
Sector Media N.V. Business Plan

Date: March 1, 2024

Contents

1. Overview of the business
2. Company management structure
3. Three year business forecast
4. Growth strategy
5. Key suppliers
6. Risk evaluation
7. Legal and governance
8. Policies and procedures

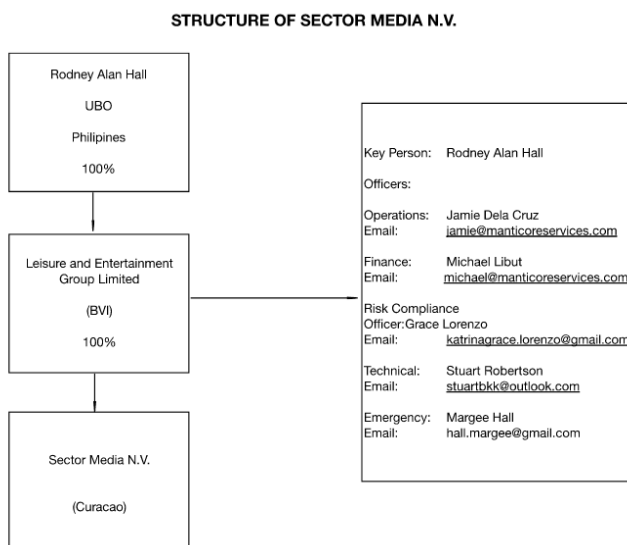
1. Overview of the business

Sector Media N.V. (SM) is a company dedicated to operating multi-language online gaming platforms. SM currently operates three online casino brands: Wonder Casino, Yous Casino and Miracle Casino.

SM utilizes Kumagaming gaming software to target specific demographics within Asia. The gaming platform primarily focuses on the Japanese market. The software is set to restrict all bets from originating from jurisdictions where betting is prohibited.

SM has two decades of experience serving the Japanese market. Japanese customers expect the highest standards of customer service, which only experienced operators are able to deliver. SM will continue to outperform its competitors in providing the ultimate igaming experience for its customers.

2. Company management structure



3. Three year business forecast

With a tremendous demand for online casino services in Asia and our expertise in the Japanese igaming industry, our business forecast is as follows:

Wonder

Year	Month	Bet	GGR	Promo&Bonus	NGR	New Registrants	FTD	Login players	Active players	Deposit players	PSP Fee	Gaming Fee	Affiliate Fee
2024	Jan	\$235,827,664	\$4,716,553	\$1,745,125	\$2,971,429	3,566	891	58,834	41,006	18,274	\$505,143	\$594,286	\$505,143
2024	Feb	\$247,619,048	\$4,952,381	\$1,832,381	\$3,120,000	3,744	936	61,776	43,056	19,188	\$530,400	\$624,000	\$530,400
2024	Mar	\$260,000,000	\$5,200,000	\$1,924,000	\$3,276,000	3,931	983	64,865	45,209	20,147	\$556,920	\$655,200	\$556,920
2024	Apr	\$273,000,000	\$5,460,000	\$2,020,200	\$3,439,800	4,128	1,032	68,108	47,469	21,155	\$584,766	\$687,960	\$584,766
2024	May	\$286,650,000	\$5,733,000	\$2,121,210	\$3,611,790	4,334	1,084	71,513	49,843	22,213	\$614,004	\$722,358	\$614,004
2024	Jun	\$300,982,500	\$6,019,650	\$2,227,271	\$3,792,380	4,551	1,138	75,089	52,335	23,323	\$644,705	\$758,476	\$644,705
2024	Jul	\$316,031,625	\$6,320,633	\$2,338,634	\$3,981,998	4,778	1,195	78,844	54,952	24,489	\$676,940	\$796,400	\$676,940
2024	Aug	\$331,833,206	\$6,636,664	\$2,455,566	\$4,181,098	5,017	1,254	82,786	57,699	25,714	\$710,787	\$836,220	\$710,787
2024	Sep	\$348,424,867	\$6,968,497	\$2,578,344	\$4,390,153	5,268	1,317	86,925	60,584	26,999	\$746,326	\$878,031	\$746,326
2024	Oct	\$365,846,110	\$7,316,922	\$2,707,261	\$4,609,661	5,532	1,383	91,271	63,613	28,349	\$783,642	\$921,932	\$783,642
2024	Nov	\$384,138,415	\$7,682,768	\$2,842,624	\$4,840,144	5,808	1,452	95,835	66,794	29,767	\$822,824	\$968,029	\$822,824
2024	Dec	\$422,552,257	\$8,451,045	\$3,126,887	\$5,324,158	6,389	1,597	105,418	73,473	32,744	\$905,107	\$1,064,832	\$905,107
2025	Jan	\$464,807,483	\$9,296,150	\$3,439,575	\$5,856,574	7,028	1,757	115,960	80,821	36,018	\$995,618	\$1,171,315	\$995,618
2025	Feb	\$488,047,857	\$9,760,957	\$3,611,554	\$6,149,403	7,379	1,845	121,758	84,862	37,819	\$1,045,399	\$1,229,881	\$1,045,399
2025	Mar	\$512,450,250	\$10,249,005	\$3,792,132	\$6,456,873	7,748	1,937	127,846	89,105	39,710	\$1,097,668	\$1,291,375	\$1,097,668
2025	Apr	\$538,072,762	\$10,761,455	\$3,981,738	\$6,779,717	8,136	2,034	134,238	93,560	41,695	\$1,152,552	\$1,355,943	\$1,152,552
2025	May	\$564,976,400	\$11,299,528	\$4,180,825	\$7,118,703	8,542	2,136	140,950	98,238	43,780	\$1,210,179	\$1,423,741	\$1,210,179
2025	Jun	\$593,225,220	\$11,864,504	\$4,389,867	\$7,474,638	8,970	2,242	147,998	103,150	45,969	\$1,270,688	\$1,494,928	\$1,270,688
2025	Jul	\$622,886,481	\$12,457,730	\$4,609,360	\$7,848,370	9,418	2,355	155,398	108,308	48,267	\$1,334,223	\$1,569,674	\$1,334,223
2025	Aug	\$654,030,805	\$13,080,616	\$4,839,828	\$8,240,788	9,869	2,472	163,168	113,723	50,681	\$1,400,934	\$1,648,158	\$1,400,934
2025	Sep	\$686,732,346	\$13,734,647	\$5,081,819	\$8,652,828	10,383	2,596	171,326	119,409	53,215	\$1,470,981	\$1,730,566	\$1,470,981
2025	Oct	\$721,068,963	\$14,421,379	\$5,335,910	\$9,085,469	10,903	2,726	179,892	125,379	55,876	\$1,544,530	\$1,817,094	\$1,544,530
2025	Nov	\$757,122,411	\$15,142,448	\$5,602,706	\$9,539,742	11,448	2,862	188,887	131,648	58,669	\$1,621,756	\$1,907,948	\$1,621,756
2025	Dec	\$832,834,852	\$16,656,693	\$6,162,976	\$10,493,717	12,592	3,148	207,776	144,813	64,536	\$1,783,932	\$2,098,743	\$1,783,932
2026	Jan	\$916,118,117	\$18,322,362	\$6,779,274	\$11,543,088	13,852	3,463	228,553	159,295	70,990	\$1,962,325	\$2,308,618	\$1,962,325
2026	Feb	\$961,924,023	\$19,238,480	\$7,118,238	\$12,120,243	14,544	3,636	239,981	167,259	74,539	\$2,060,441	\$2,424,049	\$2,060,441
2026	Mar	\$1,010,020,224	\$20,200,404	\$7,474,150	\$12,726,255	15,272	3,818	251,980	175,622	78,266	\$2,163,463	\$2,545,251	\$2,163,463
2026	Apr	\$1,060,521,235	\$21,210,425	\$7,847,857	\$13,362,568	16,035	4,009	264,579	184,403	82,180	\$2,271,636	\$2,672,514	\$2,271,636
2026	May	\$1,113,547,297	\$22,270,946	\$8,240,250	\$14,030,696	16,837	4,209	277,808	193,624	86,289	\$2,385,218	\$2,806,139	\$2,385,218
2026	Jun	\$1,169,224,662	\$23,384,493	\$8,652,262	\$14,732,231	17,679	4,420	291,698	203,305	90,603	\$2,504,479	\$2,946,446	\$2,504,479
1905年07月	Jul	\$1,227,685,895	\$24,553,718	\$9,084,876	\$15,468,842	18,563	4,641	306,283	213,470	95,133	\$2,629,703	\$3,093,768	\$2,629,703
2026	Aug	\$1,289,070,190	\$25,781,404	\$9,539,119	\$16,242,284	19,491	4,873	321,597	224,144	99,890	\$2,761,188	\$3,248,457	\$2,761,188
2026	Sep	\$1,353,523,699	\$27,070,474	\$10,016,075	\$17,054,399	20,465	5,116	337,677	235,351	104,885	\$2,899,248	\$3,410,880	\$2,899,248
2026	Oct	\$1,421,199,884	\$28,423,998	\$10,516,879	\$17,907,119	21,489	5,372	354,561	247,118	110,129	\$3,044,210	\$3,581,424	\$3,044,210
2026	Nov	\$1,492,259,879	\$29,845,198	\$11,042,723	\$18,802,474	22,563	5,641	372,289	259,474	115,635	\$3,196,421	\$3,760,495	\$3,196,421
2026	Dec	\$1,641,485,866	\$32,829,717	\$12,146,995	\$20,682,722	24,819	6,205	409,518	285,422	127,199	\$3,516,063	\$4,136,544	\$3,516,063

Year	Month	Bet	GGR	Promo&Bonus	NGR	New Registrants	FTD	Login players	Active players	Deposit players	PSP Fee	Gaming Fee	Affiliate Fee
2024	Jan	\$41,025,641	\$820,513	\$287,179	\$533,333	2,160	320	20,160	11,863	5,200	\$90,667	\$106,667	\$90,667
2024	Feb	\$43,076,923	\$861,538	\$301,538	\$560,000	2,268	336	21,168	12,456	5,460	\$95,200	\$112,000	\$95,200
2024	Mar	\$45,230,769	\$904,615	\$316,615	\$588,000	2,381	353	22,226	13,078	5,733	\$99,960	\$117,600	\$99,960
2024	Apr	\$47,492,308	\$949,846	\$332,446	\$617,400	2,500	370	23,338	13,732	6,020	\$104,958	\$123,480	\$104,958
2024	May	\$52,241,538	\$1,044,831	\$365,691	\$679,140	2,751	407	25,671	15,106	6,622	\$115,454	\$135,828	\$115,454
2024	Jun	\$54,853,615	\$1,097,072	\$383,975	\$713,097	2,888	428	26,955	15,861	6,953	\$121,226	\$142,619	\$121,226
2024	Jul	\$57,596,296	\$1,151,926	\$403,174	\$748,752	3,032	449	28,303	16,654	7,300	\$127,288	\$149,750	\$127,288
2024	Aug	\$60,476,111	\$1,209,522	\$423,333	\$786,189	3,184	472	29,718	17,487	7,665	\$133,652	\$157,238	\$133,652
2024	Sep	\$63,499,917	\$1,269,998	\$444,409	\$825,499	3,343	495	31,204	18,361	8,049	\$140,335	\$165,100	\$140,335
2024	Oct	\$69,849,908	\$1,398,998	\$488,949	\$908,049	3,678	545	34,324	20,197	8,853	\$154,368	\$181,610	\$154,368
2024	Nov	\$73,342,404	\$1,466,848	\$513,397	\$953,451	3,861	572	36,040	21,207	9,296	\$162,087	\$190,690	\$162,087
2024	Dec	\$80,676,644	\$1,613,533	\$564,737	\$1,048,796	4,248	629	39,645	23,328	10,226	\$178,295	\$209,759	\$178,295
2025	Jan	\$88,744,308	\$1,774,886	\$621,210	\$1,153,676	4,672	692	43,609	25,660	11,248	\$196,125	\$230,735	\$196,125
2025	Feb	\$93,181,524	\$1,863,630	\$652,271	\$1,211,360	4,906	727	45,789	26,943	11,811	\$205,931	\$242,272	\$205,931
2025	Mar	\$97,840,600	\$1,956,812	\$684,884	\$1,271,928	5,151	763	48,079	28,290	12,401	\$216,228	\$254,386	\$216,228
2025	Apr	\$102,732,630	\$2,054,653	\$719,128	\$1,335,524	5,409	801	50,483	29,705	13,021	\$227,039	\$267,105	\$227,039
2025	May	\$113,005,893	\$2,260,118	\$791,041	\$1,469,077	5,950	881	55,531	32,676	14,323	\$249,743	\$293,815	\$249,743
2025	Jun	\$118,656,188	\$2,373,124	\$830,593	\$1,542,530	6,247	926	58,308	34,309	15,040	\$262,230	\$308,506	\$262,230
2025	Jul	\$124,588,997	\$2,491,780	\$872,123	\$1,619,657	6,560	972	61,223	36,025	15,792	\$275,342	\$323,931	\$275,342
2025	Aug	\$130,818,447	\$2,616,369	\$915,729	\$1,700,640	6,888	1,020	64,284	37,826	16,581	\$289,109	\$340,128	\$289,109
2025	Sep	\$137,359,369	\$2,747,187	\$961,516	\$1,785,672	7,232	1,071	67,498	39,717	17,410	\$303,564	\$357,134	\$303,564
2025	Oct	\$151,095,306	\$3,021,906	\$1,057,667	\$1,964,239	7,955	1,179	74,248	43,689	19,151	\$333,921	\$392,848	\$333,921
2025	Nov	\$158,650,071	\$3,173,001	\$1,110,550	\$2,062,451	8,353	1,237	77,961	45,873	20,109	\$350,617	\$412,490	\$350,617
2025	Dec	\$174,515,078	\$3,490,302	\$1,221,606	\$2,268,696	9,188	1,361	85,757	50,461	22,120	\$385,678	\$453,739	\$385,678
2026	Jan	\$191,966,586	\$3,839,332	\$1,343,766	\$2,495,566	10,107	1,497	94,332	55,507	24,332	\$424,246	\$499,113	\$424,246
2026	Feb	\$201,564,916	\$4,031,298	\$1,410,954	\$2,620,344	10,612	1,572	99,049	58,282	25,548	\$445,458	\$524,069	\$445,458
2026	Mar	\$211,643,161	\$4,232,863	\$1,481,502	\$2,751,361	11,143	1,651	104,001	61,196	26,826	\$467,731	\$550,272	\$467,731
2026	Apr	\$222,225,319	\$4,444,506	\$1,555,577	\$2,888,929	11,700	1,733	109,202	64,256	28,167	\$491,118	\$577,786	\$491,118
2026	May	\$244,447,851	\$4,888,957	\$1,711,135	\$3,177,822	12,870	1,907	120,122	70,882	30,984	\$540,230	\$635,564	\$540,230
2026	Jun	\$256,670,244	\$5,133,405	\$1,796,692	\$3,336,713	13,514	2,002	126,128	74,216	32,533	\$567,241	\$667,343	\$567,241
2026	Jul	\$269,503,756	\$5,390,075	\$1,886,526	\$3,503,549	14,189	2,102	132,434	77,927	34,160	\$595,603	\$700,710	\$595,603
2026	Aug	\$282,978,944	\$5,659,579	\$1,980,853	\$3,678,726	14,899	2,207	139,056	81,823	35,868	\$625,383	\$735,745	\$625,383
2026	Sep	\$297,127,891	\$5,942,558	\$2,079,895	\$3,862,663	15,644	2,318	146,009	85,914	37,661	\$656,653	\$772,533	\$656,653
2026	Oct	\$326,840,680	\$6,536,814	\$2,287,885	\$4,248,929	17,208	2,549	160,610	94,506	41,427	\$722,318	\$849,786	\$722,318
2026	Nov	\$343,182,714	\$6,863,654	\$2,402,279	\$4,461,375	18,069	2,677	168,640	99,231	43,498	\$758,434	\$892,275	\$758,434
2026	Dec	\$377,500,986	\$7,550,020	\$2,642,507	\$4,907,513	19,875	2,945	185,504	109,154	47,848	\$834,277	\$981,503	\$834,277

Miracle

Year	Month	Bet	GGR	Promo&Bonus	NGR	New Registrants	FTD	Login players	Active players	Deposit players	PSP Fee	Gaming Fee	Affiliate Fee
2024	Jan	\$41,025,641	\$820,513	\$287,179	\$533,333	2,000	560	23,120	13,440	5,760	\$90,667	\$106,667	\$90,667
2024	Feb	\$43,076,923	\$861,538	\$301,538	\$560,000	2,100	588	24,276	14,112	6,048	\$95,200	\$112,000	\$95,200
2024	Mar	\$45,230,769	\$904,615	\$316,615	\$588,000	2,205	617	25,490	14,818	6,350	\$99,960	\$117,600	\$99,960
2024	Apr	\$47,492,308	\$949,846	\$332,446	\$617,400	2,315	648	26,764	15,558	6,668	\$104,958	\$123,480	\$104,958
2024	May	\$52,241,538	\$1,044,831	\$365,691	\$679,140	2,547	713	29,441	17,114	7,335	\$115,454	\$135,828	\$115,454
2024	Jun	\$54,853,615	\$1,097,072	\$383,975	\$713,097	2,674	749	30,913	17,970	7,701	\$121,226	\$142,619	\$121,226
2024	Jul	\$57,596,296	\$1,151,926	\$403,174	\$748,752	2,808	786	32,458	18,869	8,087	\$127,288	\$149,750	\$127,288
2024	Aug	\$60,476,111	\$1,209,522	\$423,333	\$786,189	2,948	825	34,081	19,812	8,491	\$133,652	\$157,238	\$133,652
2024	Sep	\$63,499,917	\$1,269,998	\$444,499	\$825,499	3,096	867	35,785	20,803	8,915	\$140,335	\$165,100	\$140,335
2024	Oct	\$69,849,908	\$1,396,998	\$488,949	\$908,049	3,405	953	39,364	22,883	9,807	\$154,368	\$181,610	\$154,368
2024	Nov	\$73,342,404	\$1,466,848	\$513,397	\$953,451	3,575	1,001	41,332	24,027	10,297	\$162,087	\$190,690	\$162,087
2024	Dec	\$80,676,644	\$1,613,533	\$564,737	\$1,048,796	3,933	1,101	45,465	26,430	11,327	\$178,295	\$209,759	\$178,295
2025	Jan	\$88,744,308	\$1,774,886	\$621,210	\$1,153,676	4,326	1,211	50,012	29,073	12,460	\$196,125	\$230,735	\$196,125
2025	Feb	\$93,181,524	\$1,863,630	\$652,271	\$1,211,360	4,543	1,272	52,512	30,526	13,083	\$205,931	\$242,272	\$205,931
2025	Mar	\$97,840,600	\$1,956,812	\$684,884	\$1,271,928	4,770	1,336	55,138	32,053	13,737	\$216,228	\$254,386	\$216,228
2025	Apr	\$102,732,630	\$2,054,653	\$719,128	\$1,335,524	5,008	1,402	57,895	33,655	14,424	\$227,039	\$267,105	\$227,039
2025	May	\$113,005,893	\$2,260,118	\$791,041	\$1,469,077	5,509	1,543	63,684	37,021	15,866	\$249,743	\$293,815	\$249,743
2025	Jun	\$118,656,188	\$2,373,124	\$830,593	\$1,542,530	5,784	1,620	66,869	38,872	16,659	\$262,230	\$308,506	\$262,230
2025	Jul	\$124,588,997	\$2,491,780	\$872,123	\$1,619,657	6,074	1,701	70,212	40,815	17,492	\$275,342	\$323,931	\$275,342
2025	Aug	\$130,618,447	\$2,616,369	\$915,729	\$1,700,640	6,377	1,786	73,723	42,856	18,367	\$289,109	\$340,128	\$289,109
2025	Sep	\$137,359,369	\$2,747,187	\$961,516	\$1,785,672	6,696	1,875	77,409	44,999	19,285	\$303,564	\$357,134	\$303,564
2025	Oct	\$151,095,306	\$3,021,906	\$1,057,667	\$1,964,239	7,366	2,062	85,150	49,499	21,214	\$333,921	\$392,848	\$333,921
2025	Nov	\$158,650,071	\$3,173,001	\$1,110,550	\$2,062,451	7,734	2,166	89,407	51,974	22,274	\$350,617	\$412,490	\$350,617
2025	Dec	\$174,515,078	\$3,490,302	\$1,221,606	\$2,268,696	8,508	2,382	98,348	57,171	24,502	\$385,678	\$453,739	\$385,678
2026	Jan	\$191,966,586	\$3,839,332	\$1,343,766	\$2,495,566	9,358	2,620	108,183	62,888	26,952	\$424,246	\$499,113	\$424,246
2026	Feb	\$201,564,916	\$4,031,298	\$1,410,954	\$2,620,344	9,826	2,751	113,592	66,033	28,300	\$445,458	\$524,069	\$445,458
2026	Mar	\$211,643,161	\$4,232,863	\$1,481,502	\$2,751,361	10,318	2,889	119,272	69,334	29,715	\$467,731	\$550,272	\$467,731
2026	Apr	\$222,225,319	\$4,444,506	\$1,555,577	\$2,888,929	10,833	3,033	125,235	72,801	31,200	\$491,118	\$577,786	\$491,118
2026	May	\$244,447,851	\$4,888,957	\$1,711,135	\$3,177,822	11,917	3,337	137,759	80,081	34,320	\$540,230	\$635,564	\$540,230
2026	Jun	\$256,670,244	\$5,133,405	\$1,796,692	\$3,336,713	12,513	3,504	144,647	84,085	36,037	\$567,241	\$667,343	\$567,241
2026	Jul	\$269,503,756	\$5,390,075	\$1,886,526	\$3,503,549	13,138	3,679	151,879	88,289	37,838	\$595,603	\$700,710	\$595,603
2026	Aug	\$282,978,944	\$5,659,579	\$1,980,853	\$3,678,726	13,795	3,863	159,473	92,704	39,730	\$625,383	\$735,745	\$625,383
2026	Sep	\$297,127,891	\$5,942,558	\$2,079,895	\$3,862,663	14,485	4,056	167,446	97,339	41,717	\$656,653	\$772,533	\$656,653
2026	Oct	\$326,840,680	\$6,536,814	\$2,287,885	\$4,248,929	15,933	4,461	184,191	107,073	45,888	\$722,318	\$849,786	\$722,318
2026	Nov	\$343,182,714	\$6,863,654	\$2,402,279	\$4,461,375	16,730	4,684	193,401	112,427	48,183	\$758,434	\$892,275	\$758,434
2026	Dec	\$377,500,986	\$7,550,020	\$2,642,507	\$4,907,513	18,403	5,153	212,741	123,669	53,001	\$834,277	\$981,503	\$834,277

4. Growth Strategy

The Interactive Gaming industry is entering into a blooming phase. There is a global demand for casino products, particularly in Asia. Based on our extensive variety of marketing strategies and experience SM believes that it can be a successful market player in the gaming industry.

The company will focus on the following marketing strategies to grow the business over the next three years:

Business Promoter Network Marketing

Business Promoter Network Marketing provides visitors and customers with sophisticated and attractive tools that engage them in marketing activities on our behalf.

SM's Business Promoter Network application offers a comprehensive set of management and control mechanisms. The referral functionality is integrated directly into web sites or email newsletters. Customers can not only recommend their favorite products and services to their friends, but also track their real-time performance as referrers and get rewarded for actions their friends down the referral chain.

SM configures the "commission" actions, the types of incentives, the number of referral levels and the duration of the program.

SM can monitor all program activities in real-time, analyze and optimize program performance and give full customer support.

Online casino Marketing

We believe the most efficient and effective way to promote our casino is to build awareness amongst existing online casino, sportsbook and Forex/financial betting customers in the target markets. This can be done by massive online marketing activities, advertising where permitted and working with large affiliate networks.

Affiliate Marketing

Affiliate Marketing is where the company uses an external party to market their products/services. It is a system of advertising in which the affiliate agrees to feature marketing materials from the company and the affiliate gets a percentage of any sales generated in return. Affiliate normally provides free advertising for the company and compensation is based on performance i.e. sales, clicks, registrations, or a combination of all.

Business generated from affiliates is monitored within the internal affiliate management system. This can be viewed by affiliates to keep track of the progress.

Regardless of whether the affiliates manage a large web site or a small one, this is an opportunity for them to make money every month for minimal effort in conjunction with the casino. When visitors go to their web site click on our site's banners they will earn a percentage of any gaming profit generated out of these visitors. This is also done through other marketing materials such as leaflets.

Through a combination of Affiliates sites and paid for online advertising we will hopefully to have a strong online presence in China. During the year we will seek to move towards an advertising serving solution which will allow tracking of click through and new registrations.

Email Campaigns

Through existing email databases and purchased email databases an initial email push will be done both prior to site launch and on the launch date. Industry average conversion rates of 0.15% should see an existing database holding in excess of 1 million email addresses resulting in approximately 1,500 funded accounts.

The use of HTML Email Marketing offers powerful, cost effective internet based marketing solutions for all businesses especially those related to online casinos. Email and newsletter marketing campaigns can help increase sales revenue and offer a better customer relationship. There already exists an extensive variety of ready-to-use HTML email templates for sportsbook as well as casino, which allows simple editing functions, allowing sportsbook and casino administrators to create professional HTML email newsletters designed to targeting existing and new players. Furthermore, no HTML skills are required. If specialist template designs are required these can be easily developed and customized to match a company's theme or marketing campaign.

HTML Email Marketing also offers a comprehensive email newsletter publishing, content-focused landing pages and Newsletter archive solution that allows a company to make a site rich with valuable information, optimizes search engine results and turns short email newsletter life cycle into a much longer news-worthy publication.

Banner Advertising

Banner Advertising is the promoting of a website, such as an affiliate website through banners. Once there is a click onto the banner, information is gathered from the customer and placed into a database. It is then monitored within the internal affiliate management system. The affiliate website will then be rewarded income based on business generated from the banner. There is usually no charge for the banner to be placed on the affiliate site. Therefore the affiliate site earns income based on performance.

It is an ideal opportunity to gain exposure from banners. These can be very colorful and depending on the size, can contain a lot of company promotional information.

5. Key suppliers

Kumagaming - platform

Paymix - banking

Payz - payment processing

Sticpay - payment processing

We are continually looking for alternatives and backups for banking and payment processing.

6. Risk Evaluation

The Company has implemented an appropriate Customer Risk Categorization Methodology in order to identify, calculate, score, and categorize the customers; this Customer Risk Categorization considers the following factors:

a. Country Risk

The Company Sanctions Policy is to periodically identify different sanctions and other data related to countries and territories; this data includes the Transparency International Index, the FATF high-risk and NCCT list, different Regulators' specific instructions related to countries etc. After the identification of these risks and data, the Company categorizes the different countries to the following categories:

- a. Non-compliant
- b. High risk
- c. Medium risk
- d. Low risk

Accordingly, The Company applies this categorization to its Customer Risk Categorization model in its AML-CFT System (as explained in more detail in the sections following)

The following territories are prohibited: USD, France, The Netherlands, Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, Saba, Singapore.

b. Customer Risk

The Company serves a very diverse customer portfolio – dealing with individuals and companies from a variety of different industries, profession types, residence types etc. The different risks associated with the ‘customer’ are identified through our Customer Risk Categorization model and used in our Risk Scoring model in our AML-CFT System (as explained in more detail in the sections following).

c. Transaction Risk / Distribution Channel Risk

The Company has stated in this Policy that the primary delivery channel is at the Branch level (regardless if it's the Main Branch or a Sub-Branch; however, based on the technological advancement and heavy investment in FinTech, the Company offers alternative delivery channels after it has first formally identified the individual or corporate.

Therefore, the Customer Risk Categorization model we employ considers the following risk variables based on the transaction types:

- a. Cash transactions – amount variables differ, e.g. $\geq$ USD1,000, or USD1,000< $\rightarrow$ USD10,000 etc.
- b. Foreign currency – transactions in foreign currency with amount variables differing (as above)
- c. Electronic channels – transactions executed via bank transfers with amount variables differing (as above)

AML-CFT Risk

The Company is using an AML-CFT System for the customer screening and transaction monitoring controls; therefore, if there are alerts generated for watchlist and PEP matching of customers - based on these alerts we would consider flagging the customers as ‘high risk’ by default if there is any such alert confirmed.

In this respect, the Customer Risk Categorization model used in our Risk Scoring model in our AML-CFT System is as explained in the next sections and throughout this Policy Document.

7. Legal and governance

The Board of Directors of the Company has appointed the Compliance Officer (C) to direct and manage the Compliance Function within the Group; the Board of Directors of the Company has appointed a MLRO to manage the customers and transactions executed within Curacao; based on these appointments, the compliance department has the following structure (as required):

- Compliance Officer (CO) – heading the Group Compliance Department and directs the compliance function for the Group; the CO reports directly to the Board of Directors of the Holding Company, and receives periodical reports by the MLRO for the Company's compliance level;
- MLRO – is responsible to manage the compliance function within the country; the MLRO reports directly to Board of Directors, but he receives consultancy by the CO for any guidance required; reports to the CO periodically for the compliance level of the Company; and,

- Branch Compliance Officer – is responsible to implement the Company AML-CTF Policy in the main office or any Branch setup by the Company, and report any suspicion, via the formal STR form, to the CO or MLRO. NOTE: All STAFF have been instructed that at NO point in time should they communicate any of their suspicions to the customer/person/entity involved in a potentially suspicious transaction

9. Policies and procedures

The company's policies and procedures are maintained internally. They will be reviewed on a quarterly basis and the GCB will be apprised of any policy changes as they happen.