

4.12.2023

Business Plan & Application Materials

“winity.com”

Operated by Winlink B.V in cooperation with Winlink Ltd

HIGHLY CONFIDENTIAL

Table of Contents

1. Business Description	3
2. Group Structure	5
3. Preliminary Target Markets	6
4. Terms and Conditions.....	7
5. Technical Information.....	8
6. Domain Ownership	10
7. Platform	11
9. Key Third Party Suppliers	13
10. Funding Requirements	14
11. Financial Projections	15
12. Money Laundering and Combating Terrorist Financing *Annex AML/CFT Policy.....	16
13. Login credentials for CEG	16
14. Previous license	16
15. Essential email addresses.....	16
16. SWOT Analysis	17
16.1 Strengths	17
16.2 Weaknesses	17
16.3 Opportunities	17
16.4 Threats:	18

1. Business Description

The Winlink B.V Group (the “**Group**”) is a new, dynamic player in the online casino and iGaming industry, relying on its industry expertise from the iGaming sector. The Group has a passion for providing top-tier iGaming experiences to a global audience. The Group is a powerhouse relying on its own technical platform solution, commitment to excellence, innovation, and a player-protection approach.

1.1 Funding

The Ultimate Beneficial Owner (“**UBO**”) of the company, with a successful track record in the iGaming sector, is strategically investing capital accumulated from previous ventures into the Winlink project, acquiring shares in the holding company. This infusion of funds not only underscores the UBO's commitment to the venture but also signifies confidence in the new entity's potential for success, aiming to provide essential financial support and bolster the company's viability and competitiveness in the iGaming industry.

1.2 Own iGaming Platform

At the core of our success lies the Group's own iGaming platform developed with consultants, an innovative and robust technology. Designed in-house by our team of expert developers, our platform offers a seamless and secure gaming environment for players across all our brands. It allows for efficient integration of the latest iGaming content, ensures the highest standards of security, and delivers a highly responsive experience.

1.3 Industry Experience and Expertise

The story of the people behind the Group has started in the iGaming industry several year ago. The experts involved in the project have witnessed and adapted to market shifts, technological advancements, and evolving player preferences concerning several other brands. The Group's extensive experience is an invaluable asset that will allow the group to build a portfolio of successful brands and a reputation for excellence.

1.4 Innovative Brands

The Group will operate a “*winlink*” brand, with its unique identity, united by the Group's commitment to quality, trust, and entertainment.

1.5 Core Values

Security and Fair Play: Security is paramount in the iGaming industry, and the Group will make that one as one of its priorities. The platforms employ the latest encryption technologies to ensure that player data remains confidential. All games are regularly audited for fairness, and we adhere to the highest standards of randomness.

1.6 Player-Centric Approach

We understand that our players are the lifeblood of our business. We invest in a dedicated, round-the-clock support team to ensure a seamless experience. Regular promotions are offered to keep the excitement alive.

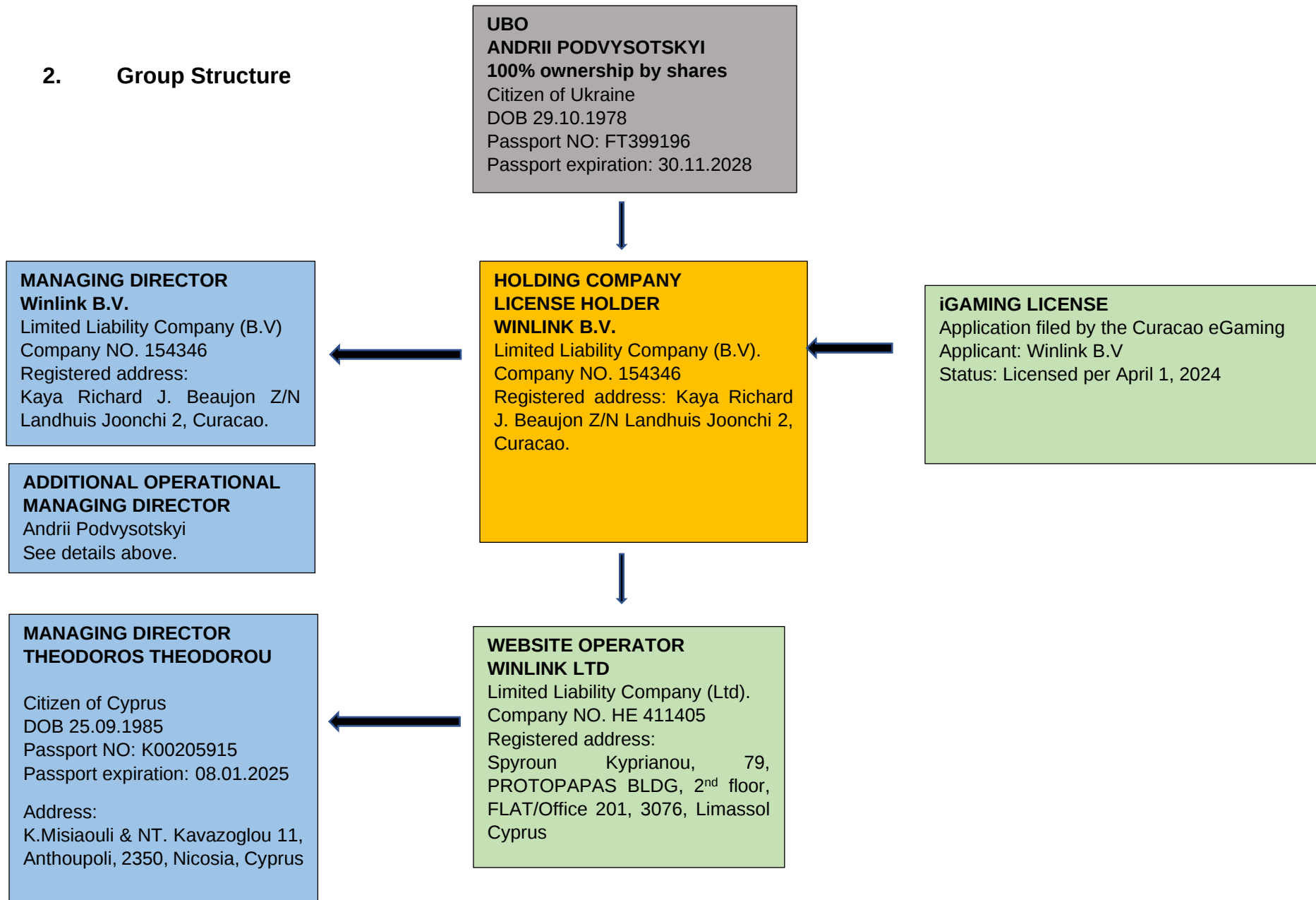
1.7 Innovation Driven

Staying ahead of the curve is non-negotiable. continuously embraces the latest technologies and trends to elevate the gaming experience. Our platforms are responsive and feature-rich, catering to both desktop and mobile players.

1.8 **Responsible Gaming**

We promote responsible gaming and have tools in place to help our players manage their iGaming activities. A player's well-being is paramount, and we actively support responsible choices.

2. Group Structure



3. Preliminary Target Markets

The online-casino Winlink B.V., a company incorporated under the laws of Curaçao under No. 154346 with a registered address at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, Curacao, provided on the site www.winity.com, has carried out a thorough analysis of the target market, including its size, demographics, trends, and growth potential. Competitive analysis, identifying key competitors and their strengths and weaknesses has been conducted. The key target markets for Winlink B.V group are the following:

- Brazil
- Mexico
- Russia
- Belarus
- Kazakhstan
- Moldova
- Armenia

We confirm that the geoblocking of restricted countries will be implemented. Players from restricted countries are unable to access the company's website www.winity.com and will be automatically blocked if attempting to do so.

4. Terms and Conditions

The General Terms and Conditions (hereinafter referred to as “Terms and Conditions”) regulate the use of games in the online-casino Winlink B.V., a company incorporated under the laws of Curaçao under No. 154346 with a registered address at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, Curacao, provided on the site www.winity.com (hereinafter referred to as “Website” or “Casino Website”), and on the other URL, owned by Winlink Ltd. The Terms and Conditions document is posted on the website and is available in the attached Word file named 'Winlink Terms and Conditions.' constitute and govern the contractual relationship between the parties the player and the Casino. Please see below attached file to access Terms and Conditions.



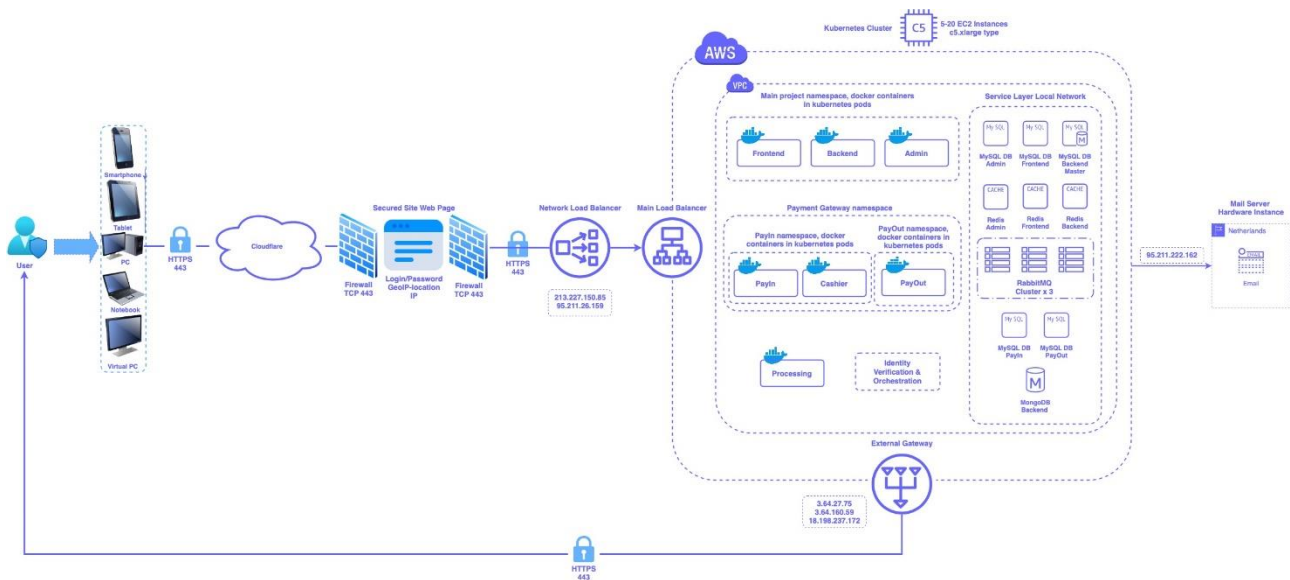
Winity T&C_V2.docx

5. Technical Information

Please find below technical information of the online-casino Winlink B.V., a company incorporated under the laws of Curaçao, having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com.

5.1 Winlink Deployment Diagram

Below picture is introducing deployment diagram of the online-casino Winlink B.V., a company incorporated under the laws of Curaçao, having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com.



5.2 Backup procedure Winlink

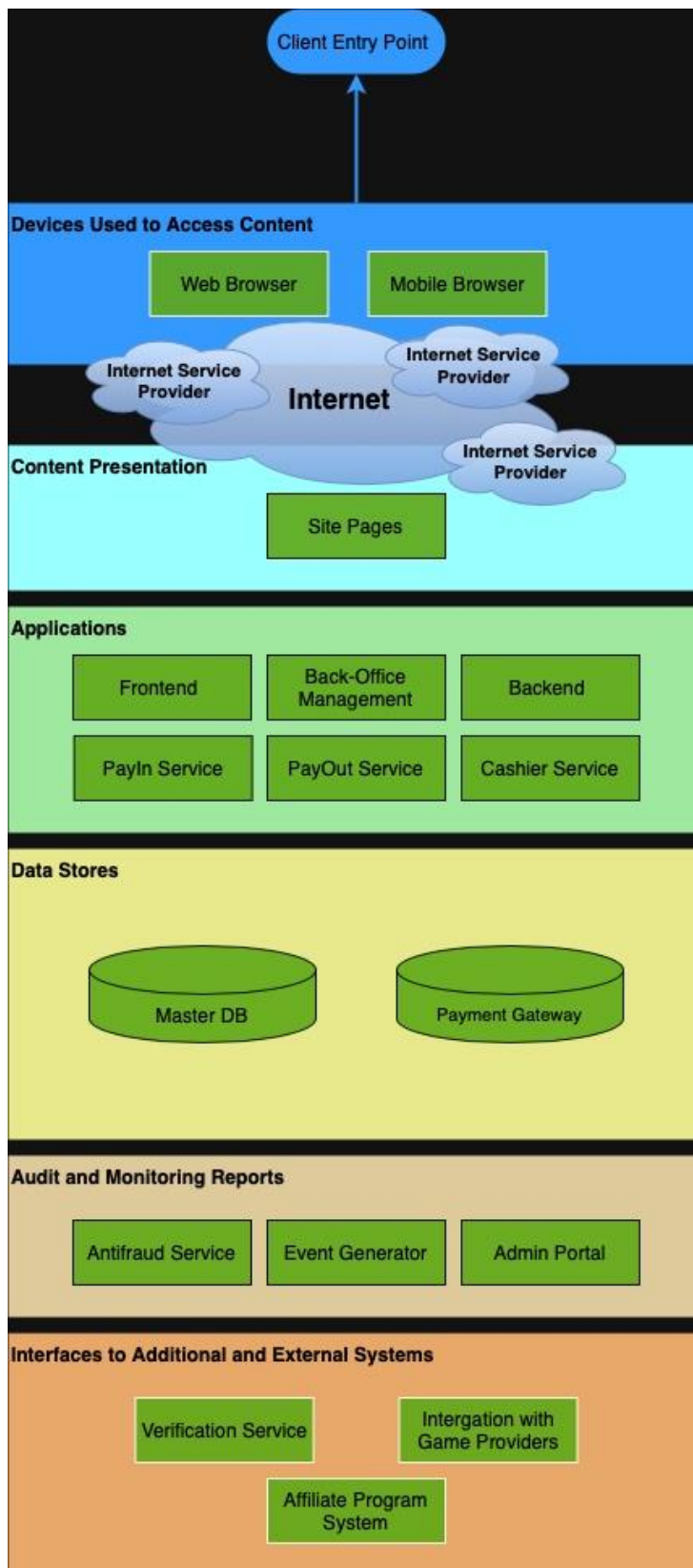
Below document is introducing backup procedure of the online-casino Winlink B.V., a company incorporated under the laws of Curaçao, having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com.



Backup
procedure_Winlink.doc

5.3 Winlink Top-level Application Architecture

Below picture is introducing top-level application architecture of the online-casino Winlink B.V., a company incorporated under the laws of Curaçao, having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com.



6. Domain Ownership

The domain where online-casino Winlink B.V., a company incorporated under the laws of Curaçao, having its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com, and on the other URL, is owned by Winlink Ltd. Please find below a screenshot displaying the domain ownership. UBO has an agreement in place regarding the domain use with Winlink B.V and Winlink Ltd..

The screenshot displays the GoDaddy Domain Portfolio interface. On the left is a sidebar with navigation options: Domains, Portfolio, DNS, Transfers, Services, Tools (marked as NEW), and Settings. The main content area is titled 'Domain Portfolio' and features a search bar with 'winity.com' entered. Below the search bar are tabs for 'Auto-renew', 'Lock', 'Domain Privacy', 'Extensions', 'Expiration', 'Nameservers', and 'More'. A table lists the domains, showing one entry for 'winity.com' with a status of 'Active', an expiration date of '18 Jan 2027', and a renewal price of '\$21.99/yr'. On the right side, there is a user profile card for 'Andrii Podvysotskyi' with a customer ID of 33783456 and a PIN of Y1826. Below the profile card are links for 'My Products', 'Account Settings', 'Renewals & Billing', 'Shop GoDaddy.com', and 'Sign Out'. The footer of the page indicates '© 2023 GoDaddy - Privacy Policy'.

Domain Name	Status	Expiration	Auto-renew	Domain Privacy	Renewal Price
winity.com	Active	18 Jan 2027	On	On	\$21.99/yr

7. Platform

The Winity.com website and Winlink B.V. utilize their own platform, developed through agreements with individual contractors—developers—for comprehensive project support. Consequently, there are no specific agreements solely dedicated to the platform's development, as the project's progression was managed internally with contractor assistance. The platform holds The Positive SSL secure site certificate, assuring users of its security and reliability for safe transmission of transactions, purchases, and personal data.

The Positive SSL secure site certificate



Moreover, the platform also holds the PCI DSS certificate, complying with the payment card industry data security standard. This certification confirms adherence to stringent information security standards mandated by the Payment Card Industry Security Standards Council, a requirement by major card brands.

The PCI DSS certificate



8. Company Control Structure and Key Personnel

The company control structure and key personnel of the company Winlink B.V., incorporated under the laws of Curaçao, with its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com, are described below.

8.1 Key Personnel

The Winlink B.V Group's, success is driven by a team of dedicated professionals who are passionate about gaming and have years of experience in the industry. The group's key personnel include the following industry experts with years of experience:

- Operating Director: Andrii Podvysotskyi Director: Mr. Podvysotskyi is a visionary leader in the iGaming sector. Their strategic insights and commitment to innovation have been instrumental in driving the company's growth.

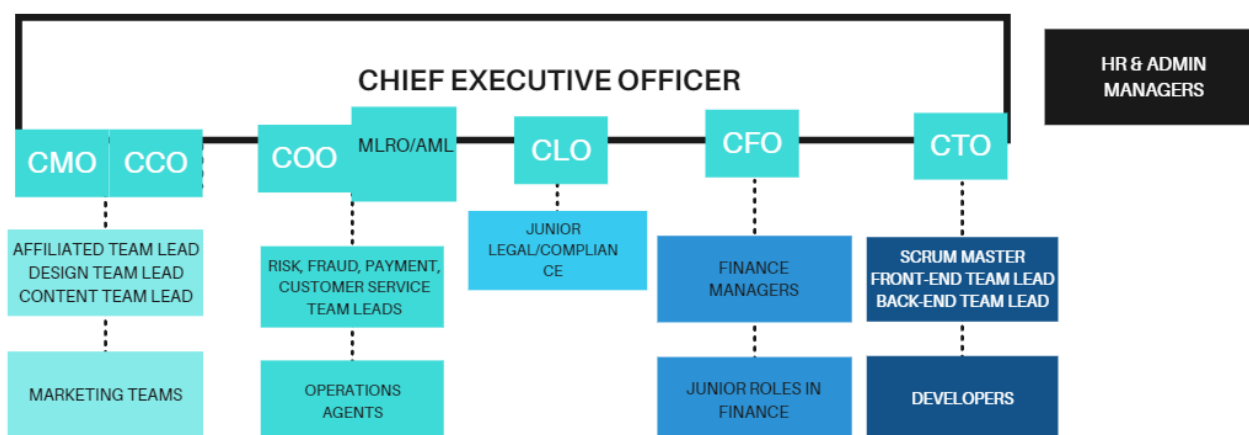
*Copy passport and utility bill of the key individual

- AML Officer: Kristian Yulianov, Head of Operations: With an impressive track record in managing online gaming operations, Mr. Yulianov ensures that our gaming brands run seamlessly and that players have the best possible experience.

*Copy passport and utility bill of the key individual

8.2 Company Control Structure

The company's control structure can be described as hierarchical, wherein the C-level executives and the MLRO/AML responsible person collaborate with the Chief Executive Officer and, when necessary, with each other regarding C-level management decisions. The reporting duties are detailed below, with lines connecting the line-managers and those with reporting responsibilities. Each department will be formed to the required extent as the casino becomes operational, and team sizes will be adjusted as deemed necessary. The image below introduces the company's planned control structure while operating under the new license.



9. Key Third Party Suppliers

9.1 Payment Service Providers

Commercegate
Accentpay
Paysafe
Exactly
Pay4fun
Pion
Verserpay

9.2 Game Providers

Netent (Evo group)
Red Tiger (Evo group)
Ezugi (Evo group)
Evolution Gaming (Evo group)
Quickspin
Amatic
Yggdrasil
Nolimitcity
Pragmatic Play
Endorphina
ELK Studios
Push Gaming
Relax
Play`N`Go
Betsoft
Playtech
Qtech
Habanero
3 Oaks
Ruby Play
Belatra
Smartsoft gaming
Spinominal
Tom Horn
Mascot Gaming
BF Games
Netgaming
PG Soft
Swintt
Mancala gaming
Bgaming
Turbogames
Gamzix
Hub88
Amusnet
Digitain
Only Play
N2

9.3 AML Related Suppliers

To be confirmed.

9.4 Other Suppliers

To be confirmed.

10. Funding Requirements

The Ultimate Beneficial Owner (UBO) of the company brings a wealth of experience and success from prior ventures in the iGaming sector, having founded several prosperous casino brands. The capital amassed through these ventures is now strategically deployed to fuel the growth of the new entity. This financial support takes the form of a loan agreement between the UBO and the holding company. This approach not only underscores the UBO's commitment to the venture but also serves as a testament to the confidence in the new entity's potential for success. The infusion of funds from the iGaming sector stalwart aims to provide the necessary financial backing for the company's endeavours, ensuring a robust foundation for its operations and contributing to its overall viability and competitiveness within the industry

11. Financial Projections

The financial projection for a three-year (3 years) period of the company Winlink B.V., incorporated under the laws of Curaçao, with its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com, is available in the linked Excel document below. The financial projections encompass detailed breakdowns for various areas, including Financial Summary, Expenditure, Marketing, Staffing, Technical Department, Customer Support Department, Finance & Accounting, Legal Department, Marketing Department, Administration, Top Management, Office, Equipment, Software, Hardware, Game Providers Costs, and Legal. Please refer to the document below for complete information.



Winlink Financial
Projections.xlsx

12. Money Laundering and Combating Terrorist Financing *Annex AML/CFT Policy

The Anti-Money Laundering & Counter-Terrorist Financing Policy & Procedures Manual of the company Winlink B.V., incorporated under the laws of Curaçao, with its registered office at Kaya Richard J. Beaujon Z/N Landhuis Joonchi 2, provided on the site www.winity.com, is available in the linked Word document below. The aim of this manual is to set out the policies, procedures, systems and controls necessary to meet the obligations of the Company that operates from Curacao and is held to compliance with National Ordinance on identification when rendering services (NOIS) and National Ordinance on the reporting of unusual transactions (NORUT). With the publication of the National Decree supervisor identification when rendering services gaming sector and the National Decree supervisor unusual transactions gaming, the Curacao Gaming Control Board (GCB) is tasked with the AML/CFT supervision of the gaming sector operating in and from Curacao. It is the Company's policy that NOIS and NORUT obligations to prevent money laundering are to be met in full and the company is committed to meeting and where possible exceeding such obligations. Please refer to the document below for complete information.



Policy AML&CFT
Winlink B.V (1).docx

13. Login credentials for CEG

We hereby confirm that the login credentials for CEG to access the website winity.com, when applicable, along with login credentials for a test player account including a small balance for testing purposes, will be provided without a delay upon request.

14. Previous license

We hereby confirm that the company Winlink B.V and the website winity.com have not previously held a license, and the license application is the company's first application of this nature.

15. Essential email addresses

Compliance related matters: compliance@winity.com

Self-exclusion: exclusion@winity.com

16. SWOT Analysis

16.1 Strengths

- 16.1.1 Own iGaming Platform: The Group's proprietary iGaming platform provides a competitive edge, offering a seamless and secure gaming environment.
- 16.1.2 Industry Experience and Expertise: The team's extensive experience in the iGaming sector equips them with valuable insights and adaptability to market shifts.
- 16.1.3 Innovative Brands: Operating under the "winity" brand signifies a commitment to quality, trust, and entertainment, which can attract a loyal customer base.
- 16.1.4 Security and Fair Play: Prioritizing security and fairness in gaming operations enhances trust among players and aligns with industry standards.
- 16.1.5 Player-Centric Approach: Investing in dedicated customer support and regular promotions enhances the player experience and fosters customer loyalty.

16.2 Weaknesses

- 16.2.1 Lack of Previous License: Being a new entrant without prior licensing could pose challenges regarding timelines and launching the project.
- 16.2.2 Limited Geographical Reach: Targeting specific markets may limit growth potential compared to competitors with broader international presence. So, it is necessary to investigate markets constantly.
- 16.2.3 Dependency on Contractors: Reliance on individual contractors for platform development and project support may introduce challenges in terms of consistency.

16.3 Opportunities

- 16.3.1 Market Expansion: Exploring opportunities to enter additional markets beyond the initial target countries could drive revenue growth and diversification.
- 16.3.2 Online Gaming Growth: Leveraging the growing popularity of online gaming platforms and mobile apps to reach a wider audience and increase market share.
- 16.3.3 Strategic Partnerships: Collaborating with established brands or affiliates could enhance brand visibility, attract new customers, and drive revenue.
- 16.3.4 Technological Advancements: Continuing to innovate and integrate emerging technologies like virtual reality (VR) or augmented reality (AR) to differentiate offerings and attract tech-savvy players.

16.3.5 Regulatory Compliance Advantage: Proactively addressing regulatory requirements and maintaining transparent and ethical business practices can confer a competitive advantage and build trust with regulators and players.

16.4 Threats:

16.4.1 Regulatory Changes: Evolving regulatory landscapes and changes in gaming laws could introduce compliance challenges and operational disruptions.

16.4.2 Intense Competition: Facing competition from established casino operators and emerging online gambling platforms may put pressure on market share and profitability.

16.4.3 Economic Uncertainty: Economic downturns or fluctuations in consumer spending habits could impact disposable income for recreational activities like gambling.

16.4.4 Cybersecurity Threats: The increasing risk of cyberattacks and data breaches poses threats to player data security and could damage the brand's reputation.

16.4.5 Negative Public Perception: Public scrutiny and stigma associated with gambling addiction or unethical gaming practices may lead to regulatory scrutiny and reputational damage.