



Apalonik B.V.

Business Plan

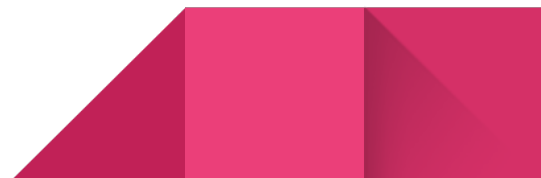


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BUSINESS OBJECTIVE

Apalonik B.V. is an emerging business-to-consumer (B2C) iGaming company that is in the process of establishing itself as a licensed operator in the global online gaming market. The company intends to offer a diverse portfolio of digital entertainment products, including online casino games, sports betting and others, all delivered through a modern, scalable, and secure platform.

Our core mission is to provide a secure, responsible, and engaging gaming environment, underpinned by state-of-the-art technology, a user-centric design approach.

Strategic Priorities

1. Platform Development and Security

Use a robust and secure platform that delivers seamless performance, user safety, and data protection.

2. Player Protection and Responsible Gaming

Implement advanced responsible gaming tools, KYC/AML procedures.

3. Product Portfolio Diversification

Offer a comprehensive range of products, including slots, table games, live casino, sports betting and more.

4. Operational Excellence

Establish efficient business processes, support systems, and customer service operations to ensure high-quality user experiences and smooth functioning.

SERVICES

The Company intends to provide services in the field of:

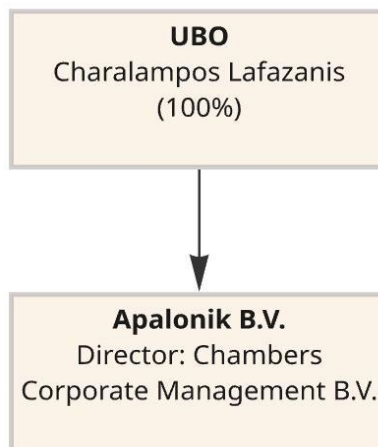
Casino

- Slots;
- Online casino games;
- Sports betting;
- Other technological solutions/services are possible in the field of iGaming.

CORPORATE STRUCTURE, DIRECTORS AND SHAREHOLDERS

The ultimate beneficial owner of Apalonik B.V. is Charalampos Lafazanis, with 100% ownership interest in the company.

Chambers Corporate Management B.V. is the Director of Apalonik B.V.



MANAGEMENT AND GENERAL CONTROLS & DUTIES

MANAGEMENT CONTROL

As the Director Chambers Corporate Management B.V. , with primary managerial control and significant industry experience, the Director is responsible for performing the following functions on behalf of the company, including but not limited to:

1. Financial Administration;
2. Compliance Services;
3. Directorship;
4. Back Office Support.

The Director is well-equipped to effectively oversee the company's operations and ensure proper control of all business activities. With a strong leadership background and strategic vision, the Managing Director will maintain operational efficiency, ensure compliance with regulatory requirements, and drive the company toward its growth objectives.

GENERAL CONTROL

The company will establish distinct departments for development, finance, casino operations, customer support, payments and fraud, business intelligence, and marketing.

Apalonik B.V. will establish a clear organizational framework in which individual roles and responsibilities are well-defined, and transparent reporting lines are implemented across all departments. This structure will ensure that each department operates with

operational depth and strategic focus, enabling the effective achievement of its objectives and alignment with the company's broader vision.

Apalonik B.V. imposes restrictions and fully complies with the accepted legal age of 18+ being the players allowed to use online commercial gaming products.

The Director will ensure strong compliance and effective Anti-Money Laundering (AML) practices across all areas of the company's operations. This includes the development and implementation of comprehensive internal policies and procedures designed to meet all relevant regulatory requirements. By establishing clear guidelines, internal controls, and training programs, the Director will foster a culture of compliance, integrity, and transparency. These efforts will ensure that the company not only adheres to applicable laws but also proactively identifies and mitigates potential compliance and AML risks.

BUSINESS RISK RATIONALE

The iGaming industry, while offering significant growth opportunities, also presents a range of business risks that must be carefully identified, assessed, and managed. Apalonik B.V. acknowledges these risks and is developing a comprehensive risk management framework to mitigate potential threats and ensure operational stability.

Key business risks include regulatory and licensing changes, market competition, operational dependencies on third-party providers (e.g., payment processors, game suppliers), data protection requirements, and the risk of financial crime, including fraud and money laundering. The company also recognizes reputational risks associated with responsible gaming obligations and customer trust.

To address these challenges, Apalonik B.V. will implement strong internal controls, ensure full compliance with applicable laws and regulations, and maintain contingency and business continuity plans. A well-defined organizational structure, experienced leadership, and dedicated compliance and AML functions will further support risk mitigation efforts. Additionally, the company will adopt a proactive approach to monitoring emerging risks and adapting its business strategy accordingly.

This risk-aware approach provides a solid foundation for sustainable growth while protecting the company, its customers, and stakeholders from adverse outcomes.

Risk	Owner	Likelihood	Impact	Mitigation/Controls	KRIs	Audit/Oversight
Regulatory non-compliance	Compliance Officer	M	H	Policy framework; training; monitoring; regulatory reporting	Findings count; remediation SLA	Compliance Committee; external audit
AML/CFT failure	MLRO	M	H	KYC onboarding; TMS alerts; SAR/STR process	Alert backlog; SAR timeliness	AML Committee; annual audit

RG shortcomings	Compliance Officer	M	H	RG tools; affordability checks; self-exclusion	RG interventions; complaint rate	RG Committee; periodic review
Cybersecurity breach	CTO	M	H	WAF, DDoS, MFA; backups; pentest	Incidents; patch cadence	Tech Risk Committee
Vendor outage	Head of Payments & Risk	M	M	Multi-vendor strategy; SLAs; runbooks	Downtime; failover success	Ops Committee

- Oversight Committees:
 - Compliance Committee
 - AML Committee
 - Risk & Audit Committee
 - Technology Risk Committee

CONTRACTUAL MODEL WITH KEY SUPPLIERS

Apalonik B.V. will establish formal contractual agreements with all key suppliers to ensure the continuity, compliance, and quality of critical services required for the company's gaming operations. These suppliers include, but are not limited to, game

content providers, payment service providers (PSPs), KYC/AML verification partners, platform technology vendors, and hosting or infrastructure providers.

All contracts will be structured to clearly define responsibilities, data protection obligations, licensing rights, termination clauses, and dispute resolution mechanisms. This contractual model is designed to minimize operational risk, ensure legal clarity, and protect the company's commercial interests.

By maintaining strong contractual relationships with its suppliers, Apalonik B.V. ensures that all outsourced services meet the company's performance standards, align with regulatory requirements, and support its long-term business objectives.

COMMERCIAL STRATEGY

MARKETING PLAN

Apalonik B.V. will implement a comprehensive and data-driven marketing plan. The marketing strategy will focus on building strong brand awareness, driving qualified traffic to the platform, and maximizing customer lifetime value through personalized and responsible engagement.

Key Components of the Marketing Plan:

- SEO & Content: Organic traffic growth through optimized content and technical SEO.
- CRM & Retention: Personalized communication.

- Social Media: Active presence to build brand visibility and community engagement.

PROBLEM SOLVING

While the global industry demonstrates consistent growth, a significant portion of the market remains underserved due to platforms that lack operational efficiency, user-centric design, and robust regulatory compliance.

Apalonik B.V. aims to solve these problems by offering a modern, user-centric platform that combines cutting-edge technology with seamless payments, real-time personalization, and a player-first approach. The company's goal is to address existing market gaps by delivering a superior entertainment experience while ensuring safety, fairness, and operational integrity.

Our Competitive Advantages

Apalonik B.V. is entering the industry with a clear strategic focus and a strong foundation of competitive advantages that support sustainable growth, regulatory compliance, and long-term market relevance.

The company's key strengths include:

1. Advanced Technological Infrastructure

A scalable and secure platform built to ensure system stability, and integrate seamlessly with third-party services such as payment providers and game suppliers.

2. Robust Compliance Framework

A proactive approach to regulatory compliance, including comprehensive AML, KYC, and responsible gaming policies aligned with Curacao licensing requirements.

3. Strategic Vendor Relationships
Partnerships with industry-leading game studios, PSPs, KYC providers, and technology vendors that ensure high-quality service delivery and operational resilience.

FINANCIAL

FORECAST

We have developed a financial forecast outlining the projected revenues we anticipate receiving from Year 1 through Year 3. The forecast is based on current market conditions, planned initiatives. While the figures presented are approximate, they offer a well-informed estimate of our expected financial performance over the forecast period.

Our forecast is that we will go live on November 1st, 2025.

EUR'000 (GGR)	Year 1	Year 2	Year 3
Total Revenue	30 000 EUR	850 000 EUR	1 300 000 EUR
Total Expenses	10 000 EUR	350 000 EUR	400 000 EUR
Net Result	20 000 EUR	500 000 EUR	900 000 EUR

Key Assumptions:

- Marketing: CAC/CPA by channel; monthly acquisition budget; bonus cost ratio; retention budget.
- Monetization: ARPU/ARPPU; deposit frequency; NGR margin by product; provider rev-share; PSP fees.
- Operations: Headcount ramp & salaries; hosting & CDNs; data & odds feeds; fraud & KYC tools.
- Taxes & Duties: corporate income tax assumptions.
- Working Capital: PSP settlement cycles; chargeback reserves; supplier payment terms.

TECHNOLOGY, SOFTWARE AND PROVIDERS

Software and payment architecture

The main offerings will consist of slot games, live casino and sports betting, provided through carefully chosen platform and software partners. To stay competitive in the fast-growing market and cater to users who prefer digital payment solutions, we have chosen to implement secure online payment methods.

3rd Party Providers

Games:

- AMATIC;
- Evolution;

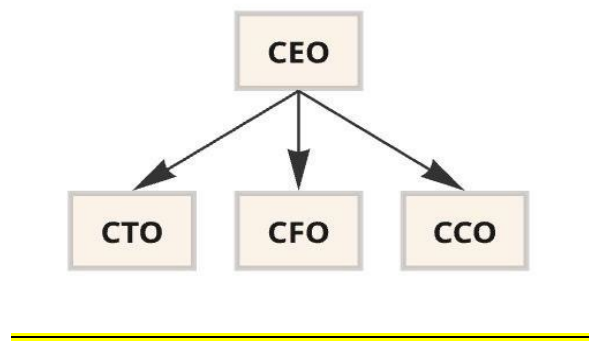
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- BGaming;
- Sports Betting.

Payment solutions:

- Paymix;
- Gurupay.

PLANNED C-LEVEL MANAGEMENT STRUCTURE



Recruitment plan

Position	Status	Responsibilities	Comments
CEO	Vacant	Strategic leadership and management.	Search to begin within 2-3 months post-licensing. Estimated budget for the role: EUR 80,000/year.
CTO	Vacant	Develop and execute the company's technology strategy	Search to begin within 2-3 months post-licensing. Estimated budget for the role: EUR 60,000/year.
CFO	Vacant	Oversee financial planning, budgeting, and forecasting	Search to begin within 2-3 months post-licensing. Estimated budget for the role: EUR 50,000/year.
CCO	Vacant	Oversee Marketing,	Search to begin

		CRM, partnerships, revenue growth	within 2-3 months post-licensing. Estimated budget for the role: EUR 50,000/year.
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Recruitment is on hold until the Curacao gaming license is granted in order to ensure compliance and efficient use of resources.

LAUNCH TIMELINE (INDICATIVE)

Milestone	Owner	Target Date
License approval	UBO / Director	TBD
Platform selection & contracts	CTO / CCO	TBD
PSP onboarding & banking	Head of Payments & Risk	TBD
KYC/ AML tooling live	MLRO / Compliance Officer	TBD
Policies & procedures submitted	Compliance Officer	Within 60–90 days post-license

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Soft launch (beta)

CEO / CTO

TBD

Public go-live

CEO

1 Nov 2025 (target)