

BUSINESS PLAN

For operators of games of chance under licence number

BetComets.com

BlackSands B.V.

Business Plan Version: [1.0.]

Our Mission

Our mission at BetComets is to redefine the online gambling experience by establishing an environment that emphasises not just the fun of gaming but also strongly upholds principles like security and responsible gaming. We aim to become a leader within the global online casino industry by meticulously focusing on delivering a wide array of top-tier, innovative games and user-oriented software.

Our concept is centred on our dedication to the welfare and confidence of our users. By giving players simple access to tools for responsible gambling, supplying comprehensive information on the rules and odds of every game, and guaranteeing the greatest levels of data safety through online security solutions, we hope to build a transparent relationship with our players.

Our progress is fueled by innovation. BetComets strives to consistently push the limits of creativity and technology, providing distinctive gaming experiences that boost engagement, encourage social interaction, and reward loyalty. We aim to not only meet but also surpass our users' expectations by keeping up with industry trends and making adjustments to the constantly changing digital world.

At BetComets, we're committed to leaving a legacy of quality, reliability, and devotion for our players, staff, and shareholders.

Company and Management

The foundational structure of BetComets is bolstered by a diverse group of shareholders, comprising seasoned investors in the online gaming industry, technology innovators, and former executives of leading casino operations. Their collective experience provides a robust financial foundation and strategic direction. These shareholders are instrumental in shaping the company's vision, leveraging their industry insights to guide us toward innovative offerings and responsible growth.

Key Staff:

- CEO, Karol Sobieraj (karol@betcomets.com) - has over a decade of experience in online gaming and casino management
- CTO, Szymon Nowak (szymon@betcomets.com) - A tech visionary, Szymon is responsible for cybersecurity and platform development. His background in cybersecurity convinced us that our user's data is safe
- CMO, Łukasz Sobieraj (luke@betcomets.com) - Luke's expertise in digital marketing helps us to effectively attract and retain a loyal user/partners base.

Investment decisions are made by a committee chaired by our CEO and a few other significant shareholders, who make sure the decisions align with the interests of shareholders as well as strategic goals. The committee is knowledgeable on the financial and regulatory landscapes of the online gambling sector, and they base their decisions on statistics and market research.

All key individuals can be reached via their provided email addresses.

- For inquiries related to the management structure and operations, contact our CEO;
- for technical and platform security matters, our CTO;
- and for marketing and partnership opportunities, our CMO.

This streamlined communication protocol ensures that stakeholders, regulatory bodies, and partners can engage with the appropriate BetComets representative efficiently.

Our Services

At the frontier of our online casino - BetComets.com - is designed to be a premier destination for online gambling enthusiasts, offering a diverse array of casino games, including slots, table games, and live dealer experiences. In addition to traditional casino offerings, we will feature sports betting, providing an extensive selection of markets and competitive odds across a wide range of sports, with special emphasis on football in Brazil and ice hockey in Canada, resonating with the sports culture in these countries.

Our strategic focus on Brazil and Canada stems from a deep market analysis that identifies both the potential and growing acceptance of online gambling within these regions. Brazil offers a great market with an enthusiastic sports fan base, particularly for football, providing a perfect environment for sports betting. Canada presents a mature market with a penchant for online casino games and sports betting, underscored by a regulatory environment that is progressively embracing online gambling.

Service Offerings

- Casino Games - BetComets.com will host a comprehensive suite of casino games, from classic slots and progressive jackpots to table games like blackjack and roulette. We're partnering with leading game developers (SoftSwiss) to ensure a constantly updated library of games featuring the latest technology and graphics.
- Live Dealer Games - For players seeking an immersive experience, our live dealer section will offer real-time games with professional dealers, replicating the ambiance of physical casinos.
- Sports Betting - Catering to sports enthusiasts, our sportsbook will cover a wide array of global sports events, offering competitive odds, live betting, and specialised betting options like accumulators and system bets.

Tools to Enhance Service Delivery

- Intercom - We will leverage Intercom as our primary tool for engaging with our customers, providing real-time support, and automating customer service processes. Intercom's integrated platform allows for a seamless communication channel

between betcomets.com and our users, enhancing the user experience through personalised messaging, support tickets, and live chat functionalities

- Onramper - it is a tool that facilitates the purchase of cryptocurrencies by converting traditional fiat currency into digital assets. Its goal is to simplify the process of buying cryptocurrencies for new users, thereby contributing to greater acceptance of digital currencies
- CoinsPaid - is a renowned provider of payment services in the field of cryptocurrencies, enabling businesses to accept payments in the form of digital assets. Through the CoinsPaid platform, enterprises can securely and effectively process cryptocurrency transactions and use advanced payment management tools.

Verification and Compliance

As stated in our operations during the application process, we are ready to provide the required verification for the tools and third-party software agreements. We also pledge to make sure that all of our collaborations and tool applications strictly adhere to the legal requirements and expectations of our intended markets.

Risk Management

Risk Assessment:

- Internal Audits: Regular internal audits should be conducted to evaluate potential risks within the operational processes of the online casino. This includes assessing compliance with regulatory requirements, financial integrity, and data security protocols.
- External Audits: Engaging third-party auditors to perform independent assessments can provide valuable insights into potential risks that may not be evident during internal audits. External audits can help identify vulnerabilities and areas for improvement.

Risk Mitigation:

- Implementing Controls: Based on the findings of risk assessments, implementing controls and procedures to mitigate identified risks is essential. This may involve enhancing cybersecurity measures, ensuring compliance with regulations, and establishing effective financial risk management protocols.
- Monitoring and Review: Continuous monitoring and periodic reviews of the risk mitigation strategies are critical to adapting to changing circumstances. Regular assessments help in identifying emerging risks and adjusting the mitigation measures accordingly.

Oversight Committees:

- Oversight Committees: Establishing oversight committees of key stakeholders can provide governance and strategic direction in managing risks. These committees can oversee risk management activities, review audit reports, and ensure that risk mitigation strategies align with the business objectives.

Safety and Responsible Gaming: A core tenet of our operation is promoting and ensuring safe and responsible gaming. betcomets.com will incorporate self-exclusion tools, set betting

limits, and provide resources for responsible gaming to safeguard our users against harmful gambling behaviours.

Our Competitive Advantage

What distinctly sets BetComets and its platform, BetComets.com, apart from the competition is the innovative integration of live streaming technology that offers our users the unique opportunity to bet alongside their favourite streamers in real-time. This pioneering feature transcends traditional online gambling experiences by fostering a dynamic community where players can engage, watch, and participate in live betting events hosted by popular and compelling streamers.

This interactive live stream betting feature capitalises on the growing trend of live streaming and gaming communities, merging the thrill of live sports betting with the engaging nature of watching beloved content creators. It bridges the gap between the streamer and the viewer, creating an immersive, shared experience that enhances the excitement of the bet. Our platform facilitates a new level of engagement and connection, encouraging community growth and loyalty.

This idea will attract Millennials and Gen Z users who seek more interactive and social gambling experiences online. By offering something beyond the conventional betting and casino service - turning betting into a more social and engaging activity - we carve a unique niche in the market. We believe that this unique selling proposition not only differentiates us from potential competitors but also positions BetComets.com as a forward-thinking leader in the online casino and sports betting industry.

Financial Considerations

BetComets has obtained venture capital (VC) funding from companies that specialise in the technology and online entertainment sectors in order to strengthen its financial foundation and facilitate its rapid expansion. These companies carry out thorough due research before making an investment because of our solid business plan, knowledgeable management group, and the platform's scalability.

Our casino also has a corporate account with Satchel Bank, which allows us to additionally secure our funds.

Costs Breakdown:

- Licensing and Legal Fees - a significant initial cost involves securing online gambling licences in targeted jurisdictions and covering legal fees for regulatory compliance.
- Platform Development - this includes the cost of software development, purchasing or licensing gaming content, integrating payment systems, and implementing security measures.
- Marketing and User Acquisition - initial and ongoing costs will be allocated to digital marketing, promotions, affiliate marketing programs, and customer retention strategies.

- Operational Expenses - these expenses cover customer support, website and game server hosting, cybersecurity measures, staff salaries, and office operations.
- Technology and Security Upgrades - continuous investment in the latest technology and security protocols to ensure an up-to-date and secure gaming environment.

Revenue Streams and Projections:

- Gameplay Profits - the primary source of revenue will stem from the house edge on casino games and sports betting operations.
- Promotional Services and Advertising - partnership with game developers for featuring their games, combined with advertising revenue from onsite promotions.
- Commissions from Winnings Withdrawals - implementing a minimal processing fee for withdrawals could serve as an additional, though minor, revenue stream.
- VIP Membership Programs - subscription-based revenue from a VIP membership offering exclusive benefits and tailored promotions.

Revenue Projections are based on a comprehensive market analysis, competitor benchmarks, and conservative estimates of user acquisition and retention rates. The projections show a trajectory to profitability within the next three years of operations, following an aggressive marketing and brand establishment phase.

Our financial strategy emphasises prudence, compliance, and aggressive growth aspirations. The CEO, supported by an experienced financial team, will oversee financial management, focusing on optimising cash flow, ensuring regulatory compliance, and managing investor relations.

BetComets commits to maintaining high transparency with our investors and regulatory bodies. Detailed records of all financial transactions, audits, and regular financial reporting will be instituted.

Concerning verifying the source of investment funds, we will provide comprehensive documentation during the application process, ensuring adherence to anti-money laundering (AML) regulations and financial laws.

Our approach to financing and managing the operations of BetComets is designed to establish a solid foundation for growth, stability, and long-term success. We understand the importance of detailed financial planning, adherence to regulatory standards, and the strategic allocation of resources to not only achieve but exceed our financial and operational goals.

Timetable

Assuming BetComets has successfully obtained a valid licence, the timeline extending to four years from now encompasses not only the launch but also significant milestones aimed at bolstering our presence and innovating within the online casino industry. The structured

approach ensures a robust foundation, strategic growth, and continuous evolution to meet and exceed market expectations.

Years 1-2: Expansion and Diversification

1. Focus on expanding our user base, introducing new games, and entering additional markets, adhering to local regulations.
2. Explore and integrate emerging technologies like VR for immersive gaming experiences.

Diversify our offerings by introducing new gaming verticals such as esports betting.

Year 3: Consolidation and Innovation

By the third year, aim to solidify our market position by strengthening user engagement through personalised gaming experiences and loyalty programs.

1. Innovate our platform with AI-driven features for personalised game recommendations and enhanced security measures.
2. Pursue strategic partnerships and acquisitions to expand our reach and technological capabilities.

Across these three years, our journey from obtaining the licence to becoming a leader in the online casino industry is meticulously planned around development, market introduction, user base expansion, and continuous innovation, all while maintaining a steadfast commitment to responsible gaming and user safety.

Business Objectives:

- Revenue Growth - this can be measured through key metrics such as daily active users, average revenue per user, and overall profitability.
- Customer Acquisition and Retention - another crucial objective is to acquire new customers while retaining existing ones. KPIs related to customer acquisition cost, customer lifetime value, and retention rates can help track success in this area.
- Regulatory Compliance - ensuring compliance with regulations and maintaining a good standing with licensing authorities like Curacao is a fundamental business objective.

Main Target KPIs:

- Player Acquisition - track the number of new players acquired over a specific period and the cost associated with acquiring each player. KPIs related to player acquisition efficiency can help optimise marketing strategies.
- Player Retention - measure the percentage of players who return to the platform regularly. KPIs like user engagement metrics, retention rates over time, and churn rates help evaluate the effectiveness of player retention initiatives.
- Financial Performance - monitor financial KPIs such as total revenue, net profit margin, and return on investment to assess the financial health and profitability of the online casino.

Measuring Success and Long-Term Objectives:

- Performance Tracking - regularly tracking and analysing KPIs can provide insights into the performance of the online casino. Monitoring trends, identifying areas of improvement, and aligning strategies with business objectives are key to long-term success.

- Strategic Planning - use KPIs and business objectives as a guide for strategic decision-making. By evaluating performance against set targets, adjustments can be made to ensure alignment with long-term business objectives.
- Continuous Improvement - establish a culture of continuous improvement based on KPI analysis. Learning from successes and challenges, adapting to market trends, and innovating based on data-driven insights can drive sustained growth and long-term success for the online casino.

Conclusions

As we stand on the precipice of launching BetComets, it is essential to reiterate our unwavering commitment to redefining the online casino experience. Through meticulous planning, strategic growth initiatives, and a relentless focus on innovation, we are poised to establish a new benchmark in the industry. Our dedication to customer satisfaction, ethical gaming practices, and leveraging cutting-edge technology is not just a business strategy, but a testament to our vision of creating a platform that is secure, engaging, and unparalleled.

We understand the magnitude of the responsibility we undertake, particularly in terms of regulatory compliance and promoting responsible gaming. Our approach is comprehensive, ensuring that while we strive for profitability, we do not lose sight of our ethical obligations to our users and the broader community.

In closing, BetComets is not merely seeking to enter the market; we are here to transform it. We believe our strategic planning, combined with our innovative offerings and commitment to excellence, positions us uniquely to achieve this aim. We are enthusiastic about what the future holds and are confident that our proposal outlines a compelling vision for what we can achieve together.

Your time and consideration in reviewing our proposal are greatly appreciated. We are looking forward to the opportunity to discuss this further and to potentially embark on this exciting journey together.

Warmest regards,

Karol Sobieraj