

Business Plan Pomadorro N.V.

An online gaming license application requires the inclusion of a business plan, which should contain, at a minimum, the following essential information:

1) Overview of the business products and services/brands as well as proprietary IP.

Pomadorro N.V. swiftly emerged as a prominent contender in the online gaming arena, commencing its journey in 2014 fueled by inventive concepts and unwavering dedication to excellence. Our trajectory is marked by astute expansion strategies and the seamless integration of original concepts into our service offerings.

A pivotal catalyst in our journey has been the sublicense facilitated by Antillephone, empowering us to assertively carve our niche in the online gambling sphere. The upward trajectory of our growth underscores the meticulous planning and adept management prowess of our team.

At the helm, our leadership, notably the Ultimate Beneficial Owner (UBO), boasts profound industry insights, instrumental in fortifying our company's market foothold. The UBO's strategic guidance has precipitated significant milestones, setting new benchmarks for our enterprise.

Collaboration with eMoore NV and its seasoned leadership has been instrumental in equipping us for future endeavors. This alliance has not only facilitated our continuous growth but also ensured adherence to legal frameworks, both locally and globally. Our marketing strategies and expansive global partnerships remain instrumental in sustaining our momentum.

It's noteworthy that the UBO's investment pursuits meticulously align with regulatory frameworks, maintaining a conspicuous separation from any involvement with competing gambling entities, whether locally or internationally. This deliberate segregation underscores our commitment to transparent and focused business practices. Nevertheless, the UBO's expertise extends to shareholding in a pivotal B2B entity, pivotal in furnishing indispensable services to industry peers, further attesting to our deep-rooted engagement within the sector.

2) Company management structure

Company Management Structure

Our company's management structure is meticulously crafted to ensure efficient oversight and strategic decision-making.

Supervisory Structure: At the helm, a single shareholder, who privately owns all shares, oversees the company. This shareholder plays a pivotal role in supervising the Board of Directors, particularly in pivotal decisions concerning company growth, development, expansion into new markets, or when shareholder-specific obligations arise.

Board of Directors: the Board of Directors is anchored by the corporate director eMoore. Possessing specialized knowledge in the gambling sector and a deep understanding of the regulatory

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landscape in Curacao and other operational regions, eMoore's expertise shapes crucial strategic directions.

Local Legal and Finance Team: In Curacao, a dedicated team of legal and finance professionals is entrusted with managing the company's day-to-day legal and financial affairs. Under the oversight of the local director eMoore, this team ensures seamless operations within the framework of local regulations.

Accountancy Services: Integral to financial management and reporting, accountancy services are meticulously managed and overseen by eMoore. This guarantees transparency and upholds the highest standards of compliance and governance in all financial operations.

Marketing Leadership: Driving our brand's growth and positioning within the competitive landscape is a key marketing professional who reports directly to the Board of Directors. This pivotal role ensures the execution of a dynamic and effective marketing strategy aligned with overarching business objectives.

3) Business forecasts for 3 years.

	Revenue	Costs	Profit
Year 2024	55'000'000 EUR	54'500'000 EUR	500'000 EUR
Year 2025	60'000'000 EUR	59'000'000 EUR	1'000'000 EUR
Year 2026	65'000'000 EUR	63'500'000 EUR	1'500'000 EUR

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

Pomadorro N.V. Growth Strategy

Pomadorro N.V. remains steadfast in its commitment to advancing along a trajectory of proven success. Our growth strategy is anchored on solid foundations within the online gaming industry, supplemented by the expertise of our management team and fruitful collaborations with global marketing partners.

Focus on User Experience:

Central to our strategy is the delivery of unparalleled user experiences. We invest in premier technical solutions to enhance gaming on our platforms and prioritize swift, efficient, and professional customer support to ensure every player engagement is exemplary.

Negotiating Favorable Terms:

As we scale, we anticipate securing increasingly favorable financial terms with our service providers, bolstering both service quality and profitability margins. Leveraging economies of scale will enable us to secure optimal industry rates and terms.

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Expansion into Emerging Markets:

Our forward-thinking approach includes active exploration of emerging markets, understanding their regulatory landscapes, and developing tailored entry strategies. This underscores our commitment to sustainable and responsible expansion.

Financial Prudence:

Aligned with our growth vision, we've devised a financial model supporting market penetration and retention strategies. A meticulously structured budget ensures ambitious growth remains financially prudent and sustainable.

Market Exclusions:

Recognizing the importance of market alignment, our global strategy involves a selective approach, focusing efforts on jurisdictions where full compliance and effectiveness are achievable. This ensures our expansion efforts are targeted and impactful. In summary, Pomadorro N.V.'s strategy for business growth is a harmonious blend of proven methodologies, strategic service improvements, financial acumen, and market explorations. With an unwavering focus on the end-user experience and a clear understanding of the evolving landscape of online gaming, we are poised for a trajectory of sustained growth and increased market share in the years to come.

5) Who are the key suppliers and material dependencies?

Key Suppliers and Material Dependencies

Pomadorro N.V. upholds operational integrity and service excellence through a sophisticated network of esteemed suppliers and essential dependencies. Our pride lies in the establishment of robust partnerships with leading service providers in the gaming industry.

Gaming Service Providers:

Our extensive range of gaming products is sourced from industry leaders including Play'n GO, Evolution Gaming, Microgaming, Pragmatic Play, Novomatic, and more. These partnerships are essential, providing us with a selection of top-quality games cherished by players and highly respected across the industry.

Marketing Partnerships:

In our marketing efforts, we partner with leading marketing firms and affiliates worldwide. These collaborations play a crucial role in enhancing our brand visibility and fueling our progress. Our direct interactions with marketers across the globe underscore our dedication to an extensive and effective marketing approach.

Technical Infrastructure:

Our online operations rely on a cutting-edge outsourced platform solution, offering flexibility and adaptability across diverse jurisdictions. This scalable infrastructure guarantees adherence to international regulatory norms, integrating features for Anti-Money Laundering (AML) and other mandatory checks.

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Payment Service Providers:

In managing financial transactions, we carefully choose payment service providers that resonate with our commitment to excellence and reliability. Upholding financial integrity, we consistently invest in finding the most suitable payment solutions, guaranteeing our clients swift and secure transactions.

Risk Management

Embedded within our operational framework is a keen awareness of potential risks stemming from the loss or interruption of services provided by our key suppliers. To address these risks, we employ the following strategies:

- Collaborating with multiple service providers to mitigate dependence on any single entity.
- Deploying comprehensive backup solutions and contingency plans.
- Conducting regular risk assessments and adapting strategies in real-time.
- Enforcing service level agreements (SLAs) with suppliers to guarantee uninterrupted service delivery.

We've adopted a multi-faceted approach to risk management, prioritizing redundancy and resilience to mitigate disruptions. Through strategic diversification, we fortify our operations, ensuring reliability and maintaining our reputation as a trusted online gaming service provider.

6) Risk evaluation and management.

Risk Evaluation and Management

Recognizing the vital role of rigorous risk evaluation and management in ensuring operational stability and financial integrity, Pomadorro N.V. has established a comprehensive framework for risk assessment. This framework integrates insights gained from previous evaluations, strengthening our overall business strategy.

Continuous Monitoring:

At Pomadorro N.V., management conducts ongoing surveillance of our operations to proactively identify and address risks. This vigilant monitoring allows for early detection of potential issues, enabling swift resolution and uninterrupted business continuity.

Strategic Partnerships:

Central to our risk management policy is the careful selection of reputable partners and service providers. By aligning with experienced and reliable entities, we inherently mitigate operational

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risks. The expertise and reliability of our partners significantly contribute to our risk mitigation strategies.

Advanced Technical Tools:

Our daily operations are supported by technologically advanced tools equipped with sophisticated management features. These systems facilitate real-time risk monitoring and rapid risk identification. We remain committed to continuous improvement, collaborating with our tool developers to enhance functionality and security features.

Audit and Oversight:

Our internal and external audit processes are thorough, ensuring rigorous scrutiny of all financial and business activities for compliance and accuracy. Oversight committees provide an additional layer of scrutiny, ensuring that our risk management practices remain current and comprehensive.

In conclusion, Pomadorro N.V. adopts a multifaceted approach to risk evaluation and management, encompassing continuous monitoring, strategic partner selection, advanced technical tools, and meticulous audit processes. Our unwavering commitment to identifying and managing risks not only safeguards our operational activities but also ensures the long-term sustainability and success of our company.

7) Legal and governance framework.

Legal and Governance Framework at Pomadorro N.V.

Pomadorro N.V. upholds a steadfast commitment to robust legal oversight and a structured governance framework, ensuring transparency, compliance, and adherence to best practices.

Board Oversight and Management Interaction:

The board, comprising distinguished members versed in various industry facets, provides comprehensive oversight. Day-to-day operations are efficiently managed by eMoore, our esteemed director, whose responsibilities extend to accounting, financial management, and legal support. This integrated management approach ensures seamless decision-making and operational efficiency.

UBO Engagement:

Our Ultimate Beneficial Owner (UBO) oversees operations, instilling confidence in partners and stakeholders, reflecting our commitment to transparent and ethical business practices.

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Deadlock Prevention:

The board and executive management team structure is designed to prevent deadlocks, with clearly defined roles and delegated powers ensuring continuous progress and decision-making.

Legal Support:

Specialized legal professionals, both internal and external, offer legal advisement on compliance, regulatory matters, and strategic decisions.

Board Meetings Inclusion Policy:

Board meetings typically include management members and occasionally experts, as deemed necessary for specific agenda items.

8) Target KPIs and business objectives

Financial Metrics:

Revenue Growth: Monitoring total bets placed, net gaming revenue, and profitability is pivotal in assessing success.

Return on Investment (ROI): Evaluating the efficacy of marketing campaigns, platform enhancements, and other investments is essential for long-term sustainability.

Customer Engagement:

Active User Base: Regularly tracking the number of active users, their visit frequency, and time spent on the platform provides insights into customer engagement.

Player Retention: Focusing on reducing churn rate and boosting player retention is vital for sustained success.

Regulatory Compliance:

Licensing Requirements: Ensuring compliance with gambling regulations in operational jurisdictions is imperative for avoiding penalties and maintaining trust.

Anti-Money Laundering (AML) Compliance: Implementing robust AML measures is essential to prevent illicit activities and safeguard platform integrity.

Responsible Gambling Practices: Promoting responsible gambling behaviors, offering tools for self-exclusion, and setting limits are integral to regulatory compliance and corporate social responsibility.

Technological Innovation:

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Platform Performance: Continuously enhancing user experience, including website responsiveness, game quality, and mobile compatibility, is crucial.

Security Enhancements: Investing in cybersecurity measures is necessary to protect customer data and financial transactions.

Personalization: Utilizing data analytics to personalize the gaming experience and anticipate customer preferences is key.

Long-term Objectives:

Market Expansion: Assessing opportunities for entering new markets or expanding the existing customer base through partnerships or geographic expansion.

Brand Reputation: Building a strong brand reputation based on trust, transparency, and integrity fosters long-term success and customer loyalty.

9) Policies and Procedures

Registration and Verification:

Policy: Prior to accessing the platform, all users are required to register an account.

Procedure: Users furnish personal information and undergo identity verification to adhere to Know Your Customer (KYC) regulations.

Responsible Gambling:

Policy: Advocate responsible gambling practices to mitigate gambling-related harm.

Procedure: Provide tools like self-exclusion, deposit limits, and reality checks. Offer resources for problem gambling assistance.

Security and Privacy:

Policy: Ensure the protection of customer data and financial transactions.

Procedure: Implement SSL encryption, secure payment gateways, and data protection measures. Regularly update security protocols to counter cyber threats.

Fair Gaming:

Policy: Guarantee fairness and integrity in all offered games.

Procedure: Utilize certified Random Number Generators (RNGs), conduct regular audits by independent testing agencies, and disclose payout percentages for transparency.

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Anti-Money Laundering (AML):

Policy: Identify and prevent money laundering activities.

Procedure: Implement AML measures like customer due diligence, transaction monitoring, and reporting suspicious activities in compliance with regulations.

Customer Support:

Policy: Deliver prompt and effective customer support services.

Procedure: Provide various channels for customer inquiries such as live chat, email, and phone support. Train staff to address customer issues professionally and courteously.

Complaints Handling:

Policy: Resolve customer complaints promptly and impartially.

Procedure: Establish a systematic process for receiving, investigating, and resolving complaints. Maintain records of complaints and their resolutions for audit purposes.

Financial Transactions:

Policy: Ensure secure and transparent financial transactions.

Procedure: Offer multiple payment methods with rigorous security measures. Ensure timely processing of deposits and withdrawals with clear terms and conditions.

Regulatory Compliance:

Policy: Adhere to relevant laws and regulations in all operational jurisdictions.

Procedure: Stay abreast of regulatory changes, obtain necessary licenses and permits, and undergo regular audits to ensure compliance.

Pomadorro N.V. implements a robust framework of policies and procedures to ensure the integrity, security, and compliance of its online gaming platform. This includes mandatory registration and identity verification, tools for responsible gambling practices, stringent security measures such as SSL encryption and regular updates, transparent fair gaming practices, anti-money laundering procedures, efficient customer support, systematic complaints handling, secure financial transactions, and adherence to regulatory requirements. These measures collectively underscore the company's commitment to providing a safe, fair, and compliant gaming experience for its users.