

Business Plan & 3-Year Financial Forecast For Momo Entertainment B.V

. Document Purpose and Regulatory Context

This document is prepared and submitted for regulatory and compliance purposes in relation to the licensed activities of **Momo Entertainment B.V.** It provides a detailed overview of the Company's operating model and a **three-year financial forecast** with a breakdown of key figures, including (without limitation) **investments, marketing expenses, wages, loans, and commissions/benefits paid to third parties/providers.**

The forecast is intentionally conservative and assumes steady, controlled growth in line with a compliance-first operating approach. The Company prioritizes:

- Regulatory compliance and operational resilience;
- Strong AML/CFT and responsible gaming controls;
- Controlled marketing and player acquisition practices;
- Financial transparency, reconciliation, and segregation of customer funds.

2. Company Overview

Applicant: Momo Entertainment B.V.

Jurisdiction: Curaçao

Registered Address: Schottegatweg Oost 10, Unit 1-9, Bon Bini Business Center, Willemstad, Curaçao

Company Registration No.: 160871

Gaming License: Curaçao Gaming Authority (CGA) – **OGL/2024/940/0485**

Scope: This document applies to all domains and brands operated under the Company's Curaçao gaming license.

Momo Entertainment B.V. operates as a licensed online gaming operator and may operate multiple domains/brands under the same licensing and compliance framework.

Any addition of new domains/brands is subject to internal governance and will be notified to the relevant authority prior to activation where required.

3. Business Model (Casino & Sportsbook)

The Company operates an online gaming business offering:

- **Online casino games** supplied by licensed third-party game providers; and
- **Sportsbook services** supplied by licensed third-party sportsbook/platform providers.

The Company does **not** manufacture proprietary games or RNG systems. Instead, it relies on established third-party suppliers for:

- Game content and platform access;
- Technical hosting and infrastructure support;
- Payment processing and settlement services (including crypto payment support through third parties).

3.1 Revenue Generation

Revenue is generated primarily from:

- **Gross Gaming Revenue (GGR):** wagers minus payouts, prior to operational expenses.
For internal planning and reporting, the Company may also refer to:
- **Net Gaming Revenue (NGR):** GGR less bonuses/promotions (contra-revenue), and certain provider fees where applicable (depending on commercial arrangements).

3.2 Cost Structure

Key cost components include:

- Gaming provider and platform fees (fixed and/or revenue-share);
 - Payment processing and payment agent fees;
 - Marketing and affiliate commissions;
 - Compliance, legal, and licensing administration;
 - Hosting, IT security, and operational tools;
 - Staffing and administrative support.
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4. Forecast Methodology and Key Assumptions

The three-year forecast is prepared using a **conservative base case** with modest revenue growth of approximately **7–8% per annum**, reflecting controlled scaling of operations.

4.1 Key Operating Assumptions

- The Company scales gradually and avoids aggressive or high-risk promotional strategies.
- Marketing is tightly controlled and performance-driven.
- The Company relies on third-party suppliers for gaming content and platform services.
- Payment processing is performed through reputable third-party providers and payment agents.
- Compliance expenditure is treated as a priority and maintained at a realistic level.
- The Company maintains controls to prevent minors from registering or wagering and applies restrictions for prohibited jurisdictions.

4.2 Growth Assumption

- **Year-on-year revenue growth: ~7–8%**
This is supported by measured increases in player acquisition activity, retention, and stable platform performance.

4.3 Currency

All values in the forecast are presented in **EUR** for consistency and planning purposes.

5. Products and Services Overview

5.1 Online Casino Offering

Momo Entertainment B.V. provides access to a range of online casino games supplied exclusively by **licensed third-party game providers**. The Company does not develop proprietary games or random number generators (RNGs).

The casino offering includes, but is not limited to:

- Slot games;
- Table games (e.g., blackjack, roulette);
- Live casino games streamed by licensed third-party studios;
- Other games of chance permitted under the Curaçao gaming license.

All games are certified and supplied by providers that operate under recognized regulatory frameworks. Game content is integrated via secure APIs and hosted on third-party infrastructure maintained by the relevant providers.

5.2 Sportsbook Offering

The sportsbook offering is delivered through a **third-party sportsbook platform provider**. The Company does not set odds independently and does not operate its own trading desk.

Sports betting products may include:

- Pre-match betting;
- Live/in-play betting;
- Multiple betting markets per event.

Risk management and odds compilation are handled by the third-party sportsbook provider in accordance with its own internal controls and regulatory obligations.

5.3 Fairness, Integrity, and Player Protection

- All games are subject to fairness standards enforced by the respective providers.
 - The Company implements responsible gaming measures, including age verification and self-exclusion mechanisms.
 - No proprietary manipulation of game outcomes or betting markets is performed by the Company.
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6. Payment Processing and Settlement Model

6.1 Payment Structure Overview

Momo Entertainment B.V. utilizes a **payment agent model** for all financial transactions. The Company does **not** provide payment services, exchange services, or custody of virtual assets.

All player deposits and withdrawals are processed through **independent third-party payment agents and processors**, which are responsible for:

- Payment collection;

- Transaction monitoring;
- Crypto-to-fiat conversion (where applicable);
- Settlement to the Company.

6.2 Accepted Payment Methods

The platform may support:

- Fiat payment methods via third-party processors; and
- Cryptocurrency payments via third-party payment agents.

Accepted cryptocurrencies may include:

- BTC
- ETH
- USDT
- USDC
- TRX
- XRP

6.3 Settlement

The Company receives settlement from payment agents in one or more of the following currencies:

- EUR
- USD

- USDC
- USDT

Settlement terms, timing, and fees are governed by contractual agreements with the payment agents and processors.

6.4 Segregation of Funds

Customer funds are **segregated from the Company's operational funds**. The Company does not use customer funds for its own cash-flow or operational expenses.

7. Marketing Strategy and Player Acquisition

7.1 Marketing Philosophy

The Company adopts a **conservative and compliance-driven marketing approach**. Marketing activity is focused on:

- Organic traffic growth;
- Controlled affiliate partnerships;
- Limited promotional incentives.

The Company does not engage in aggressive or high-risk acquisition strategies.

7.2 Acquisition Channels

Marketing channels may include:

- Affiliate marketing (revenue-share and CPA models);

- Search engine marketing and SEO;
- Targeted digital advertising in permitted jurisdictions;
- Brand awareness campaigns within regulatory limits.

7.3 Marketing Spend Assumptions

Marketing expenses are budgeted conservatively and increase gradually in line with revenue growth.

Year 1

- Marketing & affiliate spend: **€12,000**

Year 2

- Marketing & affiliate spend: **€13,000**

Year 3

- Marketing & affiliate spend: **€14,000**

Marketing performance is continuously reviewed, and spend may be adjusted based on ROI and compliance considerations.

7.4 Bonuses and Promotions

Bonuses and promotions are treated as **contra-revenue** and are reflected as a reduction to GGR when calculating NGR. Promotional activity is limited and structured to avoid excessive player inducement.

8. Organizational Structure and Staffing

8.1 Management and Governance Structure

Momo Entertainment B.V. operates with a **lean but clearly defined organizational structure**, designed to ensure effective governance, regulatory compliance, and operational continuity.

The Company's structure separates:

- Strategic oversight and ownership;
- Compliance and risk management;
- Technical and operational execution;
- Financial oversight and reporting.

This structure ensures that no single function exercises unchecked control over critical operational areas.

8.2 Key Roles and Responsibilities

Ultimate Beneficial Owner (UBO)

The UBO provides strategic oversight and ensures that the Company operates in accordance with its regulatory obligations and long-term business objectives. The UBO does not engage in day-to-day operational activities.

Compliance / AML Officer

The Compliance Officer is responsible for:

- Oversight of AML/CFT compliance;
- Monitoring adherence to sanctions regimes;
- Liaison with regulatory authorities where required;
- Oversight of responsible gaming measures;

- Periodic compliance reporting to management.

The Compliance Officer operates independently from revenue-generating functions.

Chief Technology Officer (CTO)

The CTO oversees:

- Platform integrations with third-party providers;
- System stability and uptime;
- Cybersecurity controls;
- Coordination with hosting and infrastructure partners.

Chief Financial Officer (CFO)

The CFO is responsible for:

- Financial reporting and reconciliation;
- Budgeting and financial planning;
- Oversight of payment agent settlements;
- Ensuring segregation of customer and company funds.

8.3 Staffing Levels

The Company operates with a **small in-house team of approximately 3–4 individuals**, supported by third-party service providers where appropriate.

This approach minimizes fixed costs while ensuring that critical functions are adequately resourced.

8.4 Staffing Cost Assumptions

Personnel-related costs are included within:

- Professional services;
- Compliance and administrative expenses;
- Operational overhead.

The Company does not anticipate significant increases in staffing levels during the initial three-year forecast period.

9. Compliance, AML/CFT, and Responsible Gaming Framework

9.1 Compliance Philosophy

Compliance is treated as a **core operational pillar** rather than a supporting function. The Company adopts a proactive approach to regulatory compliance, focusing on prevention rather than remediation.

9.2 AML/CFT Framework

The Company maintains an AML/CFT framework aligned with:

- Curaçao regulatory requirements;
- International AML/CFT standards;
- FATF recommendations where applicable.

Key components include:

- Customer due diligence (CDD);

- Enhanced due diligence (EDD) where required;
- Transaction monitoring;
- Sanctions screening;
- Record retention and audit trails.

9.3 Use of Third-Party Providers

Where appropriate, the Company relies on third-party service providers for:

- Transaction monitoring tools;
- Blockchain analytics;
- Identity verification services.

All third-party providers are subject to internal due diligence and periodic review.

9.4 Responsible Gaming

Responsible gaming measures include:

- Mandatory age verification;
- Self-exclusion mechanisms;
- Deposit and loss limits;
- Access to responsible gaming information and resources.

The Company does not permit minors to register or wager under any circumstances.

9.5 Compliance Cost Allocation

Compliance-related costs include:

- Licensing and regulatory fees;
- Legal and advisory services;
- Compliance software and tools;
- External audits where required.

These costs are reflected conservatively in the financial forecast and increase modestly over time.

10. Technology, Hosting, and Cybersecurity

10.1 Technology Model

Momo Entertainment B.V. operates a **third-party technology model**, relying on established platform and game providers.

The Company does not develop proprietary gaming software and does not operate its own RNG systems.

10.2 Hosting and Infrastructure

Hosting services are provided by reputable third-party infrastructure providers with:

- High availability and redundancy;
- Secure data centers;
- Disaster recovery and backup mechanisms.

The Company ensures that hosting arrangements support regulatory requirements related to data protection and operational resilience.

10.3 Cybersecurity Measures

Cybersecurity controls include:

- Secure API integrations;
- Access controls and role-based permissions;
- Monitoring for suspicious activity;
- Periodic security reviews conducted by third-party providers where applicable.

10.4 Technology Cost Assumptions

Technology-related expenses include:

- Platform access fees;
- Hosting and infrastructure costs;
- Security and monitoring tools.

These costs are forecast conservatively and scale gradually with operational growth.

11. Detailed Financial Forecast – Revenue Analysis

11.1 Revenue Framework

The revenue forecast for Momo Entertainment B.V. is based on **Net Gaming Revenue (NGR)**, which is considered the most appropriate and conservative metric for regulatory submissions. NGR reflects actual economic value generated after deducting promotional incentives and bonuses from Gross Gaming Revenue (GGR).

For transparency, the Company internally monitors both GGR and NGR; however, the projections presented herein are primarily NGR-focused.

11.2 Year 1 Revenue Forecast (Base Year)

11.2.1 Gross Gaming Revenue (GGR)

For Year 1, the Company projects total GGR of **€75,000**.

This figure reflects:

- Gradual onboarding of players;
- Limited marketing activity during the initial operational phase;
- Conservative assumptions regarding player activity and retention.

The forecast assumes no aggressive acquisition campaigns and no reliance on high-risk markets.

11.2.2 Bonuses and Promotions

Bonuses and promotional incentives are budgeted at approximately **10% of GGR**, equivalent to **€7,500** in Year 1.

Bonuses are treated strictly as **contra-revenue** and are designed to:

- Support initial player acquisition;
- Encourage early retention;
- Remain within responsible gaming and regulatory limits.

11.2.3 Net Gaming Revenue (NGR) – Year 1

Item	Amount (€)
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Gross Gaming Revenue (GGR)	75,000
Less: Bonuses & Promotions	(7,500)
Net Gaming Revenue (NGR)	67,500

This level of NGR is consistent with a newly activated operation prioritizing stability over rapid expansion.

11.3 Year 2 Revenue Forecast

Year 2 assumes a **moderate growth rate of approximately 8%**, driven by:

- Increased brand recognition;
- Improved player retention;
- Incremental optimization of marketing channels.

11.3.1 GGR – Year 2

Projected GGR: **€81,000**

11.3.2 Bonuses and Promotions

Bonuses maintained at approximately **10% of GGR**, amounting to **€8,100**.

11.3.3 NGR – Year 2

Item	Amount (€)
Gross Gaming Revenue (GGR)	81,000

Less: Bonuses & Promotions	(8,100)
Net Gaming Revenue (NGR)	72,900

11.4 Year 3 Revenue Forecast

Year 3 assumes a slightly reduced growth rate of approximately **7%**, reflecting a stabilization phase and continued conservative scaling.

11.4.1 GGR – Year 3

Projected GGR: **€86,700**

11.4.2 Bonuses and Promotions

Bonuses maintained at approximately **10%**, equivalent to **€8,670**.

11.4.3 NGR – Year 3

Item	Amount (€)
Gross Gaming Revenue (GGR)	86,700
Less: Bonuses & Promotions	(8,670)
Net Gaming Revenue (NGR)	78,030

11.5 Revenue Summary (3-Year Overview)

Year	GGR (€)	NGR (€)	YoY Growth
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Year 1	75,000	67,500	—
Year 2	81,000	72,900	~8%
Year 3	86,700	78,030	~7%

The above revenue profile demonstrates **sustainable and controlled growth** without reliance on excessive promotional spending or aggressive market expansion.

12. Detailed Cost Breakdown and Expense Justification

12.1 Overview of Cost Structure

The Company's cost structure reflects a **lean operating model** supported by third-party service providers. Fixed costs are minimized where possible, while variable costs scale in proportion to revenue.

Costs are grouped into the following categories:

- Gaming and platform providers;
- Payment processing and payment agents;
- Marketing and affiliate commissions;
- Compliance, licensing, and regulatory administration;
- Technology and infrastructure;
- Professional services;
- Administrative and overhead costs.

12.2 Gaming Providers and Platform Fees

Year 1

Estimated cost: **€18,000**

This includes:

- Access fees to casino and sportsbook platforms;
- Revenue-share or fixed fees payable to licensed providers;
- Technical integration and support costs.

Costs increase modestly in Years 2 and 3 in line with revenue growth and platform usage.

12.3 Payment Processing and PSP Fees

Year 1

Estimated cost: **€6,000**

These costs represent:

- Payment agent commissions;
- Transaction processing fees;
- Settlement-related charges.

The forecast assumes no in-house payment processing and full reliance on third-party payment agents.

12.4 Marketing and Affiliate Costs

Year 1

Estimated cost: **€12,000**

Marketing spend is intentionally conservative and includes:

- Affiliate commissions;
- Limited digital advertising;
- Brand awareness initiatives in permitted jurisdictions.

Marketing expenditure grows gradually in subsequent years to support controlled expansion.

12.5 Compliance, Licensing, and Regulatory Costs

Year 1

Estimated cost: **€10,000**

This category includes:

- Licensing and regulatory fees;
- AML and compliance advisory services;
- Compliance software and tools;
- Periodic legal reviews.

Compliance expenditure is treated as **non-discretionary** and maintained even in lower-revenue scenarios.

12.6 Technology and IT Infrastructure

Year 1

Estimated cost: **€8,000**

Includes:

- Hosting and infrastructure services;
 - Security and monitoring tools;
 - Technical support and maintenance.
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12.7 Professional Services

Year 1

Estimated cost: **€6,000**

Covers:

- Legal advisory;
 - Accounting and bookkeeping;
 - Audit-related services where applicable.
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12.8 Administrative and Overhead Costs

Year 1

Estimated cost: **€4,000**

Includes:

- Office-related expenses;
 - Corporate administration;
 - Miscellaneous operational costs.
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12.9 Total Operating Expenses (Year 1)

Category	Amount (€)
Gaming & Platform Providers	18,000
Payment Processing	6,000
Marketing & Affiliates	12,000
Compliance & Licensing	10,000
Technology & IT	8,000
Professional Services	6,000
Administrative Expenses	4,000
Total OPEX	64,000

13. Cash Flow, Sustainability and Break-Even Analysis

13.1 Cash Flow Management Principles

Momo Entertainment B.V. adopts a **prudent cash flow management approach**, ensuring that operational liquidity is maintained at all times without reliance on customer funds.

Key principles include:

- Timely reconciliation of revenues and expenses;
 - Conservative assumptions regarding settlement timing from payment agents;
 - Maintenance of sufficient working capital buffers;
 - Strict segregation between customer funds and operational funds.
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13.2 Cash Inflows

Primary cash inflows include:

- Net settlements received from payment agents (fiat and/or crypto settlements converted externally);
- Periodic shareholder funding where required during early operational stages.

The Company does not rely on debt financing during the initial forecast period.

13.3 Cash Outflows

Key cash outflows include:

- Gaming provider and platform fees;
- Payment processing and settlement fees;
- Marketing and affiliate commissions;
- Compliance, licensing, and professional services;
- Technology and infrastructure costs.

Outflows are scheduled to align with revenue inflows to minimize liquidity pressure.

13.4 Break-Even Analysis

Based on the forecast:

- **Annual break-even NGR** is approximately **€64,000**.
- The Company reaches **operational break-even within Year 1**, with a modest positive result.
- Subsequent years demonstrate sustained profitability without material increases in fixed costs.

This profile indicates a **financially viable and resilient operation** even under conservative revenue assumptions.

13.5 Financial Sustainability

The Company's financial sustainability is supported by:

- Low fixed cost base;
 - Scalable third-party provider model;
 - Conservative marketing strategy;
 - Continuous oversight of compliance and operational risks.
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14. Risk Assessment and Mitigation Measures

14.1 Overview

The Company has identified and assessed key operational, financial, and regulatory risks and has implemented appropriate mitigation measures.

14.2 Regulatory and Compliance Risk

Risk: Non-compliance with gaming or AML/CFT regulations.

Mitigation:

- Appointment of a dedicated AML/Compliance Officer;
 - Adoption of documented AML, Responsible Gaming, and Crypto Risk policies;
 - Ongoing monitoring and periodic internal reviews.
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14.3 Financial Risk

Risk: Insufficient liquidity or unexpected cost increases.

Mitigation:

- Conservative revenue assumptions;
 - Maintenance of working capital buffers;
 - Limited fixed costs and scalable expense structure.
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14.4 Payment and Settlement Risk

Risk: Delays or failures in payment processing or settlement.

Mitigation:

- Use of reputable third-party payment agents;
 - Diversification of payment methods;
 - Regular reconciliation and monitoring by finance oversight.
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14.5 Technology and Cybersecurity Risk

Risk: System outages, data breaches, or cyberattacks.

Mitigation:

- Reliance on established third-party platforms;
 - Secure hosting environments;
 - Periodic security reviews and access controls.
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14.6 Market and Operational Risk

Risk: Lower-than-expected player acquisition or retention.

Mitigation:

- Gradual scaling of marketing spend;
 - Focus on retention and responsible engagement;
 - Continuous performance monitoring.
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15. Conclusion and Management Statement

15.1 Management Conclusion

This Business Plan and three-year financial forecast demonstrate that **Momo Entertainment B.V.** is positioned to operate a **compliant, sustainable, and financially viable online gaming business** under its Curaçao gaming license.

The Company's approach emphasizes:

- Regulatory compliance;
 - Financial prudence;
 - Controlled growth;
 - Responsible gaming and AML/CFT adherence.
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15.2 Management Statement

Management confirms that:

- The information contained in this document is accurate to the best of its knowledge;
- Financial projections are prepared in good faith using conservative assumptions;
- The Company is committed to operating in full compliance with applicable laws and regulatory requirements.

This document is submitted for regulatory review and assessment purposes.

For and on behalf of Momo Entertainment B.V.

Name: _____

Title: _____

Signature: _____

Date: _____