

Business Plan

Winebet



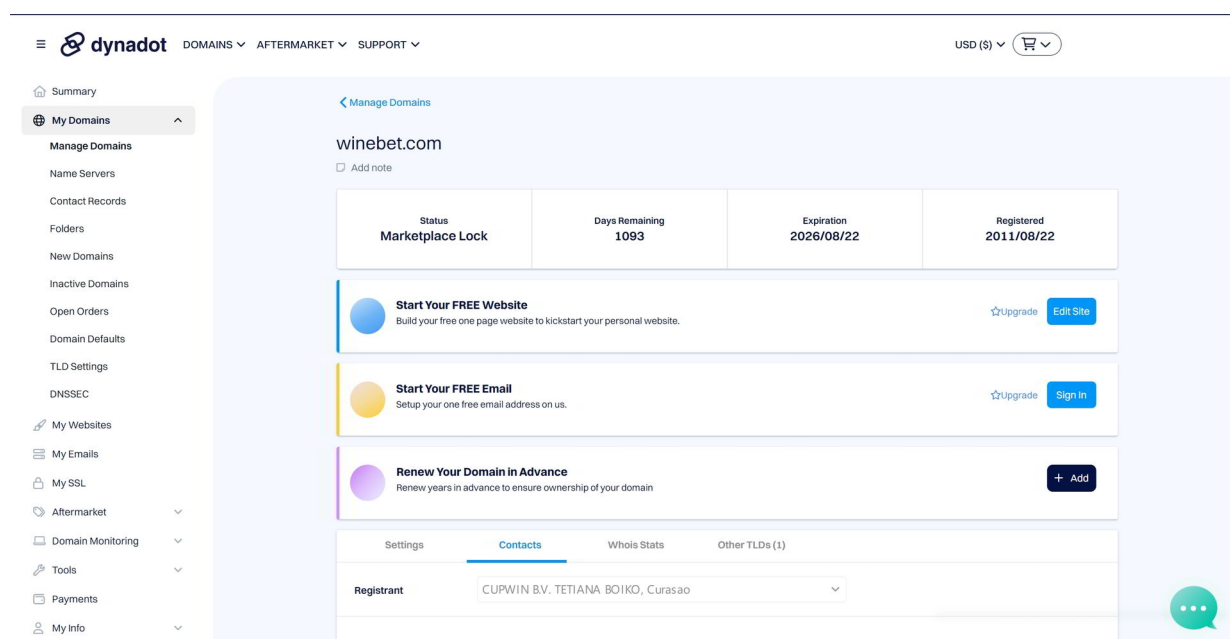
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1.EXECUTIVE SUMMARY

1.1.PROJECT SUMMARY

The initiator of the project is Cupwin B.V. The development of the Winebet.com website is currently underway. The project involves the establishment of a company aimed at delivering enhanced online gaming experiences, incorporating engaging technologies. This initiative leverages the expertise gained from successfully creating seven casinos by the founders of the new gaming platform.



In case of the online casino's closure for internal or other objective reasons, the security payment is refunded to the casino owners. However, it must remain untouched during the casino's operational phase, serving as a deposit in case of jackpot wins, thereby ensuring minimal losses.

The list of game providers includes:

- AVIATRIX
- BARBARA BANG
- MANCALA
- PRAGMATIC PLAY
- RED EAGLE
- SLOTEGRATOR
- TADA GAMING
- THUNDERSPIN
- TVBET

Commencing in 2024, the establishment of a Gaming Control Board will serve as the regulatory authority. The process of applying for the government license is presently underway.



Company Description:

Enter the realm of Winebet, an online gambling company that goes beyond boundaries to offer an engaging and responsible gaming experience. We stand as a symbol of innovation, integrity, and excitement in the dynamic world of digital gaming.

Vision:

Winebet envisions a global gaming community where every player feels empowered, entertained, and secure. Our goal is to redefine the gaming industry by promoting innovation, embracing responsibility, and creating an inclusive space for players from all walks of life.

Mission:

Guided by the following principles, our mission at Winebet is:

- **Innovation Hub:** Driving technological advancements and pushing creative boundaries to provide an unparalleled gaming experience with cutting-edge games.
- **Responsible Gaming Advocacy:** Proactively promoting responsible gaming through robust player protection measures, educational resources, and collaboration with organizations dedicated to healthy gaming habits.
- **Player-Centric Focus:** Placing our players at the heart of everything we do, offering personalized experiences, responsive customer support, and a commitment to continuously enhance our offerings based on player feedback.
- **Global Connectivity:** Breaking down geographical barriers and creating a global gaming network that welcomes players from diverse cultures, backgrounds, and regions.

Goals:

- **Excellence in Entertainment:** Striving for excellence in every aspect of entertainment, ensuring our games are not just a source of excitement but also a platform for social interaction, skill development, and memorable experiences.

- Innovation Leadership: Aspiring to be at the forefront of industry innovation, setting new standards for gaming excellence, and continuously surprising our players with novel and engaging gaming experiences.
- Community Impact: Making a positive impact on the community by contributing to charitable causes, supporting local initiatives, and promoting responsible gaming as a cornerstone of our corporate social responsibility.
- Sustainable Growth: Achieving sustainable growth by balancing financial success with ethical business practices, environmental responsibility, and a commitment to the well-being of our players.

1.2.UBO BACKGROUND

Tetiana Boiko is a seasoned Advertising & Marketing Specialist, self-employed since December 2019 in Kryvyi Rih. With a keen eye for detail, she adeptly manages the sales pipeline, delivering projects within budget and on time. Boiko's expertise lies in developing and implementing advertising policies, briefing creative teams, and crafting data-driven campaigns. Her tenure as a Bookmaker Manager in Kyiv honed her skills in staff training, industry awareness, and security protocol adherence. Boiko's background also includes coordinating multi-disciplinary teams, enhancing client care, and overseeing facility renovations as a Betting Shop Coordinator and Casino Gaming Manager in Kyiv. Her commitment to excellence and customer satisfaction shines through her career trajectory.

With her background as an Advertising & Marketing Specialist, Tetiana brings a deep understanding of project operations, providing her with a distinct advantage in steering the company towards success in her role as CEO.



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PROFESSIONAL SUMMARY

Committed Marketing Professional with broad market research and analysis background. Triggered significant increase in customer traffic to company websites and shopping outlets from promotional activities. Exceptional consumer engagement and product promotion specialist.

Results-orientated individual dedicated to creating memorable multi-channel marketing campaigns that deliver brand recognition. Uses data-driven approach to secure consistent high results.

Results-focused employee with experience developing motivated, dependable teams. Communicates and delegates effectively to aid timely, quality completion of projects.

SKILLS

- OOH advertising
- Data analysis
- Media buying
- Data analytics
- Client communication
- Digital strategy
- Programmatic advertising
- Integrated campaign strategy
- Project management

EXPERIENCE

Advertising & Marketing Specialist, Self-employed, Dec 2019 - Current, Kryvyi Rih

- Managed the sales pipeline through strategically prospecting for new business and delivering existing projects on time and within budget.
- Developed and implemented advertising policies and procedures to ensure all collaborators and clients could follow sales and campaign objectives.
- Briefed creative team members to develop digital and print collateral materials.
- Developed effective multi-channel marketing messages and data-driven campaigns.
- Improved KPIs by reducing website bounce rate, increasing dwell time and improving conversion rates.

Bookmaker Manager, Favorit sport, Nov 2016 - Dec 2019, Kyiv

- Carried out training for dealers and other customer-facing employees assisting with staff responsibilities on each staff members first day.
- Maintained knowledge of the gaming industry and followed the industry closely to remain commercially aware and on top of competitors plans.
- Ensured sufficient maintenance and security checks were carried out during all the games and cash and assets were handled, processed and secured safely.

1.3.GAMES LIST

Main types of casino games:

- 1.3.1 Type 1 – Games of Chance (RNG-based games such as slots and casino table games)
- 1.3.2 Type 2 – Betting (including live betting and virtual-sports betting)
- 1.3.3 Type 3 – Live Dealer Games
- 1.3.4 Type 4 – Pooled-prize games (such as lotteries and parimutuel)
- 1.3.5 Type 5: Promoting peer-to-peer games (such as sport-exchange, bingo and poker)

1.4.INDICATORS OF THE PROJECT

The project's economic feasibility has been confirmed through the computation of traditional financial indicators typically utilized in project analysis.

Table 1. Indicators of the project

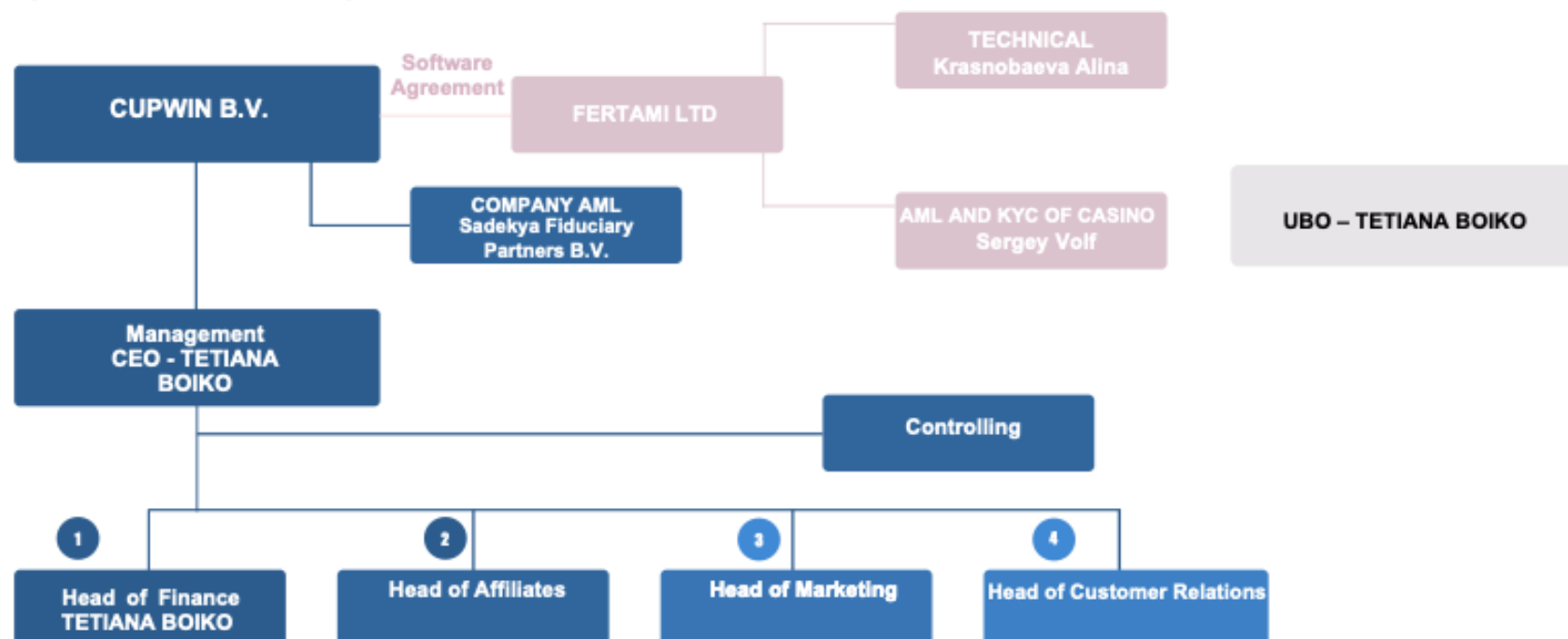
Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	210 920
Sum of proceeds (SP), EUR	4 783 541
Net average operational receipts per month (NAOR), EUR	29 924
Net profit for the project period, EUR	964 782
Average profitability for the project period (net profit to proceeds	20,17%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	491 870
Average Rate of Return of investments (ARR)	127,50%
Return on investment (ROI)	357%
Profitability index (PI)	2,3
Internal rate of return (IRR)	95,94%
Pay back period of the project in whole (PBP), incl. financing scheme	17 months
	1,4 years

2.COMPANY STRUCTURE

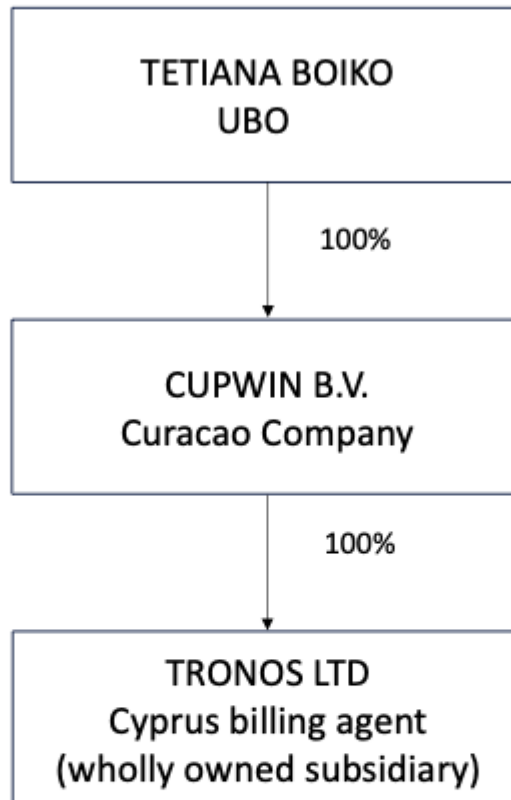
Board oversight: As the CEO and sole shareholder of the Operator, the UBO actively engages in the daily operations of the business. This includes supervising marketing initiatives, driving growth across different sectors, integrating payment systems, and expanding the brand into new geographical markets. Board meetings may include key personnel alongside the director. Decision-making is decentralized, enabling strategies and resolutions to be directly delegated to departments and functions, fostering flexibility and preventing deadlocks. Legal matters are managed internally by specialized departments and officers, with department heads primarily responsible for decision-making, ultimately under the purview of the CEO.

Company control structure

CUPWIN B.V., a company incorporated under the laws of Curaçao with registration number 164533 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curacao



Ownership structure



3.FINANCIAL SUMMARY

3.1.FINANCIAL ESTIMATION FOR THE FIRST, SECOND AND THIRD YEAR

Table 2. Cash flow for the first year, euro

	Total for 3 years	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
Month of the project		1	2	3	4	5	6	7	8	9	10	11	12
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 210 920	- 196 000	-	-	- 14 920	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 196 000	- 196 000	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 420	-	-	-	- 11 420	-	-	-	-	-	-	-	-
Office equipment and stationery	- 3 500	-	-	-	- 3 500	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 077 273	- 4 850	-	-	-	- 44 863	743	4 589	7 327	10 257	4 389	- 22 282	24 424
Proceeds	4 783 541	-	-	-	-	33 810	41 586	47 564	53 087	59 057	65 672	83 921	98 007
Income from clients	4 783 541	-	-	-	-	33 810	41 586	47 564	53 087	59 057	65 672	83 921	98 007
Expenses total	- 3 706 268	- 4 850	-	-	-	- 78 673	- 40 843	- 42 975	- 45 760	- 48 800	- 61 284	- 106 203	- 73 582
Direct costs	- 2 928 146	- 4 850	-	-	-	- 67 456	- 29 626	- 31 456	- 33 468	- 35 682	- 49 821	- 52 986	- 56 468
Advertising costs	- 1 387 418	-	-	-	-	- 31 752	- 18 295	- 20 125	- 22 137	- 24 351	- 31 656	- 34 822	- 38 304
Additional staff costs	- 1 100 167	-	-	-	-	-	-	-	-	-	- 6 833	- 6 833	- 6 833
License fees	- 142 961	- 4 850	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	-	-	-	-	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 482 933	-	-	-	-	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 53 217	- 11 217
Accounting	- 117 333	-	-	-	-	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667
Office equipment maintenance	- 96 000	-	-	-	-	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000

Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 49 600	-	-	-	-	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550
Legal support	- 96 000	-	-	-	-	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Taxes	- 295 189	-	-	-	-	-	-	- 303	- 1 075	- 1 901	- 246	-	-	- 5 897
Profit tax	- 295 189	-	-	-	-	-	-	- 303	- 1 075	- 1 901	- 246	-	-	- 5 897
Cash flow - FINANCING	- 83 388	200 850	-	-	14 920	44 863	-	- 376	- 1 334	- 2 360	- 306	22 282	-	7 318
Co-investor's investment	282 914	200 850	-	-	14 920	44 863	-	-	-	-	-	22 282	-	-
Refunds to co-investor	- 366 303	-	-	-	-	-	-	- 376	- 1 334	- 2 360	- 306	-	-	- 7 318

CASH FLOW OF THE PROJECT	782 965	-	-	-	-	-	743	4 213	5 993	7 897	4 083	-	17 106
progressive total (cash balance)	782 965	-	-	-	-	-	743	4 956	10 949	18 847	22 930	22 930	40 036

Table 3. Cash flow for the second year, euro

	Total for 3 years	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26
Month of the project		13	14	15	16	17	18	19	20	21	22	23	24
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 210 920	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 196 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 420	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 3 500	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 077 273	27 110	36 099	53 114	52 825	36 098	57 256	60 097	55 846	56 257	59 174	22 251	55 478
Proceeds	4 783 541	112 114	127 851	149 665	157 518	161 879	171 465	175 107	176 491	177 017	180 757	182 253	182 852
Income from clients	4 783 541	112 114	127 851	149 665	157 518	161 879	171 465	175 107	176 491	177 017	180 757	182 253	182 852
Expenses total	- 3 706 268	- 85 004	- 91 752	- 96 551	- 104 694	- 125 781	- 114 209	- 115 010	- 120 645	- 120 760	- 121 583	- 160 002	- 127 374
Direct costs	- 2 928 146	- 67 132	- 71 345	- 71 345	- 79 569	- 105 374	- 87 835	- 87 835	- 94 668	- 94 668	- 94 668	- 101 501	- 101 501
Advertising costs	- 1 387 418	- 42 134	- 46 348	- 46 348	- 47 738	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170
Additional staff costs	- 1 100 167	- 13 667	- 13 667	- 13 667	- 20 500	- 20 500	- 27 333	- 27 333	- 34 167	- 34 167	- 34 167	- 41 000	- 41 000
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300
Indirect costs	- 482 933	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 53 217	- 11 217
Accounting	- 117 333	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667
Office equipment maintenance	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	- 42 000	-
Office rent	- 49 600	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550
Legal support	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Taxes	- 295 189	- 6 655	- 9 190	- 13 989	- 13 908	- 9 190	- 15 158	- 15 959	- 14 760	- 14 876	- 15 699	- 5 284	- 14 656
Profit tax	- 295 189	- 6 655	- 9 190	- 13 989	- 13 908	- 9 190	- 15 158	- 15 959	- 14 760	- 14 876	- 15 699	- 5 284	- 14 656
Cash flow - FINANCING	- 83 388	- 8 258	- 11 404	- 17 359	- 17 258	- 11 404	- 18 809	- 19 804	- 18 316	- 18 459	- 19 481	- 6 557	- 18 187
Co-investor's investment	282 914	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 366 303	- 8 258	- 11 404	- 17 359	- 17 258	- 11 404	- 18 809	- 19 804	- 18 316	- 18 459	- 19 481	- 6 557	- 18 187
CASH FLOW OF THE PROJECT	782 965	18 852	24 695	35 754	35 566	24 694	38 447	40 293	37 531	37 797	39 693	15 693	37 291
progressive total (cash balance)	782 965	58 888	83 582	119 337	154 903	179 597	218 044	258 337	295 868	333 665	373 358	389 052	426 343

Table 4. Cash flow for the third year, euro

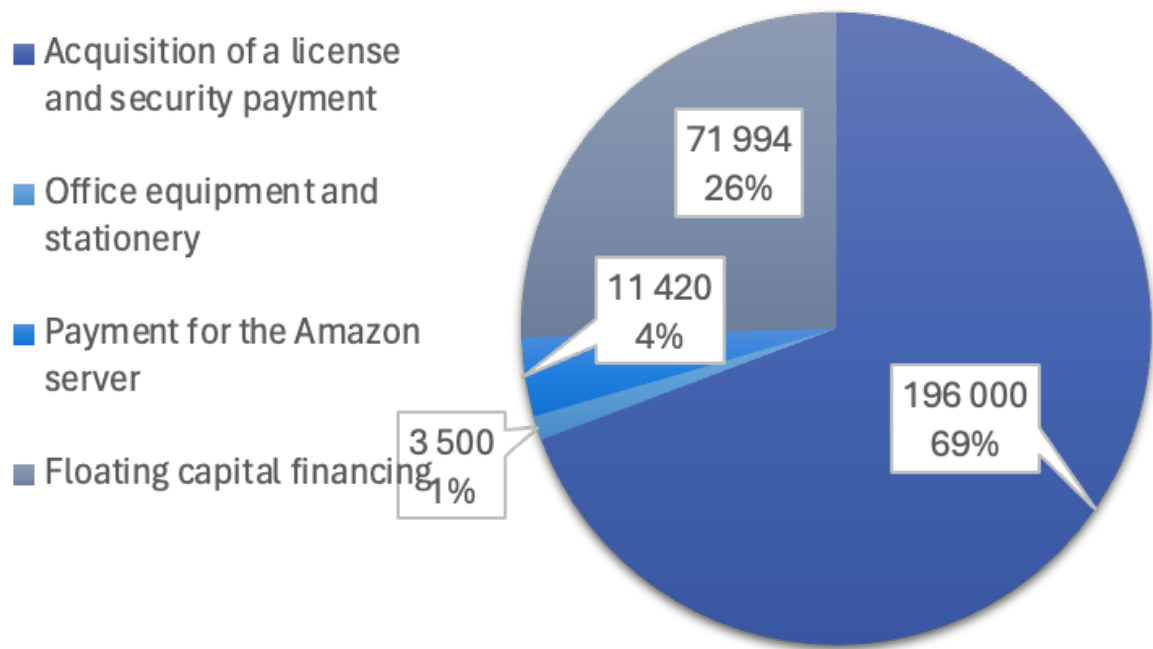
	Total for 3 years	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27
Month of the project		25	26	27	28	29	30	31	32	33	34	35	36
Number of days in the period		30	31	30	31	31	30	31	30	31	31	28	31
Cash flow - INVESTING	- 210 920	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 196 000	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 11 420	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 3 500	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 077 273	53 187	54 463	49 670	49 895	25 648	46 177	51 309	48 340	49 426	44 595	13 625	39 601
Proceeds	4 783 541	186 748	188 385	189 072	189 361	189 482	191 428	198 007	201 034	202 426	203 066	203 361	203 497
Income from clients	4 783 541	186 748	188 385	189 072	189 361	189 482	191 428	198 007	201 034	202 426	203 066	203 361	203 497
Expenses total	- 3 706 268	- 133 561	- 133 921	- 139 403	- 139 466	- 163 834	- 145 251	- 146 698	- 152 694	- 153 000	- 158 471	- 189 736	- 163 896
Direct costs	- 2 928 146	- 108 335	- 108 335	- 115 168	- 115 168	- 146 374	- 122 001	- 122 001	- 128 835	- 128 835	- 135 668	- 135 668	- 142 501
Advertising costs	- 1 387 418	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170	- 49 170
Additional staff costs	- 1 100 167	- 47 833	- 47 833	- 54 667	- 54 667	- 61 500	- 61 500	- 61 500	- 68 333	- 68 333	- 75 167	- 75 167	- 82 000
License fees	- 142 961	- 2 031	- 2 031	- 2 031	- 2 031	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 297 600	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300	- 9 300

Indirect costs	- 482 933	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 11 217	- 51 217	- 11 217
Accounting	- 117 333	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667	- 3 667
Office equipment maintenance	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Hosting	- 124 000	-	-	-	-	-	-	-	-	-	-	-	- 40 000	-
Office rent	- 49 600	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550	- 1 550
Legal support	- 96 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000
Taxes	- 295 189	- 14 010	- 14 370	- 13 018	- 13 081	- 6 243	- 12 033	- 13 480	- 12 643	- 12 949	- 11 587	- 2 851	- 10 178	
Profit tax	- 295 189	- 14 010	- 14 370	- 13 018	- 13 081	- 6 243	- 12 033	- 13 480	- 12 643	- 12 949	- 11 587	- 2 851	- 10 178	
Cash flow - FINANCING	- 83 388	- 17 385	- 17 832	- 16 154	- 16 233	- 7 747	- 14 932	- 16 728	- 15 689	- 16 069	- 14 378	- 3 538	- 12 630	
Co-investor's investment	282 914	-	-	-	-	-	-	-	-	-	-	-	-	
Refunds to co-investor	- 366 303	- 17 385	- 17 832	- 16 154	- 16 233	- 7 747	- 14 932	- 16 728	- 15 689	- 16 069	- 14 378	- 3 538	- 12 630	

CASH FLOW OF THE PROJECT	782 965	35 802	36 632	33 516	33 662	17 902	31 245	34 581	32 651	33 357	30 217	10 087	26 971
progressive total (cash balance)	782 965	462 145	498 776	532 292	565 954	583 855	615 101	649 682	682 333	715 690	745 907	755 994	782 965

3.2.INVESTMENT SCHEME, OUTLINING INVESTMENT TYPES, PROJECTED COSTS, AND SOURCE OF WEALTH EXPLANATION

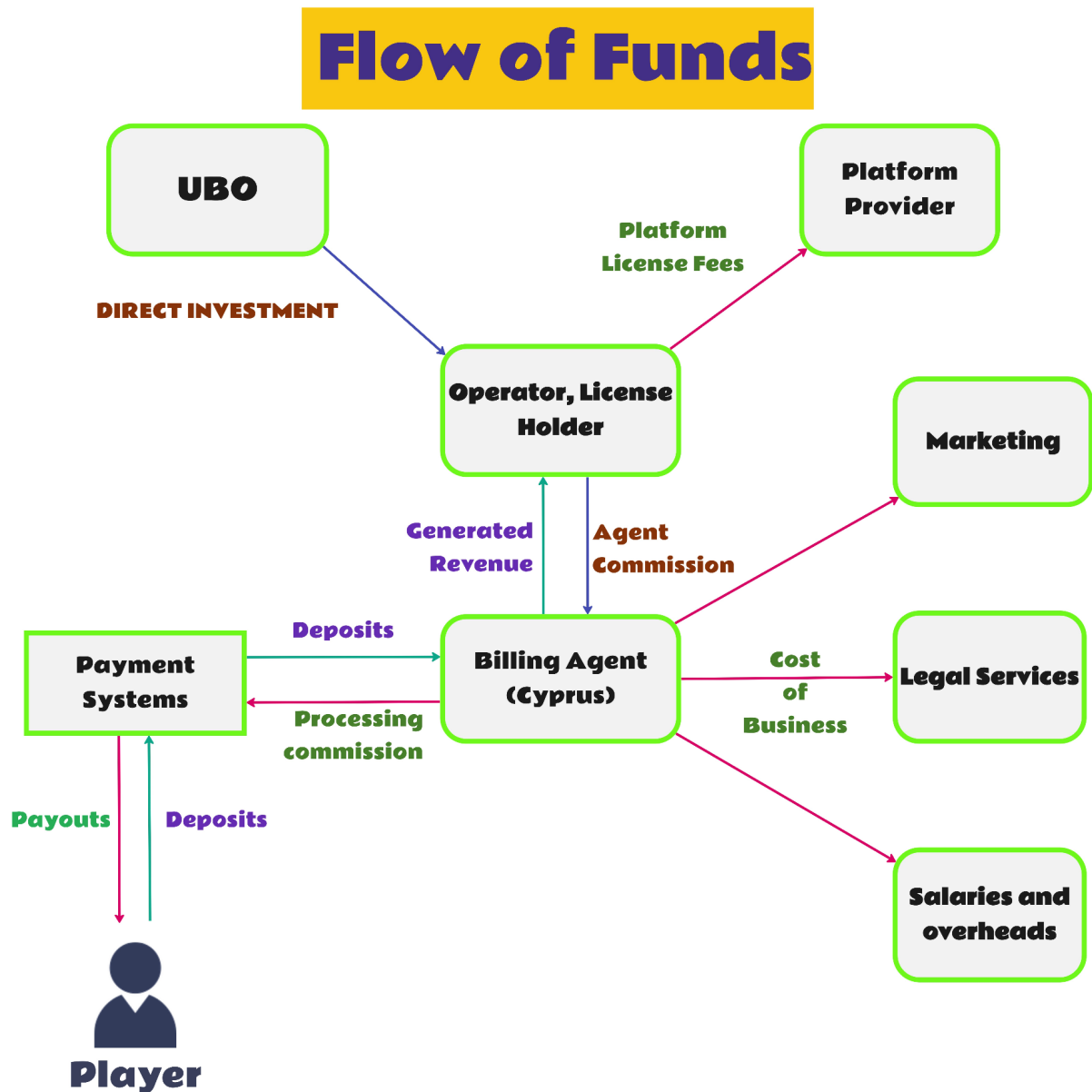
Diagram 1. Investments structure



Type of initial investments: Funds directly provided by the Ultimate Beneficial Owner.
Upon launch: Profits generated directly from operations.

3.3.FLOW OF FUNDS SCHEMATIC

The cost of business for the project includes license fees to the Platform provider, Web-marketing, Service fees to employees and legal fees to fiduciary service providers.



4.PRODUCTS & SERVICES

4.1.REGISTRATIONS AND OPENING OF AN ACCOUNT

The screenshot displays the Wnebets website interface. The top navigation bar includes links for SPORTS, LIVE, ESPORTS, PROMO, RESULTS, and STATISTICS, along with a currency selector (\$), a notification icon, and buttons for REGISTRATION, LOG IN, and a settings icon. The main content area is divided into sections for Matches, Recommended, and Upcoming events, with filters for various sports like Football, Tennis, Basketball, etc. The left sidebar shows a list of recommended games, including the Turkish Cup and Gazisehir Gaziantep vs Etimesgut Belediye Spor Kulubu. The right sidebar contains a registration form with fields for phone number, confirmation code, and promo code, and a REGISTER button. Below the registration form is a section for BET SLIP and MY BETS, with a YOUR BETS section showing a list of bets.

Wnebets SPORTS LIVE ESPORTS PROMO RESULTS STATISTICS \$ 1 REGISTRATION LOG IN 16:36 EN

« Collapse block »

Recommended

Top Games < 1/5 >

Turkish Cup

2 Half, 74 minutes / Round of 64

Gazisehir Gaziantep 1

Etimesgut Belediye Spor Kulubu 0

Detailed score

W1 1.016 X 12.8 W2 114

LIVE SPORTS

ALL 965 339

TOP

Football (54)

Tennis (35)

Basketball (34)

Ice Hockey (17)

Volleyball (16)

Table Tennis (47)

Cricket (17)

Esports (20)

CATEGORIES FROM A TO Z

Beach Volleyball (4)

Darts (2)

Field Hockey (2)

FIFA FIFA (68)

Matches Recommended Upcoming events 1st period 2nd period Search by match

With live streams

Football Tennis Basketball Ice Hockey Volleyball Table Tennis

FIVB Club World Championship

Sada Cruzeiro 2 25 31 28 16

Suntory Sunbirds 1 21 29 30 16

4 Set

1.295 - 3.58 +28

WTB. Angers. Doubles

Schoofs/Zimmermann 0 2 3 (40)

Jacquemot/Serban 1 6 2 (30)

2 Set

1.73 - 2.104 +105

Kontinental Hockey League

Sibir Novosibirsk 4 4 0

Barys 0 0 0

27:22 / 2 Period

- - - +264

Ukraine. Premier League

Dynamo Kyiv 1 1

Metallist 1925 0 0

19:30 / 1 Half

1.06 11.6 24 +435

VHL

Dynamo-Altay 1 0 1 0

Izhstal 0 0 0 0

40:54 / 3 Period

1.44 3.78 8.95 +258

Metallurg Novokuznetsk 4 3 1

Chelny 0 0 0

40:00 / Intermission

- - - +221

REGISTRATION

By phone

Confirmation code

Promo code (if you have one)

REGISTER

By clicking this button you confirm that you have read and agree to the [Terms and Conditions](#) and [Privacy Policy](#) of the company and confirm that you are of legal age

% BONUS ON YOUR 1ST DEPOSIT

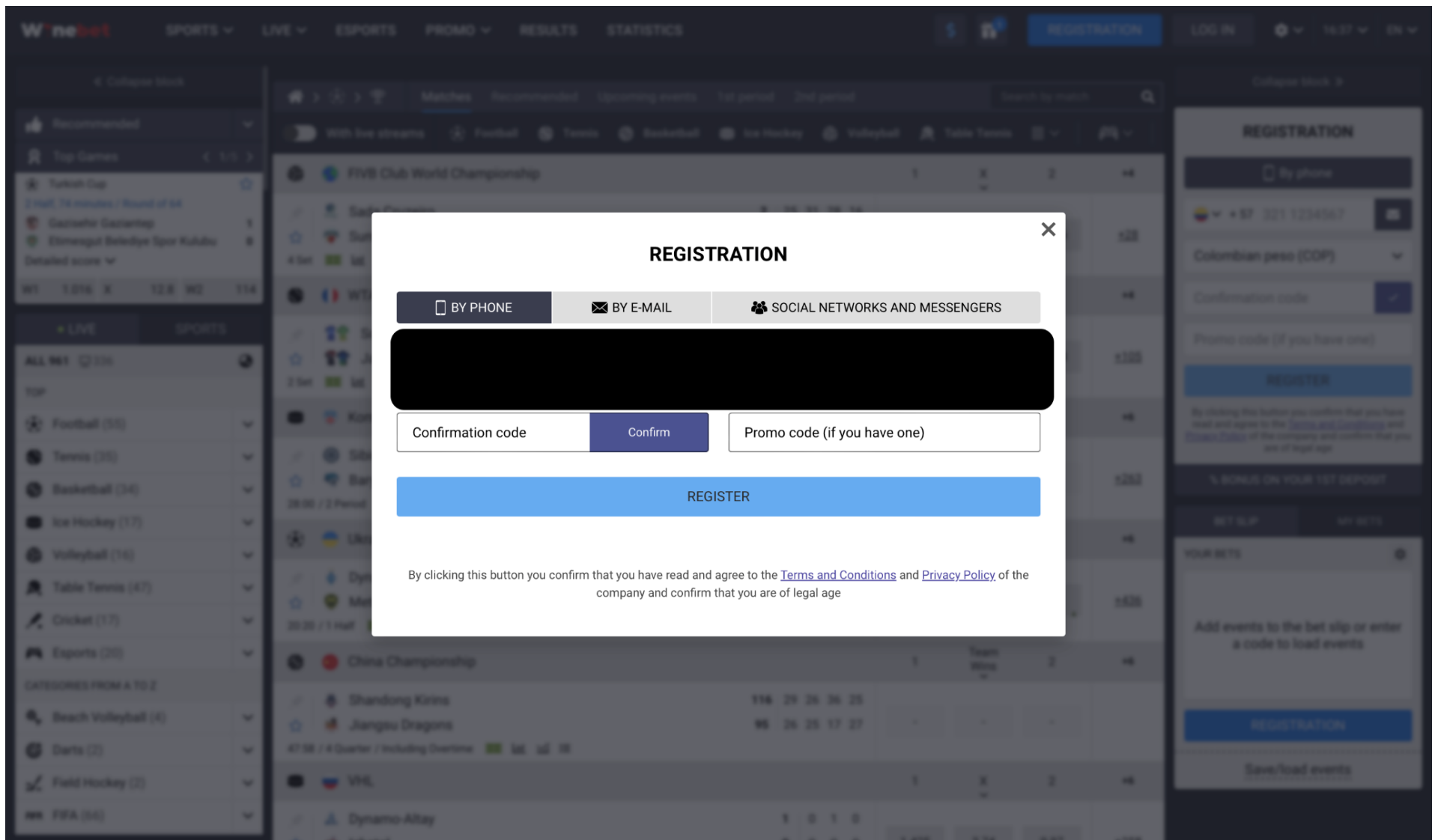
BET SLIP MY BETS

YOUR BETS

Add events to the bet slip or enter a code to load events

REGISTRATION

Save/load events





THANKS FOR THE REGISTRATION!

Username:

Password:



Do not forget to save your username and password!

SAVE TO FILE

SAVE AS PICTURE

Enter e-mail

SEND TO E-MAIL

YOU'RE JUST ONE STEP AWAY FROM A BONUS

Get up to 100 EUR on your first deposit

MAKE A DEPOSIT

Add email

1/5

Bonus points

0

Main account (EUR)

0

ACCOUNT

\$

Deposit

Withdraw funds

Bet history

Transaction history

EXTRA

Invite friends

VIP Cashback

Bonuses and gifts

Customer Support

PROFILE

Personal profile

Security

Account settings

Responsible Gambling

Log out

Personal profile

Fill in the empty fields to take advantage of the enhanced features of the website.

Fill in profile

36%

Account

Account number

Password

Registration date

04/12/2023

Contacts

Phone

Email

We recommend using Gmail to avoid any issues with receiving notifications

Personal info

Surname

Document number

First name

Document issue date

Date of birth

Country

Germany

Place of birth

Permanent registered address

Type of document

National identity card

SAVE

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

CLICKPARI

Terms of Service

Responsible Gambling

BETTING

Sports

Multi-LIVE

GAMES

Casino

Click Games

STATISTICS

Statistics

Results

USEFUL LINKS

Payment methods

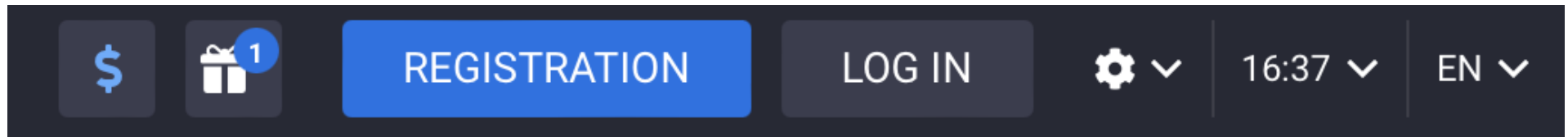
Mobile version

APPS

Android

20

4.2.LOG IN AND LOGOUT



Confirm action

Are you sure you want to log out?

LOG OUT

CANCEL

4.3.TERMS AND CONDITIONS/ RULES AND PROCEDURES

winebet.com

Winebet

SPORTS ▾

LIVE ▾

ESPORTS

PROMO ▾

RESULTS

STATISTICS

\$

1

REGISTRATION

LOG IN

⚙️

16:38 ▾

EN ▾

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11. CALCULATION OF «ACCUMULATOR» AND «SYSTEM» BETS

1. Terms of Service

Introduction: 1.1. These terms and conditions and the documents referred to below (the "Terms") apply to the use of the current website (the "Website") and its related or connected services (collectively, the "Service"). You should carefully review these Terms as they contain important information concerning your rights and obligations concerning the use of the Website and form a binding legal agreement between you - our customer (the "Customer"), and us. By using this Website and/or accessing the Service, you, whether you are a guest or a registered user with an account ("Account"), agree to be bound by these Terms, together with any amendments, which may be published from time to time. If you do not accept these Terms, you should refrain from accessing the Service and using the Website. The Service is owned by CUPWIN B.V. which is incorporated under the laws of Curaçao with company registration No. 164533 at Abraham Mendez Chumaceiro Boulevard 03, Curaçao. This website is licensed and regulated by Curaçao eGaming, license No. 1668/JAZ.

The following Betting Rules pertaining to the bookmaker Winebet (hereinafter referred to as the Rules) stipulate the manner of accepting bets, paying winnings and resolving disputes, as well as the specific features of certain bets on certain sports. These Rules shall govern any other relations between the bookmaker Winebet and the customer.

These Rules shall apply to betting on the website and at Winebet betting facilities.

Bet	- is a risk-driven agreement for potential winnings entered into between the customer and the bookmaker under the established Rules, where the fulfillment of such agreement is conditioned by an event whose outcome is yet to be determined. Bets are accepted on the conditions offered by the bookmaker.
Outcome	- is the result of the event (events) on which the bet was placed.
Customer	- is an individual placing a bet with the bookmaker on an outcome.
Bet Cancellation	- is an outcome on which the bet is not settled and winnings are not paid. As per the Rules, in the event of "bet cancellation", an arrangement between the bookmaker and the customer shall be deemed unconcluded and the stake shall be refunded.
Regular Time	- is the duration of the match subject to the regulations of the relevant sport, including time added by the referee. Regular time does not include extra time, overtime(s), penalty shootouts, etc.

POPULAR EVENTS AND SPORTS NEWS

4.4.OBLIGATIONS AS A PLAYER

4. The right to access and/or use the Website (including any or all of the products offered through the Website) may be considered illegal in certain countries (including, for example, the USA, the United Kingdom, Cyprus, the Netherlands, etc.). We do not intend for our Website to be used for sports betting, gambling or other purposes by people who reside in countries or jurisdictions in which such types of activity are illegal. The list of explicitly forbidden territories is: Aruba, Australia, Bonaire, Curacao, France, Iran, Iraq, Netherlands, Saba, Spain, St Maarten, Statia, U.S.A or the U.S.A dependencies, United Kingdom.
5. The fact that our Website is available in such a country and/or jurisdiction or that it can be displayed in the official language of any of those countries cannot be considered official authorization or legal grounds for using our Website and depositing funds into your account or withdrawing your winnings. The availability of the Website does not mean that it contains any proposals, incitement or invitation to use or subscribe to betting, gambling or any of the other services in any jurisdiction where such activity is illegal.
6. You are responsible for determining whether your accessing and/or use of the Website is compliant with applicable laws in your jurisdiction and you warrant to us that gambling is legal in the territory where you reside. When opening an account and/or using our Website you must make sure that your actions are legal in the territory in which you reside. You also guarantee and agree that you have received legal advice before registering on our Website. If we become aware that you are a resident in a country where the use of our Website is considered illegal, we will have the right to close your account and refund any remaining balance on your account at the moment of its closure (after the deduction of any winnings credited after your most recent deposit was made).
7. The bookmaker shall be entitled to refuse bets from customers who fail to abide by these Rules. The bookmaker reserves the right to refuse to accept a bet of any type from any customer should they violate social standards of conduct and public order.
8. The bookmaker reserves the right to refuse to accept a bet from any individual without giving a reason.
All bets shall be settled based on the data provided by the processing center.
9. Winnings shall be paid to the bettor within 30 (thirty) calendar days from the date of official publication of the results of the latest event on the bet slip.

4.5.PAYOUTS

Winebet

SPORTS ▾LIVE ▾ESPORTSPROMO ▾RESULTSSTATISTICS

\$🎁1

REGISTRATION

LOG IN

⚙️ ▾

16:38 ▾

EN ▾

📄

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How to place a bet

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Cookie Policy

👤

Anti-Money Laundering

👤

KYC Policies

📄

Dispute resolution

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📄

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Privacy & Management of Personal Data

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Accounts, Payouts & Bonuses

📄

Betting rules

👤

Risk warning

🛡️

Responsible Gaming

Search

Q

SHOW ALL

Accounts, Payouts & Bonuses

1. Accounts

2. Deposits and Payouts

3. Bonuses

1. Accounts, Payouts & Bonuses

1. Accounts

1. Each registered customer is allowed to have only one account. Customers are allowed to register only one account per family, address, e-mail address, IP address, credit/debit card, e-wallet or electronic payment method. Persons otherwise associated with a customer will not be allowed to register on the website.

2. No registered customer is allowed to be re-registered as a new customer (under a new name, with a new email address, etc.).

3. In the event of duplicate registration (including registering under a new name), the submission of someone else's, invalid, or forged documents (including those that have been edited by using any kind of software or graphic editor) multiple breaches of the Betting Company's T&C doubts about the identity of the customer or the information they have provided (i.e. address, credit/debit card details, other data) any types of fraud committed either by you or by another person acting in your interests or in collusion with you, including but not limited to:

a) refund or rake fraud

b) your use of a stolen or unverified bank card as a source of funds

c) any actions you have carried out or attempted to carry out which may reasonably be considered illegal in any applicable jurisdiction, which were committed deliberately or with the intention to deceive and/or circumvent constraints set in law regardless of whether this action or attempt ultimately causes loss or damage to your account

when the customer placed the bet, they had information about the result of that event the customer was able to influence the outcome of an event due to their direct participation in the match (sportspeople, coaches, referees, etc.) or because they acted on behalf of the participants bets were placed by a group of bettors acting in concert (as a syndicate) in order to exceed the limits set by the bookmaker, as well as colluding with others in order to obtain an unfair advantage through bonus schemes or any other promotions offered by us

4.6.WITHDRAWING

Withdrawals can be made using the payment methods specified below, as follows:
FIAT - provided that the deposit was made in FIAT and CRYPTO - provided that the deposit was made in cryptocurrency.

The screenshot displays the 'WITHDRAWING FROM ACCOUNT' page. On the left is a dark sidebar with navigation options: 'Add email' (1/5), 'Bonus points' (0), 'Main account (EUR)' (0), 'ACCOUNT' (Deposit, Withdraw funds, Bet history, Transaction history), 'EXTRA' (Invite friends, VIP Cashback, Bonuses and gifts, Customer Support), and 'PROFILE' (Personal profile, Security, Account settings, Responsible Gambling). A 'Log out' button is at the bottom of the sidebar. The main content area is titled 'WITHDRAWING FROM ACCOUNT' and includes a 'WITHDRAWAL REQUESTS' button. Below the title, it says 'Select payment method to withdraw money:'. A table lists 'ALL METHODS' (34), 'BANK CARDS' (2), and 'CRYPTOCURRENCY' (32). The 'BANK CARDS' section shows 'VISA' and 'MasterCard' buttons. The 'CRYPTOCURRENCY' section is a grid of 20 buttons, each with a coin icon and name: Bitcoin, Ethereum, TRON, Bitcoin Cash, Ethereum Classic, XRP, Litecoin, Dogecoin, Dash, Monero, ZCash, BitShares, DigiByte, Verge, QTUM, Stellar, Polkadot, Avalanche X-Chain, Tether on Ethereum, and USD Coin on Ethereum. A green chat bubble icon is in the bottom right corner.

ALL METHODS	34
BANK CARDS	2
CRYPTOCURRENCY	32

BANK CARDS	
VISA	MasterCard

CRYPTOCURRENCY				
Bitcoin	Ethereum	TRON	Bitcoin Cash	Ethereum Classic
XRP	Litecoin	Dogecoin	Dash	Monero
ZCash	BitShares	DigiByte	Verge	QTUM
Stellar	Polkadot	Avalanche X-Chain	Tether on Ethereum	USD Coin on Ethereum

4.7.BETTING

Winebet

SPORTS ▾ LIVE ▾ ESPORTS ▾ PROMO ▾ RESULTS ▾ STATISTICS

\$

🎁 1

REGISTRATION

LOG IN

⚙️

16:36 ▾

EN ▾

« Collapse block

Recommended ▾

Top Games < 1/5 >

🏆 Turkish Cup

2 Half, 74 minutes / Round of 64

📍 Gazisehir Gaziantep

1

📍 Etimesgut Belediye Spor Kulubu

0

Detailed score ▾

W1

1.016

X

12.8

W2

114

LIVE

SPORTS

ALL 965 📺 339

TOP

⚽ Football (54) ▾

🏸 Tennis (35) ▾

🏀 Basketball (34) ▾

🏒 Ice Hockey (17) ▾

🏐 Volleyball (16) ▾

🏓 Table Tennis (47) ▾

🏏 Cricket (17) ▾

🎮 Esports (20) ▾

CATEGORIES FROM A TO Z

🏐 Beach Volleyball (4) ▾

🎯 Darts (2) ▾

🏑 Field Hockey (2) ▾

⚽ FIFA FIFA (68) ▾

Home > 🏆 > 🏆

Matches Recommended Upcoming events 1st period 2nd period

Search by match 🔍

With live streams

⚽ Football

🏸 Tennis

🏀 Basketball

🏒 Ice Hockey

🏐 Volleyball

🏓 Table Tennis

⋮

🎮

🏐 FIVB Club World Championship

1 X 2 +4

📍 Sada Cruzeiro

2

25 31 28 16

📍 Suntory Sunbirds

1

21 29 30 16

4 Set 📺 📺 📺 📺

1.295 - 3.58 ±28

🏸 WTA. Angers. Doubles

1 X 2 +4

📍 Schoofs/Zimmermann

0

2 3 (40)

📍 Jacquemot/Serban

1

6 2 (30)

2 Set 📺 📺 📺 📺

1.73 - 2.104 +105

🏒 Kontinental Hockey League

1 X 2 +6

📍 Sibir Novosibirsk

4

4 0

📍 Barys

0

0 0

27:22 / 2 Period 📺 📺 📺 📺

- - - +264

⚽ Ukraine. Premier League

1 X 2 +6

📍 Dynamo Kyiv

1

1

📍 Metallist 1925

0

0

19:30 / 1 Half 📺 📺 📺 📺

1.06 11.6 24 +435

🏒 VHL

1 X 2 +6

📍 Dynamo-Altay

1

0 1 0

📍 Izhstal

0

0 0 0

40:54 / 3 Period 📺 📺 📺 📺

1.44 3.78 8.95 +258

🏒 Metallurg Novokuznetsk

4 3 1

📍 Chelny

0

0 0 0

40:00 / Intermission 📺 📺 📺 📺

- - - +221

Collapse block »

REGISTRATION

📞 By phone

Confirmation code ✓

Promo code (if you have one)

REGISTER

By clicking this button you confirm that you have read and agree to the [Terms and Conditions](#) and [Privacy Policy](#) of the company and confirm that you are of legal age

% BONUS ON YOUR 1ST DEPOSIT

BET SLIP

MY BETS

YOUR BETS ⚙️

Add events to the bet slip or enter a code to load events

REGISTRATION

Save/load events

26

5.KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1.PLATFORM DESCRIPTION

Fertami Ltd, a company registered under the laws of the Republic of Cyprus under registration number HE 413010 (“Fertami”) has developed **the Unionsoft Platform** (“**Platform**”) - a software solution for betting companies with 24/7 stream of data and technical support. The Platform provides betting website operators with a reliable software solution designed to deliver high performance and security. Built on advanced technologies, it offers a diverse range of features, including real-time data updates, support for multiple types of bets, huge selection of sports and flexible customization options.

1. Platform specifications

1.1. General specifications

1.1.1. The Platform’s structure

The functional structure of the Platform includes the following modules:

- a) the option to register as a customer
- b) the option to log in and reset the password
- c) the option to make deposits and withdrawals
- d) the option to place bets
- e) the option to view betting history
- f) the option to view deposit history
- g) the option to receive bonuses
- h) the option to view bonus history
- i) the option to contact the customer support team
- j) the option to self-exclude
- k) the option to place limits on deposits
- l) deployment of two-factor authentication
- m) deployment of secret phrase authentication
- n) databases and tables of real events containing established statistics or dynamic odds
- o) service for obtaining odds on events through an API
- p) service for tracking customer money – records of deposits, bets, and withdrawals
- q) service for integrating the Platform with the payment services of other third-party providers through an API

- r) service for notifying customers about a future event, changes, adverts, and marketing for promotions by email, text message and pop-up message on mobile devices
- s) tool for protecting and restricting access and assigning competences to Fertami's employees (BackOffice) and displaying an employee's level of access in their profile
- t) profiles for the technical service departments of remote operating units (B2C) including the department structure, information about the SLA and the serviced business units of the operator or affiliates
- u) technical support service including the systems for logging in, registration, and recording and resolving questions and problems from service contractors when using email services or live communication
- v) display of short messages to customers (primarily the status of their account and customer legal compliance)
- w) the option for customers to put forward and discuss customer ideas to improve the platform's services and install new services, and the option to introduce ratings
- x) document management – files received from customers – loading files and exchanging them with colleagues securely, tagging, the option to add comments and information about users that downloaded files, version control
- y) cookie service – storage and sharing of useful links to various online resources, customer recommendations and content on the basis of information accumulated about a customer, improvement and suggestions for customers to make using the platform easier and more efficient
- z) responsible gaming service – a service for customers to set up their own limits and self-exclude with the option to customize these to suit the different requirements of the various jurisdictions
- aa) Anti-fraud and AML service – the option to connect third-party resources through an API from government bodies in different jurisdictions to verify customers when they register and if they engage in suspicious activity
- bb) service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals
- cc) voting service – the opportunity for customers to vote for the operator's various marketing or informational promotions posted and sent to customers through the Platform's services
- dd) service for issuing ratings – mechanisms for determining the activity and popularity of Platform users and creation of reports on VIP customers

2. Compatibility with related platforms

The Platform is compatible with third-party betting platforms and individual slots, casino, corporate back-office portal sufficient for general navigation and information research, a payment system aggregator, and a customer support module.

The Platform also supports:

- a) marketing modules from third parties
- b) integration with the business solutions including CMS, CRM, and BackOffice
- c) integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- d) integration with additional structures providing prior verification services on customers, KYC, AML, fraud prevention, and PEP lists to help the operator decide whether to accept certain users
- e) provision of API for several modules
- f) integration with system managing access to information resources for providing the betting odds.
- g) integration with AWS and other data storage services that have security certificates and are located within the EU.

3. Ergonomic features

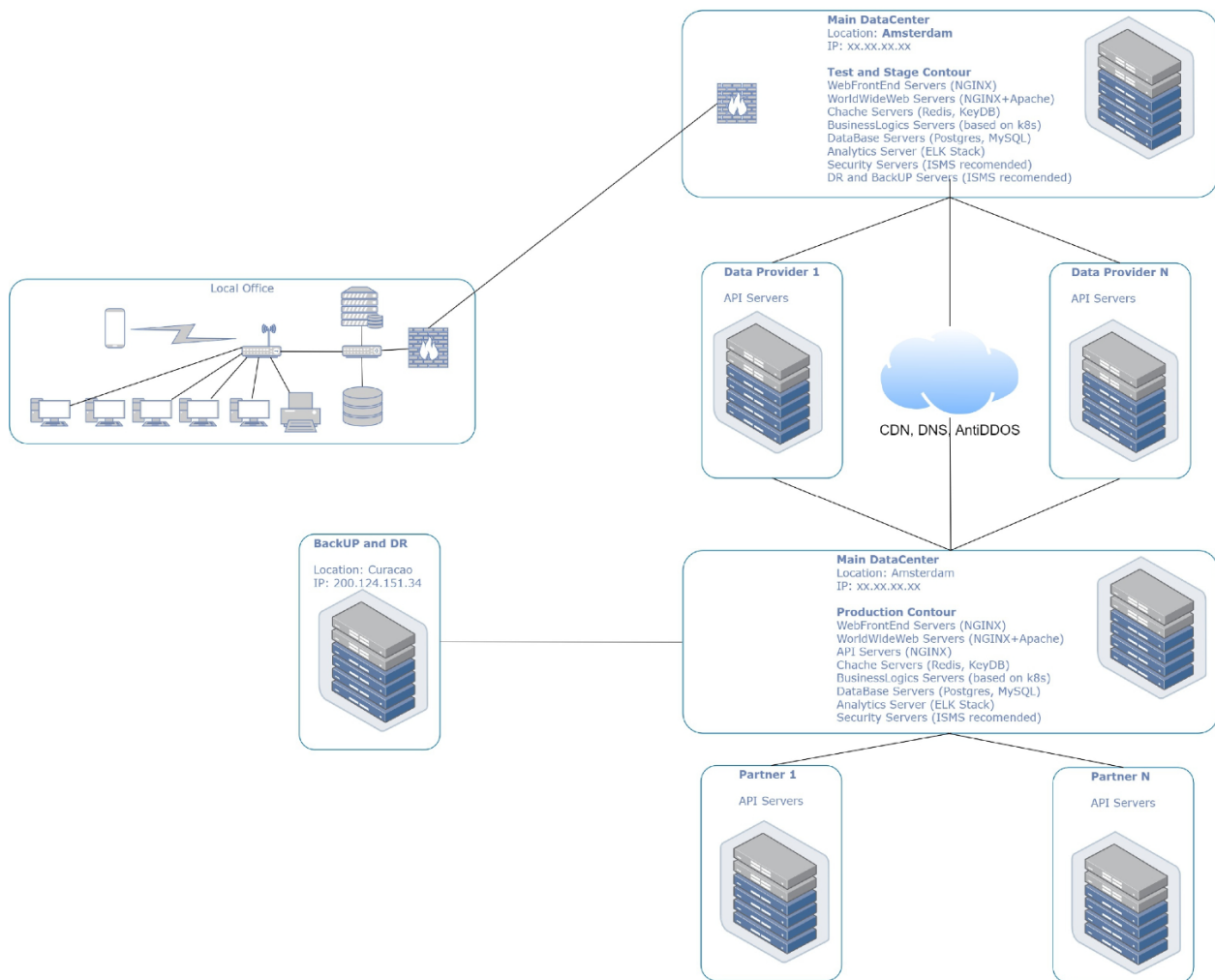
It is possible to modify the Platform's interface according to the developed and agreed designs.

The Platform supports access from the following mobile platforms:

- a) iOS
- b) Android
- c) Windows

The Platform supports adaptive web design (or an adaptive user interface) capable of carrying out W3C CSS3 requests with a changing proportion grid and also support flexible changes to image proportions.

The platform boasts a robust foundation, equipped with a thorough disaster plan and resilient infrastructure, effectively minimizing potential risks. It is imperative to enforce protocols for data backup and restoration, including redundant server systems, to mitigate service interruptions and safeguard against data loss. Regular testing and updates of the disaster plan are crucial to adapt to evolving threats and technological advancements. Collaborating with cybersecurity professionals and regulatory authorities can provide invaluable insights to fortify disaster preparedness in online casino platforms, enhancing operational resilience and fostering customer trust.



5.2.PAYMENT SERVICE PROVIDERS

An integral set of suppliers includes payment service providers, crucial for seamless payment processing. We collaborate with renowned PSPs operating within relevant jurisdictions to guarantee efficient transactions. Payment service provider (at the connection/planning stage): EasyPaygame, Flatterwave, Jeton, GateExpress, BigIdea, PayOp, Mifinity.





Likewise, our strategy for banking services adheres to a rigorous compliance framework, mitigating the risk of losing banking services. Operating with 2 to 3 banks simultaneously provides protection against inherent banking risks. Diversifying our banking relationships not only bolsters our bargaining power but also reinforces resilience in our financial infrastructure. This proactive approach not only shields against disruptions but also fosters stability and longevity in our financial operations.

5.3.LEGAL AND CORPORATE PROVIDERS

In the sphere of legal and corporate services, numerous seasoned professionals specialize in the intricacies of gambling. These experts assist us in adhering to regulatory, payment, and banking protocols, ensuring thorough compliance.

6. RISK EVALUATION AND MANAGEMENT

Each department conducts daily risk monitoring.

6.1. RISK AUDITING

Internal reviews, conducted annually across all risk categories by the Audit Committee comprising the Head of IT, Head of Legal, and Head of Finance, ensure comprehensive evaluation. External assessments occur every three years to provide an independent evaluation of business and financial matters.

Regular audits on the platform, its software providers, infrastructure, and financial health are conducted. The Audit Committee reviews and updates the risk register quarterly, alongside daily departmental communications.

Annual mandatory financial audits are performed for all companies within the organizational structure.

6.2. RISK OVERVIEW

Legal Environment (Led by: Head of Legal): Given the dynamic nature of online gambling laws, maintaining consistent vigilance is paramount. Timely notifications regarding legal modifications can be disseminated throughout departments, ensuring all employees are abreast of the evolving legal framework in online gambling. The legal department collaborates closely with other units, including compliance and operations, to ensure a thorough understanding of legal obligations and facilitate seamless implementation procedures. Sustaining transparent communication channels with regulatory agencies and industry groups underscores our commitment to adhering to online gambling legal standards.

- **Legal Compliance and Licensing:** Establishing and managing an online casino requires obtaining licenses from relevant regulatory bodies across different jurisdictions. Regulatory standards can vary significantly between jurisdictions, and non-compliance with licensing obligations can result in substantial fines, legal repercussions, or even the cessation of operations.

Risk reduction: The Operator currently holds the Gaming Curacao license No. 365/JAZ and is in the process of applying for a new GCB license.

- **Data Security and Privacy Regulations:** Online casinos collect and manage extensive volumes of sensitive customer information. Adhering to data protection laws like the EU's General Data Protection Regulation (GDPR) is essential to prevent penalties and maintain customer confidence.

Risk reduction: Collect and handle only the necessary personal data required for delivering gambling services, ensuring data is not retained beyond its necessity. Establish and implement a data breach response strategy to promptly address and mitigate the consequences of data breaches, including protocols for notifying data subjects and relevant supervisory authorities within specified timelines. Embed privacy by design and default principles in the creation of new products, functionalities, or services, integrating privacy aspects into the design and

development process from the outset.

- **Navigating Regulatory Hurdles Across Borders:** Operating in multiple jurisdictions can subject online casinos to complex regulatory landscapes and legal ambiguities. Disparities in gambling regulations and enforcement strategies between borders can present compliance obstacles, often requiring substantial legal expertise and resources.

Risk reduction: Forge strategic alliances with local enterprises, legal consultants, or industry consortia in target jurisdictions to gain insights into local regulations, streamline regulatory procedures, and build rapport with regulatory entities. Conduct thorough due diligence on prospective business collaborators, affiliates, suppliers, and other external stakeholders to verify their adherence to regulatory mandates and mitigate potential compliance risks in the casino's cross-border ventures. Stay informed of changes in gaming regulations and enforcement methodologies in target regions by consistently monitoring regulatory updates, industry literature, and legal advisories.

- **Regulatory Oversight:** Regulatory bodies may conduct investigations or audits to verify compliance with gambling regulations. Enforcement actions, including fines, license withdrawal, or legal actions, can have significant consequences for iGaming operators found to violate regulatory stipulations.

Risk reduction: Conduct routine internal audits and assessments of compliance protocols, operational practices, and procedures to identify instances of non-compliance, assess risks, and implement preemptive corrective measures. Foster transparent communication channels with regulatory bodies, industry associations, and other relevant stakeholders to cultivate partnerships, seek advice on compliance issues, and promptly address queries or concerns. Maintain meticulous documentation and records of compliance efforts, including policies, protocols, training materials, audits, and enforcement actions, to substantiate compliance efforts and facilitate regulatory inquiries or investigations.

Management of Regulatory Risks (Led by: Compliance Officer): Regulatory risks, particularly regarding Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance, are critical considerations for businesses, especially in financial and gambling sectors. The AML&KYC department is tasked with ensuring adherence to relevant laws and regulations aimed at preventing money laundering and terrorist financing. This entails establishing robust policies and procedures to verify customer identities, monitor transactions for suspicious activities, and promptly report anomalies to authorities. Non-compliance carries severe penalties, including fines and reputational damage, making strict adherence imperative to mitigate regulatory risks and uphold integrity. The department oversees compliance, conducts risk assessments, and implements controls, while ongoing training ensures staff alignment with evolving requirements.

- **Adherence to Compliance and Anti-Money Laundering (AML) Regulations:** Online casinos must adhere to stringent compliance protocols to combat money laundering and terrorist financing, failure of which can lead to sanctions and legal consequences.

Risk reduction: Develop a comprehensive AML policy outlining procedures for due diligence, transaction monitoring, and reporting suspicious activities. Provide regular training to staff on AML regulations, recognizing red flags, and their roles in preventing illicit activities.

Infrastructure Risks (Led by: Head of IT): Infrastructure maintenance, cybersecurity, and data security are vital concerns. The technical team ensures regular maintenance to minimize downtime and mitigate risks from hardware or software failures. Updating cybersecurity protocols and technologies is crucial to defend against cyber threats like hacking and data breaches. Continuous monitoring and swift response to incidents are essential to minimize risks and mitigate cybersecurity breaches.

- **Data Security:** Unauthorized access to customer information can lead to identity theft and fraud.

Risk reduction: Employ multi-layered cybersecurity protocols, including firewalls and encryption. Regularly update software and security patches to address vulnerabilities and guard against emerging threats.

Financial Risks (Led by: Head of Finance): Financial risks are inherent in business operations and require careful management for sustainability and growth. The Head of Finance plays a crucial role in identifying, assessing, and mitigating these risks by implementing robust financial controls, monitoring cash flow, and optimizing capital allocation. Collaborating with other departments, they devise financial strategies aligned with organizational goals to safeguard financial well-being and enhance shareholder value. Regular financial analysis and reporting are vital for recognizing emerging risks and opportunities, enabling timely adjustments to financial strategies.

- **Taxation:** Varying taxation policies in online gambling jurisdictions can significantly impact operators' profitability, posing financial risks.

Risk reduction: Consult tax professionals to ensure compliance with local tax laws and utilize tax treaties to optimize tax planning. Maintain precise financial records and accurate tax filings to comply with reporting obligations.

Litigation Risks (Led by: Client Service): Risks associated with customer service practices require alignment with laws and regulations to mitigate litigation potential. Clear communication policies and thorough documentation of interactions reduce misunderstandings and disputes. Periodic evaluation and enhancement of procedures based on feedback minimize customer dissatisfaction and litigation risks.

- **Promotion of Responsible Gaming:** Non-compliance with responsible gaming regulations can lead to penalties and reputational damage.

Risk reduction: Implement self-exclusion tools, customizable deposit limits, and monitoring systems to identify potential gambling issues and provide appropriate support resources.

6.3.RISK OF POTENTIAL CAPITAL LOSS

During the initial phase, potential financial losses may arise from registration fees, rent, and office equipment. If the online casino closes for valid reasons, the security deposit is

refunded to the owners. However, it's vital to preserve this amount untouched during operations, earmarking it solely as a jackpot-winning deposit to mitigate losses effectively.

Risk reduction: With 15 years of collective experience in the online casino industry among the founders and co-owners, combined with strategic managerial guidance from the project mentor, the project is well-positioned to minimize risks associated with market entry to the fullest extent possible.

7.POLICIES AND PROCEDURES

7.1.KNOW YOUR CUSTOMER

The Know Your Customer (KYC) policy establishes procedures and protocols to verify and validate client identities, aiming to prevent financial crimes like money laundering, terrorist financing, and fraud by ensuring precise information about patrons and their financial transactions. Implementing KYC measures fosters trust, ensures regulatory compliance, and mitigates risks associated with illicit financial activities.

7.2.ANTI-MONEY LAUNDERING

The primary goal of an Anti-Money Laundering (AML) policy is to deter the illegal process of concealing the origins of money acquired through criminal activities. AML policies identify and discourage money laundering, terrorist financing, and other illicit financial activities within financial institutions.

7.3.DATA PRIVACY

A Data Privacy Policy outlines how an organization collects, uses, stores, and protects individuals' personal data to comply with data protection regulations, safeguard privacy rights, and build stakeholder trust. By establishing clear guidelines and procedures for managing sensitive data, the policy aims to minimize data breaches, unauthorized access, and misuse, promoting transparency and accountability in data management.

7.4.RESPONSIBLE GAMING

A Responsible Gaming Policy promotes safe and balanced gambling behaviors while addressing risks associated with excessive or problematic gambling. It provides measures and guidelines to protect players from the adverse effects of gambling addiction, such as financial distress and mental health challenges. By offering resources for self-exclusion, setting limits on gambling activities, and providing support, the policy aims to create a responsible gambling environment, safeguarding player welfare and upholding gaming sector integrity.

7.5.TERMS OF USE

The Terms of Use policy outlines guidelines, regulations, and conditions for users accessing the online casino platform, covering user obligations, account management, payment processes, conflict resolution, and legal compliance. By agreeing to these terms, users confirm their understanding of the rules governing their interactions with the casino, ensuring transparency, fairness, and legal compliance throughout their gaming experience.

7.6.SELF-EXCLUSION

This entails the process through which individuals can voluntarily exclude themselves from participating in gambling activities on the platform for a specified period, often to regulate their gambling habits or address addiction-related issues.

7.7.DISPUTE RESOLUTION

This section delineates the procedures and mechanisms available for resolving conflicts or disputes that may arise between the casino and its users, typically outlining steps for escalation and resolution.

7.8.FAIRNESS & RNG TESTING METHODS

This section assures the fairness of games offered by the casino, confirming their randomness and impartiality, often highlighting the use of Random Number Generators (RNGs) and the methods employed to evaluate and validate their fairness.

7.9.ACCOUNTS, PAYOUTS & BONUSES

This section details account management procedures, payout methods, and conditions regarding bonuses, including wagering requirements and restrictions.

7.10.BETTING RULES

This section provides specific rules and regulations governing betting activities on the platform, covering game-specific guidelines, maximum and minimum bet amounts, and any additional terms for various types of bets.

7.11.INTERNAL POLICIES

Human Resources Policy: This policy encompasses guidelines related to recruitment, onboarding, performance evaluation, training and development, diversity and inclusion, disciplinary procedures, and termination protocols.

Financial Policy: This policy governs practices regarding budgeting, expenditure management, financial reporting, auditing procedures, procurement practices, and adherence to accounting standards.

Communication and Social Media Policy: This policy establishes protocols for internal and external communication channels, including email usage, social media guidelines, interactions with the media, and branding protocols.

Information Security Policy: This policy outlines measures for protecting sensitive information, including data management procedures, cybersecurity strategies, password management, and protocols for preventing data breaches.

Internal policies primarily support external policies. While external policies undergo annual review and updates, internal policies are subject to continuous creation, modification, and termination as necessary.

7.12.

The imperative to establish and maintain these policies arises from our commitment to ensuring sustained long-term operations, especially given the initial investment. Our strategy involves operating for a minimum of three years under the GCB license, with renewal contingent upon attaining investment returns and project Key Performance Indicators (KPIs), as outlined in our financial projections.

7.13.

To adhere to the adopted policies and procedures, the project leverages expertise and resources from various internal and external sources. The Ultimate Beneficial Owner (UBO) brings a wealth of experience in both gambling and IT, making her an ideal overseer. Key departments such as Legal, IT, Human Resources, and Finance possess significant expertise in managing large gambling operations sustainably. Additionally, jurisdictions like Curacao and Cyprus provide ample opportunities for engagement with advisors, experts, and independent auditors. The GCB offers guidance and support to operators in policy development, ensuring customization to comply with regulatory requirements and industry standards. This collaborative effort enables operators to establish robust policies that promote compliance and integrity within the gambling sector. Moreover, the GCB provides ongoing support and updates to help operators adapt to evolving regulations and emerging challenges. In summary, the assistance provided by the GCB empowers operators to establish and uphold a strong framework for responsible gambling practices.

8.MARKET ANALYSIS

8.1.INCOME AND TURNOVER

The year 2020 witnessed a prosperous period for global online casinos, driven by the onset of the pandemic and widespread self-isolation measures. In numerous countries, the overall revenue of the gambling market experienced a remarkable one-third increase compared to the preceding year, 2019, underscoring the resilience and potential of the online casino business model.

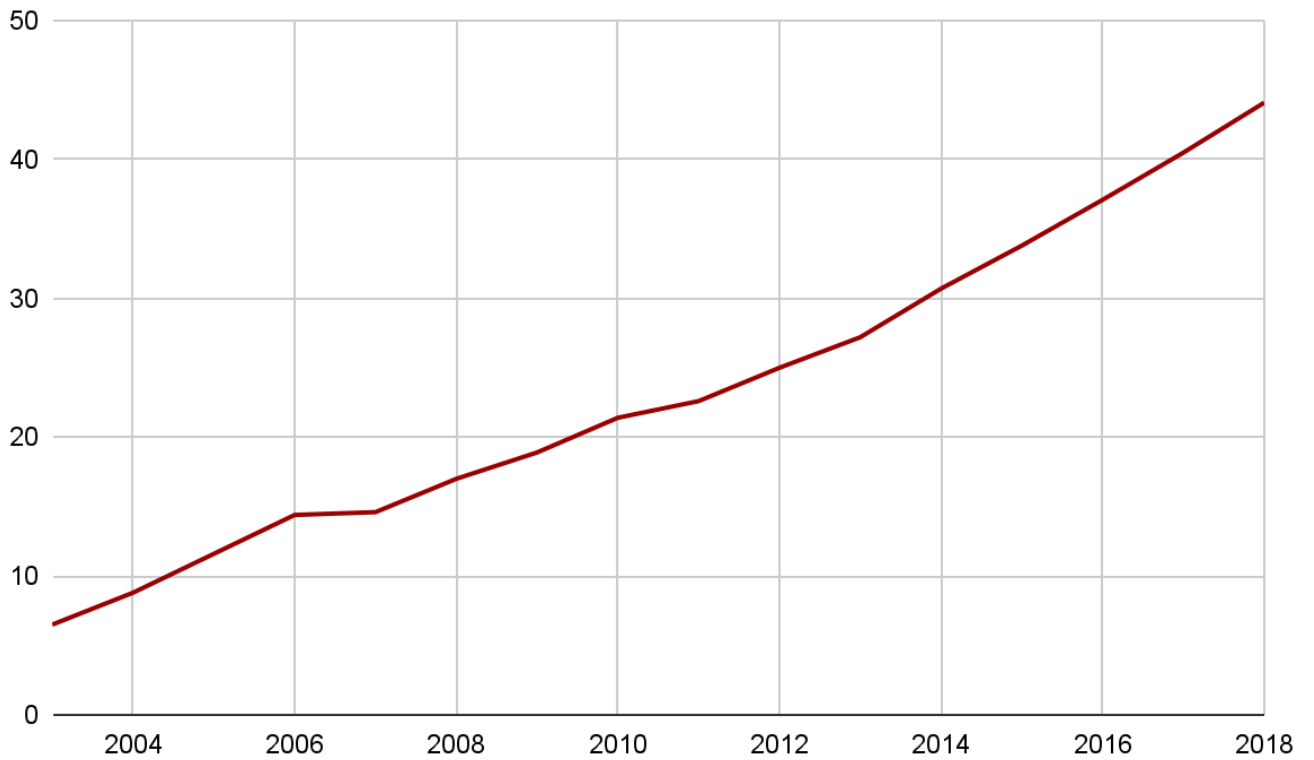
Over the past few years, online gambling has been legalized in 85 countries globally. Online betting, slot machines, and various other gambling games collectively contribute to 70% of the total income generated in the realm of Internet gambling.

The global popularity of online gambling can be attributed to the extensive range of offerings and a seamless gaming experience without restrictions. Notably, the highest income from online slot machines is reported in the United Kingdom, China, Austria, Germany, and Italy.

Despite the trend towards the regulation of national gambling markets, a few countries are moving in the opposite direction by contemplating the prohibition of online gambling and mobile applications.

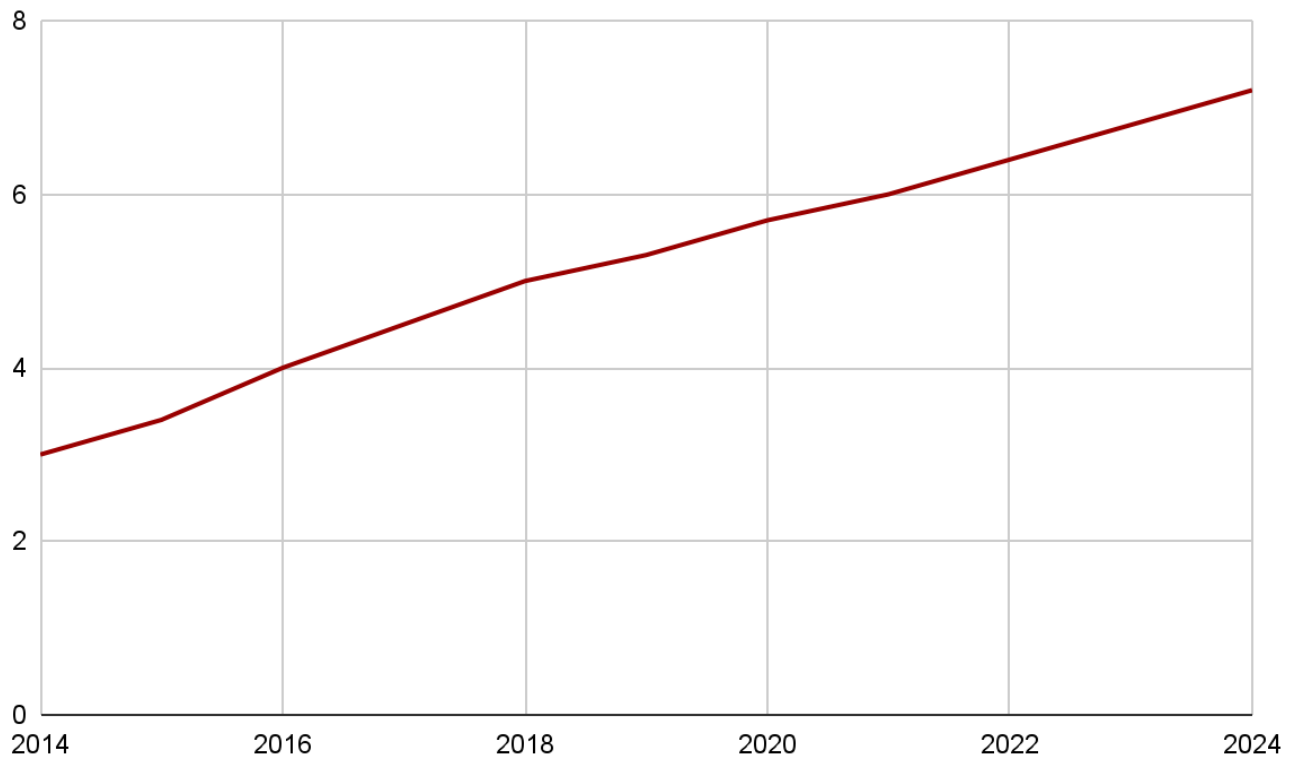
As of now, the global online gambling market constitutes 13% of the total global legal gambling market, and this percentage continues to ascend. According to a study by the American Gaming Association, approximately 85 countries have embraced the legalization of online gambling.

Diagram 2. Revenue from online gambling worldwide, billion euros



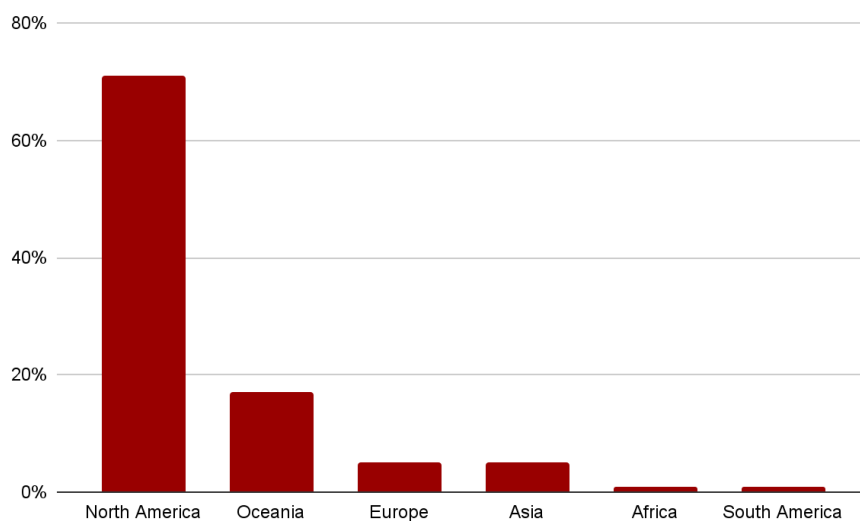
Gross Gaming Revenue (GGR) is a crucial financial metric used to measure the total revenues generated by a gambling establishment, offering valuable insights into the global behavior trends of gambling players.

Diagram 3. Forecast of Gross Gaming Revenue, \$ billion



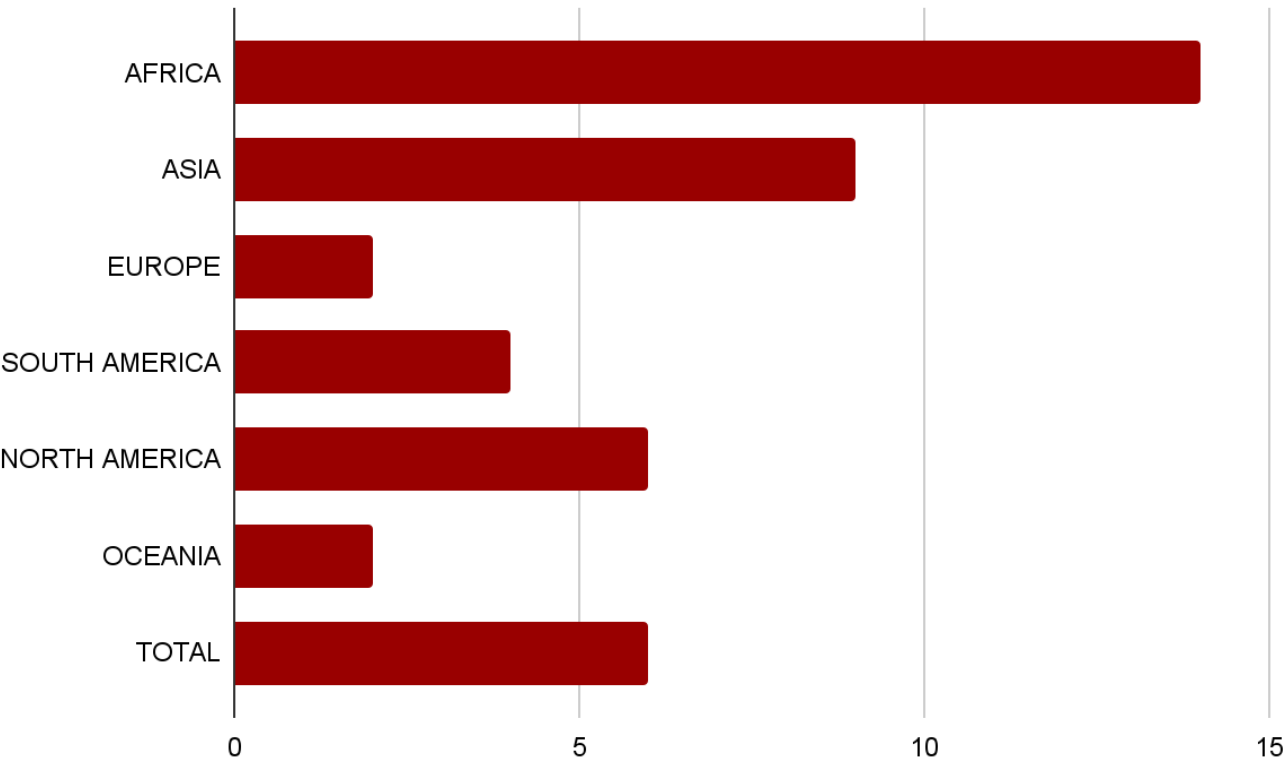
Concurrently, Oceania, which includes regions like Fiji, New Zealand, Polynesia, New Guinea, and others, wielded a strong influence, contributing 17% to the global Gross Gaming Revenue (GGR) in 2019. This represented a substantial lead over Asia and Europe, each comprising 5% of the global GGR during the same period. The noteworthy presence of Oceania in the global GGR landscape emphasizes its significant role in the overall dynamics of the gambling industry.

Diagram 4. Regional structure of gross income of the gambling business in 2019



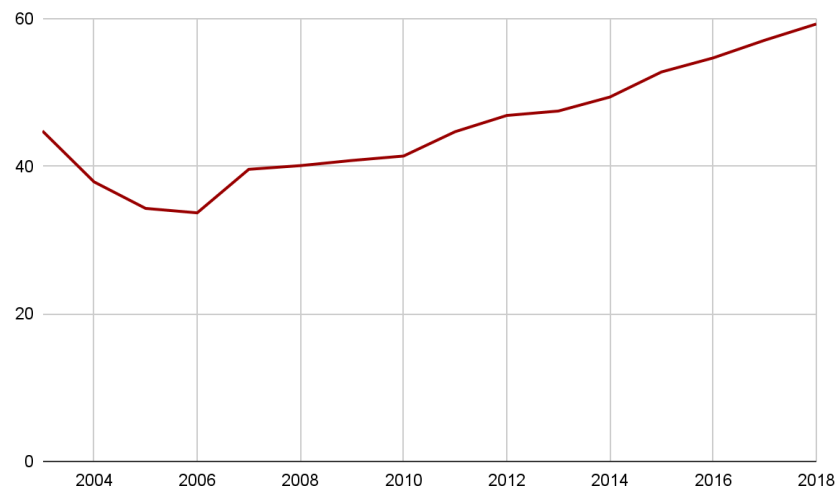
In 2019, Africa demonstrated the highest growth rate, registering an impressive 14% year-over-year increase, while Europe underwent a comparatively modest growth trajectory.

Diagram 5. Growth in gross income by region in 2019



Conversations have also centered on simplifying regulations. Presently, online gambling operators within the European Union are required to secure licenses in multiple countries, each with its distinct licensing requirements. Nevertheless, a more uniform approach would be more advantageous for them. The proliferation of compliance requirements results in redundant infrastructure and additional costs, imposing unnecessary administrative burdens on regulators.

Diagram 6. The share of the "white market" in online gambling revenue worldwide



From 2003 onwards, the market has consistently witnessed an annual growth rate averaging 23%. The key drivers contributing to this growth encompass betting, casino activities, and poker. The rising popularity of online gaming can be attributed to factors like the widespread accessibility of the Internet, the emergence of new markets, and the inclusion of diverse player demographics.

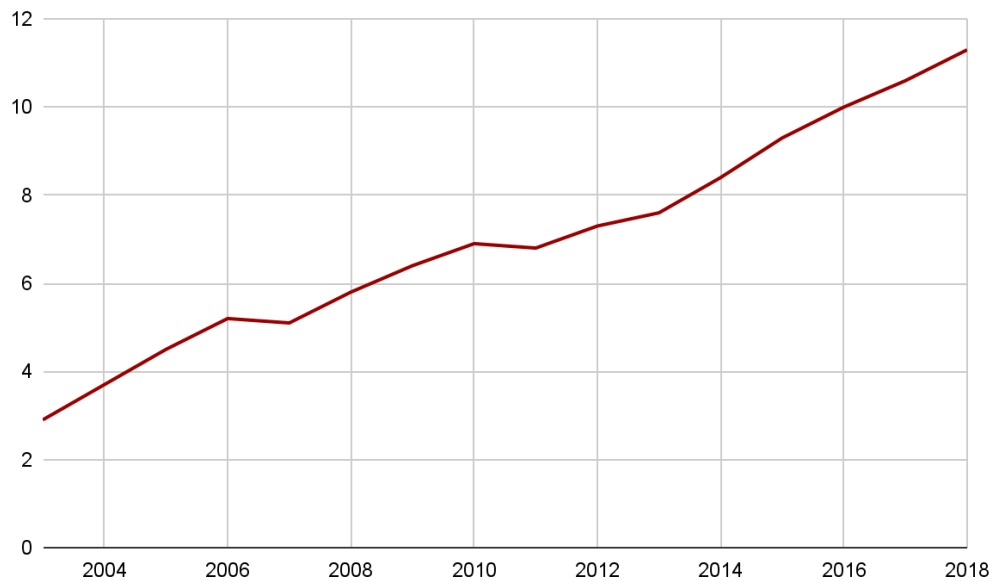
8.2.IDENTIFYING NEW PLAYER SEGMENTS

Since 2004, the number of female internet users aged 18 to 74 has surged by over 80%, surpassing the 60% increase observed in men. While online gambling initially appealed mainly to young men, there has been a noticeable shift, with increasing popularity among women and older demographics.

Diverse player preferences and motivations emphasize the need for operators and developers to stay attuned to evolving trends. Whether pursued for entertainment, monetary gain, or relaxation, understanding player preferences is paramount. As the internet becomes more pervasive in society, age differences among players are widening, challenging the stereotypical image of the average male player aged 25 to 35.

The rising popularity of bingo can be attributed to its ability to provide a social and communal gaming experience, allowing players the opportunity to relax and connect in a sociable setting.

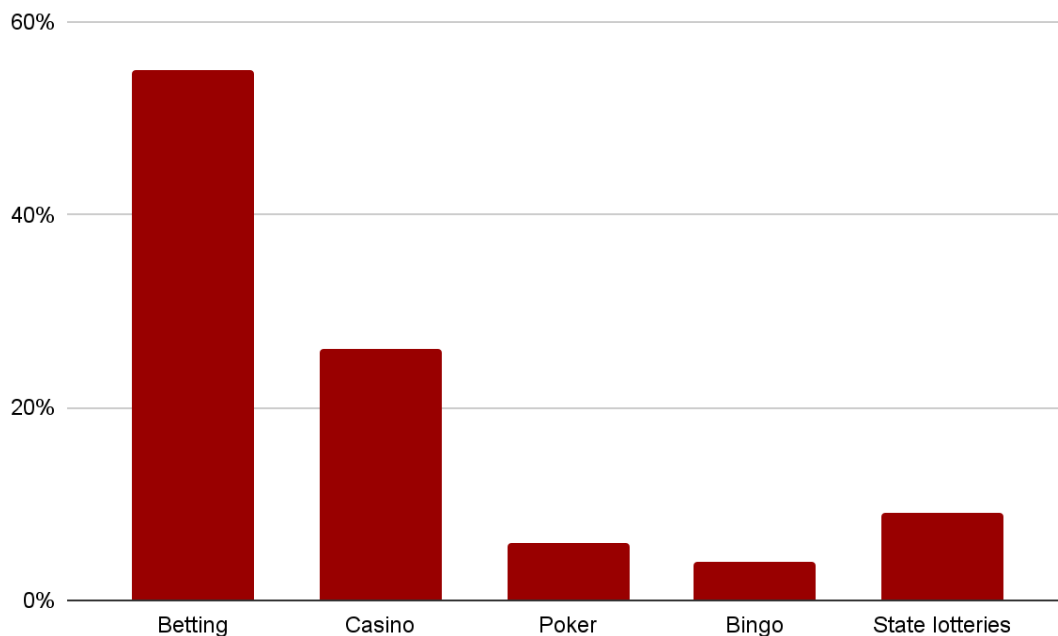
Diagram 7. Proportion of global gambling revenue contributed by online gambling



It is essential to emphasize that the prevalent forms of remote gambling today encompass traditional casino games, various betting activities, and poker variations. The choice of different types of online gambling is influenced by gender, with the bingo sector expected to experience the highest growth rates due to increased female interest in the iGaming industry.

Despite this growth, online gambling remains more popular among men, particularly young men who are more prone to engaging in gambling activities. While women also enjoy playing, their preferences often lean towards simpler games such as lotteries and slots. This difference can be attributed to societal norms and roles, where activities like betting, casino games, and skill games are traditionally associated with male audiences, while women are more inclined towards recreational play rather than seeking an adrenaline rush.

Diagram 8. Online gaming revenue by type, 2019



8.3.CURRENT TRENDS IN ONLINE CASINOS

Due to the pandemic and widespread self-isolation in many countries, 2020 has proven to be a highly successful year for online casinos worldwide. The revenue of the global online gambling market has surged by one-third compared to 2019, showcasing its resilience even during the 2008 financial crisis.

The gaming market is undergoing profound transformations with the influence of new technologies. Mobile gambling is anticipated to experience significant growth, with only the best innovations surviving competition, resulting in an enhanced quality of mobile gaming experiences for users.

While technical changes, including improvements in mobile data transmission speed, may go unnoticed by end users, qualitative and specific enhancements will be readily apparent. A notable development on the horizon is the integration of virtual reality into online gambling. With advancements in technologies like Microsoft HoloLens, HTC Vive, and Playstation VR, video slots and other online games are poised to become more spectacular and immersive than ever before.

Integration of Virtual Reality Technology

Recent advancements in VR technology now enable the faithful recreation of emotions and physiological sensations one would experience in a real casino. Utilizing virtual reality glasses, anyone can now navigate through the meticulously replicated halls of a gambling establishment, engage with dealers, and place bets at various gaming tables.

Key players in the gaming industry, including Microgaming, Novomatic, NetEnt, Lucky VR, Topgame Technology, and others, are actively involved in developing virtual reality games.

Microgaming, for instance, showcased a virtual roulette game at the ICE Totally Gaming conference in the winter of 2022, indicating the attainability of virtual reality and its promising future in the gambling industry.

NetEnt is actively exploring VR technologies, and visitors to online gambling exhibitions have already experienced the immersive Jack and the Bean Tree slot machine, receiving positive feedback from both players and competitors.

Novomatic, a pioneer in implementing VR technology in online gambling, emphasizes the main advantages of realistic online games, including full immersion in gameplay, intense emotions surpassing real-life experiences, flexibility to access the resource from any convenient location with an Internet connection, and engaging and diverse storylines.

Novomatic continues to be at the forefront of VR technology implementation in online gambling, with ongoing developments. The concept of integrating virtual gameplay into social networks has also been expressed, and it is likely that such an idea will be realized in the near future.

Fusion of Social Games with Slot Machines

Social-format online gambling is gaining popularity, with the recent review of Microgaming's Castle Builder 2 slot showcasing advancements in spinning reels and betting mechanisms.

The appeal of social gambling lies in its heightened dynamism and addictiveness compared to traditional slot machines. These games allow players to select a playable character and navigate various paths based on the character's traits. Characters are encouraged to evolve by accumulating experience, skills, and achievements, providing more favorable conditions for gameplay. Unlike conventional slot machines where winning combinations yield only money, in these social games, they also provide resources crucial for progressing in the game.

The demand for slot machines with social gaming capabilities is currently high, prompting numerous developers to actively work on creating such games. The latter half of 2019 witnessed the release of several innovative products in this category.

Progressive Poker Jackpot with Live Dealer Interaction

Many gamblers opt for slot machines with progressive jackpots, seeing them as an opportunity to win substantial cash prizes. This trend is now seamlessly extending to poker. Evolution Gaming, for instance, has introduced the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em!

The initial jackpot size is set at 1,000,000 euros, but being cumulative, it grows proportionally to the players' activity. Todd Haushalter, Evolution Gaming's Product Director, highlighted the potential for the jackpot to reach an incredible €30,000,000! Undoubtedly, playing poker with such a substantial prize at stake adds an extra layer of excitement. The game also features a second-level jackpot with lower fixed payments.

Other developers of live online casino games are also contemplating the introduction of enticing progressive jackpots to enhance the gaming experience for players.

Live Games Experience

Live dealer games experienced significant popularity in the past year, marking just the initial stages of their successful development. The year 2023 is anticipated to witness a further surge in the popularity of live games, especially when combined with VR technology. Developers have ambitious plans to craft even more realistic games featuring enhanced functionality. Additionally, the expansion includes the establishment of new studios dedicated to broadcasting games in real-time.

Skill-Based Games

Contemporary players increasingly depend on both luck and their own skills. This motivation has prompted many providers to create platforms featuring strategy games that require specific skills, making them highly appealing for players. The rise of skill games is anticipated to lead to substantial popularity in the near future.

Gamification Trends

This concept involves incorporating game dynamics and strategic thinking to engage an audience in the process and address marketing challenges. Gamification is poised to emerge as a prominent trend in gambling, offering new missions, competitions, bonus programs, and rewards to entice and engage gamblers.

Rich Entertainment Content

Online casino operators are making efforts to retain users on their platform through various means. In addition to chat features, special sections featuring useful non-game content such as movies, TV series, music videos, and TV shows are being incorporated. Furthermore, online casinos will include plot details of many slots to enhance the overall user experience.

Utilization of Big Data

A prominent trend in the current year is the utilization of Big Data technology. This technology facilitates the collection and storage of vast amounts of information, proving indispensable for the evolving online gambling industry. With the capability to analyze and organize extensive data, games will efficiently adapt to the interests and needs of the target audience.

Trends in Mergers and Acquisitions

As per expert predictions, the growth of the gambling market is advancing so swiftly that its volume is expected to surpass \$60 billion by 2023. Consequently, in 2023, gambling

companies are poised to expand and enhance their capital.

Integration of Messengers

The evolving capabilities of mobile internet consistently draw in players. While social networks and phone communication were once in vogue, convenient instant messengers have now taken the lead.

Slotegrator is actively embracing this trend by introducing its own Telegram casino. Integrating the gaming platform into the messenger enables users to enjoy gambling on their smartphones at any time.

Unique Individual Slot Experiences

Offering customized slot creation services will be a prominent feature among top online casino offerings. Developing unique slots will empower operators to gain a competitive edge in the market and enhance brand awareness to the fullest extent.

Cryptocurrencies in Gaming

Cryptocurrencies are renowned for significant advantages such as anonymity, convenience, minimal fees, and freedom from legislative restrictions. Due to these attributes, they are poised to become one of the most popular means of payment in the realm of online gambling. Beyond bitcoin, other currencies like litecoin, dogecoin, ethereum, ripple, monero, zcash, and others are expected to gain popularity.

Currently, the use of cryptocurrencies by customers raises concerns due to their association with the illegal or gray financial market. At the initial stage, it is not advisable to engage in settlements with clients using cryptocurrencies.

Addressing Security Challenges in Online Gaming

Emerging technologies necessitate the exploration of innovative approaches to address security concerns. Additionally, there has been a recent surge in the frequency of DDoS attacks, causing substantial harm to online bookmaker sites over the past year. Surprisingly, even major operators with a strong focus on security, such as Britain's William Hill, fell victim to hacker provocations. The operator experienced service instability last fall, resulting in significant losses given its daily revenue of 5 million.

In 2019, a considerable portion of gambling operators' investments was allocated towards enhancing security measures.

Increasing Female Engagement in Online Gaming

The trend of a growing presence of female gamblers in online casinos was identified as early as 2015 and continues to gain momentum. Research indicates that women prefer gambling on personal devices and in private settings, providing more flexibility and avoiding potential

ridicule from male players.

The most engaged female gamblers are typically under the age of 35, although older women also occasionally indulge in spinning slot reels, initiating roulette spins, or participating in card games. Online casinos designed specifically for women have already started emerging, and some operators are launching advertising campaigns tailored specifically to women.

8.4.PROMINENT GAMING MARKETS IN ASIA

Asia, housing over half of the world's population, is home to numerous enthusiastic gamblers. Unfortunately, many Asian countries currently prohibit gambling. Nevertheless, major casino operators like MGM, Wynn, and Las Vegas Sands view Asia as a highly untapped market. Faced with enticing deals and the potential for substantial tax revenue, combined with public pressure, Asian state governments are reconsidering their stance.

In recent years, particularly since the COVID-19 pandemic severely impacted the once-thriving tourism industry, there has been a rise in legal gambling operations. Let's explore which Asian nations are gearing up to welcome both tourists and locals to their new venues.

The Asia Pacific Online Gambling Market exceeded USD 15 billion in 2019 and is projected to demonstrate an approximately 18% growth rate from 2020 to 2026. The growth is fueled by an increasing number of internet users and the widespread adoption of digital payments in Southeast Asia. The e-Conomy Southeast Asia (SEA) 2020 report reveals that around 40 million users from Malaysia, Vietnam, Singapore, the Philippines, Indonesia, and Thailand came online for the first time in 2020. This surge brought the total number of internet users to approximately 400 million, representing 70% of the region's population. Similarly, digital payments in Southeast Asia are expected to reach USD 1 trillion by 2025.

Japan

For over a century, Japan has imposed strict prohibitions on most gambling activities. Currently, the only permitted forms of gambling in Japan include wagers on specific football games, horse races, and pachinko machines.

There has been a notable shift in Japan towards the broader licensing of casinos, driven by the enactment of the Integrated Resort (IR) Promotion Act and the subsequent Integrated Resort (IR) Improvement Law a few years later. Integrated Resorts, encompassing hotels, shops, restaurants, and, notably, casinos, are emerging as significant tourist destinations.

In 2021, the newly established Japan Casino Regulatory Commission introduced regulations outlining the requirements for establishing casinos, implementing the Specified Integrated Resort Area Development Law. The late Shinzo Abe, a proponent of this initiative and former prime minister, expressed optimism that these measures would enhance tourism and bolster the country's economy.

Philippines

The Philippine gambling industry is primarily regulated by two key authorities: the Cagayan Economic Zone Authority, responsible for licensing internet operators, and the Philippine Amusement and Gaming Corporation (PAGCOR), which oversees licensing for land-based gambling establishments.

While online casinos are allowed to operate from the Philippines, they are not authorized to provide online gaming services within the country. Interestingly, foreign companies are legally permitted to offer online gambling services to Filipinos. Adding complexity to the situation, these offshore casino businesses obtain their licenses from PAGCOR, an entity initially established to handle licensing for land-based operations.

China

Apart from two state-run lotteries, mainland China strictly prohibits gambling. However, this doesn't imply that Chinese citizens lack options for enjoying casino entertainment. Exploiting certain legal loopholes, Macau and Hong Kong, China's two special administrative territories, are authorized to legally offer gambling entertainment. Recognizing this opportunity, neighboring countries of China make substantial investments to attract and cater to Chinese gambling tourists, often through the development of luxury five-star casino resorts.

Macau

Recognized as the Asian counterpart to "Las Vegas," Macau boasts a massive gambling industry with 41 casinos primarily catering to high-rolling professionals rather than casual visitors. The island authentically captures the "Vegas vibe," featuring an abundance of neon lights, intricately themed hotels, and casinos. Notably, online gambling has been prohibited in Macau since 2015.

Hong Kong

Capitalizing on its heightened autonomy, Hong Kong, China's other special administrative region, established the Jockey Club. This institution permits horse race betting and sports gambling but is subject to stringent regulations. Online gambling and sports betting are strictly prohibited, and access to foreign online casino sites is actively and effectively restricted. Other forms of gambling, including land-based casino games, are only allowed outside Hong Kong's territorial waters. As a result, individuals seeking to engage in gambling activities are often transported to nearby Macau.

Singapore

For an extended period, Singapore's gambling offerings were exclusively provided by state-owned entities: Singapore Pools for lottery-style games and Singapore Turf Club for horse racing and sports betting. Prior to 2005, Singapore restricted gambling to government-operated establishments, namely the Turf Club for horse races and sports

wagers, and the Singapore Pools for lotteries, with a strict prohibition on casinos.

In 2005, the Singaporean government initiated a shift by allowing land-based casinos to operate in the country, but only within integrated resorts. Additionally, a prerequisite for tourists seeking to engage in casino entertainment was the payment of an admission fee. To regulate the industry effectively, only two gambling licenses are available to international operators, and online gambling remains prohibited.

Vietnam

Vietnam initiated the legalization process of gambling in 2018, allowing sports betting and opening casinos to tourists. Although local residents are generally prohibited from playing in casinos, there is an initiative to permit Vietnamese citizens in specifically licensed venues, provided they can demonstrate a monthly income exceeding €370. While several developers seek government approval to build more casinos, currently only one is operational, with another in the developmental stage.

Cambodia

Only tourists are allowed to engage in gambling at brick-and-mortar casinos in Cambodia, a popular destination for neighboring countries whose governments have not yet legalized this form of entertainment. Online gambling was briefly legal from 2015 to 2020, but the government has since reversed this decision, reinstating the prohibition.

Malaysia

Like Vietnam and Cambodia, Malaysia only allows tourists to engage in gambling at physical locations; both online and land-based gambling are prohibited for its own citizens. The positive aspect is that if you're a Malaysian citizen and are caught gambling, it won't be treated as a criminal offense.

Conclusion

While the prospect of a legalized Asian gambling market may still be some time away, positive strides are being made, with an increasing number of states recognizing the benefits of higher tax revenues and enhanced security that a regulated market could offer to their citizens.

8.5.MARKET FORECAST

Research conducted by Juniper predicts that the turnover in the online gambling segment will reach \$950 billion by 2021, and this upward trend was anticipated even prior to the pandemic, as reported by Yogonet. The study reveals a shifting landscape towards online gambling, with a particular emphasis on mobile applications, consistently accounting for a growing share of bets.

Despite a general inclination towards regulating national gambling markets, a few countries

are considering a complete ban on online gambling and mobile applications. The global online gambling market already represents over 13% of the total global legal gambling market and continues to expand. Niche revenue is projected to reach \$65 billion by 2021, with the niche itself undergoing changes and reforms based on market dynamics.

The gambling industry is witnessing active developments in modern technologies, encompassing classic slots, video slots, and virtual reality (VR) gambling. A new generation of players is entering the market, prompting companies to meet elevated expectations, leading to the emergence of esports betting and skill-based games.

The Asian market, the world's largest in terms of volume, experiences increasing demand for gambling each year. In 2019, there was a notable relaxation in legal frameworks, with more countries legalizing online betting and casinos, a trend that extends into 2020, offering new prospects for the industry. For the best deals from Asian casinos, explore options at 3snet.

In Africa, the online gambling market is undergoing rapid development and growth. The primary challenge lies in the lack of regulation for casino activities in most countries on the continent. While not explicitly prohibited by legislation, the industry needs time to fully unlock its potential in this region.

9. CHALLENGES OF LAUNCHING AN ONLINE CASINO

Unstable legislation

Gambling regulations vary from country to country and are subject to frequent changes. Casino owners should be prepared to adapt their establishments to comply with evolving laws, potentially necessitating reformatting decisions in response to legal modifications.

Instability of equipment operation

Given that the primary setting is the internet, it is crucial for everything to function seamlessly. Any disruption to the site or server could lead to significant losses for the casino.

Software

The architecture of an online casino resembles a construction set comprising three software types: a gaming platform, a payment solution, and gaming content.

Payment systems fall into the least risky category, rigorously examined by regulatory bodies and banks, minimizing the risk of acquiring subpar software. The primary concern for operators lies in non-original or pirated software, posing a significant risk of losing experienced players who prioritize authentic software for guaranteed payouts and a transparent Return to Player (RTP) percentage.

Operators often overlook the threat of backdoors—malicious algorithms embedded in makeshift software to illicitly siphon funds from unsuspecting operators. Additionally, a plethora of errors and bugs can lead to financial losses.

"Pirate" software involves legal risks, as clients remain unaware of the final provider due to a convoluted chain of intermediaries. Original software, on the other hand, ensures transparency in contracts, preventing providers from disappearing after investments.

Ignoring copyright laws can also lead to legal consequences, although this aspect is often overlooked. In our country, there remains a possibility of prosecution under copyright laws.

Security is a paramount consideration in software selection, with reputable development companies investing substantial resources to create secure products. Emphasizing security is a deliberate choice that requires extra time and human resources.

Usability, often neglected in favor of functionality, is another critical aspect. Overlooking usability can result in a platform accumulating unsystematic functionality, underscoring the importance of prioritizing user-friendliness in all stages of software development, from initial technical specifications to subsequent upgrades.

High competition

Running a gambling business can be highly lucrative due to the significant demand for such services. Many aspire to carve a niche in the industry, but only those with the right business approach attain success. It's essential to recognize that success requires dedicated effort and hard work.

Money laundering

Regulatory bodies consistently monitor online casinos to prevent money laundering by criminal entities and the financing of terrorism. Should evidence reveal insufficient anti-money laundering measures, casinos risk the revocation of their licenses.

Advertising

Regulatory bodies uphold the responsibility of gambling advertising, emphasizing social consciousness and safeguarding children, young individuals, and other vulnerable groups from harm or exploitation. This includes scrutinizing depictions of toys, comic book characters, cartoons, fairy tales, and beloved children's brands.

Loss of funds

In the initial phase, there might be potential losses of funds allocated for registration, rent, and office equipment. If the online casino is closed due to internal or other objective reasons, the security payment is refunded to the casino owners. However, it is crucial that this amount remains untouched during the ongoing operation of the online casino, serving solely as a deposit in the event of winning the jackpot. This precaution is in place to ensure minimal losses.

Risk insurance

Leveraging a collective expertise of 10 years in the online casino industry among the founders and co-owners, coupled with the seasoned managerial experience of the project mentor, the project is strategically positioned to mitigate risks associated with market entry to the greatest extent possible.

10.FINANCIAL PLAN

10.1.INVESTMENTS BREAKDOWN

Investment Volume and Structure

Table 5. Investment budget, euro

<i>No</i>	<i>Name</i>	<i>Value</i>
1	<i>Acquisition of a license and security payment</i>	<i>196 000</i>
2	<i>Payment for the Amazon server</i>	<i>11 420</i>
3	<i>Office equipment and stationery</i>	<i>3 500</i>
4	<i>Floating capital financing</i>	<i>71 994</i>
<i>Invested capital total (actual need for cash)</i>		<i>282 914</i>

Project Milestones and Investment Implementation Schedule

The entire project duration encompasses 36 months (3 years). The investment phase, preceding the official project launch, is scheduled for 0.3 years. The project implementation unfolds through the following pivotal stages:

First Stage: Obtaining a license and processing the security payment.

Second Stage: Settling the payment for the Amazon server.

Third Stage: Acquiring office equipment and stationery.

A comprehensive phased work schedule, accompanied by a corresponding financing schedule, is outlined in the table below.

Table 6. Financial plan, euro

		Total for 3 years	Apr-24	Jul-24	Aug-24	Feb-25
1	Acquisition of a license and security payment	196 000	196 000	-		
2	Payment for the Amazon server	11 420	-	11 420		
3	Office equipment and stationery	3 500	-	3 500		
4	Floating capital financing	71 994	4 850		44 863	22 282
	Investment total excl. floating capital	210 920	196 000	14 920	-	-
	Invested capital total (actual need for cash)	282 914	200 850	14 920	44 863	22 282

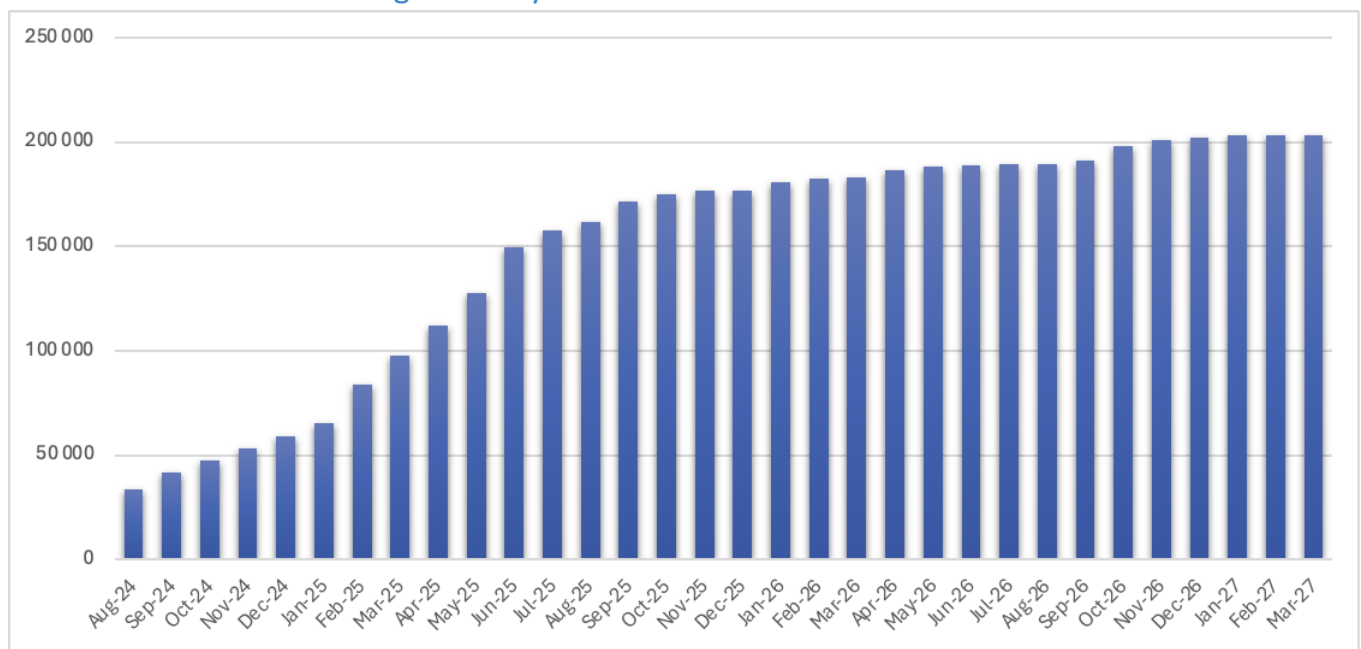
10.2.INCOME STRATEGY

Diverse Income-Generating Activities and Products

Within the framework of this initiative, the projected income is expected to be generated through the delivery of online casino services.

Projected Income Volume

Diagram 9. Dynamics of Sales Proceeds in Euros



The total revenue for the entire project period of 3 years is projected to amount to 4,783.5 thousand euros (EUR).

Table 7. Income and direct cost plan, euro

Physical indicators	Unit	Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Total number of clients	ppl	118 846	5 841	41 160	56 691	15 153
Number of new clients	ppl	74 347	5 128	28 243	32 780	8 195
Number of current clients	ppl	44 499	713	12 917	23 911	6 958

Proceeds		4 783 541	235 104	1 656 708	2 281 805	609 924
Income from clients	40,25	4 783 541	235 104	1 656 708	2 281 805	609 924

Direct costs		3 024 146	217 538	955 047	1 428 723	422 838
Advertising costs	18	1 387 418	116 660	533 202	590 045	147 511
Additional staff costs	1 367	1 100 167	0	225 500	642 333	232 333
Salary		297 600	46 500	111 600	111 600	27 900
License fees		142 961	39 378	48 745	48 745	6 093
Depreciation	60m	96 000	15 000	36 000	36 000	9 000

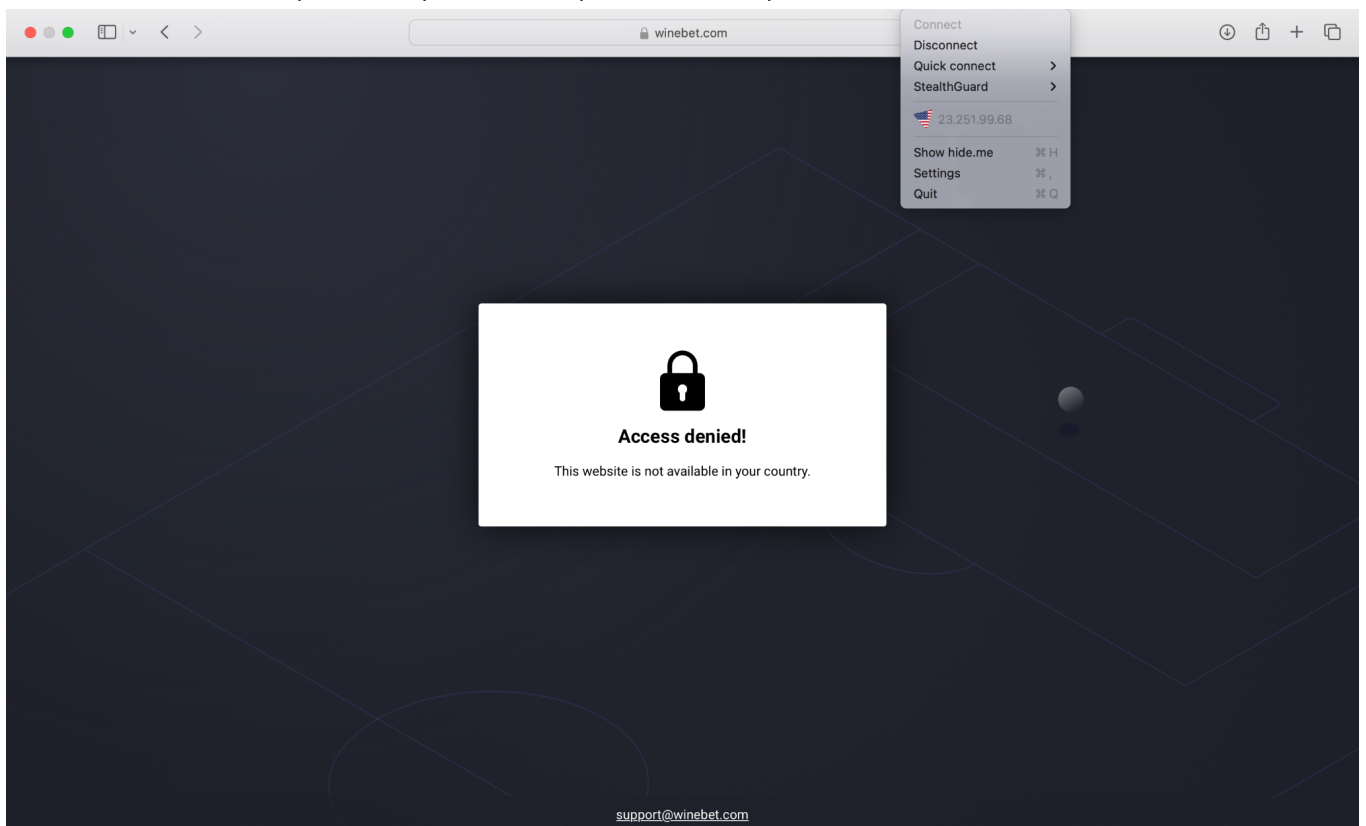
Indirect costs		482 933	56 083	176 600	176 600	73 650
Accounting		117 333	18 333	44 000	44 000	11 000
Office equipment maintenance		96 000	15 000	36 000	36 000	9 000
Hosting		124 000	0	42 000	42 000	40 000
Office rent		49 600	7 750	18 600	18 600	4 650
Legal support		96 000	15 000	36 000	36 000	9 000

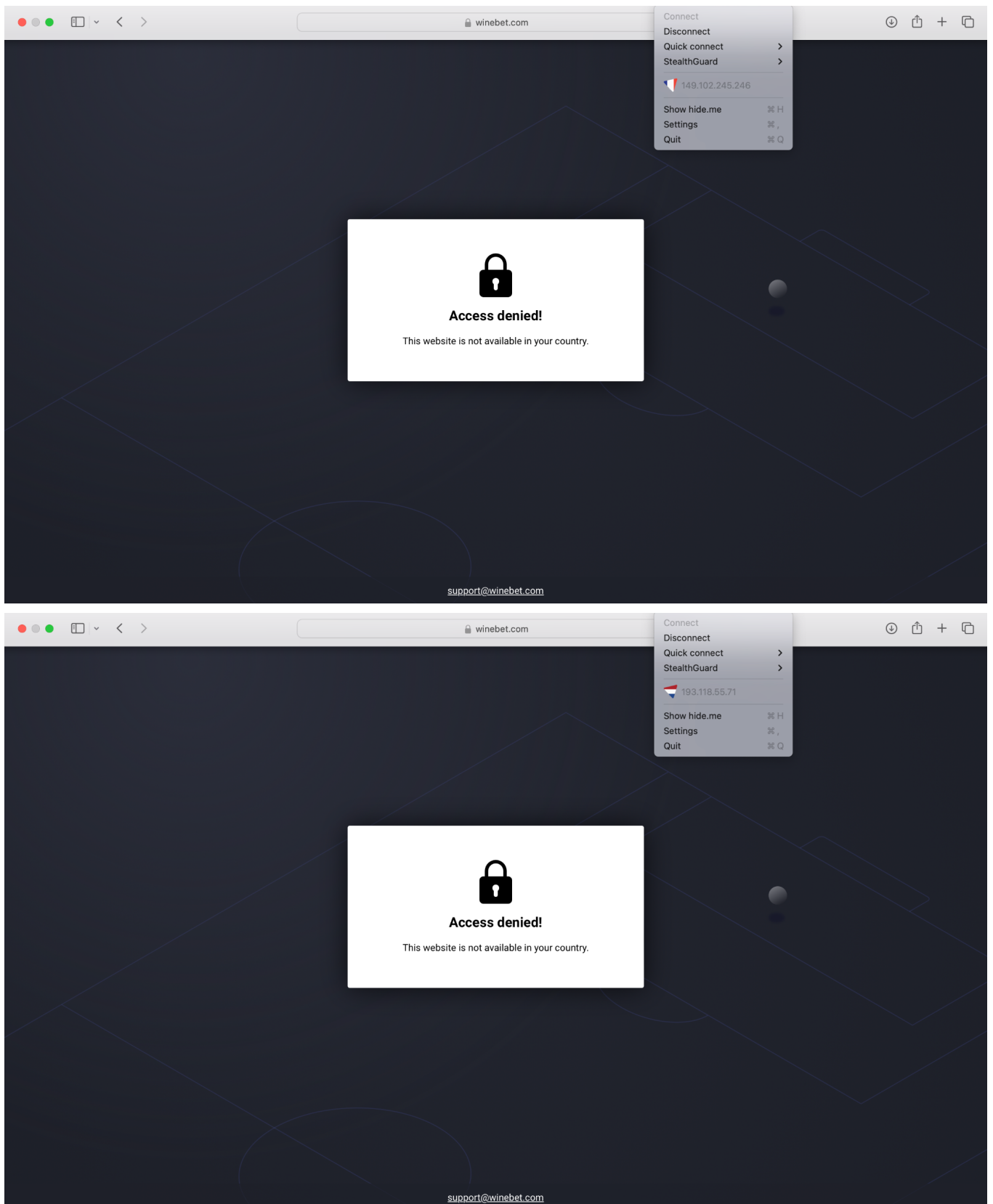
10.3. MARKETING PLAN

10.3.1 Winebet is tailored for individuals aged 18 and older who are in pursuit of a unique and responsible gaming encounter. This all-encompassing marketing strategy delineates approaches to cultivate brand affinity, captivate the target demographic, and stimulate sales through innovative and ethical endeavors.

10.3.2 Target Audience:

- Demographics: Mainly directed at individuals aged 18 and above, with a specific emphasis on the 21-35 age bracket.
- Geo: Canada, Turkey, Croatia, Finland, Poland.
- Geoblock: USA, France, The Netherlands, The Dutch Caribbean Islands: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.





- Psychographics: Appeals to enthusiasts of state-of-the-art technology, gaming devotees, and those who prioritize a dedication to responsible gaming principles.

10.3.3 Marketing Strategies:

a. Brand Identity:

- Craft a compelling brand narrative highlighting a commitment to transforming the gaming landscape through innovation, thrill, and a solid foundation in responsible gaming.
- Establish Winebet as a hub for cutting-edge technology, diverse gaming experiences, and a vibrant gaming community.

b. Digital Realm Dominance:

- Enhance the website for an intuitive user experience, ensuring seamless navigation across various platforms.
- Harness the potential of social media platforms for targeted advertising, engaging content distribution, and community-building initiatives.

c. Content Expedition:

- Formulate a content strategy featuring captivating blog posts, interactive tutorials, and exclusive insights from developers to nurture a sense of community and sustained player engagement.
- Collaborate with gaming influencers and content creators to expand NexusGamer Ventures' reach and influence.

d. Advocacy for Responsible Gaming:

- Incorporate responsible gaming messages seamlessly into marketing materials and gaming interfaces.
- Implement features like session duration reminders, spending limits, and voluntary self-exclusion tools to empower players.

10.3.4 Sales Ventures:

a. Launch Spectacle:

- Introduce captivating launch promotions and exclusive bonuses to captivate early adopters.
- Employ strategically timed limited-time offers to create urgency and anticipation.

b. Partnership Exploration:

- Forge strategic partnerships with gaming affiliates, influencers, and complementary brands to enhance visibility and attract a broader audience.
- Establish an appealing affiliate program to incentivize third-party promotion.

c. Data-Driven Refinement:

- Utilize analytics tools to extract insights into player behavior, preferences, and the effectiveness of various acquisition channels.
- Drive data-driven optimizations in marketing strategies, precision targeting, and overall user experience.

d. Customer Harmony Mastery:

- Implement an agile Customer Relationship Management (CRM) system to tailor communications, promotions, and offers based on individual player preferences.
- Utilize targeted email marketing campaigns for personalized promotions and real-time updates.

10.3.5 Performance Metrics:

- Consistently track crucial indicators, such as customer acquisition cost, conversion rates, player lifetime value, and overall customer satisfaction.
- Conduct regular reviews and implement agile adjustments informed by performance analytics.

10.4.PROJECT COST ANALYSIS

Fixed Expenditures

Staffing Costs and Salary Allocation

As outlined in the staffing table, the anticipated workforce comprises 6 individuals, each operating on a standard workload. The average salary for these roles is established at 1,550 euros per month. Compensation for all employees will adhere to a time-based payment structure. Furthermore, future initiatives include the establishment of a financial incentive system, encompassing bonuses and other reward mechanisms.

Table 8. Staffing table with salaries, euro

No	Position	Number of people	Salary	Total per month
1	Director	1	2 400	2 400
2	Site developer	1	1 700	1 700
3	Designer	1	1 500	1 500
4	Advertising specialist	1	1 500	1 500
5	Employee	2	1 100	2 200
	Total	6		9 300

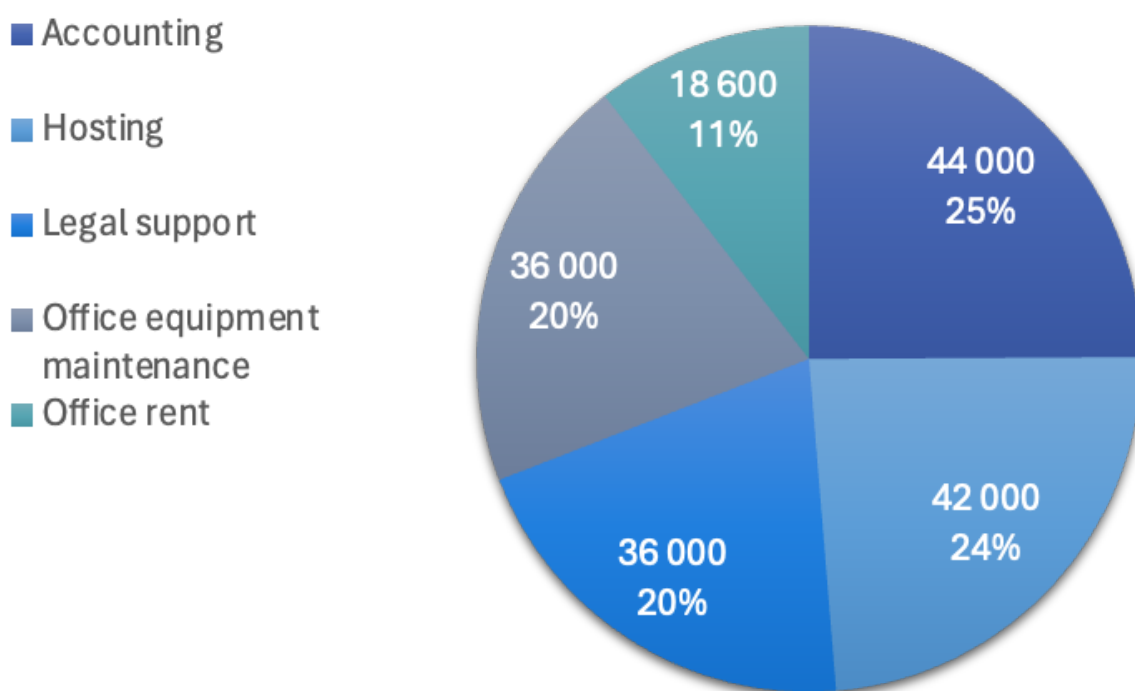
For every 6000 new clients, an additional 5 staff members will be employed. The associated costs related to this additional personnel are reflected in the variable costs.

Other Incurred Fixed Expenses

Table 9. Fixed costs, euro

No	Item of expense	Total per year
1	Accounting	44 000
2	Office equipment maintenance	36 000
3	Hosting	42 000
3	Office rent	18 600
4	Legal support	36 000
	Total	176 600

Diagram 10. The structure of fixed costs



Variable Costs Assessment

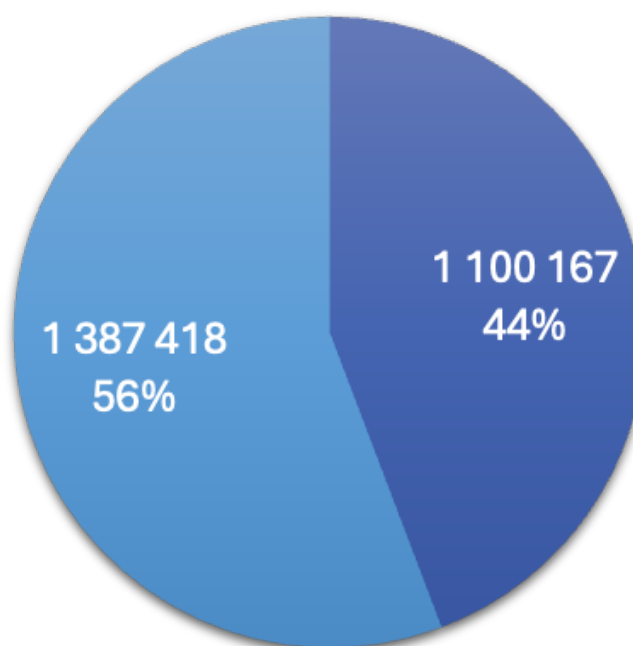
Direct Production Expenses

Table 10. Variable costs, euro

No	Item of expense	Per unit, total	Calculation base
1	Advertising costs	18	for 1 client
2	Additional staff costs	1 367	for 1 person

Diagram 11. Structure of variable costs (to the total volume of variable costs)

- Additional staff costs
- Advertising costs



Taxation Considerations

Taxes of the company as a tax subject

The projected total amount of accrued and paid taxes for the entire project period is estimated to be 295.1 thousand euros (EUR).

10.5.FINANCIAL PLAN

Attracting Investment Resources

Financial Resource Requirements And Funding Structure

The financial requirement for the project is 282.9 thousand euros (EUR). The intended funding for this project is anticipated to be sourced from the investor.

Cash Flow Plan Indicators

Day-to-day Operational Activities

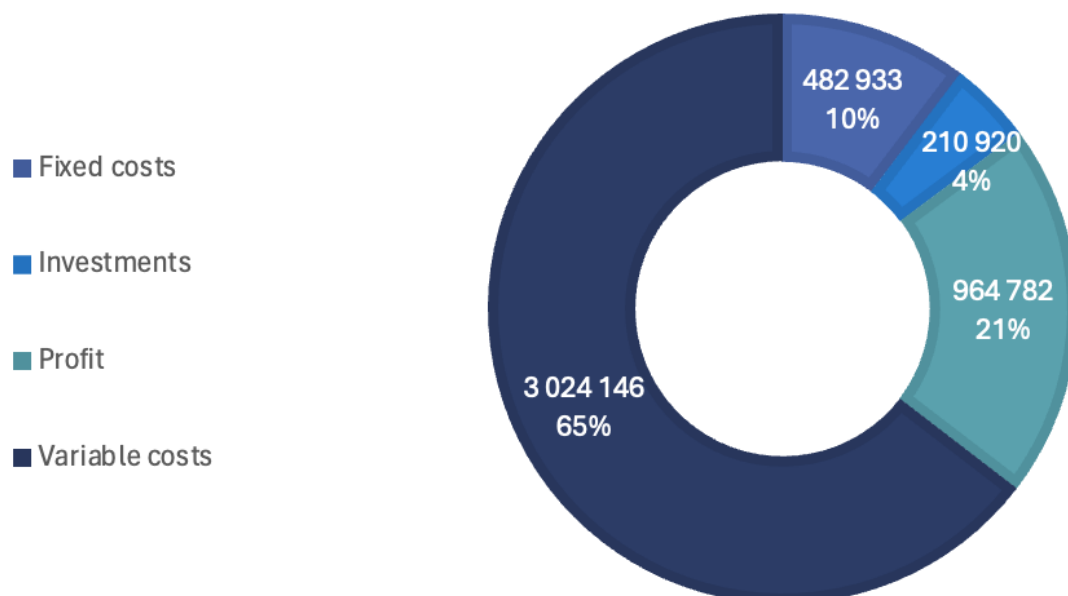
Positive cash flows from operating activities result from sales proceeds, while negative cash flows arise from the company's operating costs. The total proceeds for the project period amount to 4,783.5 thousand euros (EUR).

The negative cash flow amounts to 3,706.2 thousand euros (EUR) and comprises the following key components:

- Variable costs: Advertising costs 18 for 1 client; Additional staff costs 1367 for 1 person
- Fixed costs: 176.6 thousand euros (EUR) per year
- Taxes: 295.1 thousand euros (EUR)

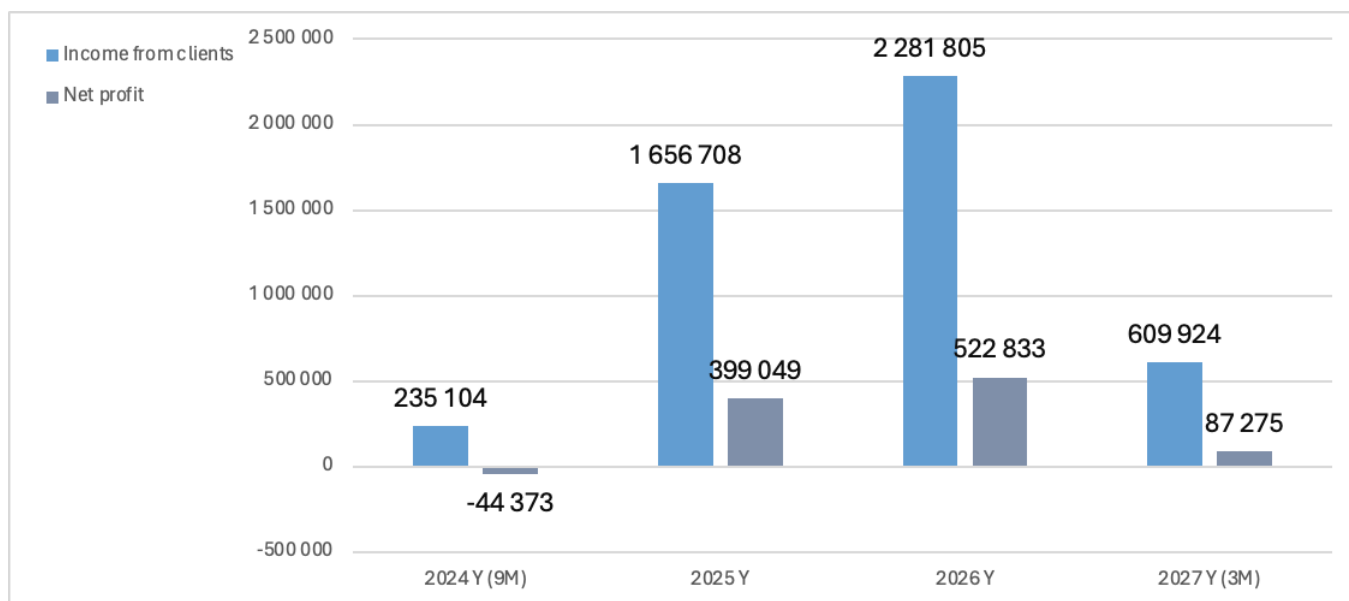
Consequently, the balance on operating activities at the end of the project is expected to be equivalent to the net profit, totaling 964.7 thousand euros (EUR).

Diagram 12. Distribution Structure of Sales Proceeds to Costs and Profit



Profit And Loss Plan Indicators

Diagram 13. Dynamics of income and net profit in Euros



Overall Financial Performance

The project calculation horizon spans 36 months (3 years), with an investment period of 4 months (0.3 years) leading up to the project launch, followed by a working period of 32 months (2.7 years).

The total sales proceeds for the entire project implementation period are projected to reach 4,783.5 thousand euros (EUR).

The net profit upon completion of the project is forecasted to amount to 964.7 thousand euros (EUR). These financial indicators provide insights into the performance and profitability of the project over its specified timeline.

Table 11. Financial and investment indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	210 920
Sum of proceeds (SP), EUR	4 783 541
Net average operational receipts per month (NAOR), EUR	29 924
Net profit for the project period, EUR	964 782
Average profitability for the project period (net profit to proceeds	20,17%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	491 870
Average Rate of Return of investments (ARR)	127,50%
Return on investment (ROI)	357%
Profitability index (PI)	2,3
Internal rate of return (IRR)	95,94%
Pay back period of the project in whole (PBP), incl. financing scheme	17 months
	1,4 years

10.6.SWOT ANALYSIS

Table 12. SWOT analysis

SWOT Analysis			
STRENGTH	WEAKNESS	OPPORTUNITIES	THREATS
• Significant experience of the project managers and team members in the field of communications and casino management • High quality service • Strict policy against any type of fraud, which protects players from any potential troubles during the game • Wide range of games	• Competitors can quickly offer similar products or services • Limited pricing flexibility • Not available in all countries • Online content requires high internet speed • Lack of a clearly formulated long-term strategy (due to the nature of the business)	• Growing popularity of mobile gambling • Constant emergence of new technologies • Global trend towards legalizing online casinos	• Instability of the political environment • High competition • Impossibility of local placement of equipment and/or bans on the use of international services in some countries • Decrease in disposable income of the population against the backdrop of economic recession