



Online Casino Pongbet88 KREVETKA B.V.

BUSINESS PLAN

CONFIDENTIALITY MEMO

This document, including its entirety and individual components, along with the materials comprising it, is the intellectual property of the project customer. It may not be transferred to third parties or utilized for purposes other than those explicitly outlined in the summary without the customer's explicit permission. Any reproduction or duplication of this document, in whole or in part, is strictly prohibited.

CONTENTS

1	SUMMARY.....	3
2	COMPANY MANAGEMENT STRUCTURE.....	8
3	SUMMARY OF FINANCES.....	10
4	PRODUCTS & SERVICES.....	18
5	KEY SUPPLIERS, MATERIAL DEPENDENCIES.....	32
6	RISK EVALUATION AND MANAGEMENT.....	36
7	POLICIES AND PROCEDURES.....	40
8	OVERVIEW OF THE ONLINE GAMBLING MARKET.....	42
9	RISKS FACTORS IN ONLINE GAMBLING.....	53
10	INVESTMENT STRATEGY.....	54
11	REVENUE GENERATION STRATEGY.....	56
12	PROJECT EXPENDITURES.....	64

1 SUMMARY

1.1 Project Objectives

Pongbet88 is a cutting-edge online gambling company committed to providing a thrilling and responsible gaming experience. We are offering a diverse range of games that cater to the preferences of our global audience.

Vision:

To be the foremost online gambling destination that seamlessly blends innovation, entertainment, and responsibility, setting the standard for excellence in the gaming industry.

Mission:

At Pongbet88, our mission is to deliver an unparalleled online gambling experience by:

- **Innovation:** Constantly pushing the boundaries of technology to introduce new and exciting games that captivate our players.
- **Responsibility:** Promoting responsible gaming practices through robust player education, self-exclusion options, and partnerships with organizations dedicated to preventing gambling-related harm.
- **Fair Play:** Ensuring fairness and transparency in all our games, employing state-of-the-art algorithms and technologies to guarantee a level playing field for all participants.
- **Community Engagement:** Fostering a vibrant gaming community where players can connect, share experiences, and enjoy a sense of belonging in a secure and welcoming environment.

Goals:

- **Customer Satisfaction:** Striving to exceed the expectations of our players by delivering a seamless and enjoyable gaming experience through user-friendly interfaces, responsive customer support, and a vast selection of high-quality games.
- **Innovation Leadership:** Continuously investing in research and development to introduce groundbreaking technologies and games that set us apart as a pioneer in the online gambling industry.
- **Global Reach:** Expanding our reach to new markets and demographics, ensuring that players from around the world can access and enjoy our diverse portfolio of games.
- **Responsible Gaming Advocacy:** Collaborating with industry stakeholders, regulators, and non-profit organizations to promote responsible gaming practices and contribute to the development of standards that safeguard players' well-being.

Pongbet88 is not just a destination for gaming; it's a commitment to excellence, responsibility, and the relentless pursuit of creating a world-class online gambling platform.

Gaming Control Board - We are currently in the process of applying for the governmental license required for legal operation under this jurisdiction.



The project involves the creation of a company offering online games.

Safenames International Domain Portal

Home | WHOIS | Help | Logout

Account Domain Management SSL Search & Order Support Resources

Account: KREVETKA B.V. | Security level: 1 Cashpot balance: €0.00 | [Wire Transfer](#) | [Top-Up](#) | [History](#)

Home / Domain Management / Domain Names / View My Domains

My Domain Names

1 domain names found (matching "Pongbet88.com")

1 - 1 of 1 items

Bulk Actions Views Groups Show Search

Show 10, 50, 250, 500 items Filter Pongbet88.com

	Domain Name ▲	TLD	Account / Sub Account	Registration Term	Registered Date	Renewal Date	Invoice Info
☐	pongbet88.com	com	KREVETKA B.V.	1 yr	04.10.2023	04.10.2024	View (1) Invoices ▼

<< first < previous | Page 1 of 1 | next > last >>

Site Map

Account

Account Profile

More Resources

Support

Help

Global Domain Search

Find

The list of game providers:

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

1.2 Ubo Background

Aleksandrs Nazarovs, CEO & Founder of Pongbet88 since 2023, spearheads the launch of online betting platforms, negotiates strategic partnerships with major software providers, and implements cutting-edge technologies to enhance user experience. His tenure as a Software Engineer and B2B Sales Associate at Gravity Team involved developing web applications, collaborating in global projects, and targeting potential business clients. At AppXite, he honed his software engineering skills, focusing on efficient application development and maintenance. Prior experiences include roles as a Systems Administrator at Mikrotīkls SIA and a part-time QA Tester at Enersense SIA, where he gained expertise in network security and software testing methodologies.

With his role as CEO & Founder of Pongbet88, Aleksandrs' extensive expertise enables him to understand all project intricacies, providing him with a distinct advantage in leading the company towards success in his current position.



CONTACT

Email: aleksandarsnazarovs@gmail.com

Date of Birth: 21.11.1996

Sex: Male

EDUCATION

2013 - 2017

TSI - TRANSPORT AND
TELECOMMUNICATION
INSTITUTE

- Computer Engineering

SKILLS

- Advanced programming
(Python, Java, C++)
- Database management (SQL,
MongoDB)
- Project management
- Data analysis and machine
learning
- Network security and
cryptography

LANGUAGES

- Russian (Native)
- English (Intermediate)
- Latvian (Advanced)

ALEKSANDRS NAZAROVS

CEO & FOUNDER

PROFILE

Diligent and analytical IT professional with a passion for technology and business development. Excellent problem-solving skills and a proven track record in software development and system analysis. Track record in software development, system analysis and customer relations.

WORK EXPERIENCE

Pongbet88

2023 - PRESENT

CEO & FOUNDER

- Directs the launch of online betting platforms.
- Negotiates strategic partnerships with major software providers.
- Implements cutting-edge technologies for user experience enhancement.
- Spearheads regulatory compliance and licensing processes.
- Initiates successful international marketing campaigns.

Gravity Team, Latvia

2022 - 2023

Software Engineer, B2B Sales Associate

- Developed and optimized web applications.
- Collaborated in global software projects.
- Implemented responsive design techniques.
- Identified and targeted potential business clients.
- Conducted sales presentations and product demonstrations.
- Negotiated contracts and closed B2B deals.

AppXite, Latvia

2019 - 2021

Software Engineer

- Developed and maintained software applications efficiently.
- Collaborated in coding, testing, and debugging processes.
- Implemented software design patterns and best practices.
- Reviewed and improved existing code for optimization.
- Participated in agile development and scrum meetings.

Mikrotikls SIA, Latvia

2017 - 2019

Systems Administrator

- Oversaw network and system security.
- Performed routine database maintenance.
- Managed server deployment and scaling.

Enersense SIA, Latvia

2015 - 2017

Part time QA Tester

- Executed test cases and documented results accurately.
- Identified, reported, and tracked software bugs.
- Collaborated with developers on issue resolution.

1.3 Game List

Main types of casino games:

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

1.4 Project Indicators

The economic viability of the project has been substantiated through the computation of conventional financial metrics commonly employed in project analysis.

The project's calculation horizon spans 36 months (3 years), with an investment phase lasting 4 months (0.3 years) until the project's initiation. Subsequently, the operational phase of the project, from launch onwards, encompasses 32 months (2.7 years).

Table 1. Indicators of the project

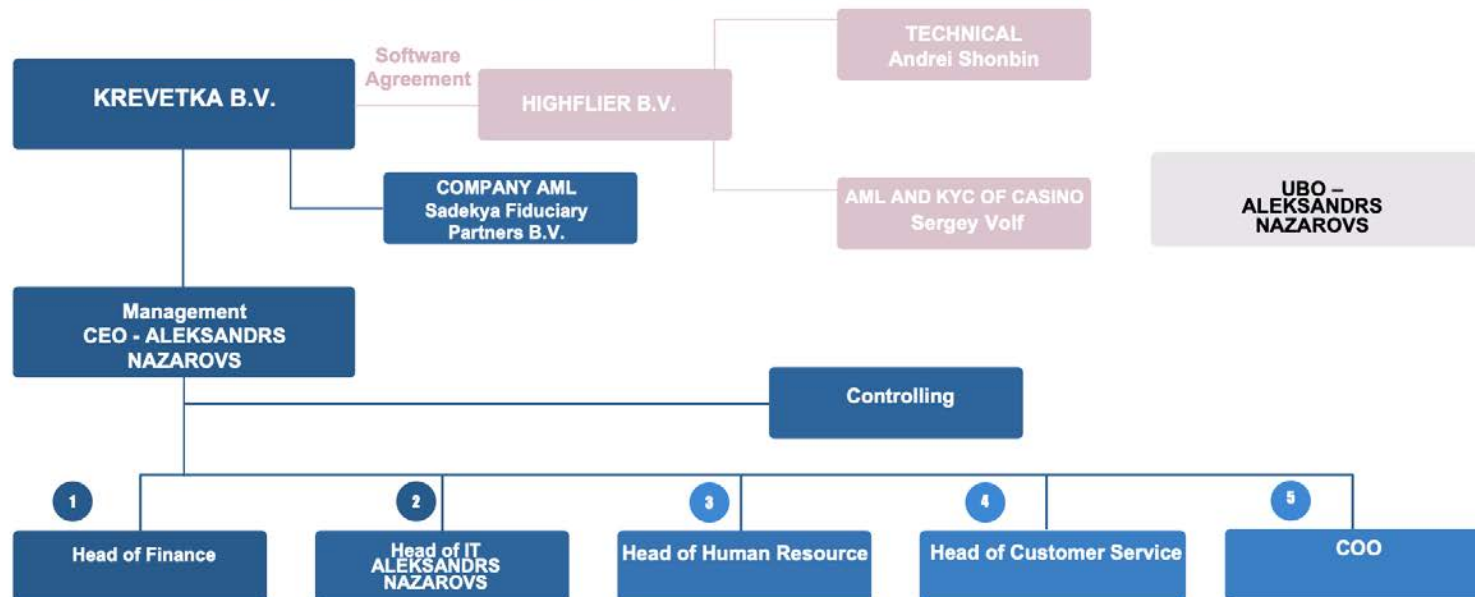
Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	194 520
Sum of proceeds (SP), EUR	4 966 762
Net average operational receipts per month (NAOR), EUR	32 707
Net profit for the project period, EUR	1 073 725
Average profitability for the project period (net profit to proceeds	21,62%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	573 598
Average Rate of Return of investments (ARR)	145,72%
Return on investment (ROI)	452%
Profitability index (PI)	2,9
Internal rate of return (IRR)	110,32%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

2 COMPANY MANAGEMENT STRUCTURE

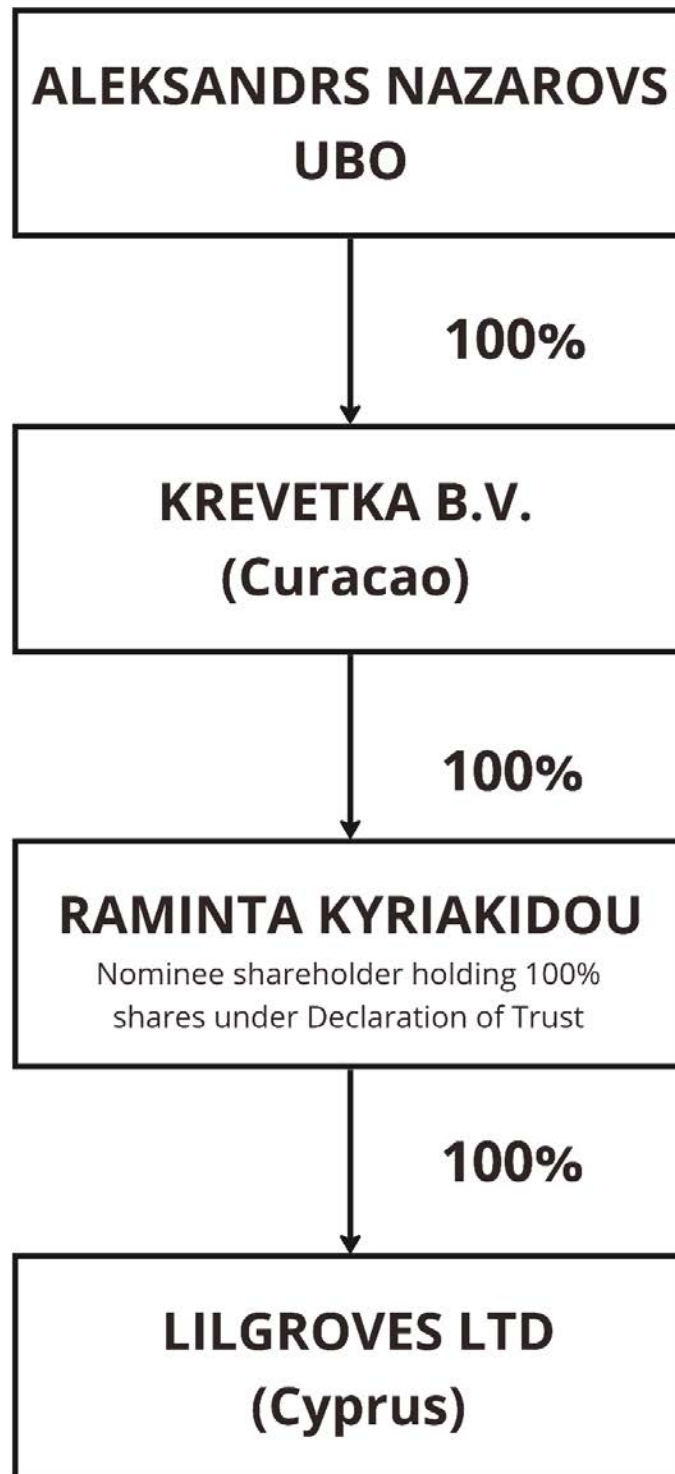
In the dual capacity of CEO and sole shareholder, the UBO actively oversees the day-to-day operations of the business. Duties encompass managing marketing endeavors, formulating growth strategies across various sectors, integrating payment solutions, and extending the brand into new markets. Board meetings may include key personnel alongside the director. Decision-making is decentralized, with strategies and decisions directly delegated to departments and functions, promoting flexibility and avoiding deadlock. Legal support is handled internally by specialized departments and officers, with department heads primarily accountable for final decisions, under the CEO's supervision.

Company control structure

KREVETKA B.V., a company incorporated under the laws of Curaçao with registration number 166108 and registered address at Abraham Mendez Chumaceiro Boulevard 03, Curacao



COMPANY STRUCTURE



3 SUMMARY OF FINANCES

3.1 Financial estimation for the first, second and third year

Table 2. Cash flow for the first year

	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	- 194 520	- 174 600	-	-	- 19 920	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 174 600	- 174 600	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 17 420	-	-	-	- 17 420	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 500	-	-	-	- 2 500	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 177 469	- 5 100	-	-	-	- 46 572	248	4 224	7 020	10 011	3 302	- 24 314	23 950
Proceeds	4 966 762	-	-	-	-	35 105	43 179	49 386	55 120	61 319	68 188	87 136	101 760
Income from clients	4 966 762	-	-	-	-	35 105	43 179	49 386	55 120	61 319	68 188	87 136	101 760
Expenses total	- 3 789 293	- 5 100	-	-	-	- 81 677	- 42 931	- 45 162	- 48 100	- 51 308	- 64 886	- 111 450	- 77 810
Direct costs	- 2 975 676	- 5 100	-	-	-	- 70 419	- 31 673	- 33 627	- 35 776	- 38 141	- 53 610	- 56 992	- 60 711
Advertising costs	- 1 481 932	-	-	-	-	- 33 915	- 19 542	- 21 496	- 23 645	- 26 010	- 33 813	- 37 194	- 40 913
Additional staff costs	- 1 027 333	-	-	-	-	-	-	-	-	-	- 7 667	- 7 667	- 7 667
License fees	- 143 211	- 5 100	-	-	-	- 26 404	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031	- 2 031
Salary	- 323 200	-	-	-	-	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100
Indirect costs	- 486 667	-	-	-	-	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 54 458	- 11 258
Accounting	- 124 800	-	-	-	-	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900

Office equipment maintenance	- 87 733	-	-	-	-	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742
Hosting	- 126 400	-	-	-	-	-	-	-	-	-	-	-	- 43 200	-
Office rent	- 46 400	-	-	-	-	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450
Legal support	- 101 333	-	-	-	-	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Taxes	- 326 951	-	-	-	-	-	-	- 277	- 1 066	- 1 909	- 17	-	-	- 5 841
Profit tax	- 326 951	-	-	-	-	-	-	- 277	- 1 066	- 1 909	- 17	-	-	- 5 841
Cash flow - FINANCING	- 135 209	179 700	-	-	19 920	46 572	-	- 344	- 1 322	- 2 369	- 21	24 314	-	7 248
Co-investor's investment	270 507	179 700	-	-	19 920	46 572	-	-	-	-	-	24 314	-	-
Refunds to co-investor	- 405 716	-	-	-	-	-	-	- 344	- 1 322	- 2 369	- 21	-	-	- 7 248

CASH FLOW OF THE PROJECT	847 739	-	-	-	-	-	248	3 880	5 698	7 642	3 281	-	16 702
progressive total (cash balance)	847 739	-	-	-	-	-	248	4 128	9 826	17 468	20 749	20 749	37 451

Table 3. Cash flow for the second year

	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	- 194 520	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 174 600	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 17 420	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 500	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 177 469	32 184	35 439	53 106	58 307	41 635	68 409	71 359	66 500	60 946	63 975	25 511	59 691
Proceeds	4 966 762	116 408	132 748	155 398	163 552	168 080	178 032	181 814	183 251	183 797	187 681	189 234	189 855
Income from clients	4 966 762	116 408	132 748	155 398	163 552	168 080	178 032	181 814	183 251	183 797	187 681	189 234	189 855
Expenses total	- 3 789 293	- 84 224	- 97 309	- 102 292	- 105 244	- 126 445	- 109 623	- 110 455	- 116 751	- 122 851	- 123 706	- 163 724	- 130 164
Direct costs	- 2 975 676	- 64 802	- 76 969	- 76 969	- 78 455	- 104 357	- 79 984	- 79 984	- 87 651	- 95 318	- 95 318	- 102 984	- 102 984
Advertising costs	- 1 481 932	- 45 005	- 49 505	- 49 505	- 50 990	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520
Additional staff costs	- 1 027 333	- 7 667	- 15 333	- 15 333	- 15 333	- 15 333	- 15 333	- 15 333	- 23 000	- 30 667	- 30 667	- 38 333	- 38 333
License fees	- 143 211	- 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	- 323 200	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100
Indirect costs	- 486 667	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 54 458	- 11 258
Accounting	- 124 800	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900
Office equipment maintenance	- 87 733	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742
Hosting	- 126 400	-	-	-	-	-	-	-	-	-	-	- 43 200	-
Office rent	- 46 400	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450
Legal support	- 101 333	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Taxes	- 326 951	- 8 163	- 9 081	- 14 064	- 15 531	- 10 829	- 18 380	- 19 212	- 17 842	- 16 275	- 17 130	- 6 281	- 15 922
Profit tax	- 326 951	- 8 163	- 9 081	- 14 064	- 15 531	- 10 829	- 18 380	- 19 212	- 17 842	- 16 275	- 17 130	- 6 281	- 15 922
Cash flow - FINANCING	- 135 209	- 10 130	- 11 269	- 17 452	- 19 273	- 13 438	- 22 808	- 23 841	- 22 140	- 20 196	- 21 257	- 7 794	- 19 757

Co-investor's investment	270 507	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 405 716	- 10 130	- 11 269	- 17 452	- 19 273	- 13 438	- 22 808	- 23 841	- 22 140	- 20 196	- 21 257	- 7 794	- 19 757

CASH FLOW OF THE PROJECT	847 739	22 054	24 170	35 654	39 035	28 198	45 601	47 518	44 360	40 750	42 718	17 717	39 934
progressive total (cash balance)	847 739	59 506	83 676	119 329	158 364	186 562	232 162	279 680	324 040	364 789	407 508	425 224	465 158

Table 4. Cash flow for the third year

	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	- 194 520	-	-	-	-	-	-	-	-	-	-	-	-
Acquisition of a license and security payment	- 174 600	-	-	-	-	-	-	-	-	-	-	-	-
Payment for the Amazon server	- 17 420	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 2 500	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	1 177 469	62 847	58 192	58 749	53 003	34 090	48 697	54 025	50 496	51 624	46 163	15 201	34 551
Proceeds	4 966 762	193 901	195 600	196 314	196 614	196 740	198 760	205 591	208 734	210 179	210 844	211 150	211 291
Income from clients	4 966 762	193 901	195 600	196 314	196 614	196 740	198 760	205 591	208 734	210 179	210 844	211 150	211 291
Expenses total	- 3 789 293	- 131 054	- 137 408	- 137 565	- 143 611	- 162 650	- 150 063	- 151 566	- 158 237	- 158 555	- 164 682	- 195 949	- 176 740
Direct costs	- 2 975 676	- 102 984	- 110 651	- 110 651	- 118 318	- 142 691	- 125 984	- 125 984	- 133 651	- 133 651	- 141 318	- 141 318	- 156 651
Advertising costs	- 1 481 932	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520	- 52 520
Additional staff costs	- 1 027 333	- 38 333	- 46 000	- 46 000	- 53 667	- 53 667	- 61 333	- 61 333	- 69 000	- 69 000	- 76 667	- 76 667	- 92 000
License fees	- 143 211	- 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	- 323 200	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100	- 10 100
Indirect costs	- 486 667	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 11 258	- 51 258	- 11 258
Accounting	- 124 800	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900	- 3 900
Office equipment maintenance	- 87 733	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742	- 2 742
Hosting	- 126 400	-	-	-	-	-	-	-	-	-	-	- 40 000	-
Office rent	- 46 400	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450	- 1 450
Legal support	- 101 333	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167	- 3 167
Taxes	- 326 951	- 16 812	- 15 499	- 15 656	- 14 035	- 8 701	- 12 821	- 14 323	- 13 328	- 13 646	- 12 106	- 3 373	- 8 831
Profit tax	- 326 951	- 16 812	- 15 499	- 15 656	- 14 035	- 8 701	- 12 821	- 14 323	- 13 328	- 13 646	- 12 106	- 3 373	- 8 831
Cash flow - FINANCING	- 135 209	- 20 862	- 19 233	- 19 427	- 17 416	- 10 797	- 15 909	- 17 774	- 16 539	- 16 934	- 15 022	- 4 186	- 10 958
Co-investor's investment	270 507	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 405 716	- 20 862	- 19 233	- 19 427	- 17 416	- 10 797	- 15 909	- 17 774	- 16 539	- 16 934	- 15 022	- 4 186	- 10 958

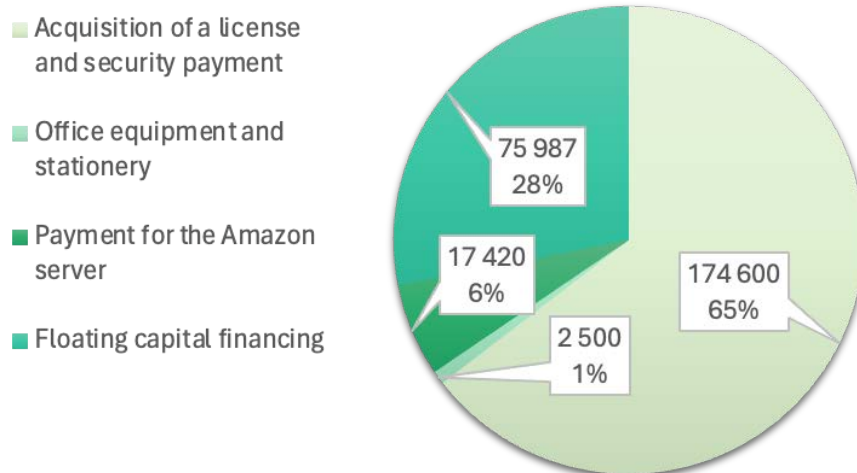
CASH FLOW OF THE PROJECT	847 739	41 985	38 960	39 321	35 586	23 293	32 788	36 251	33 957	34 690	31 140	11 015	23 593
progressive total (cash balance)	847 739	507 144	546 103	585 425	621 011	644 304	677 092	713 343	747 300	781 991	813 131	824 146	847 739

3.2 Categories of investments, anticipated costs, funding origins

Type of initial investments - funds provided directly by the Ultimate Beneficial Owner amounting for 270 507 EUR.

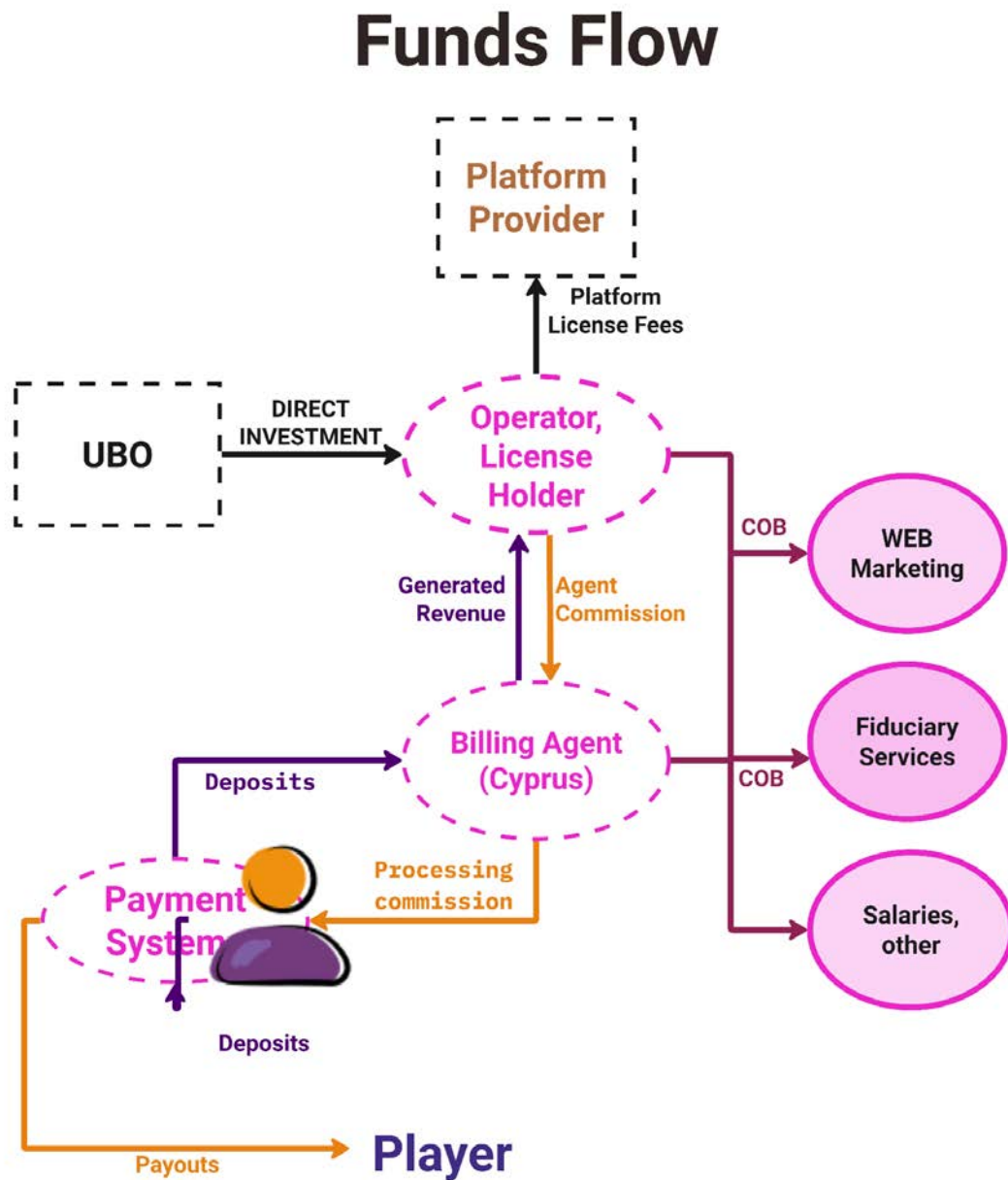
Upon launch - profits generated directly from operations.

Diagram 1. Investments structure



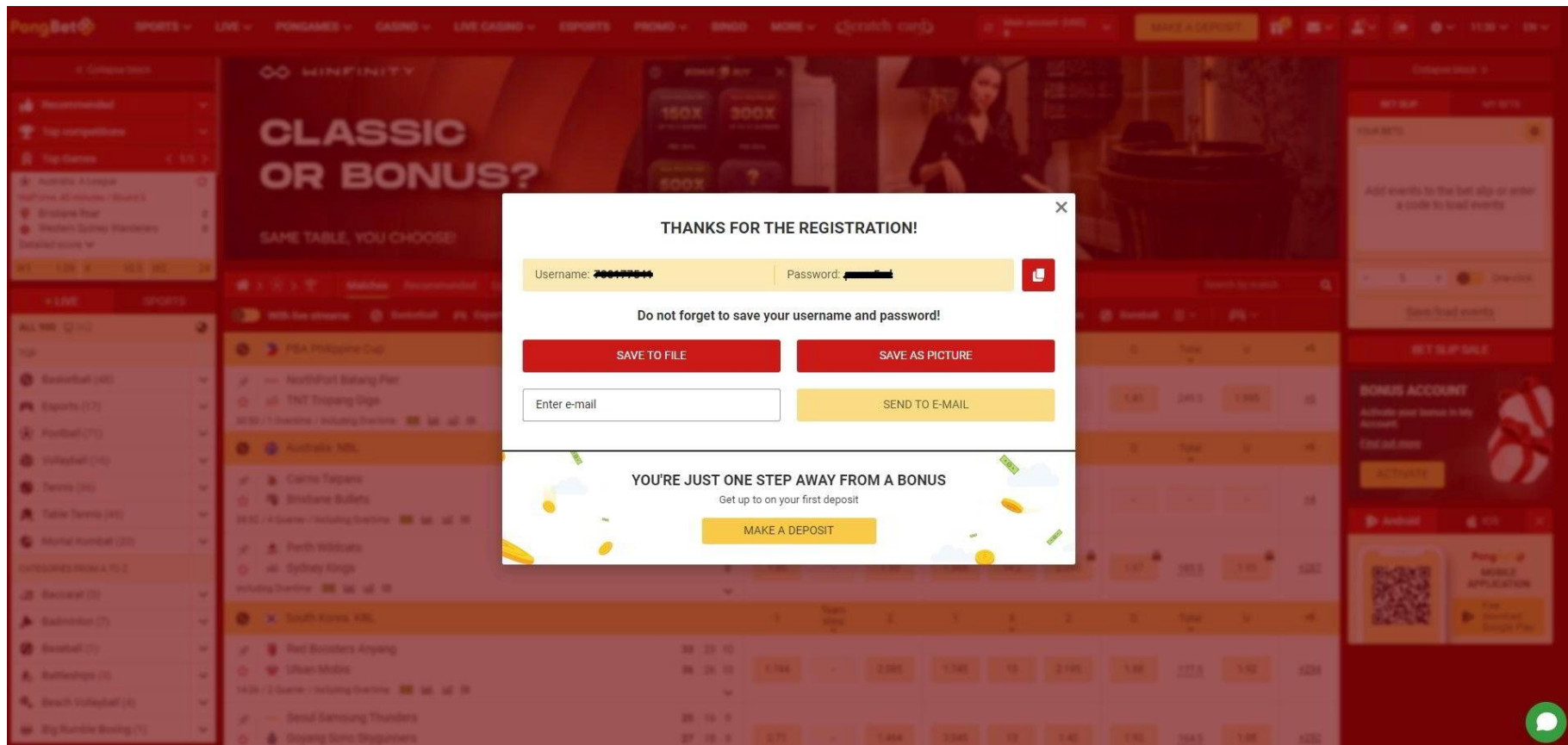
3.3 Flow Of Funds Schematic

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:



SPORTS

LIVE

PONGAMES

CASINO

LIVE CASINO

ESPORTS

PROMO

BINGO

MORE

Scratch card

\$

REGISTRATION

LOG IN

11:29

EN

« Collapse block

Recommended

Top competitions

Top Games

Australia. A League

1 Half, 48 minutes / Round 6

Brisbane Roar

Western Sydney Wanderers

Detailed score

W1

1.09

X

10.5

W2

24

LIVE

SPORTS

ALL 896

329

TOP

Basketball (47)

Esports (17)

Football (71)

Volleyball (16)

Tennis (38)

Table Tennis (42)

Mortal Kombat (19)

CATEGORIES FROM A TO Z

Baccarat (4)

Badminton (7)

Baseball (2)

Battleships (2)

Beach Volleyball (4)

Big Rumble Boxing (1)

WINFINITY

CLASSIC OR BONUS?

SAME TABLE, YOU CHOOSE!

BONUS BUY

150X

UP TO 5 NUMBERS

FEE 20%

300X

UP TO 10 NUMBERS

FEE 50%

500X

UP TO 30 NUMBERS

FEE 100%

MYSTERY

UP TO 50 NUMBERS

FEE 50%

Auto-Repeat

Matches

Recommended

Upcoming events

1st period

2nd period

Search by match

With live streams

Basketball

Esports

Football

Volleyball

Tennis

Table Tennis

Mortal Kombat

Baccarat

Badminton

Baseball

PBA Philippine Cup

1

Team Wins

2

1

X

2

0

Total

U

+5

NorthPort Batang Pier

122

37

24

29

23

9

1.12

-

6.23

-

-

-

1.88

254.5

1.92

+6

TNT Tropang Giga

116

33

29

27

24

3

50:00 / 1 Overtime / Including Overtime

Australia. NBL

1

Team Wins

2

1

X

2

0

Total

U

+5

Cairns Taipans

73

21

21

12

19

15.7

-

1.01

-

-

-

1.715

159.5

2.13

+8

Brisbane Bullets

80

17

26

25

12

38:31 / 4 Quarter / Including Overtime

Perth Wildcats

0

1.85

-

1.95

1.965

14.2

2.045

1.87

185.5

1.93

+287

Sydney Kings

0

Including Overtime

South Korea. KBL

1

Team Wins

2

1

X

2

0

Total

U

+5

Red Boosters Anyang

31

23

8

1.85

-

1.952

1.89

13

2.005

1.9

178.5

1.9

+296

Ulsan Mobis

36

26

10

13:37 / 2 Quarter / Including Overtime

Seoul Samsung Thunders

23

16

7

3.325

-

1.33

3.33

13

1.365

1.9

162.5

1.9

+294

Goyang Sono Skygunners

27

18

9

Collapse block

REGISTRATION

One-click

By phone

Philippines

US dollar (USD)

Promo code (if you have one)

REGISTER

This site is protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply.

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

Android

iOS

PongBet

4.2 Log in and logout:

PongBet SPORTS LIVE PONGAMES CASINO LIVE CASINO ESPORTS PROMO BINGO MORE Scratch cards

REGISTRATION LOG IN 15:34 EN

CLASSIC OR BONUS?
SAME TABLE, YOU CHOOSE!

W1 7.75 X 3.75 W2 1.485

Recommended
Top competitions
Top Games

UEFA Nations League. Women
1 Half, 32 minutes / Group Stage, League
C. Group 1, Round 5
Moldova (Women) 0
Malta (Women) 0
Detailed score

With live streams Basketball Esports Football Volleyball Tennis Table Tennis Mortal Kombat Baccarat Badminton Battleships

Egypt. Premier League

	1	X	2	1X	12	2X	0	Total	U	
Al-Masry	0	0								
ENPPI	0	0								
34:53 / 1 Half	2.456	2.584	3.63	1.264	1.47	1.52	1.975	1.5	1.83	+373
El Daklyeh	0	0								
Baladiyet El Mahallah	0	0								
33:19 / 1 Half	3.59	2.312	2.784	1.416	1.575	1.27	2.26	1.5	1.592	+403

WTA. Andorra

	1	X	2	0	Total	U	1	Handicap	2	
Erika Andreeva	1	6	5 (0)							
Ella Seidel (WC)	0	4	3 (0)							
2 Set	1.01	-	17.4	3.455	19.5	1.32	1.304	-4.5+	3.55	+47

CS2. CCT Online Finals

	1	X	2	0	Total	U	1	Handicap	2	
Sprout	1	13	1							
Anonymo	0	4	5							
2 map	1.48	-	2.655	1.88	56.5	1.92	1.856	-8.5+	1.945	+6

Dota 2. European Pro League

	1	X	2	0	Total	U	1	Handicap	2	

REGISTRATION
E-mail or ID
Password
Remember
Forgot your password?
LOG IN
You can log in to the website via:
SMS LOGIN

BET SLIP MY BETS
YOUR BETS
Add events to the bet slip or enter a code to load events
Save/load events

4.3 Terms and conditions/ Rules and procedures:

1. GENERAL TERMS AND DEFINITIONS

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 following Betting Rules pertaining to the bookmaker Pongbet88 (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 Pongbet88 and the customer.

These Rules shall apply to betting on the website and at Pongbet88 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.

4.4 Obligations as a player:

2. GENERAL TERMS

1. In order to register for this website, the user is required to accept the General Terms and Conditions. In the event the General Terms and Conditions are updated, existing users may choose to discontinue using the products and services before the said update shall become effective, which is a minimum of two weeks after it has been announced. Remember that gambling can be addictive. Play responsibly.
2. Bets may only be placed by individuals who are 18 years of age or the age of majority in their state (if the age of majority is over 18) and agree to the Betting Rules offered by the bookmaker. The customer shall be held liable for violation of this regulation. By registering and playing on the website, you confirm that you do not suffer from a gambling addiction.
3. The following individuals are not allowed to place bets:
 - o individuals who are under 18 years of age at the time of placement;
 - o individuals who directly participate in the events being betted on (e.g. sportspeople, coaches, referees, club owners or club management, or other individuals who can influence the outcome of the event), as well as any individuals acting on their behalf or affiliating with them;
 - o ~~individuals representing other bookmakers;~~
 - o individuals who are prohibited from entering into a contract with a bookmaker subject to the effective legislation.
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.

4.5 Payouts:

7.2. DEPOSITS AND PAYOUTS

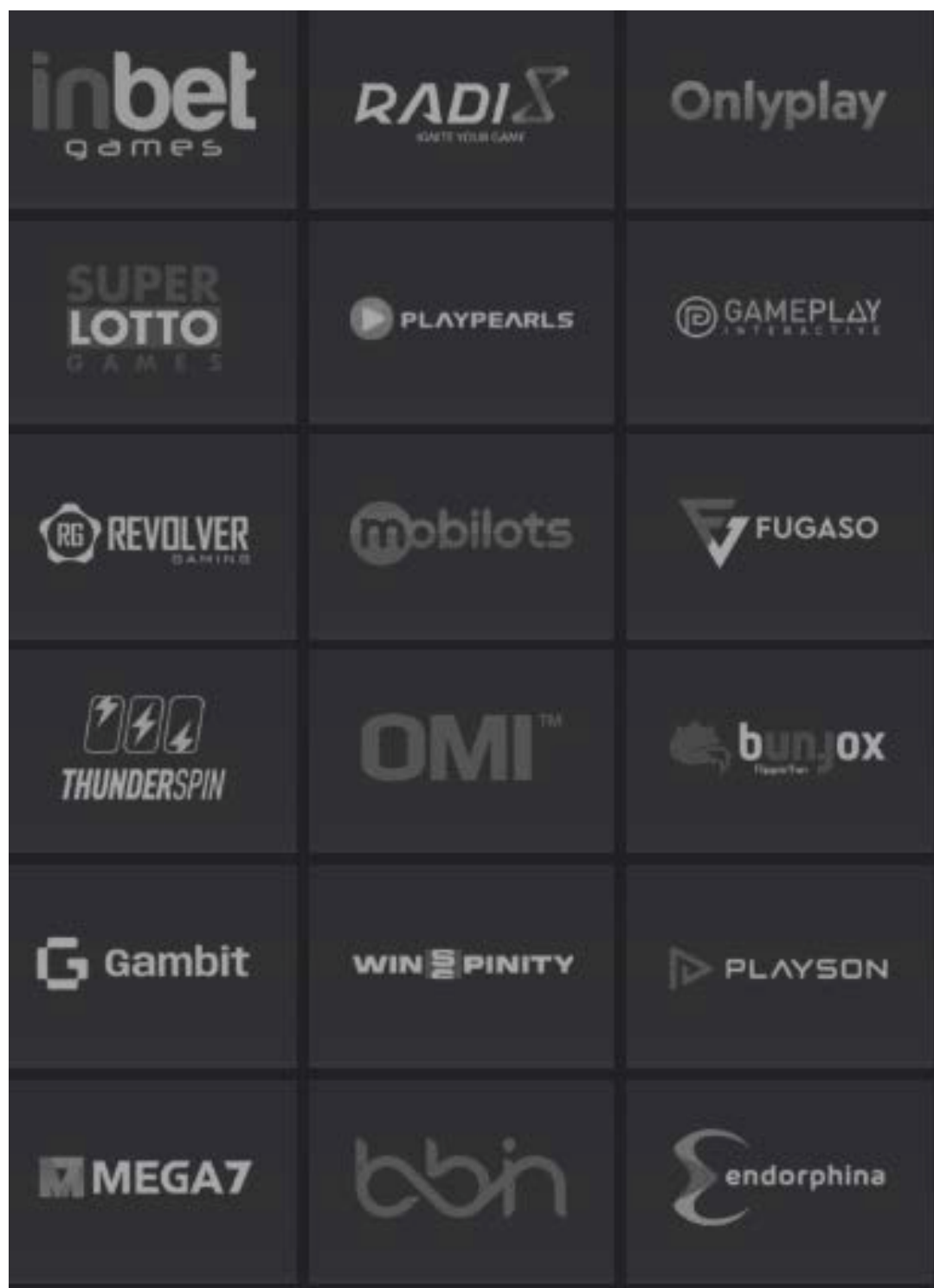
1. There are various ways of depositing and withdrawing funds from the Customer's account. All deposit and withdrawal methods can be found in the "Payments" section.
2. All withdrawal requests are processed 24/7.
3. The Pongbet88 Security Service is entitled to:
 - o decline cash withdrawal requests if deposits were made through e-payment systems.
 - o refuse any withdrawal should the deposit or withdrawal amounts be inconsistent with bets placed (the Customer must place bets with stakes which add up to the sum of all deposits and the bets must have odds of at least 1.1; placing a high volume of bets that have a minimal impact on your balance shall not be taken into account, i.e. bets placed on opposite outcomes in games such as Roulette, Baccarat, Craps and Dice). Permitted withdrawal amounts shall be calculated based on the amount of the bets placed from any given deposit.
 - o refuse any withdrawal if the betting account is misused. In this case your account must be verified before withdrawal can take place.
4. The Pongbet88 Security Service does not recommend Customers:
 - transfer funds from one payment system to another;
 - deposit and withdraw funds without placing bets;In the foregoing events, funds will be returned to your account.
5. You can only withdraw funds using the same payment details that were used for depositing funds into your account. If you use different methods to make a deposit, withdrawals should be proportionate to the deposits made using any particular method.
6. Pongbet88 may refuse withdrawals via payment systems or in cash and offer a bank transfer as a substitute. The company may, at its discretion, restrict one or more of the payment methods you use to make deposits and/or withdrawals.
7. ATTENTION! Our administration does not recommend making deposits and withdrawing funds using someone else's electronic wallet.
 - o Our Security Team reserves the right to deem such deposits to be fraudulent and block users' transactions without prior notification.
 - o Our administration is entitled to deny withdrawals of funds using payment details which do not belong to the account holder.
8. In certain circumstances and in respect to certain customers Pongbet88 may decide not to reimburse service charges imposed by payment systems on deposits or withdrawals, which Pongbet88 usually reimburses.
9. In certain cases, the company has the right to unilaterally initiate the verification procedure of a customer's payments and request additional information from the payment system. The customer's account may be blocked for financial procedure purposes during the verification process.
According to the terms of some payment systems, the verification procedure can last up to a maximum of 180 days.

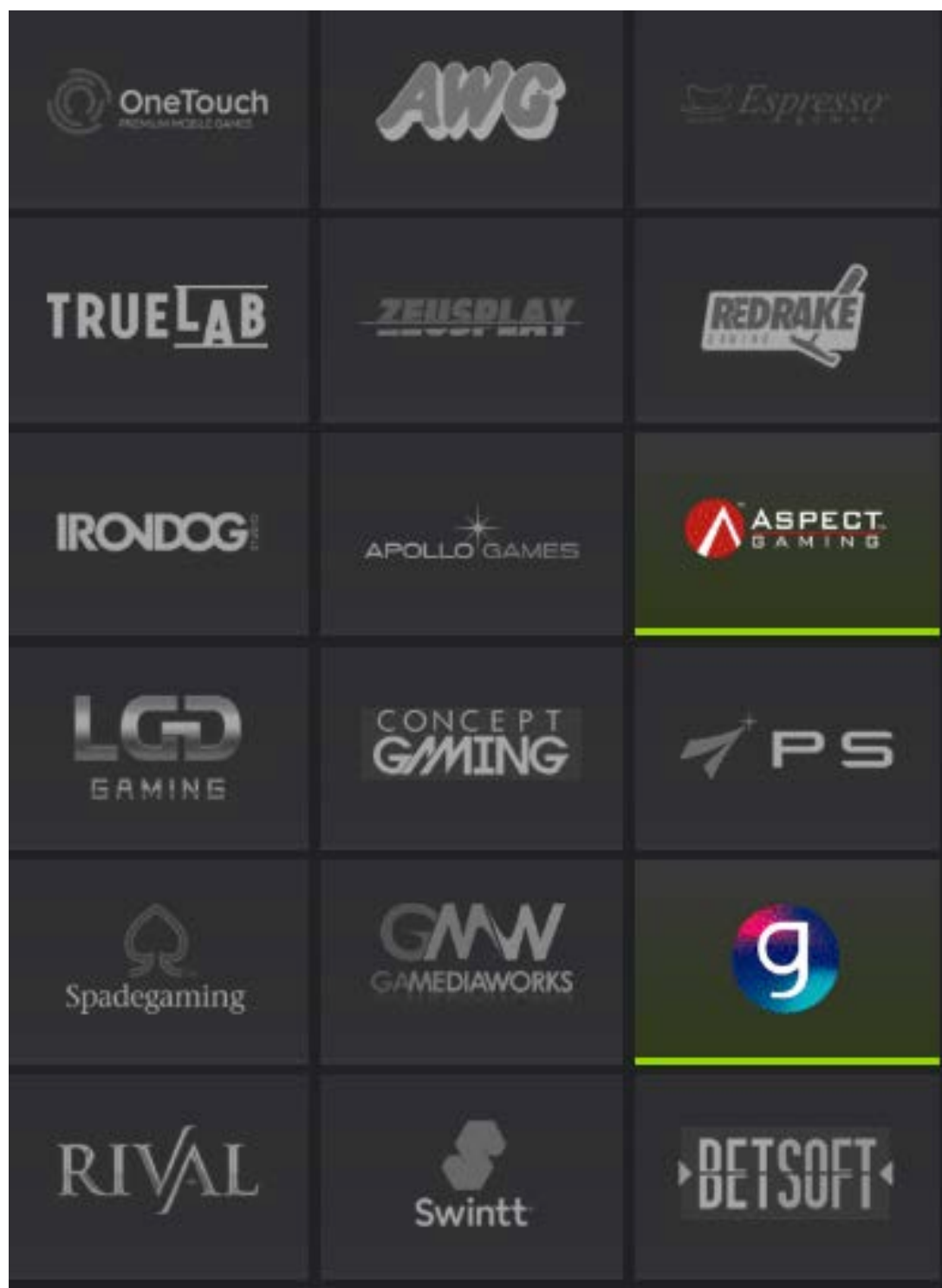
4.6 Withdrawing:

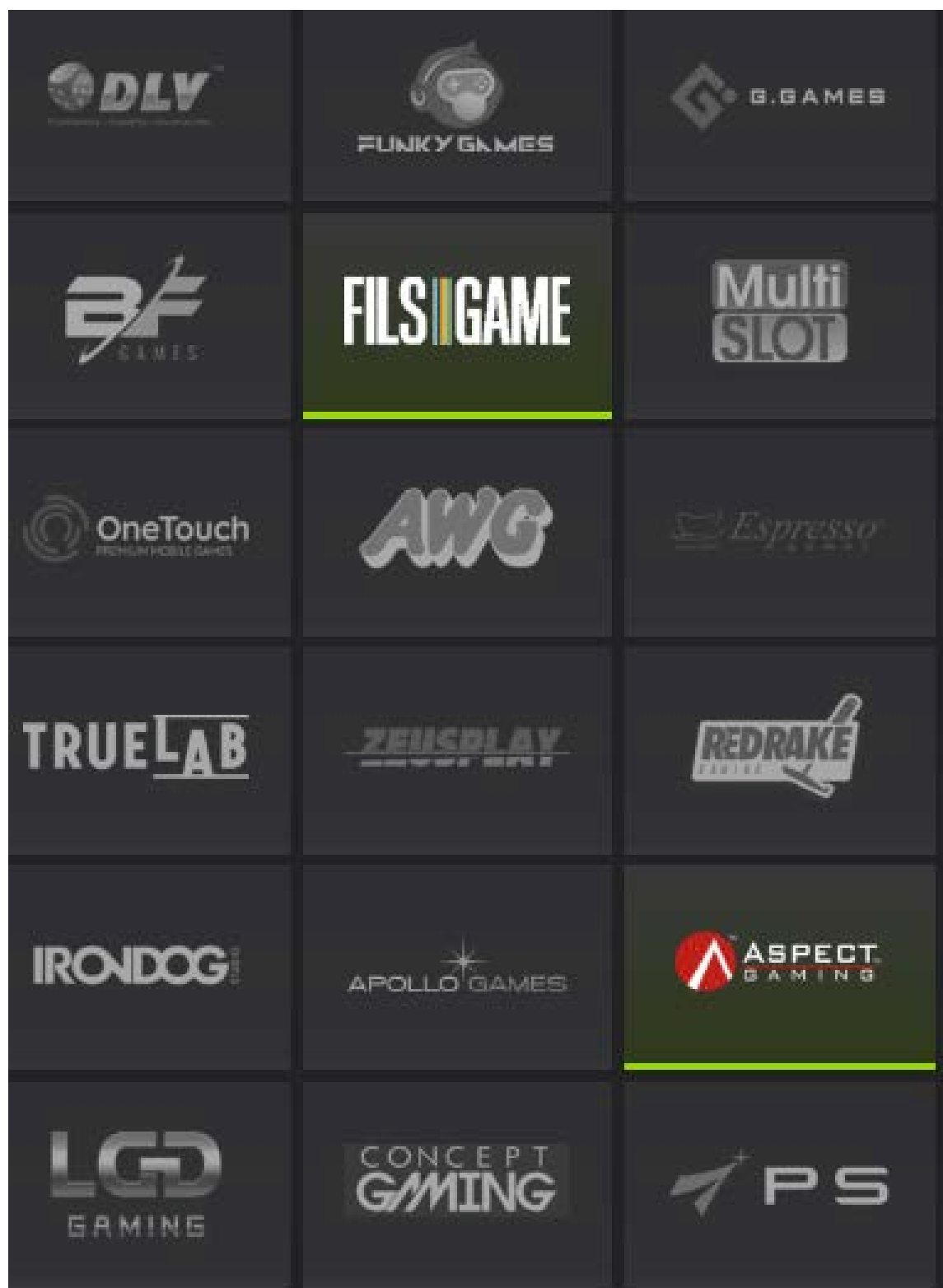
Withdrawals can be made using the payment methods specified below, as follows: FIAT - provided that the deposit was made in FIAT, and CRYPTO - provided that the deposit was made in cryptocurrency.

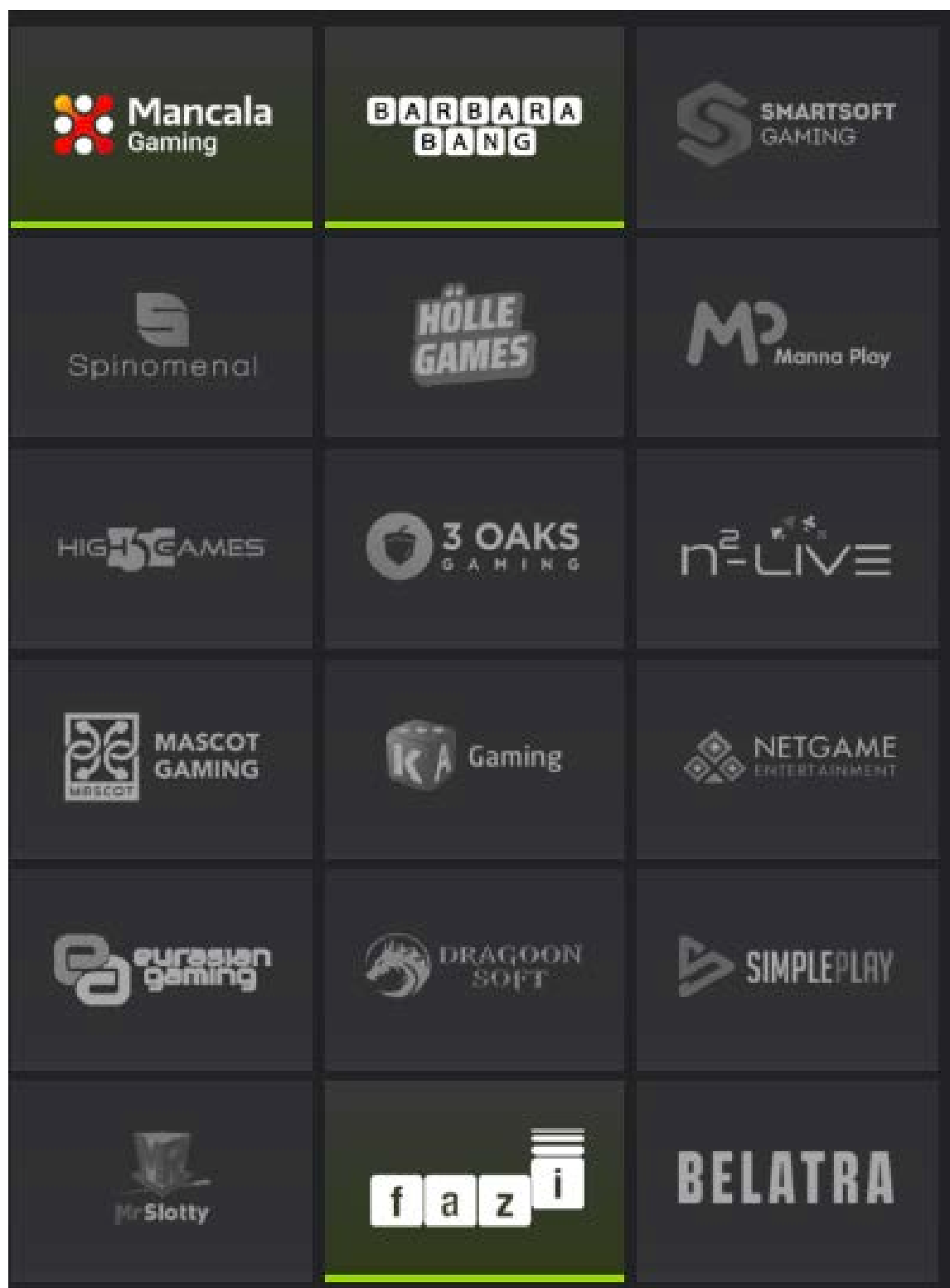
4.7 Games that will be provided:











5 KEY SUPPLIERS, MATERIAL DEPENDENCIES

5.1 Platform Description

HIGHFLIER B.V., a company registered under the laws of Curacao under registration number 149996 (“HIGHFLIER”) has developed **the bet-b2b 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:

- the option to register as a customer
- the option to log in and reset the password
- the option to make deposits and withdrawals
- the option to place bets
- the option to view betting history
- the option to view deposit history
- the option to receive bonuses
- the option to view bonus history
- the option to contact the customer support team
- the option to self-exclude
- the option to place limits on deposits
- deployment of two-factor authentication
- deployment of secret phrase authentication
- databases and tables of real events containing established statistics or dynamic odds
- service for obtaining odds on events through an API
- service for tracking customer money – records of deposits, bets, and withdrawals
- service for integrating the Platform with the payment services of other third-party providers through an API
- 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
- tool for protecting and restricting access and assigning competences to HIGHFLIER’s employees (BackOffice) and displaying an employee’s level of access in their profile
- 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
- 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
- display of short messages to customers (primarily the status of their account and customer legal compliance)
- 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
- 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

- 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
- 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
- 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
- service for monitoring suspicious customer activity, such as using different payment methods and a large number of small deposits, bets, and withdrawals
- 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
- 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

2.1 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:

- marketing modules from third parties
- integration with the business solutions including CMS, CRM, and BackOffice
- integration with external platforms such as Microsoft Office, business email, tasks and calendars, and a platform for sending mass messages by email and SMS
- 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
- provision of API for several modules
- integration with system managing access to information resources for providing the betting odds.
- 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:

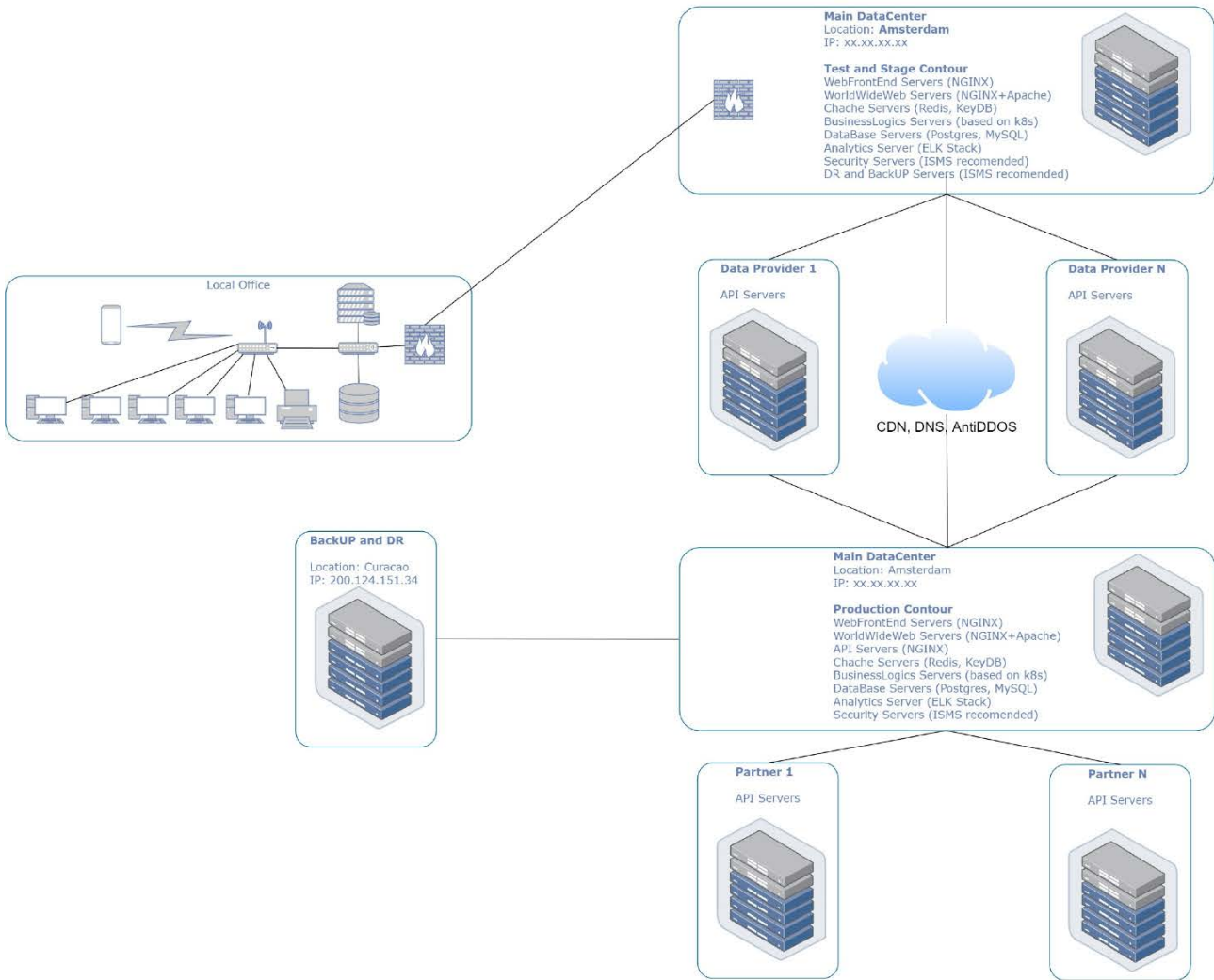
- iOS
- Android
- Windows

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.

Platform Risk Management

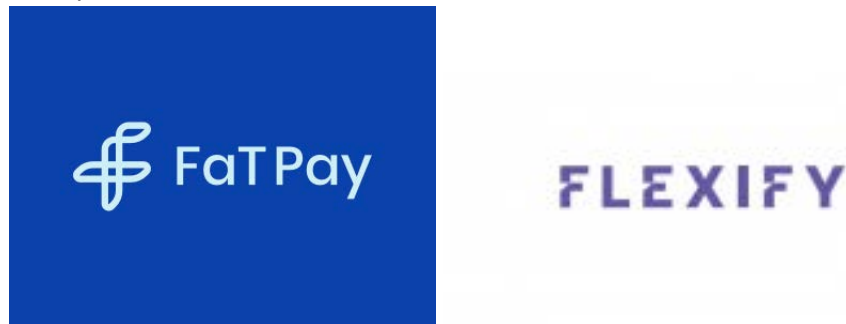
Through proactive disaster preparedness and robust infrastructure reinforcement, we effectively mitigate risks inherent in platform implementation. Employing rigorous protocols for data backup and restoration, alongside redundant server systems, reduces service interruptions and data loss. Ongoing testing and refinement of our disaster plan, crucial for adapting to evolving threats and technological advancements,

guarantee its effectiveness. Collaborating with cybersecurity specialists and regulatory authorities offers invaluable insights, enhancing the resilience of our platform and ensuring its leading position in disaster preparedness for online casino platforms. This safeguards operations and strengthens customer confidence.



5.2 Payment Service Providers

An essential cluster of crucial suppliers comprises payment service providers (PSPs). To ensure seamless payment processing, we collaborate with reputable PSPs operating within relevant jurisdictions. Payment service provider (at the connection/planning stage): Payment.Center, Fatpay, iSettle, Flexify, Getapays, Monnify.



Similarly, stringent compliance protocols within banking services mitigate the risk of service interruptions, while engaging with 2 to 3 banks serves as a safeguard against inherent banking risks. Expanding our banking relationships not only enhances our bargaining power for favorable terms but also strengthens the resilience of our financial framework. This proactive approach not only protects us from potential disruptions but also enhances the solidity of our financial infrastructure. Through strategic diversification of our banking affiliations, we optimize our risk management strategy, fostering stability and longevity in our financial pursuits.

5.3 Legal And Corporate Providers

In the field of legal and corporate services, a multitude of experienced professionals possess deep knowledge of the gambling industry. These experts play a crucial role in helping us meet regulatory, payment, and banking requirements, ensuring comprehensive compliance.

6 RISK EVALUATION AND MANAGEMENT

Every department diligently manages its own set of risks on a daily basis.

6.1 Risk Auditing

Internal audits, overseen by the Audit Committee composed of the Heads of IT, Legal, and Finance, take place annually, covering all risk categories. External audits are conducted every three years to offer an impartial evaluation of business and financial matters. Routine audits are also carried out on the platform, software providers, infrastructure, and financial status. A comprehensive risk register is meticulously managed and reviewed quarterly by the Audit Committee, supplementing daily communication between departments. Furthermore, mandatory financial audits are conducted annually for all companies within the organizational structure.

6.2 Risk Overview

- **Legal Oversight (Headed by the Head of Legal):** Vigilant monitoring of legal regulations in the online gambling sphere is essential given their dynamic nature. Regular updates on legal revisions are disseminated throughout departments to ensure all staff are abreast of evolving laws. The legal team collaborates closely with other departments, including compliance and operations, to ensure a thorough grasp of legal obligations and streamline implementation processes. By maintaining transparent communication channels with regulatory bodies and industry associations, we exhibit transparency and underscore our dedication to upholding legal standards in online gambling.
 - **Legality and Licensing:** Securing and upholding licenses from pertinent regulatory bodies across diverse jurisdictions is paramount for the establishment and operation of an online casino. Regulations vary substantially between jurisdictions, and non-compliance with licensing prerequisites can lead to severe penalties, legal repercussions, or cessation of operations.
Mitigation: Presently, the Operator holds the Gaming Curacao license No. 365/JAZ and is actively pursuing a new GCB license.
 - **Data Protection and Privacy Laws:** Online casinos handle extensive volumes of sensitive customer data, necessitating compliance with data protection regulations such as the EU's General Data Protection Regulation (GDPR) to evade fines and uphold customer trust.
Mitigation: To address this, only collect and process the minimal amount of personal data necessary for gambling services provision, ensuring data isn't retained longer than required. Establish and enact a data breach response plan to effectively manage and alleviate the repercussions of data breaches, including protocols for notifying affected individuals and relevant regulatory authorities within mandated timeframes. Embed privacy by design and default principles into the development of new products, features, or services, integrating privacy considerations from project inception.
 - **Advertising and Marketing Restrictions:** Stringent regulations dictate the advertising and marketing of online gambling services in numerous jurisdictions to safeguard vulnerable populations, such as minors and individuals with gambling addictions. Non-compliance with advertising standards can lead to regulatory penalties and public condemnation.
Mitigation: To address this, consistently monitor advertising and marketing endeavors to ensure adherence to relevant laws, regulations, and industry standards concerning gambling advertising. Transparently disclose all terms, conditions, restrictions, or limitations associated with promotions, bonuses, or other marketing offers to prevent consumer deception and potential regulatory repercussions. Thoroughly vet third-party advertising partners, agencies, or affiliates to verify their compliance with advertising and marketing regulations and commitment to responsible advertising practices.
 - **Cross-Border Regulatory Challenges:** Operating across diverse jurisdictions exposes online casinos to intricate regulatory landscapes and legal ambiguities. Disparities in gambling laws and enforcement methodologies between borders can present hurdles in maintaining

compliance, often necessitating substantial legal support.

Mitigation: Forge strategic alliances with local entities, legal experts, or industry groups in targeted jurisdictions to acquire knowledge of local regulations, navigate regulatory procedures, and foster connections with regulatory bodies. Conduct exhaustive due diligence on potential business partners, affiliates, suppliers, and other external entities to confirm their compliance with regulatory standards and mitigate compliance risks in the casino's cross-border operations. Remain vigilant regarding alterations in gaming regulations and enforcement strategies in targeted jurisdictions by consistently monitoring regulatory updates, industry literature, and legal counsel advisories.

- **Regulatory Changes:** The regulatory landscape governing online casinos is in a constant state of flux, with new laws, regulations, and enforcement measures regularly being introduced. Operators must remain vigilant about these regulatory developments and adjust their operations accordingly to mitigate compliance risks.

Mitigation: To address this challenge, conduct comprehensive assessments of how new regulations may impact the casino's operations, financial standing, and risk exposure. Identify areas of vulnerability and develop proactive strategies to mitigate them. Implement agile compliance approaches that facilitate quick adaptation to evolving regulatory requirements. This may involve developing modular compliance solutions, leveraging technology for automation and efficiency gains, and fostering a culture of continuous learning and innovation. Offer regular training and educational programs for employees on emerging regulations, compliance mandates, and best practices for upholding regulatory standards. Empower staff members to recognize and respond effectively to regulatory changes within their respective roles.

- **Enforcement Actions:** Regulatory bodies may initiate investigations or audits to ensure compliance with gambling regulations. Enforcement measures, such as fines, license suspension, or legal proceedings, can have significant repercussions for iGaming operators found in breach of regulatory standards.

Mitigation: To address this, conduct regular internal audits and reviews of compliance practices, operations, and procedures to identify areas of non-compliance, assess risks, and proactively implement corrective measures. Foster transparent communication channels with regulatory bodies, industry associations, and stakeholders to establish relationships, seek guidance on compliance issues, and address concerns promptly. Maintain comprehensive documentation and records of compliance activities, including policies, procedures, training materials, audits, and enforcement actions, to demonstrate compliance efforts and support regulatory inquiries or investigations.

- **Political and Public Perception:** Public sentiment toward gambling can sway regulatory decisions and policy measures. Negative publicity or public backlash against iGaming operators may lead to increased regulatory scrutiny and calls for stricter regulations.

Mitigation: Promote transparency in business operations, regulatory compliance, and corporate governance to foster trust with regulators, customers, and the public. Provide educational resources to inform the public about the online casino industry, responsible gambling practices, and potential gambling-related risks. Raise awareness of problem gambling support services and helplines for individuals in need. Monitor online and offline platforms for discussions, reviews, and mentions of the online casino brand, and address any negative feedback or misconceptions through targeted communication and engagement strategies proactively.

- **Regulatory Risks (Headed by Compliance Officer):** Managing regulatory risks associated with Anti-Money Laundering (AML) and Know Your Customer (KYC) compliance is critical across various sectors, notably in finance and gambling. The AML&KYC department ensures adherence to relevant laws and regulations aimed at preventing money laundering and terrorist financing. This involves establishing robust protocols for verifying customer identities, monitoring transactions for suspicious activity, and promptly reporting any irregularities to authorities. Non-compliance can result in substantial fines, reputational harm, and legal repercussions, underscoring the importance of strict adherence to these standards. The AML&KYC department oversees compliance efforts,

conducts thorough risk assessments, and implements necessary controls to mitigate regulatory risks. Ongoing training initiatives are essential to keep employees abreast of evolving AML&KYC requirements and industry best practices. In essence, proactive management of regulatory risks is paramount, with the AML&KYC department serving as a linchpin in the organization's compliance framework.

- **Compliance and Anti-Money Laundering (AML) Regulations:** Online casinos must adhere strictly to compliance standards to prevent money laundering, terrorist financing, and other illicit activities. Inadequate implementation of AML controls can lead to regulatory penalties, reputational harm, and legal consequences.
Mitigation: Develop a comprehensive AML policy outlining procedures for customer due diligence, transaction monitoring, and reporting suspicious activities. Ensure alignment with regulatory requirements and industry best practices. Provide regular training and awareness programs for casino staff to educate them on AML regulations, recognize indicators of suspicious behavior, and understand their role in preventing money laundering and terrorist financing activities.
- **Technical Risks (Headed by Technical Department):** Infrastructure maintenance, platform integration, cybersecurity, and data security are critical aspects. The technical department oversees regular infrastructure maintenance to reduce downtime and address risks associated with hardware or software malfunctions. Emphasizing the implementation and updating of cybersecurity protocols and technologies is crucial to counter cyber threats like hacking, data breaches, and malware attacks. Diligent monitoring for potential security breaches and prompt response to incidents are essential duties of the technical department to mitigate risks and limit the impact of cybersecurity breaches. Conducting routine audits and security assessments aids in identifying vulnerabilities and weaknesses in the infrastructure, enabling proactive risk mitigation by the technical team.
 - **Data Security:** Unauthorized access to customer information, encompassing personal and financial data, poses risks of identity theft, fraud, and legal consequences.
 - **Mitigation:** Deploy multi-layered cybersecurity protocols, comprising firewalls, intrusion detection systems, and encryption mechanisms. Consistently update software and security patches to rectify vulnerabilities and enhance defenses against evolving threats.
- **Financial Risks (Headed by Head of Finance):** Financial risks are inherent in all business operations, demanding vigilant management for sustained viability and prosperity. As the overseer of financial matters, the Head of Finance assumes a pivotal role in identifying, evaluating, and mitigating these risks. Core responsibilities include establishing robust financial controls, monitoring cash flow, and optimizing capital allocation to mitigate exposure to financial risks. Moreover, close collaboration with other departments is essential to devise and implement financial strategies aligned with organizational goals. Through proactive risk management and strategic planning, the Head of Finance strives to safeguard the company's financial well-being and enhance shareholder value. Regular financial analysis and reporting are vital for identifying emerging risks and opportunities, facilitating timely adjustments to financial strategies.
 - **Taxation:** Taxation policies concerning online gambling exhibit considerable divergence across jurisdictions, exerting substantial influence on the profitability of iGaming operators. Fluctuations in tax laws or unforeseen tax obligations can pose financial risks to casino operators.
Mitigation: Engage tax professionals, accountants, and legal experts well-versed in international taxation to ensure adherence to local tax laws and regulations. Leverage tax treaties and agreements between nations to mitigate double taxation and optimize tax planning strategies. Such treaties may offer provisions for tax credits, exemptions, or reduced tax rates for cross-border transactions. Maintain meticulous financial records, robust accounting systems, and diligent tax filings to comply with local tax laws and regulations in each jurisdiction where the casino operates. This encompasses timely submission of tax returns, tax payments, and adherence to reporting obligations.
- **Litigation Risks (Headed by Customer Service):** Mitigating customer service-related risks involves ensuring compliance with relevant laws and regulations to prevent potential litigation resulting from regulatory breaches. Clear communication protocols are established by Customer Service to

efficiently manage customer expectations, reducing misunderstandings and potential legal disputes. Thorough documentation of customer interactions and resolutions serves as crucial evidence of adherence to service standards, aiding in the amicable resolution of disputes and mitigating litigation risks. Regular reviews and refinement of customer service processes, based on feedback and performance metrics, address recurring issues, minimizing the risk of customer dissatisfaction leading to litigation. Fostering a culture of transparency and accountability within the customer service team builds trust with customers, reducing disputes arising from perceived unfairness or ambiguity. Clear escalation procedures ensure prompt resolution of unresolved customer concerns by appropriate management levels, preventing the escalation of grievances into potential litigation.

- **Responsible Gaming Practices:** Adhering to regulatory mandates and deterring problem gambling behaviors are essential obligations for casino operators. Non-compliance can result in regulatory penalties and reputational harm.
- **Mitigation:** Implement self-exclusion tools allowing players to voluntarily abstain from gambling for specified periods. Ensure these tools are easily accessible and prominently featured on the casino's platforms. Enable players to set deposit limits and timeouts, empowering them to manage their gambling activities. Customize and enforce these limits to ensure compliance. Utilize data analytics and monitoring tools to identify players at risk of gambling problems and provide necessary support and interventions.

6.3 Risk Of Potential Capital Loss

During the initial phase, there's an expectation of potential losses involving funds designated for registration, rent, and office equipment. If the online casino were to cease operations due to internal or external factors, the security deposit would be refunded to the casino owners. However, it's crucial to maintain this amount untouched during casino operations, serving exclusively as a reserve for potential jackpot wins. This precaution aims to minimize losses.

Mitigation:

Drawing from a combined 25 years of experience in the online casino industry among the founders and co-owners, alongside the seasoned managerial expertise of the project mentor, the project is strategically positioned to mitigate 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 comprises procedures and guidelines crafted to authenticate and verify the identity of clients. Its primary objective is to thwart financial crimes like money laundering, terrorist financing, and fraud by ensuring that casinos possess accurate information about their customers and their financial activities. Adhering to KYC protocols enables casinos to instill trust, fulfill regulatory mandates, and mitigate the risks associated with illicit financial activities within the system.

7.2 Anti-Money Laundering

The primary objective of the Anti-Money Laundering (AML) policy is to prevent the illicit concealment of the sources of funds acquired through criminal activities. AML policies and procedures are established to identify and deter money laundering, terrorist financing, and other unlawful financial activities within financial institutions.

7.3 Data Privacy

The Data Privacy Policy delineates procedures for collecting, utilizing, retaining, and protecting the personal data of individuals within an organization. Its objective is to ensure adherence to data protection regulations, protect the privacy rights of customers and employees, and foster trust with stakeholders. By articulating precise guidelines and protocols for managing sensitive data, the policy aims to reduce the likelihood of data breaches, unauthorized access, and misuse of personal information, thereby promoting transparency and accountability in data management procedures.

7.4 Responsible Gaming

The Responsible Gaming Policy endeavors to foster safe and moderate gambling habits while addressing the risks linked to excessive or problematic gambling. It sets forth strategies and principles to shield players from the adverse effects of gambling addiction, such as financial strain, mental health challenges, and social consequences. Through initiatives like self-exclusion tools, limits on gambling activity, and assistance for those in need, the policy aims to cultivate a responsible and enduring gambling environment, placing emphasis on player well-being and upholding the integrity of the gaming sector.

7.5 Terms Of Use

The Terms of Use policy for an online casino delineates the guidelines, regulations, and conditions users must adhere to while utilizing the platform. It encompasses various aspects including user obligations, account administration procedures, payment processes, conflict resolution methods, and adherence to relevant laws and regulations. By consenting to these terms, users affirm their comprehension of the rules governing their engagement with the casino, thereby ensuring transparency, fairness, and adherence to legal standards throughout their gaming involvement.

7.6 Self-Exclusion

This section delineates the procedure for individuals to voluntarily abstain from engaging in gambling activities on the platform for a specified duration, often to regulate their gambling habits or address addiction concerns.

7.7 Dispute Resolution

The procedures and mechanisms available for resolving conflicts or disputes between the casino and its users are explained, typically detailing steps for escalation and resolution.

7.8 Fairness & RNG Testing Methods

Ensures the fairness of the casino's games, confirming their randomness and impartiality, often highlighting the use of Random Number Generators (RNGs) and the methodologies employed to assess and validate their fairness.

7.9 Accounts, Payouts & Bonuses

Elaborates on account management procedures, payout methods, and the terms associated with bonuses, including wagering requirements and limitations.

7.10 Betting Rules

Specific rules and regulations governing betting activities on the platform are provided, including game-specific guidelines, maximum and minimum betting limits, and any additional terms applicable to various types of bets.

7.11 Internal Policies

Human Resources Policy encompasses guidelines concerning recruitment, onboarding, performance assessment, staff development, diversity initiatives, disciplinary measures, and termination protocols.

Financial Policy outlines procedures for budget allocation, expenditure oversight, financial statement preparation, auditing, procurement practices, and compliance with accounting norms.

Communication and Social Media Policy delineates protocols for both internal and external communication channels, encompassing email guidelines, directives for social media use, media engagement protocols, and brand representation guidelines.

Information Security Policy addresses the protection of sensitive data, including protocols for data handling, cybersecurity measures, password management practices, and strategies for preventing data breaches.

Internal Policies primarily serve to uphold external policies, with the latter undergoing periodic review and updates, while the former adapt, modify, and discontinue as necessary.

7.12

The necessity of establishing and adhering to these policies arises from our commitment to maintaining sustainable long-term operations, particularly considering the substantial initial investment involved. Our goal is to ensure operational continuity for a minimum of three years under the GCB license, with renewal contingent upon achieving investment returns and meeting key performance indicators outlined in our financial forecasts.

7.13

To uphold adherence to established policies and procedures, our project leverages a diverse array of resources, both internal and external. The Ultimate Beneficial Owner (UBO) contributes invaluable expertise in both gambling and IT, making him an ideal overseer. Key departments such as Legal, IT, Human Resources, and Finance demonstrate significant proficiency in sustainably managing large-scale gambling operations. Moreover, jurisdictions like Curacao, Cyprus, and others offer ample opportunities for engagement with advisors, experts, and independent auditors.

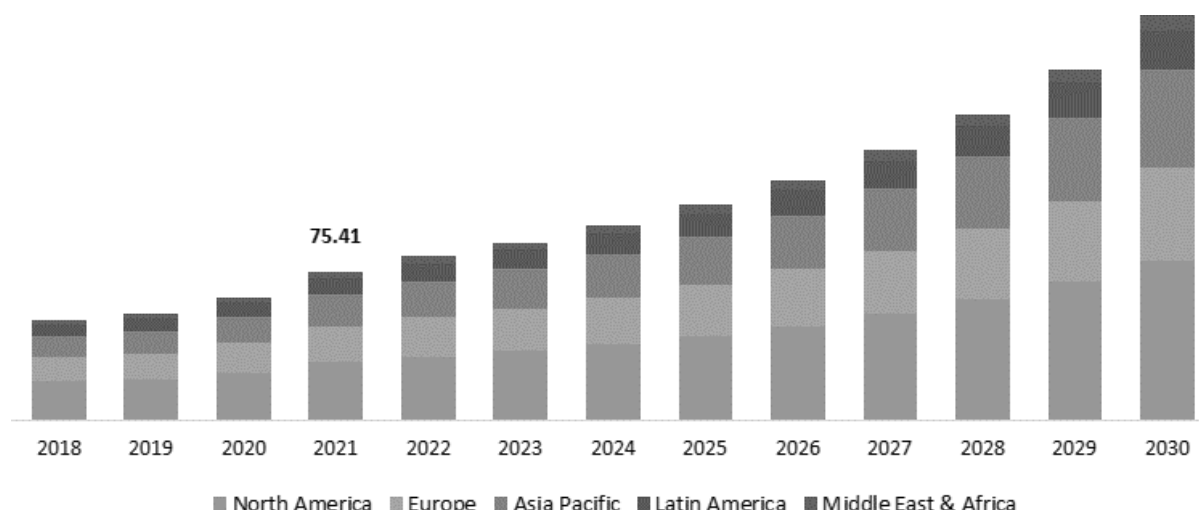
The Gaming Control Board (GCB) plays a crucial role in supporting operators by providing guidance and assistance in policy development. This collaborative effort ensures that operators can tailor their policies to effectively meet regulatory requirements and industry standards. By leveraging the GCB's expertise and resources, operators can establish robust policies that promote compliance and integrity within the gambling sector. Additionally, the GCB offers ongoing support and updates to assist operators in adapting their policies to evolving regulations and emerging challenges. Ultimately, the assistance provided by the GCB empowers operators to establish and maintain a solid framework for responsible gambling practices.

8 OVERVIEW OF THE ONLINE GAMBLING MARKET

8.1 Earnings and Revenue

In 2021, the worldwide online gambling market reached a valuation of USD 75.41 billion and is projected to exhibit a Compound Annual Growth Rate (CAGR) of 12.0% throughout the forecast period. Online gambling encompasses activities such as sports betting, casino games, and more conducted over the internet, providing consumers with the convenience of gambling from their preferred locations. The industry's expansion is expected to be fueled by the increasing adoption of virtual wagering and the incorporation of the freemium model in online gambling, enhancing its overall popularity.

Diagram 2. Online gambling market size, by region, 2018-2030, USD billion



The main catalysts propelling the industry's expansion encompass the rising prevalence of smartphones, convenient availability of digital betting platforms, and a growing internet user base, among other factors. To illustrate, the American Gaming Association (AGA) reported over 2,800 active betting sites in 2018. The surge in virtual payment gateways and the global uptick in digital currency usage are anticipated to fuel the broader industry's growth. Operators across diverse digital platforms are devising an array of promotions and tournaments that swiftly capture the attention of new audiences, presenting substantial growth prospects for the online gambling market..

The COVID-19 pandemic has exerted a favorable influence on the online gambling market, with a growing number of consumers turning to virtual platforms to address both financial and social challenges experienced during lockdowns. Lund University's research highlights a surge in interest in virtual betting due to the extensive closure of sports and other events imposed by lockdown measures. Additionally, the closure of traditional gambling establishments prompted a significant shift toward digital platforms, further contributing to the positive growth observed in the online gambling market amid the pandemic.

In 2021, online casinos globally experienced notable success, attributed to the impact of the pandemic and widespread self-isolation. Many countries witnessed a substantial 33% increase in the revenue of the overall gambling market, at least in comparison to the preceding year of 2020. This surge in revenue reflects the resilience and promise inherent in the online casino business model.

Legalization of online gambling has gained traction over the past few years, with 85 countries worldwide now permitting various forms of internet-based betting. Online betting, slot machines, and other gambling games collectively contribute to a significant 70% of the total income generated from internet gambling.

The popularity of global online gambling can be attributed to its diverse offerings and a user-friendly

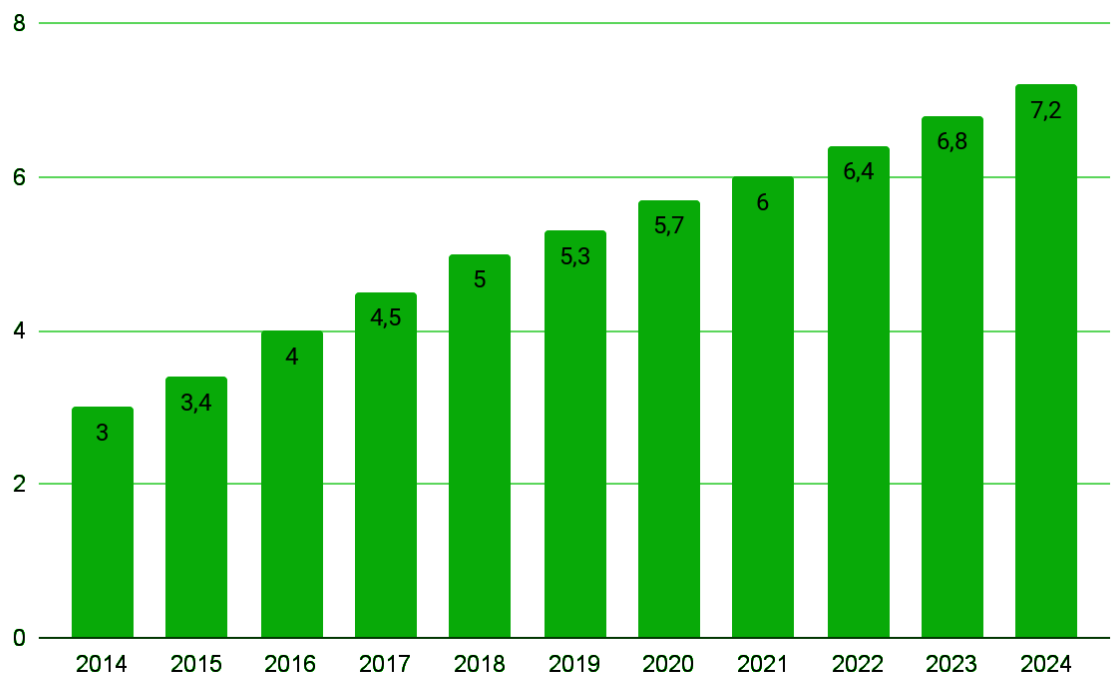
gaming experience free from restrictive conditions. Players around the world are drawn to the wide array of options and the convenience of engaging in gambling activities on the global network.

Despite a general trend towards the regulation of national gambling markets, the study highlights that a few countries are moving in the opposite direction by considering the prohibition of online gambling and mobile applications. This divergence in regulatory approaches reflects the ongoing debate and varying attitudes toward internet-based gambling on a global scale.

As of now, the global online gambling market constitutes 13% of the total global legal gambling market, and this percentage is consistently expanding. With around 85 countries allowing online gambling, the industry's growth and acceptance on a global scale underscore its increasing importance and prevalence within the broader gambling market.

Gross Gaming Revenue (GGR) serves as a crucial financial indicator, offering insights into the overall revenues generated by a gambling establishment. This parameter is instrumental in tracking the dynamics of gambling player behavior on a global scale.

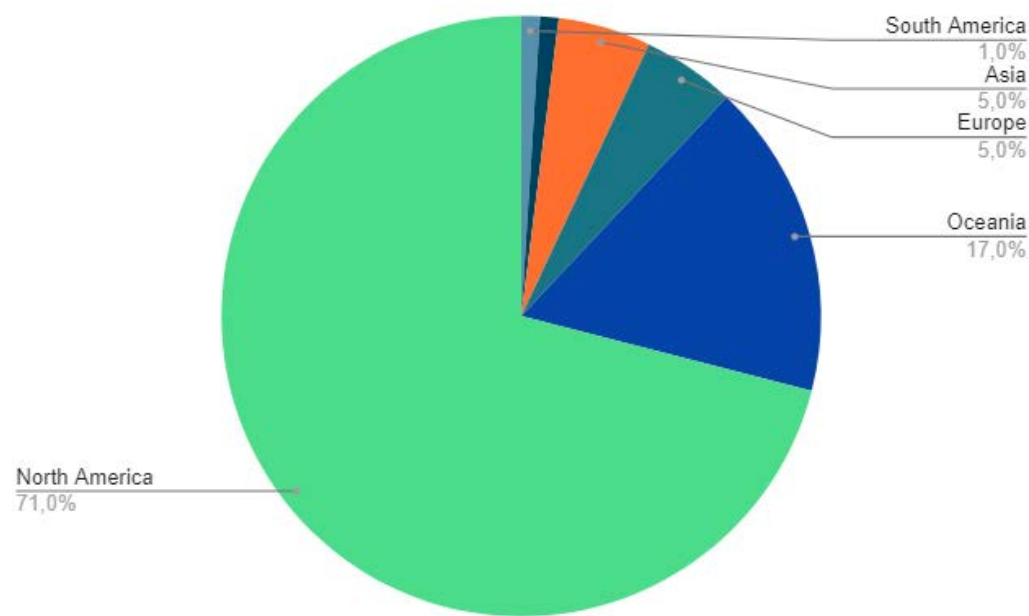
Diagram 3. Forecast of Gross Gaming Revenue, \$ billion



In the online casino industry, North America maintains its dominant position, constituting a substantial 71% of the total market share. This region continues to play a pivotal role in shaping the dynamics of the online casino market.

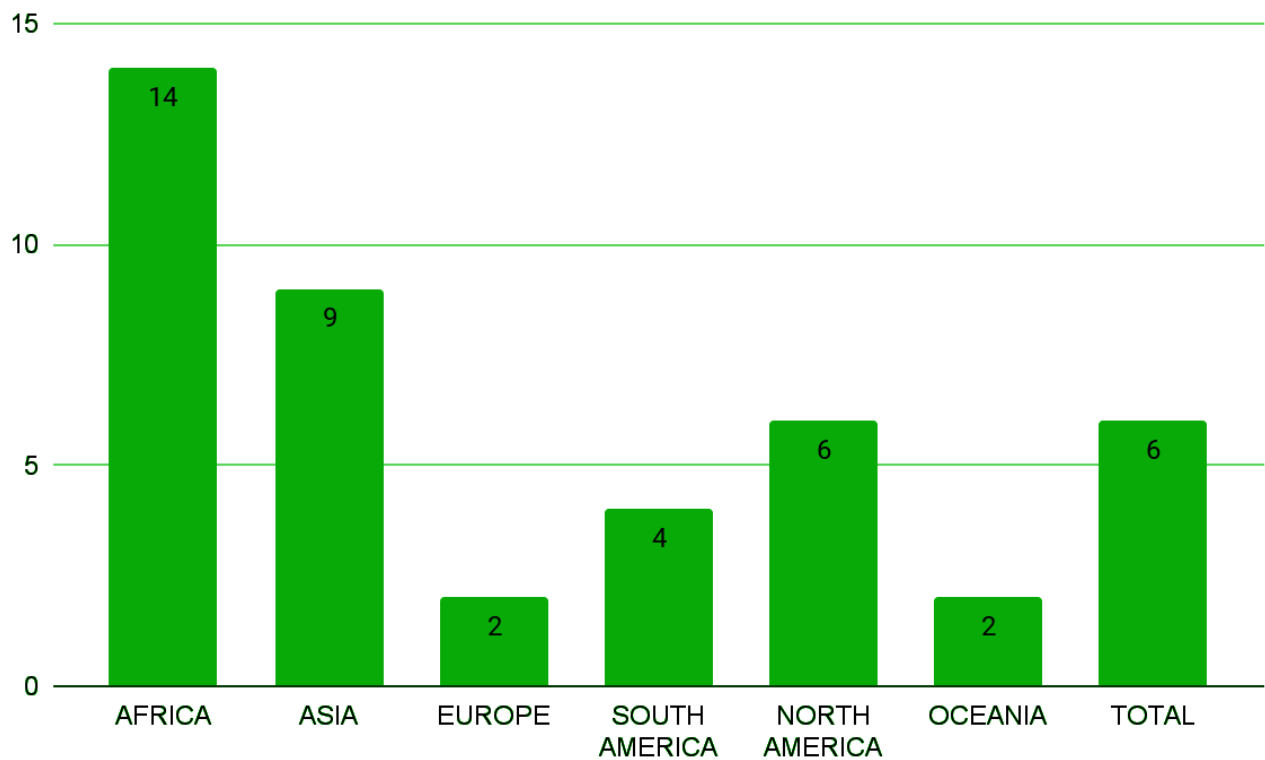
Simultaneously, Oceania, encompassing countries like Fiji, New Zealand, Polynesia, and New Guinea, holds a robust presence, contributing to 17% of the global Gross Gaming Revenue (GGR) in 2019. This places Oceania ahead of Asia and Europe, which accounted for 5% each. The significant share held by Oceania underlines its noteworthy influence on the global online casino market, reflecting a diverse and distributed presence across different regions.

Diagram 4. Regional structure of gross income of the gambling business in 2022



In 2022, Africa emerged as the region with the fastest growth rate in the online casino industry, recording a remarkable 14% year-over-year (YoY) increase. This signifies a robust expansion and heightened activity within the online casino market across the African continent.

Diagram 5. Growth in gross income by region in 2022

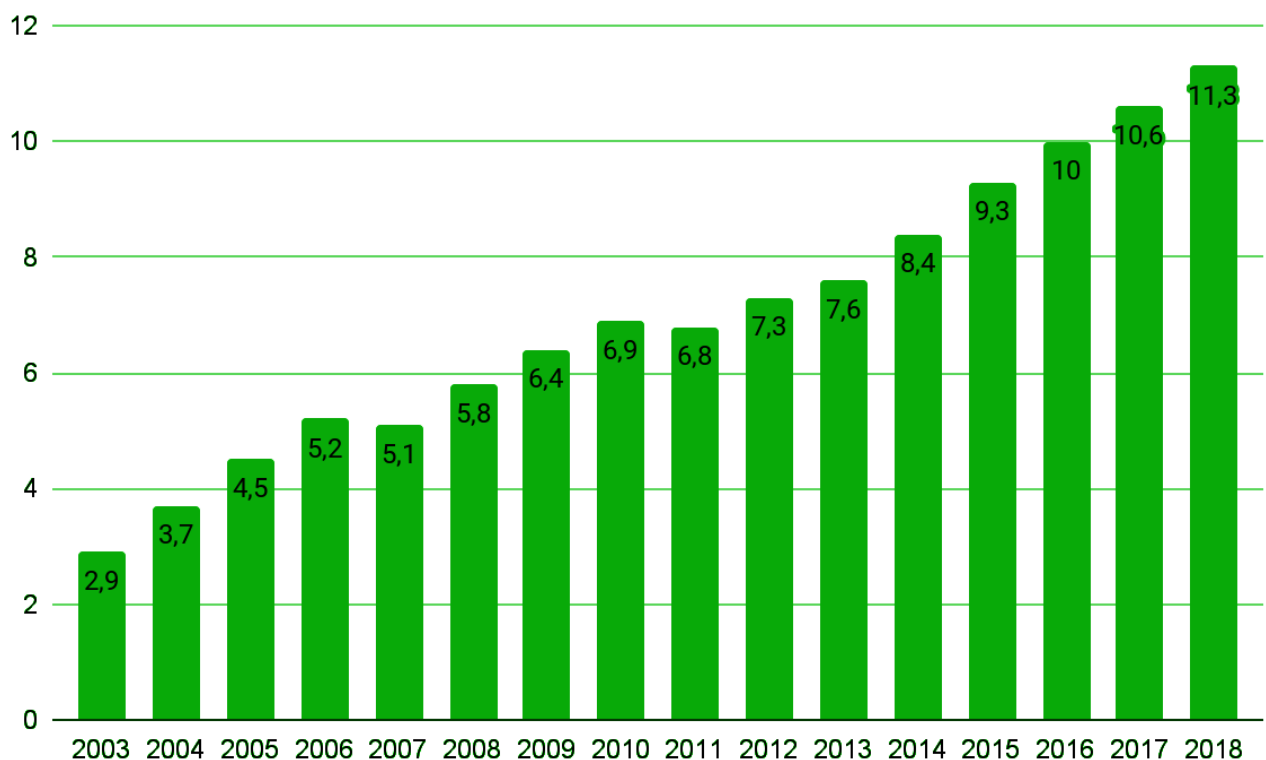


The European Union stands out as the largest regulated market in the online gambling industry. In contrast, players from Iran face restrictions in approximately 30% of casinos, indicating a more limited access to online gambling platforms.

As reported by the European Commission, the online gambling industry in the European Union is currently valued at \$14.7 billion and is experiencing sustained growth. Within the EU, online casino gambling holds the distinction of being the fastest-growing segment, boasting an impressive annual growth rate of 15%. This underscores the significant economic impact and increasing popularity of online casino activities within the European market.

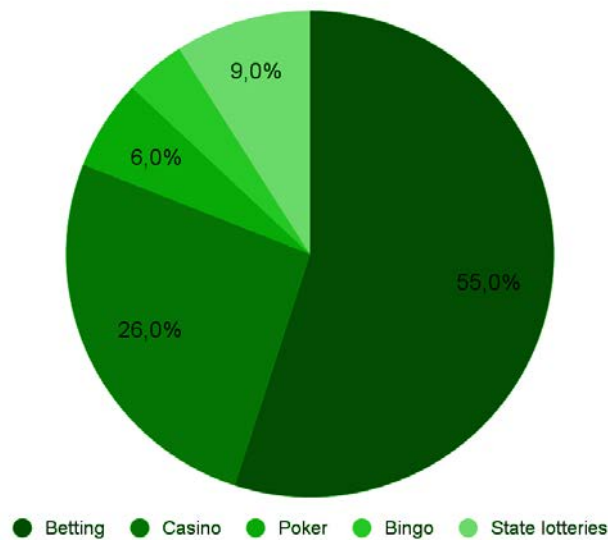
Discussions have arisen regarding the simplification of regulations. In the previous year, the European Commission expressed the view that online gambling operators within the European Union face the obligation to secure licenses from multiple countries, each with its own licensing demands. The Commission advocates for a more overarching approach, arguing that the current proliferation of compliance requirements leads to redundant infrastructure and increased costs. This, in turn, imposes unnecessary administrative burdens on regulators

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



Since 2003, the market has experienced an average annual growth rate of 23%. Key components driving this growth include betting, casino activities, and poker. The increasing popularity of online gaming is fueled by factors such as the widespread availability of the Internet, the emergence of new markets, and the inclusion of new player demographics.

Diagram 7. Online gambling income by game type



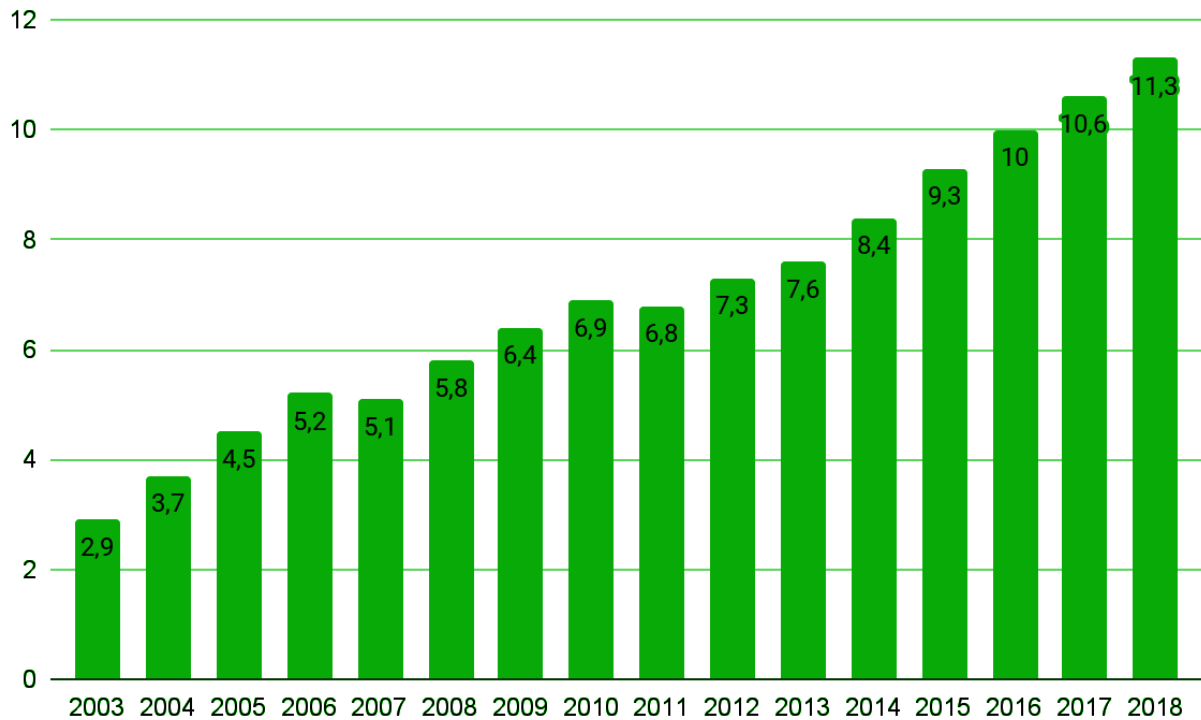
8.2 Emerging players Segment

Since 2004, there has been a significant increase in the number of female Internet users aged 18 to 74, rising by more than 80%, while the increase for men has been 60%. Initially, online gambling primarily appealed to young men, but there is now a noticeable shift as it becomes increasingly popular among women and older demographics. Various players engage in online gambling with distinct preferences and motivations. While some do it for entertainment, others are motivated by the prospect of winning money, and some seek relaxation. Regardless of the motivation, it is crucial for operators and developers to remain attentive to the evolving preferences of players. The expanding reach of the Internet is contributing to age differences among players, challenging the stereotypical image of the average male player aged 25 to 35.

According to a study by GP Bullhound, 43% of all online gamblers in 2019 were women. Bingo remains a favorite among women, and their playing patterns differ from men. Women often engage in longer gaming sessions with lower bets, while men tend to play more frequently with higher bets, but shorter game durations.

The popularity of bingo is on the rise, driven by its ability to offer a social and relaxing gaming experience, contributing to its appeal across a diverse player demographic.

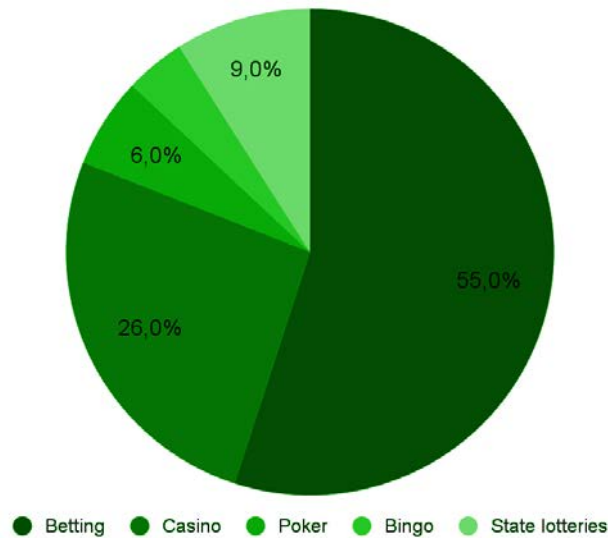
Diagram 8. Share of online gambling income from total gambling income in the world



It is noteworthy that the prevalent forms of remote gambling today predominantly revolve around traditional casino games, various betting options, and poker variations. The popularity of specific online gambling types exhibits a gender-dependent trend. Notably, the bingo industry is anticipated to experience the highest growth rates, driven by an increasing interest among women in the iGaming sector and bingo specifically. This underscores the significance of understanding and catering to diverse preferences within the online gambling landscape.

Despite growing popularity among both genders, online gambling remains more prevalent among men, with young men being particularly inclined toward such activities. While women equally enjoy playing, their preferences often lean towards simpler games like lotteries and slots. This discrepancy can be attributed to societal roles and norms that have traditionally associated betting, casino games, and skill games with male audiences. In contrast, women may be more accustomed to engaging in gaming for leisure and entertainment rather than seeking the adrenaline rush often associated with certain forms of online gambling. The evolving landscape reflects a blend of traditional gender perceptions and the changing dynamics within the online gaming industry.

Diagram 9. Online gaming revenue by type, 2022



8.3 Present trends in online casinos

In 2022, the global online casino industry experienced significant success attributed to the COVID-19 pandemic and widespread self-isolation measures in many countries. The entire online gambling market saw a remarkable one-third increase in revenue compared to the previous year, demonstrating the resilience and strength of this business model. Interestingly, during the 2008 financial crisis, online casinos seemed largely unaffected, showcasing the robustness of their operations.

The gaming market is undergoing transformative changes due to new technologies. The future is expected to witness considerable growth in mobile gambling, with only the most innovative products thriving in a competitive landscape. This competition is anticipated to drive improvements in the quality of mobile gambling experiences for users, highlighting the dynamic nature of the online gaming industry.

Anticipated technical changes, such as improvements in mobile data transmission speed, may not be overtly noticeable to end users as they occur in the background. However, the more apparent and impactful changes will be qualitative and specific, directly enhancing the user experience.

One major innovation on the horizon is the integration of virtual reality (VR) into online gambling. The advancements in technologies like Microsoft HoloLens, HTC Vive, and Playstation VR are expected to revolutionize video slots and other online games, making them more spectacular and immersive than ever before. This development is poised to introduce a new level of excitement and engagement for users in the online gambling landscape.

Virtual reality technology

Recent advancements in virtual reality (VR) technology have opened up possibilities to authentically replicate the emotions and physiological sensations one would experience in a real casino. Utilizing virtual reality glasses, individuals can now immerse themselves in the meticulously recreated ambiance of a gambling establishment. They have the ability to stroll through the halls, engage in conversations with virtual dealers, and place bets at various gaming tables, providing a highly realistic and interactive gaming experience.

Prominent players in the gaming market, including industry giants such as Microgaming, Novomatic,

NetEnt, Lucky VR, Topgame Technology, and others, are actively involved in the development of virtual reality games. This signals a concerted effort to leverage cutting-edge technology to enhance the overall gaming experience and introduce a new dimension of realism to online gambling.

In the winter of the previous year, Microgaming showcased an impressive stand at the international conference ICE Totally Gaming, featuring a demonstration of a virtual roulette game. The showcased software made it evident that virtual reality is not only achievable but holds great promise for the future of the gambling industry.

NetEnt is actively exploring VR technologies, and attendees at online gambling exhibitions have had the opportunity to experience the Jack and the Bean Tree slot machine. The remarkably realistic journey offered by NetEnt's VR initiatives has garnered positive feedback from both players and industry competitors.

Novomatic, in discussing its strides in virtual reality, highlights the primary advantages of realistic online games. These include full immersion in the gameplay, heightened emotions surpassing those in real life, the flexibility to access the resource from any location with an internet connection, and engaging, diverse storylines. This underlines the exciting potential that virtual reality holds for transforming the landscape of online gambling.

Novomatic stands out as one of the pioneers leading the way in the integration of virtual reality (VR) technology within online gambling, boasting a portfolio of innovative developments in this realm.

Furthermore, there has been a growing discussion regarding the potential integration of virtual gameplay into social networks. This idea, which has been repeatedly expressed, suggests that the convergence of virtual reality and social platforms may soon become a reality. Such a development would mark a significant evolution in the way individuals engage with and experience online gaming, blending the immersive aspects of VR with the social connectivity of popular online networks. This potential integration underscores the continuous evolution and exploration of novel technologies within the online gambling industry.

Integration of Social Games and Slot Machines

The landscape of online gambling is evolving with the increasing popularity of social formats. A recent example is the review of the new Castle Builder 2 slot from Microgaming, which showcases advancements in spinning reels and betting mechanisms.

Social gambling offers a more dynamic and addictive experience compared to traditional slot machines. Games in this genre often allow players to select a playable character and explore various paths depending on the character's traits. Furthermore, these characters can evolve, accumulating experience, skills, and achievements, leading to more favorable conditions for gameplay. In contrast to traditional slot machines where winning combinations result in monetary rewards, social games incorporate resources necessary for progression in the game.

The demand for slot machines with social gaming features is currently high, prompting numerous developers to work on creating such engaging experiences. The second half of 2021 has seen the release of several fresh products in this category, reflecting the industry's ongoing innovation and response to evolving player preferences.

Live Dealer Progressive Poker Jackpot

The allure of winning substantial cash prizes has made slot machines with progressive jackpots popular among many gamblers. This concept is now expanding into the realm of poker, with Evolution Gaming introducing the world's first Jumbo 7 Progressive Jackpot in Live Casino Hold'em.

The initial jackpot size is an impressive 1,000,000 euros, and because it is cumulative, the amount grows in proportion to the players' activity. Evolution Gaming Product Director Todd Haushalter highlights that the jackpot has the potential to reach an incredible €30,000,000. The introduction of such substantial prizes adds an extra layer of excitement to poker gameplay. Additionally, the game includes a second-level jackpot with lower fixed payments, providing players with various opportunities for winning significant rewards.

Other developers of live online casino games are also considering introducing an attractive progressive jackpot for players.

Live-games

The popularity of live dealer games has surged in the past year, and it appears to be just the beginning of their successful development. Anticipated for this year is a continued rise in the popularity of live games, coupled with the integration of virtual reality (VR) technology. Developers are aiming to create even more realistic gaming experiences, enhancing functionality and opening new studios for real-time game broadcasting.

Skill-Based games

Many contemporary players now place significance not just on luck but also on their personal skills. This has spurred numerous providers to create platforms featuring strategy games that require players to apply specific skills. This added layer of skill-based gameplay is becoming increasingly attractive to players, hinting at the promising future popularity of these skill games..

Gamification

The concept of gamification involves incorporating game dynamics and thinking into processes and solutions for marketing purposes. In the realm of gambling, gamification is emerging as a new trend, promising to introduce innovative elements such as missions, competitions, bonus programs, and rewards to attract and engage gamblers. This approach leverages gaming principles to enhance the overall gaming experience and create a more interactive and rewarding environment for players.

Entertainment content

Online casino operators are actively seeking ways to retain users on their platforms. In addition to traditional features like chats, operators are now incorporating special sections with non-game content to enhance user engagement. This includes a variety of entertainment such as movies, TV series, music videos, and TV shows. Furthermore, many online casinos are introducing plot details for numerous slots, providing players with additional context and narratives related to the games. These initiatives aim to create a more immersive and entertaining experience, encouraging users to stay longer and explore various forms of content within the online casino environment.

Big data

In the current year, another notable trend in the online gambling industry is the adoption of Big Data technology. This technology facilitates the collection and storage of vast amounts of information, proving indispensable for the progressive development of online gambling. The analytical capabilities of Big Data enable effective sorting and analysis of extensive datasets, allowing games to adapt dynamically to the interests and needs of the target audience. This trend reflects the industry's commitment to leveraging advanced technologies to enhance user experiences and tailor offerings based on comprehensive data insights

Mergers and acquisitions

The experts' forecasts indicate that the gambling market is undergoing rapid development, and by 2023, its volume is projected to surpass \$60 billion. This suggests that gambling companies are poised to expand and experience significant capital growth in the coming years, reflecting the robust momentum within the industry. The optimistic outlook underscores the continued popularity and expansion of the gambling market, driven by various factors such as technological advancements, changing consumer preferences, and regulatory developments.

Individual slots

The creation of custom slots tailored to individual orders is poised to become a top service offered by online casinos. Developing unique slots provides operators with a means to secure a competitive edge in the market and enhance brand awareness. This personalized approach allows online casinos to differentiate themselves, cater to specific preferences, and potentially attract a dedicated player base seeking a distinctive gaming experience. The trend towards custom slot development reflects the industry's focus on innovation and customization to meet the evolving demands of players and stand out in a competitive landscape.

Cryptocurrencies

Cryptocurrencies are gaining popularity in the field of internet gambling due to significant advantages such as anonymity, convenience, minimal fees, and the absence of legislative prohibitions. Bitcoin is leading the way, and other cryptocurrencies like Litecoin, Dogecoin, Ethereum, Ripple, Monero, Zcash, and more are expected to become increasingly popular as means of payment in online gambling.

However, the use of cryptocurrencies by customers can raise concerns as they are sometimes associated with the illegal or gray financial market. At the initial stage, caution is recommended when considering settlements with clients in cryptocurrency until regulatory frameworks become more established and widely accepted in the industry.

Security issues in online gambling

The emergence of new technologies necessitates the exploration of innovative solutions to address security concerns. Furthermore, Distributed Denial of Service (DDoS) attacks have witnessed a rise in frequency, causing substantial damage to online bookmaker sites in the recent past. Notably, even major operators known for their diligent approach to security, such as the UK's William Hill, faced vulnerabilities to hacker provocations. Last autumn, the services of this operator experienced instability, resulting in significant losses for a platform generating 5 million in daily revenue.

In 2019, a substantial portion of investments made by gambling operators was allocated towards enhancing security measures.

8.4 Gaming industry in Africa

Online gaming platforms, fueled by the broader adoption of mobile payments and heightened demand for digital entertainment during the pandemic, have experienced notable growth.

According to a 2017 South African government survey, the most recent data on gambling, sports betting witnessed a 14% annual growth from 2008 to 2016. This growth persisted even as the percentage of South Africans engaging in gambling decreased from 57% to one-third of the adult population.

Presently, online sports betting accounts for 45% of the South African gambling market, a notable shift from a decade ago when casinos dominated with an 80% market share, as reported by the National Gambling Board.

Sibongile Simelane-Quntana, the executive director of the South African Responsible Gambling Foundation, notes "significant growth" in online sports betting post-pandemic lockdowns. Funding for her group, sourced from gambling establishments, has increased by 50% compared to pre-lockdown levels.

African gamblers increasingly see online gambling as entertainment, and a government survey reveals a halving of respondents who perceived gambling as a viable income source, dropping from 22.7% in 2019 to 11.2% in 2021.

8.5 Market Projections

Currently representing over 13% of the total global legal gambling market, the global online gambling market is continuously expanding.

The niche revenue is expected to reach \$65 billion by end of 2023, and the niche itself is set to undergo various changes and reforms based on market dynamics.

The Asian market, the largest in the world in terms of volume, exhibits a growing demand for gambling each year. The year 2021 witnessed legal softening in the industry, with more countries legalizing online betting and casinos. This trend continues into 2022, presenting new opportunities for the industry.

In Africa, the online gambling market is experiencing rapid development and growth. However, the main challenge lies in the fact that, in most countries on the continent, casino activities are currently unregulated (though not legislatively prohibited). Full realization of this market's potential is expected to take time.

9 RISKS FACTORS IN ONLINE GAMBLING

Online gambling comes with a distinctive set of risks, and when combined with the challenges posed by the COVID-19 crisis, it becomes particularly tempting and potentially destructive for individuals grappling with gambling problems. Here are six key risk factors associated with online gambling:

- **Convenient Accessibility:** With just a few clicks or taps, individuals can readily access a plethora of games and betting opportunities directly from their devices.
- **Solitary Engagement:** Unlike the social interactions facilitated by casinos, online gambling is often a solitary activity. This isolation makes it easier for individuals with a gambling problem to conceal the frequency and locations of their play.
- **Continuous Availability:** Gambling sites operate 24/7, providing individuals with the opportunity to engage in play at any time, day or night.
- **Apparent Limitless Betting Funds:** The use of credit cards allows for quick bets and losses. In contrast to casinos where money is exchanged or loaded onto registered loyalty cards, credit cards require no loading or reloading, making it easier to lose track of expenditures. Significant losses can also have adverse effects on credit scores.
- **Lack of Regulation:** Fraudulent or unregulated gambling sites may exploit players, and their elusive nature can pose challenges in tracking down and taking action against them if issues arise.
- **Cybersecurity Vulnerabilities:** Due to the absence of regulation on some sites, personal data, including credit card and banking account numbers, may be vulnerable and accessible to hackers or scammers. Moreover, contact information may be shared with third-party partners to promote gambling sites and associated offers.

10 INVESTMENT STRATEGY

10.1 Investment Volume and Structure

The overall investment needed for the project amounts to 270,507 euros.

The project envisions allocating the raised funds to the following areas of financing:

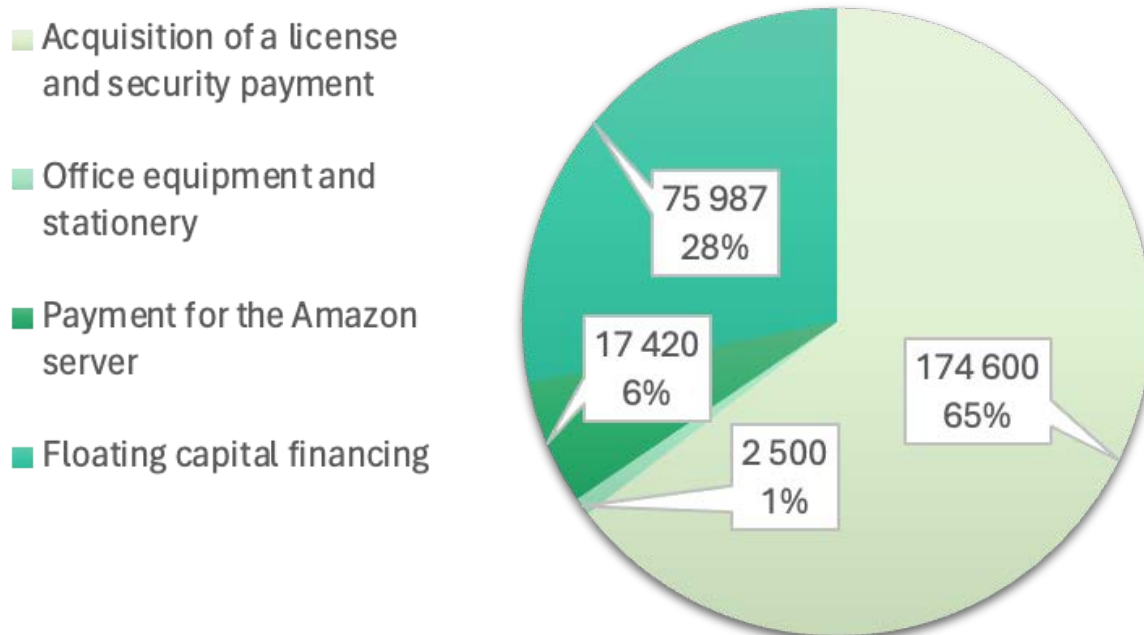
- acquisition of the platform core (back office);
- floating capital financing.

Table 5. Investment budget

No	Name	Value
1	Acquisition of a license and security payment	174 600
2	Payment for the Amazon server	17 420
3	Office equipment and stationery	2 500
4	Floating capital financing	75 987
Invested capital total (actual need for cash)		270 507

The predominant portion of investment costs is allocated to floating capital financing, constituting approximately 65% of the total.

Diagram 10. Investment cost structure



10.2 Implementation Schedule and Project Milestones for Investments

The investment period's duration, leading up to the project launch, is 0.3 years.
A detailed phased work schedule, along with a financing plan, is provided in the table below.

Table 6. Financial plan, euro

		<i>Total for 3 years</i>	<i>Apr-24</i>	<i>Jul-24</i>	<i>Aug-24</i>	<i>Feb-25</i>
1	<i>Acquisition of a license and security payment</i>	174 600	174 600	-		
2	<i>Payment for the Amazon server</i>	17 420	-	17 420		
3	<i>Office equipment and stationery</i>	2 500	-	2 500		
4	<i>Floating capital financing</i>	75 987	5 100		46 572	24 314
	<i>Investment total excl. floating capital</i>	194 520	174 600	19 920	-	-
	<i>Invested capital total (actual need for cash)</i>	270 507	179 700	19 920	46 572	24 314

11 REVENUE GENERATION STRATEGY

11.1 Service Offerings

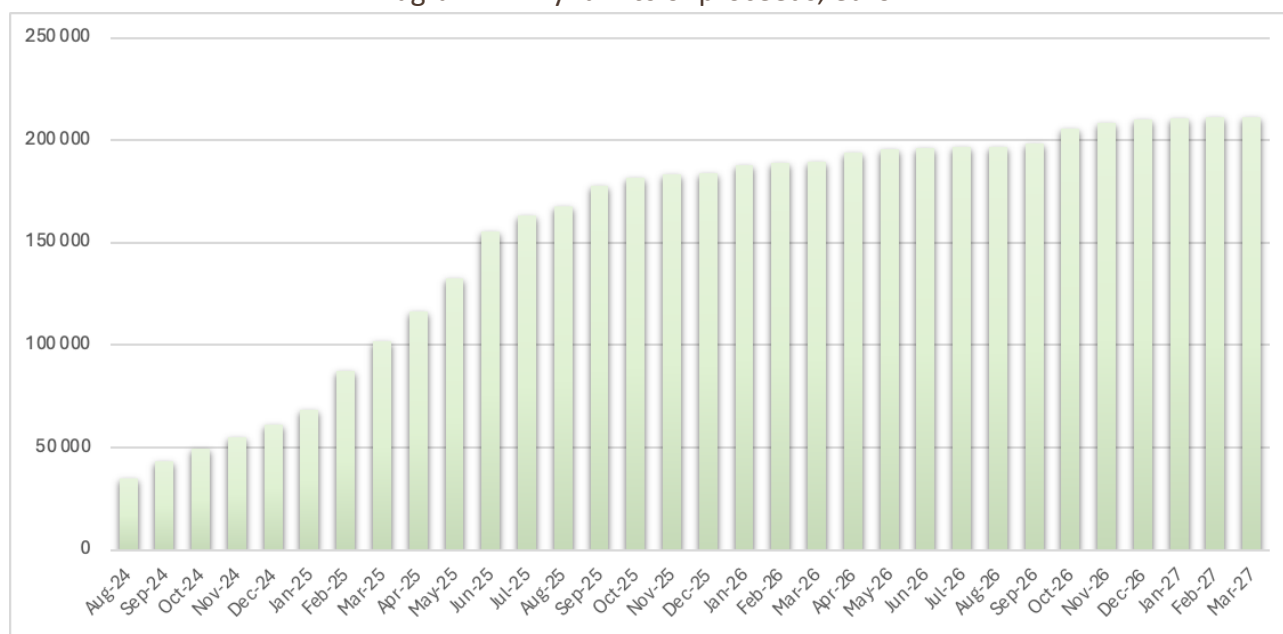
Anticipated Casino Guest Volume

The targeted number of new guests to be attracted is 2350 people per month, revenue is calculated based on the monthly retention of unique users an average of 3,758 people per month with the retention rate – 35%. The expected average income per guest is 41.3 euros per month. Additional funds need to be invested in advertising to either retain or re-attract the guest.

11.2 Income Volume

The average monthly income for the project period (3 years) will be about 155.21 thousand euro.

Diagram 11. Dynamics of proceeds, euro



The overall revenue for the project duration (3 years) is projected to reach 4,966.8 thousand euros. An inclusive plan outlining income generation and financing for direct costs is detailed in the table below.

Table 7. Income and direct cost plan (before reaching design capacity)

		Total for 3 years	2024 (9M)	2025	2026	2027 (3M)
Physical indicators	Unit					
Total number of clients	ppl	120 261	5 911	41 650	57 366	15 334
Number of new clients	ppl	75 232	5 189	28 580	33 171	8 293
Number of current clients	ppl	45 028	721	13 071	24 195	7 041

Proceeds		4 966 762	244 109	1 720 164	2 369 204	633 286
Income from clients	41,30	4 966 762	244 109	1 720 164	2 369 204	633 286

Direct costs		3 077 009	230 568	953 803	1 443 851	448 786
Advertising costs	19	1 481 932	124 607	569 525	630 240	157 560
Additional staff costs	1 533	1 027 333	0	176 333	605 667	245 333
Salary		323 200	50 500	121 200	121 200	30 300
License fees		143 211	39 628	48 745	48 745	6 093
Depreciation	60m	101 333	15 833	38 000	38 000	9 500

Indirect costs		486 667	56 292	178 300	178 300	73 775
Accounting		124 800	19 500	46 800	46 800	11 700

Office equipment maintenance		87 733	13 708	32 900	32 900	8 225
Hosting		126 400	0	43 200	43 200	40 000
Office rent		46 400	7 250	17 400	17 400	4 350
Legal support		101 333	15 833	38 000	38 000	9 500

11.3 Marketing Plan

1. *Executive Summary:*

Pongbet88 aims to position itself as a premier online gaming destination, offering a diverse range of innovative and responsibly curated games for players aged 18 and above. The marketing strategy focuses on creating brand awareness, engaging the target audience, and fostering a sense of community within the gaming platform.

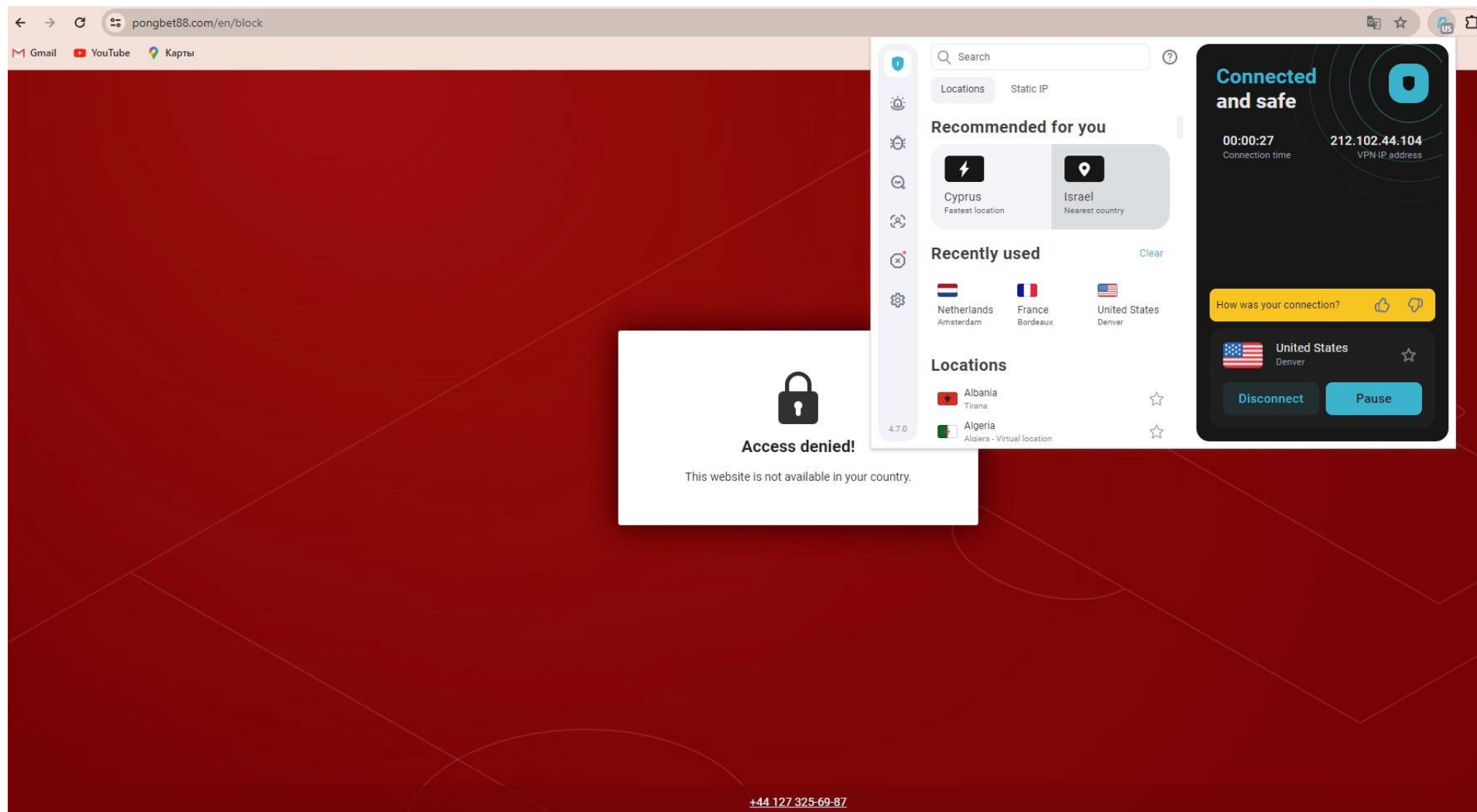
2. *Target Customer:*

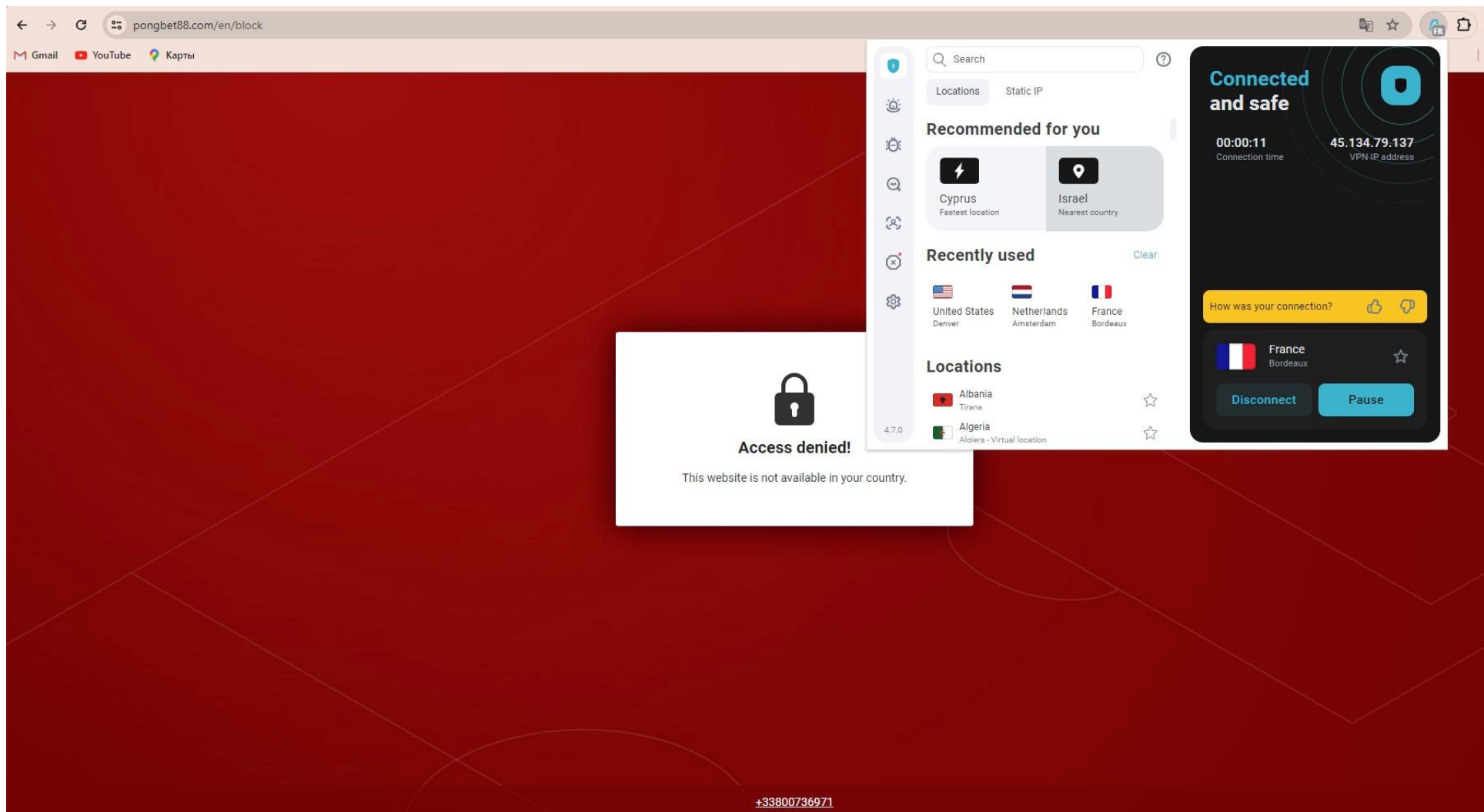
Demographics: Adults aged 18 and above, with a primary focus on the 18-35 age group.

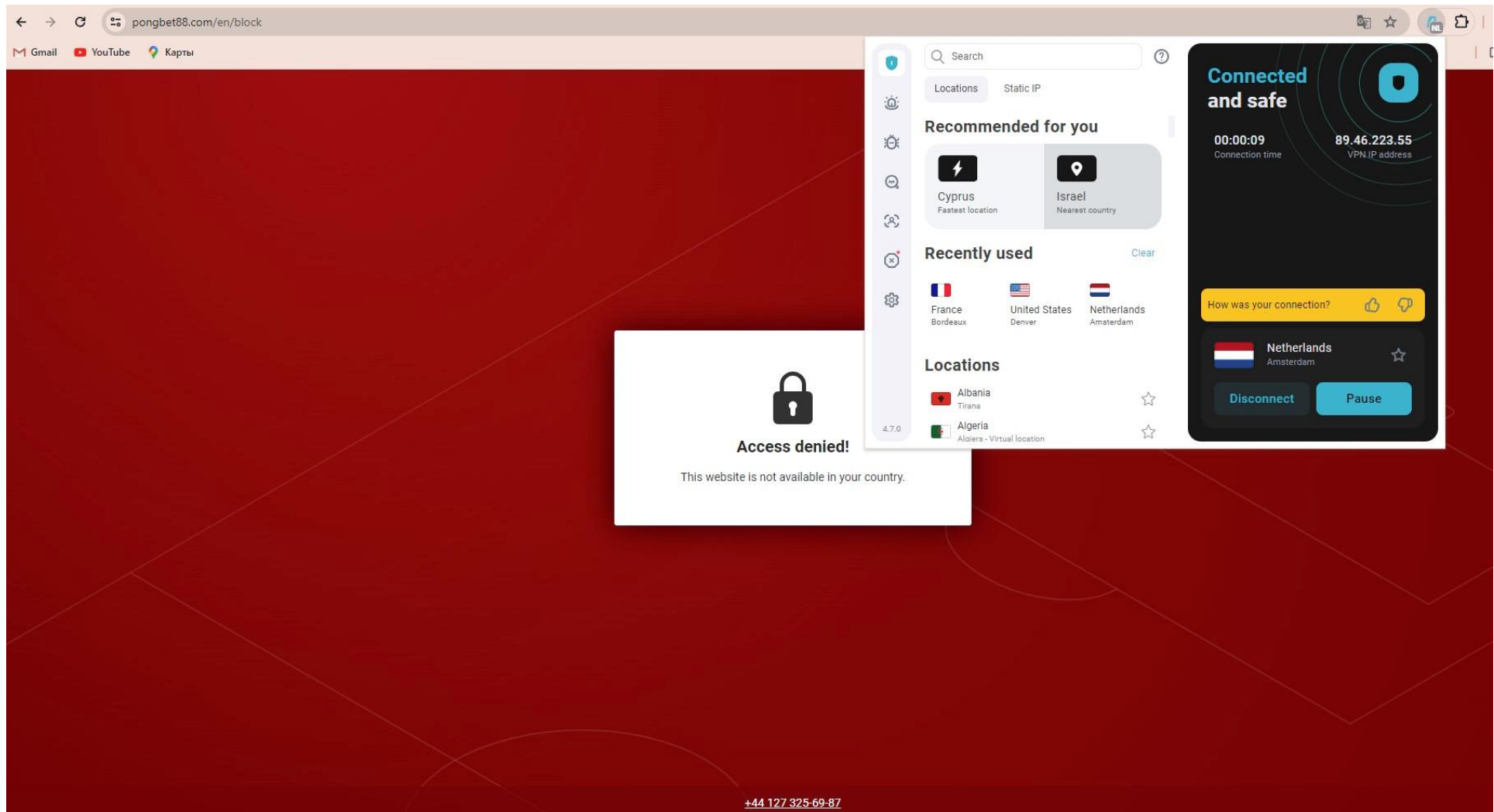
Geographics: South Korea, Vietnam, Thailand, Malaysia, Indonesia.

Psychographics: Tech-savvy individuals seeking an immersive gaming experience, interested in cutting-edge technology, and conscious of responsible gaming practices.

Geoblock: USA, France, The Netherlands, The Dutch Caribbean Island: Curacao, Aruba, Bonaire, St. Martin, St. Eustatius, and Saba.







3. Marketing Strategies:

a. Branding and Positioning:

Develop a distinct brand identity that reflects innovation, excitement, and responsibility.

Position Pongbet88 as a leader in the online gaming industry, emphasizing the quality and diversity of the gaming portfolio.

b. Online Presence:

Optimize the website for user experience, ensuring easy navigation and accessibility.

Leverage social media platforms for targeted advertising, engaging content, and community building.

Invest in influencer marketing to reach a wider audience through trusted figures in the gaming community.

c. Content Marketing:

Create engaging content such as gameplay videos, tutorials, and behind-the-scenes glimpses to connect with the audience.

Implement a blog section on the website for gaming-related articles, industry news, and responsible gaming guides.

d. Responsible Gaming Initiatives:

Promote responsible gaming through informative content, in-game reminders, and partnerships with organizations advocating responsible gaming.

Implement self-help tools, time limits, and expenditure tracking features to empower players to manage their gaming habits.

4. Sales Strategies:

a. Promotions and Incentives:

Launch promotional campaigns, welcome bonuses, and exclusive in-game incentives to attract new players.

Implement a loyalty program to reward regular players and encourage retention.

b. Partnerships:

Form strategic partnerships with other gaming platforms, influencers, and relevant brands to expand the reach and credibility of PinnaclePlay.

c. Data-Driven Decision Making:

Utilize analytics tools to gather and analyze player data, enabling targeted marketing campaigns and personalized gaming experiences.

Implement A/B testing for promotional offers to optimize conversion rates.

d. Customer Support:

Offer responsive and knowledgeable customer support to enhance the player experience.

Collect feedback actively and use it for continuous improvement.

5. Metrics and Evaluation:

Track key performance indicators (KPIs) such as user acquisition cost, conversion rates, player retention, and customer satisfaction.

Regularly review marketing and sales strategies based on data analytics, making adjustments to optimize performance.

12 PROJECT EXPENDITURES

12.1 Fixed Expenses

Salary

The staffing table indicates that there are a total of five personnel with a standard workload, each receiving an average monthly salary of 1,740 euros. Consequently, the overall monthly payroll is projected to be 10.1 thousand euros. The current intention is to remunerate all company employees based on time worked. Moreover, there are future plans to establish a comprehensive system of financial incentives, including bonuses and other forms of rewards.

Table 8. Staffing table and salaries

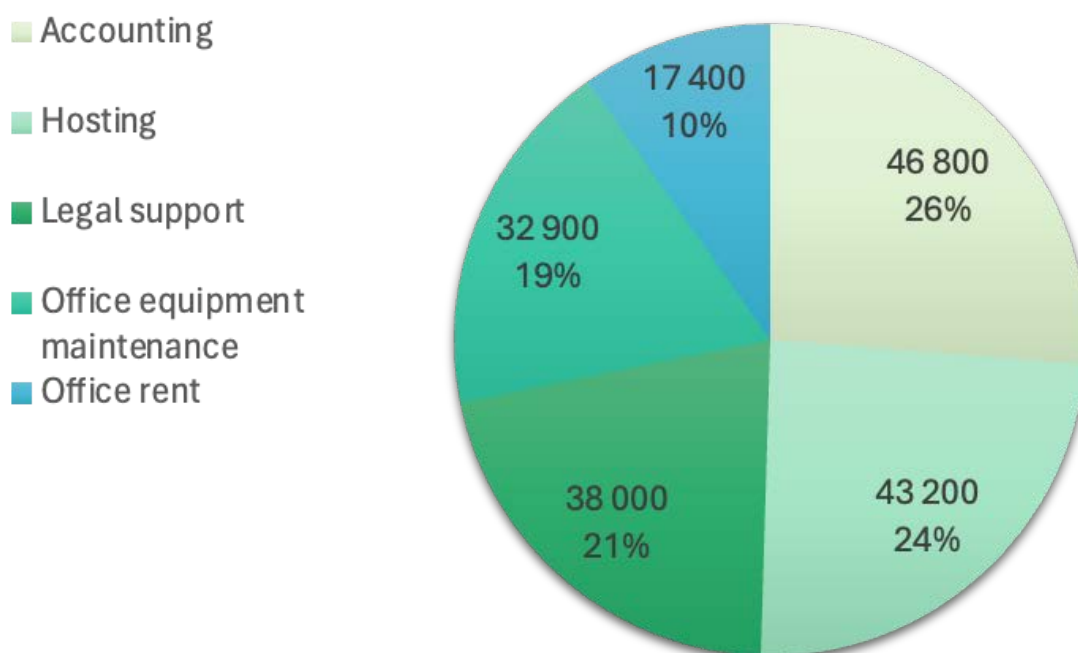
№	Position	Number of people	Salary	Total per month
1	Director	1	2 400	2 400
2	Site developer	1	1 700	1 700
3	Designer	1	1 600	1 600
4	Advertising specialist	1	1 600	1 600
5	Employee	2	1 400	2 800
	Total	6		10 100

5 additional staff are employed for every 6000 new clients. The cost of additional personnel is shown in variable costs.

Table 9. Fixed costs, thousand EUR

№	Item of expense	Total per year
1	Accounting	46 800
2	Office equipment maintenance	32 900
3	Hosting	43 200
3	Office rent	17 400
4	Legal support	38 000
	Total	178 300

Diagram 12. The structure of fixed costs (to the total volume of fixed costs)



12.2 Variable Expenses

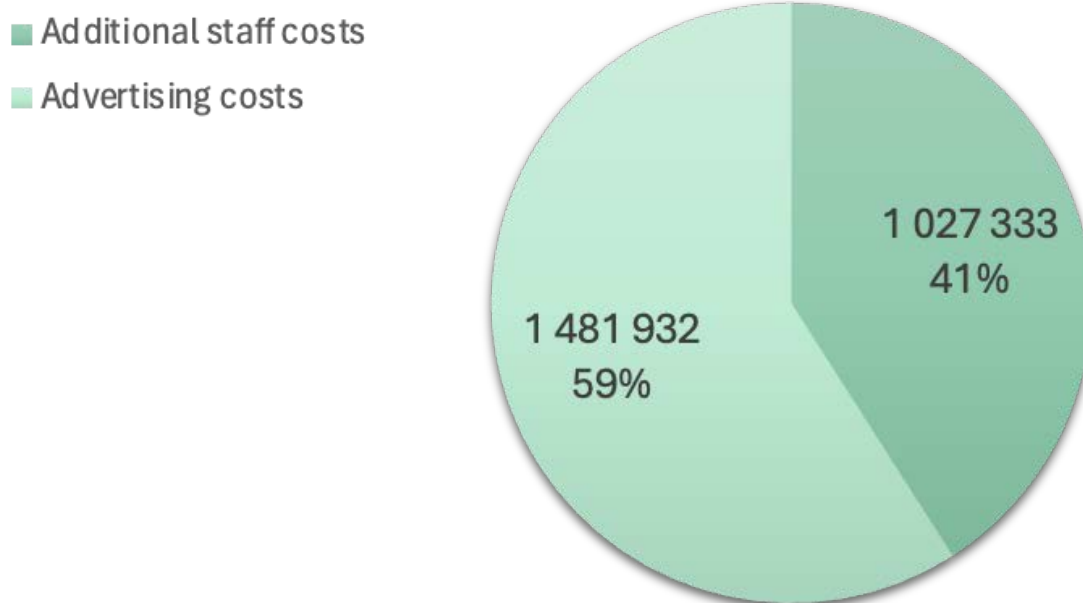
Direct production costs

A complete list of current variable costs is presented in the table below.

Table 10. Variable costs

No	Item of expense	Per unit, total	Calculation base
1	Advertising costs	19	for 1 client
2	Additional staff costs	1 533	for 1 person

Diagram 13. Structure of variable costs (to the total volume of variable costs)



12.3 Project Revenue

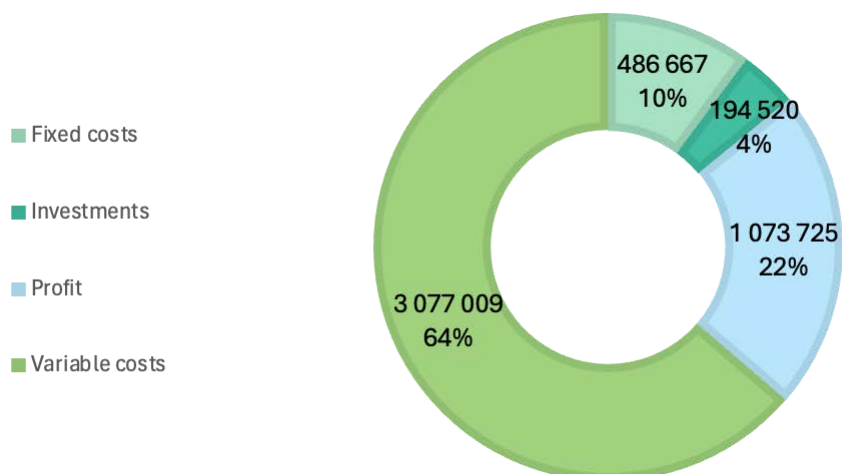
The most straightforward method for assessing the primary cost components and their proportion in the overall expenses is to examine the distribution of total revenue over the project period, spanning four years.

The breakdown of revenue distribution across major cost categories and profit, arranged in descending order, will take the following structure:

- variable costs - 64%;
- profit - 22%;
- fixed costs - 10%;
- investments - 4%.

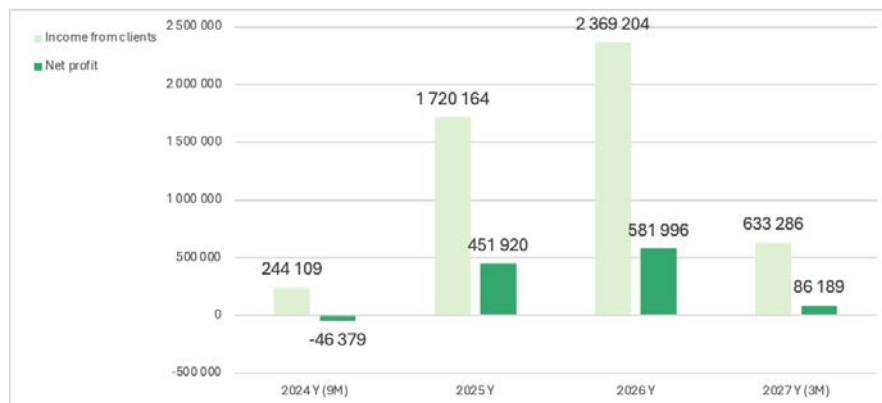
The diagram below visually represents that 22% of the project's total revenue is allocated to net profit.

Diagram 14. Distribution Structure of Sales Proceeds to Costs and Profit



12.4 Profit and Loss Plan Indicators

Diagram 15. The structure of fixed costs (to the total volume of fixed costs)



12.5 Financial Performance Analysis

Over the entire project implementation period, sales proceeds are anticipated to reach 4,966.8 thousand EUR.

The total project cost is estimated at 3,893.03 thousand EUR.

The monthly average net operating income is projected to be 32,7 thousand EUR.

Upon the project's completion, the net profit is forecasted to reach 1,073.7 thousand EUR.

Table 11. Indicators of the project

Name of the index	Value of the index
Calculation period of the project, year	3
Laid-down capital (LDC), EUR	194 520
Sum of proceeds (SP), EUR	4 966 762
Net average operational receipts per month (NAOR), EUR	32 707
Net profit for the project period, EUR	1 073 725
Average profitability for the project period (net profit to proceeds	21,62%
Discounting rate (DR), %	19,00%
Net present value (NPV), EUR	573 598
Average Rate of Return of investments (ARR)	145,72%
Return on investment (ROI)	452%
Profitability index (PI)	2,9
Internal rate of return (IRR)	110,32%
Pay back period of the project in whole (PBP), incl. financing scheme	16 months
	1,3 years

12.6 SWOT analysis

Table 12. SWOT analysis

STRENGTHS	WEAKNESS
• 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	• 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)
OPPORTUNITIES	THREATS
• 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