

Dynamik Marketing B.V.

BUSINESS PLAN

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---	1.0	06/03/2017	First Cut	MO
1.0	2.0	20/04/2024	Several updates to reflect current and intended future operations	MO
2.0	3.0	23/07/2026	Added Organisational Chart Added Risk Register Removed mentions of BFB247	MO

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1. Business Description

Sharp Klick Limited (SK) is the holding company of entities incorporated and licenced in Curacao, a jurisdiction that allows for a wide range of real money remote gambling activities with cost-effective corporate structures and gambling duties. SK is the sole shareholder of Dynamik Marketing B.V. (DM), incorporated in 2020 and currently operating the business Indibet.

DM has engaged with Xecutive Corporate Management (XCM), a corporate service provider in Curacao, and Antillephone N.V., holder of master licence 8048/JAZ, to maintain a sub-licence which entitles it to operate the businesses described in this document.

As the business has been operating profitably for 4 years and reached profitability at the end of 2023 and it intends to continue to operate at a profit, SK has decided to apply for DM's own operating licence to be issued by the Gaming Control Board (GCB). All of the technology utilised by the business is provided by a related entity, Neon Eight Technology Limited (NETL) which has developed its own platform and integrated content from several reputable suppliers (such as Betfair, Pinnacle, Evolution Gaming and more), and all of the operations are provided to DM by SK by means of a service agreement giving DM access to finance, marketing, customer services, and other functions distributed across the globe and operated by companies of same ownership and control as SK.

2. Company Background

DM is fully owned by SK. SK is fully owned by the holding company Neon Eight Holdings Limited (NEHL) which is ultimately owned by Ms Iann Yee Yan Tang who is also a director of SK and NEHL. Ms Tang has proven experience in all aspects of land based and remote gambling operations with a focus on building strong, long-term client and partner relationships and reaching niche market segments not catered for by mainstream operators. Ms Tang has achieved such success working with a team of expert management executives and a highly efficient operations team, delivering bespoke products and excellent customer service.

Ms Tang's management team handles the day-to-day operations of all of her current businesses leaving her the time to focus her entrepreneurial efforts on new ventures and expanding the breadth of products and services offered to high net worth and professional gamblers. Ms Tang holds a Personal Management Licence (026623-M-333394-001) issued by the UK Gambling Commission and also owns businesses licensed in the UK and the Isle of Man.

The corporate mission is to provide a wide range of services in the sports betting space with a mixed risk profile, in order to take advantage of the senior management existing relationships and know-how to monetise opportunities of interest.

The choice of Curacao as a jurisdiction is motivated by the inclusive licence, the favourable taxation on profits for Ezone businesses, and the lack of restriction on servers and technology location.

3. Products/Services

The activities listed below will be operated under the brand Bet-Football (www.bet-football.com), :

- A. Casino - accepting wagers on random-number generator and live dealer-based games.
- B. Sportsbook - accepting fixed odds bets on sporting events from customers.
- C. Betting Exchange - Accepting bets on sporting events onto a shared-liquidity peer-to-peer betting mechanism.
- D. Telephone and instant messaging betting - accepting fixed odds bets on sporting events from customers over the phone or IM applications (ie Skype, Teams, WhatsApp or similar).

4. Technologies/Special Know-How

4.1 Bet-Football

The software that powers the customer-facing website and bet entry system has been developed and is owned by NETL. It is hosted on AWS cloud facilities with hourly back up and disaster recovery procedures being executed. DM will not have any other technology suppliers. DM has entered into a licensing agreement with Eight Central Limited N.V. (holder of B2B licence issued under LOK with number OGL/2024/1572/1027) to source a Betfair whitelabel.

4.2 Regulatory Compliance

All customers are verified at account opening to ascertain age and country of residence as well as any attempted breach of self-exclusion. All details of our KYC and EDD processes are included in the policy attached.

Customers are able to set time, deposit and spend limits on their accounts as well as self-exclude for set period of times. All relevant details are included in the Responsible Gambling policy attached.

Ms Leyre Leire N'shimbi Fernandez as Compliance Officer and MLRO with access to relevant resources and systems. SK has access to a time of qualified full-time compliance officers dedicated to its real money gaming and gambling products.

5. Markets

The target markets for the services listed above are detailed below with percentage of volumes expected in Year 1 of licence being granted:

- A. Sportsbook - Europe (30%), APAC (30%), LATAM (20%) and others (20%)

- B. Betting Exchange - Europe (30%), APAC (30%), LATAM (20%) and others (20%)
- C. Telephone and IM Betting - Europe (30%), APAC (30%), LATAM (20%) and others (20%)

The company does not intend to acquire players from the United States of America, the United Kingdom, Australia, the Netherlands, Curacao or any other locations that require a local licence, nor from any sanctioned countries. DM aims to launch additional skins of the same brand with the same products in additional markets and possibly pursue local licenses in other jurisdictions where the board deems the opportunity to be appealing and to lead to long-term profits. The board has not identified such opportunities yet.

6. Distribution Channels

We aim to distribute all our services via two main channels.

6.1 Direct B2C Acquisition.

We will provide accounts to customers upon registration and compliance with our policies regulating:

- account verification and minimum age;
- deposit and withdrawals of funds; and
- responsible gambling.

The relationship between DM and its customers will be regulated by the Terms and Conditions published on the websites.

6.2 Affiliates

We hold relationships with webmasters and affiliates who introduce customers in our target markets in exchange for a percentage of the commission we make from other bookmakers and exchanges, or for a percentage of the net revenue we generate from customers betting on our services. All customers go through the same registration process and are subject to the same policies and terms and conditions as those directly acquired by DM.

7. Operations

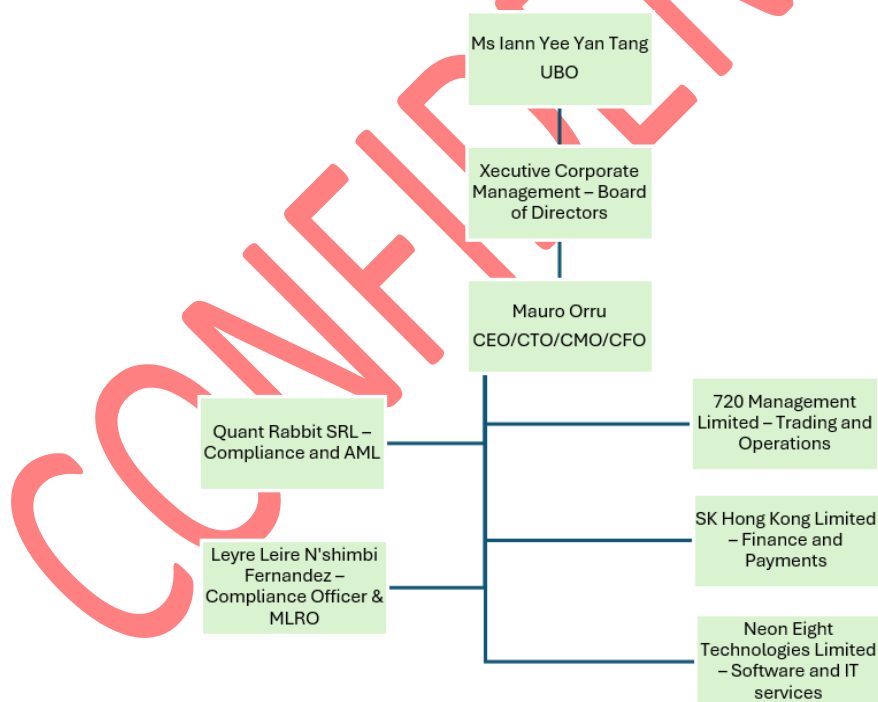
DM is the operating entity for the Bet-Football business. In order to deliver its services, DM contracts its management services and operations from its parent company SK which in turn sources those services from its sister companies incorporated in the UK, Romania and Hong Kong. Ms Tang and Mr Orru are directors and controllers of all the outsourced suppliers ensuring alignment between

the supply and delivery of services in accordance with DM's strategic goals and regulatory standards.

DM sources its technology from NETL, a BVI incorporated company that has recently been awarded certification for its software by BMM Testing Labs in accordance with the standards established by the Secretariat of Prizes and Betting in Brazil. NETL also currently holds a B2B provider licence issued by the Internet Gaming Regulatory Authority of Anjouan (license number ALSI-202604041-FI2). EC is a sister company of DM from which DM sources a Betfair whitelabel. NETL and EC are also fully owned by Ms Tang and controlled by Ms Tang and Mr Orru.

DM has appointed Ms Leyre Leire N'shimbi Fernandez as Compliance Officer and MLRO. Ms Fernandez has full access to resources and information within the organisation, receives reports and escalations directly from operational and compliance staff, and is able to make suspicious activity reports and escalations to the directors where appropriate.

DM has entered into an agreement with EGIS – FZCO (Certificate Holders according to article 5.17 of the LOK number CGA/ADR/2025/03) for the provision of ADR services made available to consumers at no cost to them.



8. Competition

We deem our competition to be substantially different in their proposition to not present a significant risk to the bottom line. Our business mainly competes with similar companies licenced in Curacao or not licenced at all, that target mainly Asian customers. We expect the market to remain sufficiently large and potentially grow, as

a by-product of regulatory pressures, to grant our expected volumes and growth and we expect our fully compliant set-up to withstand the test of further regulation being introduced. Our brand competes in a very large marketplace which grants a sufficient market share for our appetite.

9. Risks

Category	Risk	Description
Customers	Identity Risk	Online gambling platform - there is a risk customers that register to use it may not be the individuals who use it
Customers	Hacking	Online gambling is particularly vulnerable to fraud due to its accessibility and can be easy targets.
Customers	Tracking and Monitoring	Even after the customer's identity has been verified, the KYC process doesn't end. Online gambling platforms are required to monitor customer transactions to detect any suspicious activity continuously. This includes looking out for patterns that may indicate money laundering, such as large deposits or bets, frequent withdrawals, or unusual changes in betting patterns.
Customers	Politically exposed persons and sanctioned individuals	Risk of taking Politically exposed persons as customers. Money laundering is a major risk associated with PEPs. By using their influence, PEPs can facilitate large-scale money laundering operations. Corruption is another significant risk. PEPs can abuse their power to solicit bribes, embezzle funds, or engage in other corrupt practices.
Product	Market Manipulation	Manipulation of sports competitions may be based on betting or sports. The aim of betting-related manipulation is to obtain direct or indirect financial returns through betting. Direct financial return refers to the amount of money obtained through betting and indirect financial return refers to the benefit obtained, for example, through money laundering. The aim of sports-based manipulation is to gain a competitive advantage through unfair means. The goal may be, for example, to win or lose a meaningful match or to avoid relegation or gain promotion.
Product	Price Manipulation	Spoofing/Layering/Bluffing - placing large orders on one side of the book to push the price the other way.
Product	Sports Integrity	Allowing bets on match-fixed
Product	Payment solutions	Payment Solutions fraud
Product	Betfair Minimum Compliance Standards	Minimum Betfair Compliance Standards

Geography	Sanctioned Countries	Sanctions and Embargoed Countries Screening from FATF List / Money Laundering & Terrorist Financing Screening from Country Risk Index (CRI based on investing /doing business in a particular country)
Geography	Restricted Countries	Contractual obligations - Betfair
Geography	High Risk countries	Some countries pose an inherently higher money laundering risk than others. In addition to considering their own experiences, operators (particularly those who operate in a remote environment) should take into account a variety of other credible sources of information identifying countries with risk factors in order to determine that a country and customers from that country pose a higher risk.
Geography	Country Mismatch	Country mismatch between Country residence and Bank accounts country and the risk to accept deposits/ or pay winnings on/from bank accounts that sits in sanctioned countries.
Finance	Minimum Guaranteed Commission	Betfair Minimum Guaranteed Commission - Contractual obligations
Finance	Profitability	Profitability
Finance	Assets	Depreciation of the fixed assets / real estate
Human Resources	Staff Location	Staff location may pose a risk when the staff is located in countries with political insecurities, with war in between borders or close to their borders or even location with high climatic dangers.
Human Resources	Staff Numbers	The Risk to have an insufficient head count designated for each team that handles important functions: ops team, traders, compliance, finance, settlements etc. Smaller number of employees might result in a risk of operation not being covered properly, risk of shortage of staff if people resign
Human Resources	Confidentiality	Disclosure of unauthorised company information - existing risk that may occur with employees that have access to a confidential information.
Human Resources	Training and Qualification	Staff - Roles and responsibilities
Human Resources	Probity	Pre-employment due diligence checks on staff and service contractors.
Tax	Gambling Duty	Gambling Duties
Tax	Taxes	Corporation Tax, VAT and other taxes
Management and Control	Accounts	Financial reporting / Financial results - the Board gets monthly figures and can quickly change strategy and take action
Management and Control	Management Team	Management team to have a strong professional background in gambling / betting
Payments	Crypto payments	The Company does not accept crypto payments.

Payments	Authorisations	Unauthorised payments from staff or funds hijacked by internal staff (finance, controllers, etc)
Payments	Purchasing and Due Diligence	Third Party contractors and services - DD Checks
Regulatory	Reporting responsibility	Suspicious Activity Report (SAR) Suspicious Transaction Report (STR)
Regulatory	Record Keeping	Customer Identification Records Transaction Records Suspicious Activity Reports (SARs) Risk Assessment Reports Compliance Training Records
Regulatory	Regulatory Changes and Inspections	Regulatory Changes and Inspections

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10. Financial Projections

A set of forecasts for the next 3 years is provided below. In green, are the previous 3 full years while in yellow are the current and following 3 years. All figures are presented in HKD millions.

Year	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026	FY 2027
Gross Profits HKD mln	148.06	-49.54	2.24	74.03	-14.10	88.84	1.12
Operating Expenses HKD mln	10.16	7.40	9.38	10.03	10.73	11.49	9.38
EBITDA HKD mln	137.91	-56.93	-7.14	64.00	-24.83	77.35	-8.26

These conservative forecasts are based on:

- Licence being granted in Q2 or Q3 2024 and continued operations with no interruption.
- Revenues are heavily dependent on main soccer competitions and larger events (EUROs 2024, World Cup 2026).
- An increase in operating costs during main soccer events and large competitions.
- Business as usual and no investment in new product or brand launches.