methods to ensure a comprehensive analysis.
- **Key Risk Areas:** Our risk assessment process covers key risk areas specific to the iGaming industry. These areas include but are not limited to:
 - **Regulatory Compliance:** Ensuring that we meet the legal and regulatory requirements of the jurisdictions in which we operate.
 - **Data Security:** Protecting player data and financial information from cybersecurity threats.
 - **Financial Stability:** Managing financial risks and maintaining a stable financial position.
 - **Market Volatility:** Adapting to changes in the iGaming market, including shifts in player preferences and market dynamics.

Mitigation Strategies:

Identifying risks is only part of the equation. Equally important is our commitment to implementing effective mitigation strategies to minimise or eliminate these risks.

- **Internal Controls:** To address identified risks, we implement strong internal controls. These controls are designed to prevent, detect, and correct issues before they escalate. For instance, in the case of financial risks, we have financial controls in place to monitor and manage expenditures, cash flow, and financial reporting.

- **Risk Registers:** We maintain comprehensive risk registers that document identified risks, their potential impact, and the steps taken to mitigate them. These registers serve as a central repository for tracking and managing risks across the organization.
- **Audit and Compliance Processes:** Regular audits are an integral part of our risk mitigation strategy. These audits help validate the effectiveness of our internal controls, policies, and procedures. Additionally, compliance processes ensure that we adhere to the ever-evolving regulatory landscape.

Our commitment to risk assessment and mitigation is a fundamental element of our corporate culture. By conducting thorough assessments, implementing sound internal controls, and engaging in ongoing audits, we aim to safeguard our business, protect our players, and maintain the highest standards of integrity and compliance within the iGaming industry.

Moreover, considering the developing Regulatory landscape, we are keen to adapt and make the necessary changes to our operations by the upcoming Regulatory changes in Curacao.

Analysis of iGaming trends

Europe's iGaming market saw a notable 23% boost in revenue, hitting EUR 108.5bn (USD 115.7bn) in Gross Gaming Revenue (GGR) in 2022. This growth, driven by both online and brick-and-mortar establishments, showcases the industry's stability and upward potential. Specifically, the online segment alone jumped 8% from the previous year to a GGR of EUR 38.2bn (USD 40.7bn).

The trend above represents that the iGaming market continues to grow. Moreover, a similar trend is shown in the Latam regions:

- **Market size:** The Latin America gaming market is approximately \$2.7b and is estimated to grow 10% YoY through 2028 (to \$4.3b)
- **# of gamers:** In 2022, there were ~316m gamers in Latin America (growing 5% YoY).

- # of payers: These gamers are monetizing - a report by Visa and Newzoo revealed that 82% of Latin American and Caribbean individuals play games and 80% (vs the global average of 69%) spend money on video games
- Play time: Latin American gamers, on average, spend 1 hour and 12 minutes playing games a day. This is comparable to North America (1 hour and 14 minutes) and APAC (1 hour and 17 minutes). According to Pesquisa Games Brasil (PGB), almost half (51%) of Brazilian gamers spend more than 20 hours per week playing.
- Platform: Latin American gamers primarily play on mobile devices. According to a survey by PagBrasil, the mobile gaming market in Brazil generated revenue of 1.65b in the previous year.
- Unique discovery methodology: Game content discovery in Latin America has a distinct, influencer-led culture. Roughly one in three internet users follows an influencer and these influencers distinctly influence how games are discovered. 39% of gamers say that they discover games through online video channels, 38% via social media networks, 35% via influencers, and 33% through word-of-mouth. It should be noted that all of these discovery methods can have some connection to influencers (though not exclusively).

Conclusion

Our project has great potential in emerging markets, such as Latin America. Through the employment of the latest trends in the iGaming industry, such as gamification and AI-based player management, together with a professional team of expert senior managers, our project will be able to reach its financial projections.

Annex 1

Business Forecasts

	Year 1	Year 2	Year 3
UBO Investments	150,000	-	-
NGR	19,000	28,600	35,750
GGR	475,000	615,550	769,438
Net Profit	10,000	38,550	52,438
Expenses:			
Platform Fee	90,000	120,000	150,000
License Fee	63,000	47,000	47,000
Marketing	310,000	410,000	520,000
Total expenses	463,000	577,000	717,000

To launch the platform, we will utilize funding from **UBO Investments**, which will cover all operational and development costs for the first **three months**. This includes platform development, licensing, integration of payment and game providers, and initial marketing efforts. The goal during this period is to build user acquisition momentum through targeted marketing campaigns.

By the end of the fourth month, we project the platform will reach **break-even** point, allowing it to become **self-sustaining** moving forward. This financial model is supported by performance-based marketing strategies, user retention initiatives, and affiliate partnerships designed to generate steady revenue growth.