

RED777 N.V.

B2B SOFTWARE AGGREGATOR

Business Plan

2025

Contents

1. Overview of Red777	3
2. Company Control and Ownership Structure	6
2.1. Legal and governance framework	6
2.1.1. Board Oversight and Membership	6
2.1.2. Deadlock	6
2.1.3. Legal Support and Advice	7
3. Business Forecasts for 3 Years	8
4. Overview of intended strategy for the business growth and to secure/maintain/grow market share with specific financial and marketing plans.	16
5. Key suppliers and Material Dependencies	20
6. Risk Evaluation and Management	21
7. Target KPIs and Business Objectives	24
8. Policies and Procedures	27

1. Overview of Red777

Red777 was initially established as a B2C online gambling project, providing gaming services directly to players. In 2025, following the change of ownership, the new Ultimate Beneficial Owner defined a revised development strategy focused on the B2B segment. This strategic shift reflects the Company's intention to build long-term partnerships with licensed operators, strengthen its position in the international iGaming market, and apply its existing technological expertise to serve a broader range of business clients.

Today, Red777 specializes in providing B2B gambling aggregation services, offering casino games from licensed developers to operators and business partners. The Company is committed to delivering reliable, scalable, and compliant aggregation solutions that meet the needs of international clients.

Red777 is managed under the guidance of Denys Lutsenko, Ultimate Beneficial Owner of the Company.

Denys Lutsenko has over 15 years of professional experience in marketing, affiliate management, and business development within the iGaming and digital entertainment sectors. Since 2025, he has served as Business Developer at Red777, focusing on identifying new markets, building partnerships, and overseeing commercial agreements. In parallel, he acts as Independent Marketing Adviser at NETPIK LTD, supporting marketing operations, campaign performance, and customer management systems. His previous positions include Senior Affiliate Manager at Gambit Stream, Affiliate Account Manager at ServReality, and earlier roles in marketing and customer support at KEVURU GAMES and Redwerk.

Leveraging this extensive background, Denys Lutsenko has defined the Company's new strategic direction, reorienting its activities from B2C operations to a sustainable B2B model. His combination of operational, marketing, and strategic expertise provides Red777 with a reliable foundation for meeting regulatory requirements and supporting long-term business growth in the international gambling sector.

Business Developer, Red777

2025 - Present

- Identifies new business opportunities, including markets, partnerships, and revenue streams
- Optimizes marketing strategies, using artificial intelligence and machine learning, including personalized recommendations, dynamic targeting and predicting customer behavior.
- Negotiates and finalizes commercial deals, partnership agreements, and revenue-sharing contracts.
- Analyzes market demand, player behaviors, and key performance indicators (KPIs) to inform strategic decisions.
- Tracks performance metrics and evaluates the success of business initiatives.

Independent Marketing Adviser, NETPIK LTD

2023 - Present

- Provides 24/7 support for marketing platforms and analytics tools, ensuring continuous campaign performance tracking, ad strategy optimization, and prompt incident resolution.
- Develops, maintains, and scales cloud infrastructure to support marketing operations, with a focus on resource efficiency, data security, and compliance.
- Integrates and manages CRM, CDP, and ERP systems to streamline marketing automation, enable personalized communications, and optimizes customer segmentation using behavioral analytics.
- Prepares and delivers monthly reports on key marketing metrics such as ROI, customer lifetime value, customer acquisition cost, and the efficiency of traffic channels and sales funnels.

Senior Affiliate Manager, Gambit Stream

2020 - 2025

- Handled high-value affiliate accounts, ensuring long-term business growth.
- Developed strategic partnerships with game providers, payment processors, and media agencies.
- Leverage AI and machine learning to identify high-potential affiliates, forecast campaign performance, and personalize partner communication strategies.
- Led performance analysis to optimize traffic sources and ROI.
- Automate reporting and analytics of marketing data using BI systems and predictive analytics algorithms.

Firstly, the Company's strategic reorientation from B2C to B2B operations, introduced under the new ownership in 2025, positions Red777 as a dedicated gaming aggregator. This transition reflects the Company's focus on building sustainable partnerships with licensed operators and delivering long-term value in the international iGaming market.

Secondly, Red777 maintains a strong commitment to regulatory compliance, including adherence to AML/CFT frameworks and data protection standards such as GDPR, ensuring transparency and client trust.

Thirdly, the Company collaborates with licensed game developers and established technology providers in reputable jurisdictions, enhancing the quality, security, and scalability of its solutions.

Lastly, Red777 integrates responsible gaming principles and enforces robust internal controls, further distinguishing itself as a reliable partner in the B2B gambling sector.

Red777 functions exclusively as a software aggregator, acquiring gaming content from licensed developers such as Mancala, Winfinity and other prominent developers. This content is subsequently distributed to B2C operators as well as B2B resellers and distributors.

The business model is based on entering into software distribution agreements with developers, under which Red777 secures the rights to distribute their games to its network of partners.

Following this, Red777 concludes Software License and Services Agreements with B2C operators and B2B resellers. These agreements provide partners with a non-exclusive, royalty-bearing license to use, sub-license, and integrate the software into their platforms.

Revenue is generated from the margin between the licensing fees paid to developers and the fees received from operators and distributors. This margin constitutes the Company's profit.

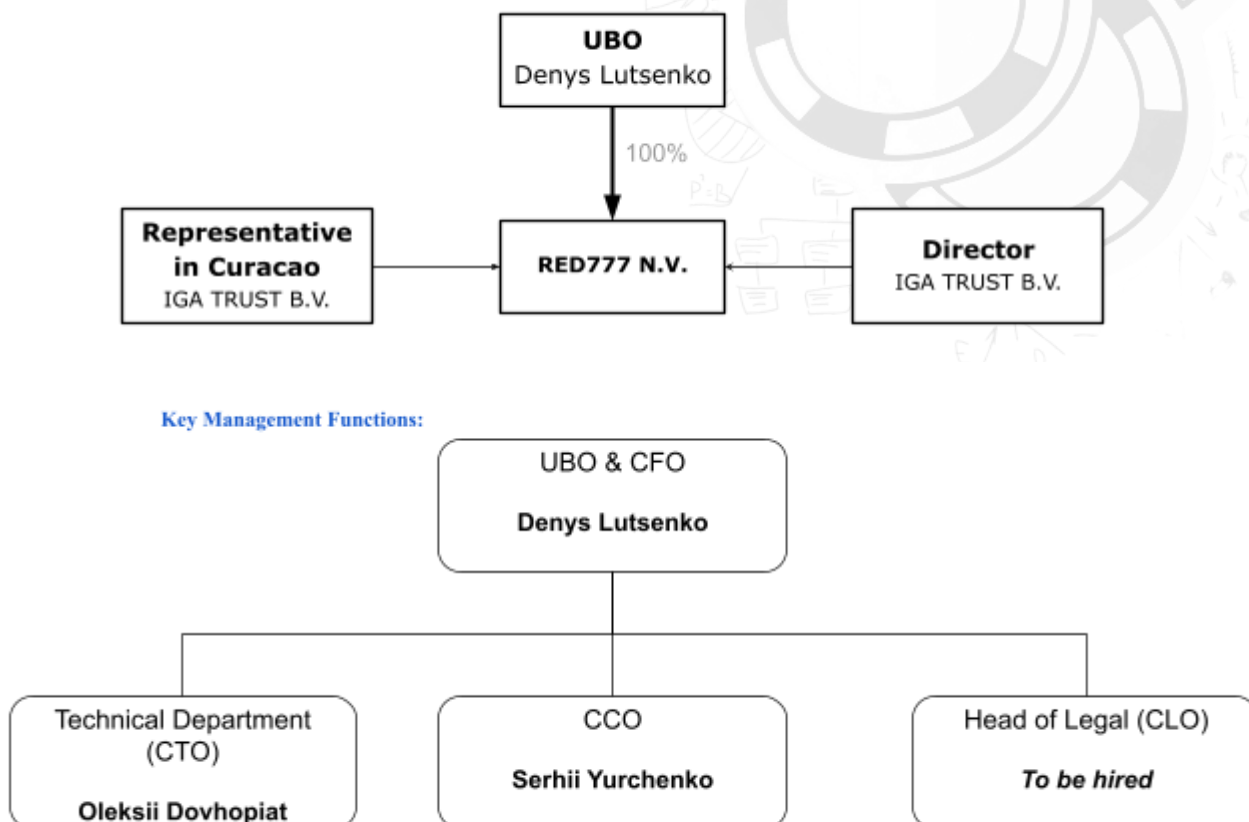
Red777's revenue is generated solely from software licensing margins. The Company does not provide additional platform services beyond aggregation.

Product Description

Red777 provides B2C operators with software licenses that include selected games from developers such as Mancala, Winfinity and other prominent developers. The Company's role is strictly limited to aggregation of certified gaming content, ensuring straightforward integration for operators and distributors.

2. Company Control and Ownership Structure

RED777 N.V., a company incorporated under the laws of Curacao with registration number 159999 and registered address at Zuikertuintjeweg Z/N, Curacao.



2.1. Legal and governance framework

The legal and governance framework of RED777 N.V. is designed to ensure transparent ownership, effective management, and full compliance with Curacao regulations.

2.1.1. Board Oversight and Membership

The Company is 100% owned by Mr. Denys Lutsenko, who acts as the Ultimate Beneficial Owner (UBO) and provides strategic oversight. Operational management is entrusted to the appointed Director, IGA TRUST B.V., who is responsible for day-to-day administration, implementation of company policies, and regulatory compliance. This streamlined structure allows for efficient decision-making and clear accountability.

2.1.2. Deadlock

As the Company has a single UBO, there are no risks of governance deadlock. Ownership and control are clearly defined, ensuring continuity and stability in decision-making.

2.1.3. Legal Support and Advice

Legal support is provided by the Company's local representative in Curacao, IGA TRUST B.V., which ensures compliance with Curaçao Gaming Authority (CGA) requirements and provides fiduciary support. Where necessary, external legal counsel may be engaged for specialized matters requiring independent expertise or representation.

2.1.4. Invited Participants in Board Meetings

In addition to the Director, board or management meetings may involve other senior advisors or service providers invited to contribute expertise on specific operational, legal, or financial matters. This ensures comprehensive decision-making aligned with the Company's strategic objectives and regulatory obligations.

3. Business Forecasts for 3 Years

Cash flow for the First Year (EUR)

	Total for 3 years	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Total 1Y
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	- 90 000	- 53 500	- 8 500	- 8 500	-19 500	-	-	-	-	-	-	-	-	- 90 000
Technological Infrastructure	- 18 000	- 18 000	-	-	-	-	-	-	-	-	-	-	-	- 18 000
Cybersecurity	- 22 000	- 11 000	-	-	- 11 000	-	-	-	-	-	-	-	-	- 22 000
Office equipment and stationery	- 16 000	- 16 000	-	-	-	-	-	-	-	-	-	-	-	- 16 000
Marketing and Promotion	- 34 000	- 8 500	- 8 500	- 8 500	- 8 500	-	-	-	-	-	-	-	-	- 34 000
Cash flow - OPERATING	700 379	-	-	-	-	- 35 550	- 41 458	- 42 162	- 25 900	- 11 100	- 22 250	- 4 250	- 1 703	- 184 373
Proceeds	8 207 424	-	-	-	-	58 667	53 973	51 627	70 835	140 167	141 500	141 500	149 990	808 258
Income from clients	8 207 424	-	-	-	-	58 667	53 973	51 627	70 835	140 167	141 500	141 500	149 990	808 258

Expenses total	- 7 507 045	-	-	-	-	- 94 217	- 95 431	- 93 789	- 96 735	- 151 267	- 163 750	- 145 750	- 151 693	- 992 631
Direct costs	- 6 699 697	-	-	-	-	- 64 567	- 65 781	- 64 139	- 73 085	- 121 617	- 149 050	- 125 050	- 130 993	- 794 281
License fee	- 96 000	-	-	-	-	-	-	-	-	-	- 24 000	-	-	- 24 000
Hosting	- 115 200	-	-	-	-	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 28 800
Software fee	- 5 745 197	-	-	-	-	- 41 067	- 37 781	- 36 139	- 49 585	- 98 117	- 99 050	- 99 050	- 104 993	- 565 781
Salary	- 332 800	-	-	-	-	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 83 200
Management services	- 184 000	-	-	-	-	- 2 000	- 2 000	- 2 000	- 2 000	- 2 000	- 4 500	- 4 500	- 4 500	- 23 500
Technical support	- 226 500	-	-	-	-	- 7 500	- 12 000	- 12 000	- 7 500	- 7 500	- 7 500	- 7 500	- 7 500	- 69 000
Indirect costs	- 648 400	-	-	-	-	- 29 650	- 29 650	- 29 650	- 23 650	- 29 650	- 14 700	- 20 700	- 20 700	- 198 350
Office equipment and stationery	- 24 000	-	-	-	-	-750	-750	-750	-750	-750	-750	-750	-750	- 6 000
Advertising- Marketing costs	- 370 000	-	-	-	-	- 18 000	- 18 000	- 18 000	- 12 000	- 18 000	- 6 000	- 12 000	- 12 000	- 114 000
Accounting	- 51 200	-	-	-	-	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 12 800
Office rent	- 41 600	-	-	-	-	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 10 400
Legal support	- 161 600	-	-	-	-	- 8 000	- 8 000	- 8 000	- 8 000	- 8 000	- 5 050	- 5 050	- 5 050	- 55 150
Taxes	- 158 948	-	-	-	-	-	-	-	-	-	-	-	-	-
Profit tax	- 158 948	-	-	-	-	-	-	-	-	-	-	-	-	-

Cash flow - FINANCING	-	53 500	8 500	8 500	19 500	35 550	41 458	42 162	25 900	11 100	22 250	4 250	1 703	274 373
Co-investor's investment	291 705	53 500	8 500	8 500	19 500	35 550	41 458	42 162	25 900	11 100	22 250	4 250	1 703	274 373
Refunds to co-investor	- 291 705	-	-	-	-	-	-	-	-	-	-	-	-	-
CASH FLOW OF THE PROJECT	610 379	-	-	-	-	-	-	-	-	-	-	-	-	-
progressive total (cash balance)	610 379	-	-	-	-	-	-	-	-	-	-	-	-	-

Cash flow for the Second Year (EUR)

	Total for 3 years	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Total 2Y
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	- 90 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Technological Infrastructure	- 18 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Cybersecurity	- 22 000	-	-	-	-	-	-	-	-	-	-	-	-	-

Office equipment and stationery	- 16 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Marketing and Promotion	- 34 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	700 379	- 6 495	- 3 864	7 692	- 6 973	30 452	25 156	12 424	25 818	51 216	14 333	48 791	61 273	259 823
Proceeds	8 207 424	127 350	142 786	181 307	175 924	220 674	203 020	194 193	205 227	289 886	317 886	326 636	368 244	2 753 133
Income from clients	8 207 424	127 350	142 786	181 307	175 924	220 674	203 020	194 193	205 227	289 886	317 886	326 636	368 244	2 753 133
Expenses total	- 7 507 045	- 133 845	- 146 650	- 173 615	- 182 897	- 190 222	- 177 864	- 181 769	- 179 409	- 238 670	- 303 553	- 277 845	- 306 971	- 2 493 310
Direct costs	- 6 699 697	- 115 145	- 125 950	- 152 915	- 171 147	- 178 472	- 166 114	- 159 935	- 167 659	- 226 920	- 270 520	- 257 145	- 286 271	- 2 278 193
License fee	- 96 000	-	-	-	- 24 000	-	-	-	-	-	- 24 000	-	-	- 48 000
Hosting	- 115 200	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 43 200
Software fee	- 5 745 197	- 89 145	- 99 950	- 126 915	- 123 147	- 154 472	- 142 114	- 135 935	- 143 659	- 202 920	- 222 520	- 228 645	- 257 771	- 1 927 193
Salary	- 332 800	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 124 800
Management services	- 184 000	- 4 500	- 4 500	- 4 500	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 76 500
Technical support	- 226 500	- 7 500	- 7 500	- 7 500	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 3 000	- 7 500	- 7 500	- 58 500
Indirect costs	- 648 400	- 18 700	- 20 700	- 20 700	- 11 750	- 11 750	- 11 750	- 11 750	- 11 750	- 11 750	- 11 750	- 20 700	- 20 700	- 183 750
Office equipment and stationery	- 24 000	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	- 9 000
Advertising- Marketing	- 370 000	10 000	12 000	- 12 000	- 6 000	- 6 000	- 6 000	- 6 000	- 6 000	- 6 000	- 6 000	- 12 000	- 12 000	- 100 000

costs														
Accounting	- 51 200	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 19 200
Office rent	- 41 600	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 15 600
Legal support	- 161 600	- 5 050	- 5 050	- 5 050	- 2 100	- 2 100	- 2 100	- 2 100	- 2 100	- 2 100	- 2 100	- 5 050	- 5 050	- 39 950
Taxes	- 158 948	-	-	-	-	-	-	-	-	-	-	-	-	- 31 367
Profit tax	- 158 948	-	-	-	-	-	-	-	-	-	-	-	-	- 31 367
Cash flow - FINANCING	-	6 495	3 864	-	6 973	-	-	-	-	-	-	-	- 53 500	- 36 168
Co-investor's investment	291 705	6 495	3 864	-	6 973	-	-	-	-	-	-	-	-	17 332
Refunds to co-investor	- 291 705	-	-	-	-	-	-	-	-	-	-	-	- 53 500	- 53 500
CASH FLOW OF THE PROJECT	610 379	-	-	7 692	-	30 452	25 156	12 424	25 818	51 216	14 333	48 791	7 773	
progressive total (cash balance)	610 379	-	-	7 692	7 692	38 144	63 300	75 725	101 543	152 758	167 091	215 882	223 655	223 655

Cash flow for the Third Year (EUR)

	Total for 3 years	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27	Jan-28	Feb-28	Mar-28	Apr-28	May-28	Total 3Y
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	- 90 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Technological Infrastructure	- 18 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Cybersecurity	- 22 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Office equipment and stationery	- 16 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Marketing and Promotion	- 34 000	-	-	-	-	-	-	-	-	-	-	-	-	-
Cash flow - OPERATING	700 379	13 164	48 767	53 034	9 978	45 170	36 544	25 205	57 445	66 596	52 546	104 046	112 434	624 929
Proceeds	8 207 424	312 660	326 556	385 614	347 400	359 400	330 648	336 371	355 483	465 986	465 986	465 986	493 945	4 646 033
Income from clients	8 207 424	312 660	326 556	385 614	347 400	359 400	330 648	336 371	355 483	465 986	465 986	465 986	493 945	4 646 033
Expenses total	- 7 507 045	- 299 495	- 277 789	- 332 579	- 337 421	- 314 230	- 294 103	- 311 166	- 298 038	- 399 390	- 413 440	- 361 940	- 381 512	- 4 021 104
Direct costs	- 6 699 697	- 247 362	- 257 089	- 302 929	- 276 180	- 284 580	- 264 453	- 263 960	- 277 338	- 378 690	- 354 690	- 350 190	- 369 762	- 3 627 223
License fee	- 96 000	-	-	-	-	-	-	-	-	- 24 000	-	-	-	- 24 000

Hosting	- 115 200	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 3 600	- 43 200
Software fee	- 5 745 197	- 218 862	- 228 589	- 269 929	- 243 180	- 251 580	- 231 453	- 235 460	- 248 838	- 326 190	- 326 190	- 326 190	- 345 762	- 3 252 223
Salary	- 332 800	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 10 400	- 124 800
Management services	- 184 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 7 000	- 84 000
Technical support	- 226 500	- 7 500	- 7 500	- 12 000	- 12 000	- 12 000	- 12 000	- 7 500	- 7 500	- 7 500	- 7 500	- 3 000	- 3 000	- 99 000
Indirect costs	- 648 400	- 20 700	- 20 700	- 29 650	- 29 650	- 29 650	- 29 650	- 20 700	- 20 700	- 20 700	- 20 700	- 11 750	- 11 750	- 266 300
Office equipment and stationery	- 24 000	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	-750	- 9 000
Advertising- Marketing costs	- 370 000	- 12 000	- 12 000	- 18 000	- 18 000	- 18 000	- 18 000	- 12 000	- 12 000	- 12 000	- 12 000	- 6 000	- 6 000	- 156 000
Accounting	- 51 200	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 1 600	- 19 200
Office rent	- 41 600	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 1 300	- 15 600
Legal support	- 161 600	- 5 050	- 5 050	- 8 000	- 8 000	- 8 000	- 8 000	- 5 050	- 5 050	- 5 050	- 5 050	- 2 100	- 2 100	- 66 500
Taxes	- 158 948	- 31 434	-	-	- 31 592	-	-	- 26 506	-	-	- 38 049	-	-	- 127 581
Profit tax	- 158 948	- 31 434	-	-	- 31 592	-	-	- 26 506	-	-	- 38 049	-	-	- 127 581
Cash flow - FINANCING	-	- 8 500	- 8 500	- 19 500	- 35 550	- 41 458	- 42 162	- 25 900	- 11 100	- 22 250	- 23 285	-	-	- 238 205
Co-investor's investment	291 705	-	-	-	-	-	-	-	-	-	-	-	-	-
Refunds to co-investor	- 291 705	- 8 500	- 8 500	- 19 500	- 35 550	- 41 458	- 42 162	- 25 900	- 11 100	- 22 250	- 23 285	-	-	- 238 205

CASH FLOW OF THE PROJECT	610 379	4 664	40 267	33 534	- 25 572	3 712	- 5 618	-695	46 345	44 346	29 261	104 046	112 434	
Progressive total (cash balance)	610 379	228 319	268 586	302 120	276 548	280 260	274 642	273 948	320 292	364 638	393 900	497 946	610 379	610 379

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

4.1. Financial Plan

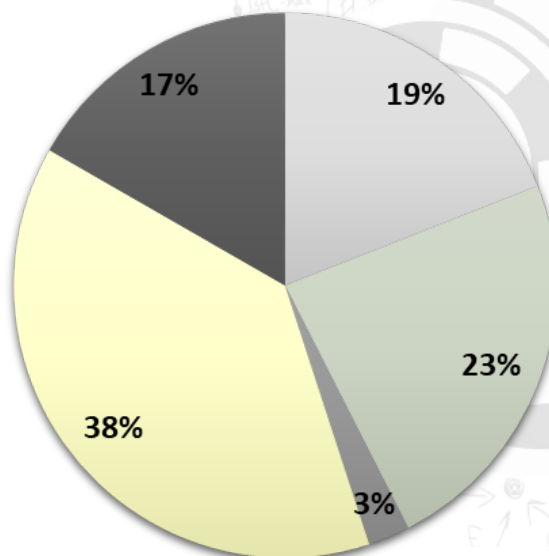
4.1.1. Fixed costs (EUR)

No	Item of expense	Average per year	Total for 3 years
1	License fee	24 000	96 000
2	Software fee	3 077 784	5 745 197
3	Accounting	19 200	51 200
3	Hosting	43 200	115 200
4	Office rent	15 600	41 600
	Total	3 179 784	6 049 197

4.1.2. Variable costs (EUR)

No	Item of expense	Total per month min	Total per month max	Total for 3 years
1	Management services	2 000	7 000	184 000
2	Technical support	3 000	12 000	226 500
3	Office equipment and stationery	500	1 000	24 000
4	Advertising-Marketing costs	6 000	18 000	370 000
5	Legal support	2 100	8 000	161 600
	Total	39 000	120 000	966 100

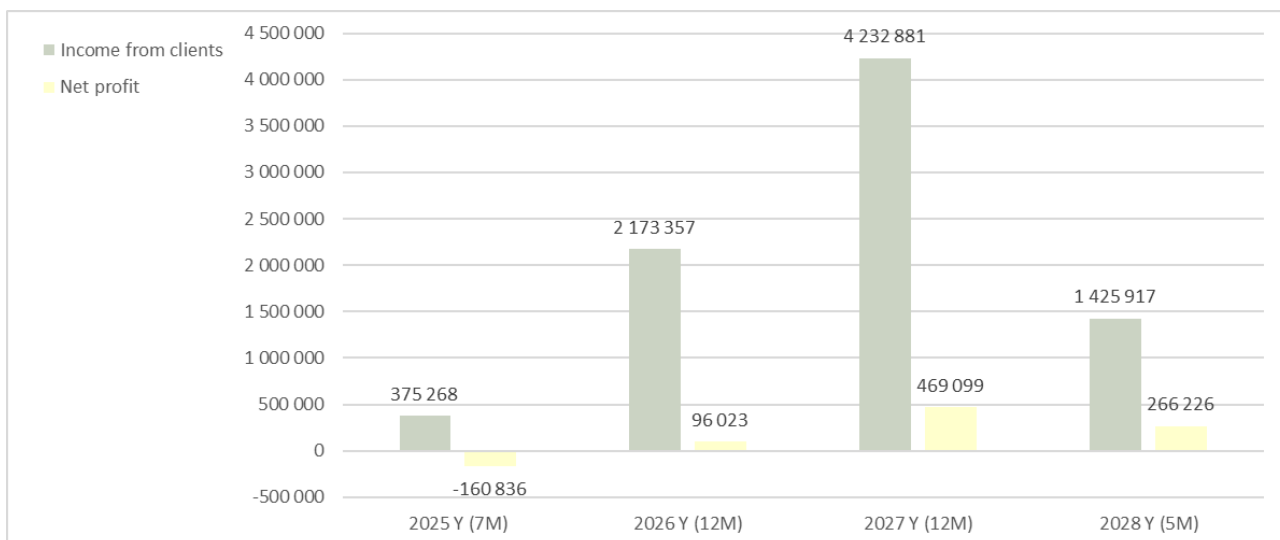
- Management services
- Technical support
- Office equipment and stationery
- Advertising- Marketing costs
- Legal support



4.1.3. Staff (EUR)

No	Position	Number of people	Salary	Total per month
1	Director	1	3 500	3 500
2	Marketing manager	1	2 400	2 400
3	Business development manager	1	1 900	1 900
4	Employee	2	1 300	2 600
	Total	6		10 400

4.1.4. Result - Dynamics of income and net profit in Euros



4.2. Marketing Plan

Overview of Business Growth Strategy and Market Expansion

Red777 is strategically positioned to build on the professional background of its Ultimate Beneficial Owner, who brings over 15 years of experience in marketing, affiliate management, and business development within the iGaming sector. With this expertise, the Company focuses on strengthening its presence in the B2B market by offering software aggregation solutions tailored for licensed operators.

By combining market knowledge, operational expertise, and strong industry connections, Red777 aims to achieve sustainable business growth and expand its footprint across international markets. The Company's strategy emphasizes long-term partnerships, regulatory compliance, and continuous innovation in order to secure a competitive position in the B2B gambling solutions market.

Strategic Growth Initiatives

Red777's primary growth strategy focuses on expanding its client base among licensed operators and B2B distributors. The Company plans to increase the number of active clients with a long-term objective of establishing itself as a recognized provider of software aggregation services in the international iGaming market.

This growth will be supported by onboarding additional major game providers from multiple jurisdictions, which will enhance the Company's portfolio and ensure a broad, diverse, and reliable offering for its business partners. The strategic emphasis remains on building sustainable partnerships, strengthening market credibility, and delivering high-quality B2B gambling solutions.

Market Penetration and Regulatory Compliance

A central element of Red777's strategy is ensuring full compliance with regulatory requirements in each jurisdiction where its partners operate. As a B2B provider, the Company maintains strict adherence to legal frameworks governing the supply of gambling software and services to licensed operators.

Before entering new markets, Red777 conducts thorough feasibility studies to evaluate both the

financial viability and the regulatory environment, ensuring that all business activities align with applicable laws and licensing requirements. This approach allows the Company to expand responsibly while maintaining its reputation as a reliable and compliant partner in the international iGaming sector.

Investment in Talent and Training

Red777 recognizes that a highly skilled and knowledgeable workforce is essential to achieving its B2B growth objectives. The Company intends to attract qualified professionals with proven expertise in iGaming, software development, and business operations.

To support continuous improvement, Red777 will implement structured training and development programs designed to enhance employee competencies, ensure regulatory compliance, and maintain high service standards. This investment in human capital will enable the Company to deliver reliable and innovative solutions that consistently meet the expectations of its business partners.

Financial Forecast

Outlined below are the projected marketing costs for the upcoming years, reflecting Red777's planned expenditures to enhance brand visibility and attract new clients:

- 2025: EUR 114,000 per year
- 2026: EUR 100,000 per year
- 2027: EUR 156,000 per year

These projections highlight Red777's commitment to scaling operations and strengthening its market position through continuous investment in marketing and business development.

As a B2B provider, the Company prioritizes marketing efforts focused on industry events, exhibitions, referrals, and networking activities. A significant portion of the marketing budget is allocated to participation in leading international fairs and conferences, including ICE, iGB, SBC, SiGMA, and the Global Gaming Expo.

In conclusion, Red777's growth strategy integrates client expansion, regulatory compliance,

investment in talent, and careful financial planning. By aligning these initiatives with its operational expertise and market knowledge, the Company is positioned to achieve sustainable growth and establish itself as a reliable player in the competitive B2B gambling sector.

5. Key suppliers and Material Dependencies

Red777 success depends heavily on its collaboration with key game suppliers and essential service providers. These partnerships are fundamental to ensuring the quality, diversity, and reliability of our B2B solutions, as well as the smooth execution of business operations. Below is an overview of Red777's main suppliers and the measures in place to mitigate potential risks.

Main Game Suppliers

Red777 collaborates with established and reputable game suppliers known for their innovation, quality, and reliability in the iGaming sector. Our primary suppliers include Mancala, Winfinity and other prominent developers.

These providers deliver a wide portfolio of certified, high-quality games, ensuring compliance with international standards and enhancing the attractiveness of our aggregation services. Our Software License Agreements are structured to align the interests of both parties, motivating suppliers to maintain high performance standards, bug-free operation, and continuous improvements.

Material Dependencies

In addition to game suppliers, Red777 relies on several critical service providers essential for uninterrupted operations:

- **Banking and Payment Solutions:** Financial transactions are supported by multiple banking partners and payment service providers. By diversifying across several banks and Electronic Money Institutions (EMIs), the Company mitigates the risk of service disruptions and ensures resilience in payment processing.
- **IT Infrastructure:** The Company's operations are built on advanced IT infrastructure provided by leading technology firms. This includes cloud hosting, cybersecurity systems, and data management solutions that guarantee stability and security.
- **Compliance and Legal Services:** Regulatory compliance remains a cornerstone of Red777's business model. The Company works with experienced legal and compliance partners to ensure adherence to Curaçao requirements and applicable international regulations.

6. Risk Evaluation and Management

Red777 employs a comprehensive approach to risk evaluation and management, ensuring that potential risks are systematically identified, assessed, mitigated, and monitored through robust internal controls and external oversight mechanisms. Below is a detailed overview by risk category.

Internal and External Audits

As part of its risk management framework, Red777 implements both internal and external audits to ensure comprehensive oversight and accountability.

- Internal Audits

Internal audits are carried out on a regular basis to evaluate compliance, financial controls, and operational efficiency. These reviews allow the Company to detect risks at an early stage, verify adherence to internal policies, and ensure alignment with applicable regulatory requirements.

- External Audits

Independent external audits provide an impartial assessment of Red777's financial statements, compliance status, and operational practices. Such audits reinforce transparency, support regulatory confidence, and strengthen trust with stakeholders and business partners.

Oversight Committees and Risk Registers

Red777 employs oversight committees and maintains detailed risk registers to ensure systematic risk management and monitoring.

- Oversight Committees

Oversight responsibilities are carried out by the Company's senior management and appointed advisors, who review risk management practices on a regular basis. These committees ensure that risk controls remain aligned with Red777's strategic objectives and comply with regulatory obligations.

- Risk Registers

Comprehensive risk registers are maintained, documenting identified risks, their potential impact, and the mitigation strategies in place. These registers are updated and reviewed on a regular basis, enabling the Company to proactively address emerging risks and strengthen operational resilience.

Legal and Regulatory Oversight

Responsible Entity: Head of Legal ((to be hired)

The regulatory framework for online gambling is constantly evolving, requiring continuous monitoring and adaptability. The Head of Legal ensures that legal updates and changes are communicated across all relevant departments, maintaining compliance and organizational awareness.

1. Legality and Licensing

Assessment: Regular review of applicable legal requirements for providing B2B gambling software and services across jurisdictions.

Mitigation: Operating under Curaçao Gaming Authority license No. OGL/2024/948/0661 and ensuring strict adherence to its conditions.

2. Cross-Border Regulatory Challenges

Assessment: Monitoring variations in gambling laws and enforcement practices across different markets.

Mitigation: Establishing partnerships with local entities, legal advisors, and industry associations to effectively address regulatory complexities. Comprehensive due diligence on all business partners and ongoing monitoring of regulatory updates.

3. Political and Public Perception

Assessment: Evaluating public sentiment and its potential influence on regulatory policies.

Mitigation: Maintaining transparency in business operations and strong corporate governance. Promoting responsible gambling principles and supporting public education initiatives, while safeguarding the Company's reputation through proactive communication strategies.

Technical Risks

Responsible Entity: Technical Department (CTO – Oleksii Dovhopiat)

Technical risks primarily concern the integrity, availability, and security of Red777's IT infrastructure, platforms, and data.

1. Infrastructure Maintenance and Cybersecurity

Assessment: Regular reviews and audits of hardware and software systems to identify vulnerabilities and ensure operational stability.

Mitigation: Implementing continuous updates, firewalls, intrusion detection systems, and encryption protocols. Conducting scheduled security assessments and promptly addressing identified weaknesses.

2. Data Security

Assessment: Evaluation of risks associated with unauthorized access to sensitive operational and partner data.

Mitigation: Maintaining multi-layered cybersecurity defenses, strict access control policies, and regular system updates. Periodic security audits are conducted to ensure compliance with international data protection standards.

Financial Risks

Responsible Entity: Head of Finance (CFO – Denys Lutsenko)

Financial risks for Red777 include cash flow management, capital allocation, and compliance with taxation requirements in multiple jurisdictions.

1. Financial Controls and Cash Flow Management

Assessment: Ongoing monitoring and analysis of financial performance to identify risks in liquidity, capital allocation, and operational expenditures.

Mitigation: Implementing strong internal financial controls, optimizing capital allocation, and aligning financial strategies with overall business objectives. Regular reporting and financial analysis are conducted to detect and address emerging risks and opportunities at an early stage.

2. Taxation

Assessment: Evaluating the impact of varying taxation frameworks across jurisdictions on the Company's profitability and compliance obligations.

Mitigation: Engaging qualified tax professionals and legal advisors to ensure adherence to all applicable tax laws. Utilizing tax treaties where available to minimize double taxation risks and maintaining accurate financial records to support timely and transparent tax filings.

Red777's approach to financial risk management combines continuous assessment, proactive mitigation, and independent auditing. By leveraging both internal expertise and external advisory services, the Company ensures effective risk controls that safeguard its financial stability and support sustainable long-term growth.

7. Target KPIs and Business Objectives

Overview

Red777 measures its success through a combination of key financial indicators and strategic business objectives. The Company's long-term goals are centered on expanding its client base in the B2B gambling sector, improving profitability, and ensuring sustainable growth. These objectives are supported by detailed planning, strict regulatory compliance, and continuous monitoring of performance metrics.

Key Performance Indicators (KPIs)

1. Income and Revenue Growth

- **Income Targets:** Red777 projects total revenue of €8.21 million over the 36-month project period. This forecast reflects consistent growth supported by software licensing fees and strategic market expansion. Average monthly operational receipts are projected at approximately €21.9 thousand. Annual revenues are expected to rise steadily in line with the scaling of operations and increased business capacity.
- **Measurement:** Revenue will be monitored on a monthly and annual basis against predefined targets to ensure alignment with strategic objectives. Milestones include maintaining stable monthly revenues through core operational activities while expanding scalable income streams.

2. Profitability

- **Net Profit:** Red777 anticipates a total net profit of approximately €670.5 thousand over the 36-month period, achieved through disciplined expense management and operational efficiency. Profitability is supported by high-margin software fees and effective cost controls across all major categories.
- **Profit Margins:** The projected average net profit margin is approximately 8.2% (net profit of €670.5 thousand relative to total revenue of €8.21 million), while the EBITDA margin is estimated at 9.7%, demonstrating the sustainability of the business model and long-term profitability despite significant investments in technology and marketing.

3. Return on Investment (ROI)

ROI: The expected ROI over the project period is estimated at 6.45%, calculated as net profit (€670.5 thousand) relative to total expenses. This reflects a balanced approach to growth, prioritizing market expansion and technology development while maintaining a positive return for stakeholders.

Additional financial indicators include a Net Present Value (NPV) of €104.3 thousand, an Internal Rate of Return (IRR) of 32.8%, and a payback period of approximately 15 months (1.25 years).

Business Objectives

1. Market Expansion

- *Objective:* To increase the client base among licensed operators and B2B distributors from approximately 3 partners in 2025 to 20 by 2027.
- *Strategy:* Growth will be achieved through partnerships with major game providers and expansion into diverse jurisdictions. Red777 will actively participate in leading industry events and exhibitions to strengthen its market visibility and attract new clients.

2. Operational Efficiency

- *Cost Management:* Fixed and variable costs are carefully planned and monitored. Fixed expenses such as license fees, operational fees, and hosting/domains are managed with controlled annual increases. Variable expenses, including technical support and IT operations, are optimized to ensure cost efficiency without compromising service quality.
- *Expense Tracking:* The Company maintains detailed monthly and annual expense tracking to ensure budget alignment and to identify potential areas for cost-saving.

3. Quality Assurance and Compliance

- *Legal and Regulatory Compliance:* Ensuring that all activities adhere to applicable regulatory standards across jurisdictions. Red777 operates under Curaçao Gaming Authority license No. OGL/2024/948/0661.
- *Risk Management:* Implementing comprehensive risk assessment and mitigation strategies to address legal, technical, and financial risks, thereby ensuring operational stability and long-term sustainability.

Strategic Plans for Sustainable Growth

1. Investment in Human Resources

- *Team Growth:* Red777 plans to expand its team with qualified professionals who bring relevant expertise in iGaming, technology, and business operations. Comprehensive training and development initiatives will be provided to maintain high service standards and ensure regulatory compliance.
- *Staff Costs:* Personnel-related expenses will be carefully monitored and managed, with planned salary increases to retain existing staff and attract new talent.

2. Marketing and Brand Expansion

- *Monthly marketing and advertising expenses* are projected to remain moderate and controlled over the coming years. In 2025, total marketing costs are estimated at €114,000 (averaging €9,500 per month). In 2026, expenses are projected at €100,000 (approximately €8,300 per month), while in 2027, the budget is expected to increase to €156,000 (around €13,000 per month).

This results in a cumulative marketing expenditure of approximately €370,000 over the 36-month project period. The allocation reflects a balanced and cost-effective approach, ensuring sufficient brand visibility, participation in industry events, and targeted promotion, while maintaining strict financial discipline.

- *Brand Visibility:* Red777 will continue to strengthen its presence at major industry events, exhibitions, and networking forums to promote its brand, develop partnerships, and attract new clients.

3. Technological Advancement

- *IT and Infrastructure:* The Company will continuously improve its IT infrastructure, including hosting, servers, and software systems, ensuring reliability, scalability, and security.
- *Amortization:* Planned amortization costs are incorporated into the budget to keep technology up to date and maintain efficient operations.

Financial Planning and Taxation

1. Tax Compliance

- *Tax Planning:* Red777 ensures compliance with applicable taxation frameworks in all jurisdictions where it operates. Profit tax is projected to increase proportionally with profitability, and planning is aligned with sustainable business growth.
- *Tax Management:* The Company engages qualified tax professionals to optimize tax strategies, apply available tax treaties, and maintain accurate and transparent financial records in order to meet all filing obligations on time.

8. Policies and Procedures

Red777 has implemented a comprehensive framework of policies and procedures designed to ensure full regulatory compliance, safeguard partner and operational data, and maintain the integrity of its B2B operations. These policies are fundamental to preventing financial crimes, protecting sensitive information, and supporting a transparent and trustworthy business environment.

Internal vs. External Management

Red777's policies and procedures are primarily developed and maintained internally to ensure a clear understanding of operational processes and regulatory requirements. For specialized compliance areas or where independent expertise is required, the Company engages external consultants. This balanced approach combines in-depth internal knowledge with external professional insight, ensuring that all policies remain effective, up to date, and aligned with industry standards.

Know Your Customer (KYC) Policy

1. Objective:

The KYC policy is designed to verify and validate the identities of Red777's business partners and clients. Its primary objective is to prevent financial crimes such as money laundering, terrorist financing, and fraud by ensuring that all contractual counterparties are legitimate and compliant entities.

2. Procedures:

- *Identity Verification:* Collecting and verifying official corporate documents and ownership structures of clients and partners.
- *Ongoing Monitoring:* Continuously monitoring business relationships and transactions to detect unusual or suspicious activities.
- *Record Keeping:* Maintaining comprehensive records of partner information, due diligence results, and transactional history in accordance with regulatory requirements.

3. Timeline and Commitment:

KYC procedures are applied during the onboarding of every new partner and are reviewed periodically throughout the business relationship. Red777 is committed to maintaining updated records and ensuring ongoing compliance with applicable regulations.

Anti-Money Laundering (AML) Policy

1. Objective:

The AML policy is designed to detect and prevent the use of Red777's services for laundering proceeds of crime or financing terrorism. Its goal is to ensure compliance with applicable AML/CFT regulations and to safeguard the integrity of the Company's business operations.

2. Procedures:

- *Risk Assessment:* Identifying and assessing risks related to money laundering, terrorist financing, and high-risk jurisdictions or partners.
- *Reporting:* Ensuring that all suspicious activities or transactions are documented and, where required, reported to the relevant authorities.
- *Employee Training:* Conducting regular training sessions for staff members to ensure awareness of AML risks, recognition of red flags, and proper reporting procedures.
- *Enhanced Due Diligence (EDD):* Applying stricter checks to high-risk partners, jurisdictions, and transactions. EDD measures include obtaining additional documentation on ownership structures, verifying source of funds, and conducting enhanced monitoring throughout the business relationship.

3. Timeline and Commitment:

AML procedures are applied on an ongoing basis and are subject to continuous monitoring, review, and independent audit. Red777 is committed to maintaining an effective AML

framework that evolves in line with regulatory changes and industry best practices.

Data Privacy Policy

1. Objective:

The Data Privacy Policy defines how Red777 collects, processes, stores, and protects personal and operational data. Its goal is to ensure compliance with applicable data protection laws, including GDPR, and to safeguard the rights of clients, partners, and employees.

2. Procedures:

- *Data Collection:* Collecting only the data necessary for legitimate business purposes, with proper consent and in accordance with legal requirements.
- *Data Usage:* Using collected data exclusively for clearly defined and legitimate purposes, such as contract execution, compliance checks, or operational needs.
- *Data Protection:* Applying strict technical and organizational security measures, including encryption, access controls, and cybersecurity protocols, to protect against data breaches or unauthorized access.
- *Data Retention:* Retaining personal and business data only for as long as necessary to fulfill legal or contractual obligations, followed by secure disposal.

3. Timeline and Commitment:

Data privacy policies and practices are reviewed and updated on a regular basis to reflect regulatory changes, technological developments, and industry best practices. Red777 is committed to maintaining the highest standards of transparency and accountability in data management.

Other Key Policies

Dispute Resolution and Customer Service Policy

This policy establishes clear and transparent procedures for handling complaints and resolving disputes with business partners. The objective is to ensure that all issues are addressed promptly, fairly, and in accordance with contractual obligations. Red777 is committed to maintaining constructive relationships with its partners by providing efficient resolution mechanisms, designating responsible contact persons, and documenting all outcomes for accountability and continuous improvement.

Responsible Gaming Policy

Although Red777 operates as a B2B provider and does not interact directly with end-users, the Company is committed to ensuring that responsible gaming principles are embedded into its products and services. Red777 partners only with licensed operators who implement responsible gambling frameworks, including self-exclusion mechanisms, deposit limits, and player protection tools. By doing so, Red777 supports a safer gambling environment and contributes to the integrity of the iGaming industry.

Internal Policies

1. Human Resources Policy

- *Content:* Establishes guidelines for recruitment, onboarding, performance evaluation, training and development, diversity and inclusion, disciplinary actions, and termination procedures.
- *Objective:* To foster a professional, supportive, and equitable workplace environment that enables employees to perform effectively and in alignment with company goals.

2. Financial Policy

- *Content:* Defines procedures for budget allocation, expense monitoring, financial reporting, internal and external auditing, procurement processes, and compliance with accounting standards.
- *Objective:* To ensure financial integrity, accountability, and transparency across all company operations.

3. Information Security Policy

- *Content:* Sets out protocols for data handling, cybersecurity controls, password and access management, system monitoring, and breach prevention strategies.
- *Objective:* To protect sensitive business and partner data, strengthen cybersecurity, and maintain compliance with international data protection standards.

Competency and Qualifications

Red777 ensures that the personnel responsible for developing and overseeing internal policies and compliance frameworks are highly qualified, competent, and independent of conflicts of interest.

- **Qualifications:** Staff members and appointed advisors possess the necessary expertise and professional experience in their respective areas, including compliance, finance, technology, and legal oversight.
- **Competence:** Regular training sessions and professional development programs are conducted to ensure that employees remain up to date with the latest regulatory requirements, technological standards, and industry best practices.
- **Independence:** All policies and procedures are developed and implemented impartially, free from conflicts of interest, thereby maintaining transparency, accountability, and integrity.

Intended Timelines and GCB/CGA Commitment

Red777 is committed to maintaining transparency and accountability with the Curacao Gaming Authority (CGA). This commitment includes:

- **Regular Updates:** Providing timely updates to the CGA on policy changes, compliance status, and audit results.
- **Annual Reviews:** Conducting annual reviews of external policies and making ongoing revisions to internal policies as required.
- **Incident Reporting:** Promptly reporting any incidents or breaches to the CGA, together with details of remedial actions taken.