

BUSINESS PLAN

For operators of games of chance

Firo Lod N.V.

Business Plan Version: 1.0.

Our Mission

Firo Lod N.V. is dedicated to delivering a dynamic and immersive online gaming experience that seamlessly blends entertainment, strategy, and innovation. Our platform offers a broad spectrum of online casino and sportsbook options, specifically tailored to the preferences of players in Eastern Europe. We aim to provide a secure, engaging, and culturally relevant environment for users to enjoy their favourite games and sporting events.

Our mission is to become the leading destination for betting and interactive gaming in Eastern Europe, combining cutting-edge technology, trust, and localized content. We strive to offer a comprehensive suite of sports betting, casino games, and event-based wagering opportunities designed to meet:

- Local sports interests (football, hockey, basketball, esports);
- Player demand for classic and live casino experiences;
- Cultural nuances and engagement patterns unique to the region.

We are committed to delivering an intuitive, visually appealing, and highly adaptive product that meets the expectations of Eastern European players — from newcomers to experienced high-value customers.

We aim to leverage state-of-the-art digital solutions and high-performance software systems to ensure reliable and fast product performance, even during peak traffic, enhance personalization for recommendations, promotions, and bonuses, achieve integration with payment methods popular in Eastern Europe, including local bank cards, e-wallets, and instant payment solutions and provide for advanced security protocols to safeguard user data and transactions in full compliance with regional regulations.

Our commitment to customer satisfaction is unwavering – the product will operate with a dedicated 24/7 multilingual support team, able to provide professional assistance, resolve issues promptly, and promote responsible gaming practices tailored to local regulatory requirements.

To support our growth, the Company has entered into a strategic partnerships with BTB Betlab Holding, a globally recognized software developer with a proven track record in reliability and technological excellence. With its international footprint, deep industry expertise, and operational insights, BTB Betlab Holding strengthens our ability to deliver on our mission and establish new benchmarks in the Eastern European online gaming market.

For operational and regulatory excellence, the Company collaborates with Service Synergy, a turnkey corporate services provider that manages all corporate and administrative affairs. Their services include compliance and MLRO functions, tax and legal reporting, legal supervision, and process facilitation. This partnership ensures that our operations remain fully compliant with regional and international regulations, while freeing our internal resources to focus on product development and market expansion.

Company and Management

The Company is a newly established entity currently in its startup phase, with its product suite nearing full completion and ready for launch immediately upon securing the necessary gaming license. Following lean startup principles, the internal team consists of a select group of key personnel responsible for strategic leadership and core managerial functions, while non-core operational tasks are outsourced to specialized service providers. This model allows for rapid execution, cost efficiency, and scalability.

The Company is wholly owned by Mrs. Jana Skalicka, a seasoned and visionary entrepreneur with extensive experience in sales, strategic leadership, and business administration. Serving as both Chief Executive Officer (CEO) and Chief Financial Officer (CFO), Mrs. Skalicka leverages her strong track record to guide the Company through its initial growth stages and the complex regulatory onboarding process. To ensure international credibility and market access, Mrs. Skalicka plans to apply for a Curaçao Gaming License, aligning the Company's operations with globally recognized standards of integrity, player protection, and responsible gaming.

The Company's operating model is designed to fully leverage an extensive business network, including platform providers, casino and sportsbook content suppliers, payment processors,

and third-party operational support partners. By adopting a variable-cost structure—where operational expenses scale in proportion to actual revenue—the Company minimizes upfront capital requirements and preserves financial flexibility during the early growth phase.

To meet all regulatory and administrative obligations, the Company has contracted Service Synergy as its principal corporate services and compliance partner. Service Synergy is a trusted provider for the iGaming industry, delivering a turnkey solution that includes:

- Corporate administration and governance;
- Policy and procedure development;
- Comprehensive compliance program design;
- AML/KYC frameworks and monitoring;
- Internal control systems.

These services are fully integrated into the Company's daily operations, ensuring continuous governance, transparency, and regulatory alignment.

In accordance with Curaçao Gaming Authority (CGA) requirements, Ihor Filimonov, a member of the Legal and Compliance team at Service Synergy, has been designated as the Company's Compliance Officer. In this role, she is responsible for ensuring best-practice compliance, maintaining active liaison with local regulators, and safeguarding the Company's adherence to licensing conditions.

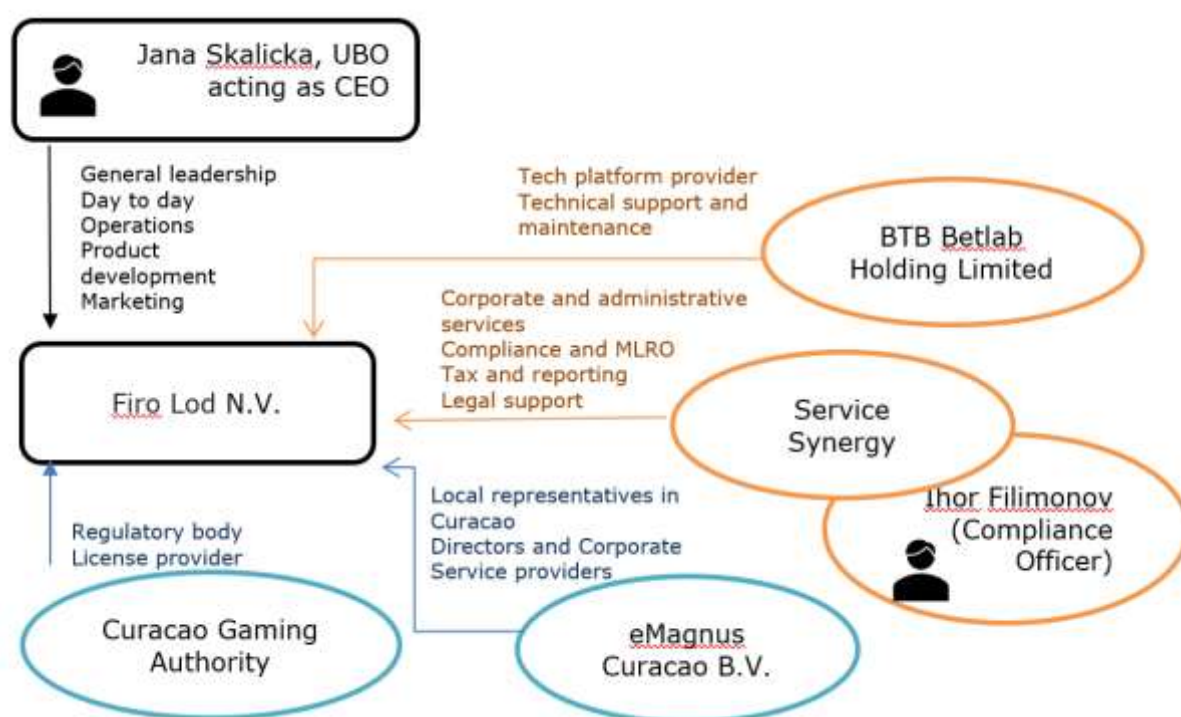
The Company's technological foundation is powered by BTB Betlab Holdings Limited, a globally recognized iGaming software developer. BTB Betlab provides robust platform infrastructure, seamless casino and sportsbook content integration, and ongoing technical innovation—ensuring optimal performance, scalability, and user experience.

The Company also maintains a critical partnership with eMagnus Curaçao B.V. (eMagnus), which serves as the appointed local representative and director in Curaçao. eMagnus ensures the Company maintains a valid legal presence within the jurisdiction and complies with all local statutory and regulatory requirements.

The Curaçao Gaming Authority (CGA), as the reformed licensing body, has replaced outdated licensing models with a modernized regulatory framework. This new structure emphasizes greater accountability, transparent oversight, and stricter compliance standards for all licensed operators.

By aligning with industry-leading technology providers, regulatory advisors, and corporate service partners, the Company has established a lean, compliant, and highly scalable operational foundation. This structure enables rapid market entry into Eastern Europe and other targeted jurisdictions, ensures full regulatory compliance, and positions the Company for long-term growth and sustainable competitiveness in the global gaming sector.

The Company's operational structure can be summarized by a chart below:



Corporate governance, Risks and Controls

The Company has adopted a lean yet robust corporate governance framework, specifically designed to balance operational agility with full compliance to all applicable regulatory standards. This governance model supports the Company's early-stage business strategy, enabling it to remain flexible and cost-efficient without compromising oversight, accountability, or operational integrity.

Leadership and Oversight

The Ultimate Beneficial Owner (UBO), currently serving as Chief Executive Officer (CEO), provides strategic leadership and direct oversight of all core operations. To satisfy jurisdictional corporate requirements in Curaçao, the Company has appointed eMagnus Curaçao B.V., a reputable and licensed Corporate Service Provider, to manage all corporate affairs. eMagnus holds directorship responsibilities and acts as the Company's official local representative, ensuring statutory compliance within the jurisdiction.

Outsourcing of Specialized Functions

Acknowledging the complexity and regulatory sensitivity of the online gaming sector, the Company has strategically outsourced mission-critical operational and technical functions to accredited third-party providers with proven industry expertise. These outsourced functions include:

- Gaming platform development and maintenance;
- Financial and tax reporting;
- Internal audit and controls;
- Regulatory compliance and licensing support;
- Know Your Customer (KYC) and Anti-Money Laundering (AML) program implementation;
- Risk management and Anti-Money Laundering Reporting Officer (AMRO) responsibilities.

All external partners have been selected based on their track record of excellence, sector-specific credentials, and familiarity with evolving online gaming regulations in both global and regional contexts, including Eastern Europe.

Risk Management and Control Framework

By entrusting these specialized functions to seasoned service providers, the Company significantly reduces operational, legal, and financial risks. Each partner operates within a defined Service Level Agreement (SLA) and compliance framework, ensuring:

- Transparent operational reporting;

- Clear accountability lines;
- Continuous monitoring of compliance obligations;
- Rapid response protocols for regulatory or operational issues.

This outsourcing model strengthens governance standards and ensures that all critical functions are performed by qualified professionals. It allows the internal leadership team to remain focused on business strategy, market growth, and innovation, while maintaining full confidence in the Company's legal, financial, and regulatory standing.

Our Services

The Company is strategically targeting Eastern Europe as its primary market, recognizing the region's strong commercial potential and the fact that it remains underdeveloped by competitors.

Eastern Europe presents significant growth potential for the online gaming and sports betting sector. The region's population is largely urbanized, increasingly tech-savvy, and deeply passionate about sports—particularly football, basketball, and tennis. With accelerating digital adoption, consumers are steadily shifting from traditional retail betting outlets to mobile and online platforms, seeking real-time betting options, live streaming of sporting events and personalized gaming and promotional experiences.

The market remains relatively unsaturated, with no single dominant regional operator, creating an opening for agile, well-structured companies. Operators capable of delivering localized content, intuitive user interfaces, and strong customer support are uniquely positioned to capture market share.

The Company's approach will center on:

- Culturally tailored marketing campaigns that resonate with local preferences;
- Full local language support across all user touchpoints;
- Strategic partnerships with regional affiliates, payment providers, and sports organizations to foster trust and accelerate user acquisition.

With its flexible operational model, the Company is well-positioned to enter and expand across Eastern European markets. By focusing on user experience, seamless integration with licensed content providers, and targeted market segmentation, the Company aims to establish itself as a trusted, innovative, and regionally relevant gaming brand for customers, partners, and other stakeholders.

Market Opportunity, Strategy, and Competitive Advantage

Eastern European Market Potential and Growth

The Eastern European online gambling market remains relatively underdeveloped in terms of regulated offerings, yet it exhibits clear signs of rapid future growth. Accelerating digital transformation—marked by increasing high-speed internet penetration, affordable smartphones, and expanding mobile coverage—has made online platforms more accessible than ever.

A growing segment of the population, especially younger, urban, and tech-savvy users, now prefers mobile-first entertainment. This shift aligns perfectly with online gambling's core strengths: on-demand access, personalization, and a broad range of betting and gaming options unavailable in traditional retail outlets.

The region also boasts a deep-rooted passion for sports, particularly football, basketball, tennis, and emerging esports, which drives high engagement levels in sports betting—especially during major international tournaments. In parallel, familiarity with casual and competitive gaming has fostered a tech-literate user base willing to embrace new interactive entertainment formats.

Economic growth and urban migration are expanding the digitally connected middle class with higher disposable income. This demographic actively seeks immersive, socially engaging online experiences, from live betting and virtual sports to loyalty programs and gamified interfaces.

Comparative benchmarks from more mature Eastern European jurisdictions suggest that the region could achieve compound annual growth rates (CAGR) exceeding 8% once comprehensive regulation and open market access are established. Existing demand is already

visible through unregulated channels, signaling a latent user base ready for safe, localized, and fully licensed platforms.

By entering the market early with a compliance-first operating model, the Company aims to secure first-mover advantage, building brand recognition and long-term customer loyalty before significant market saturation occurs.

Product Strategy

The Company will deliver a comprehensive and locally relevant portfolio of online gambling products, including sportsbook with pre-match and live betting and online casino (including slots, table games, and high-quality live dealer experiences).

The online casino vertical offers particularly strong potential due to its variety and retention appeal, while poker enjoys a dedicated following across Eastern Europe, supported by online communities, live streaming, and a culture of competitive play. The Company will capitalize on this by offering diverse formats, frequent tournaments, and community-driven engagement.

Marketing Strategy

The Company's flagship brand, Betmatch, will be promoted through a targeted, localized, and digital-first strategy built on four core pillars:

- Social Media & Digital Marketing – Engage audiences on high-penetration platforms like Facebook, Instagram, Telegram, TikTok, and YouTube, using linguistically and culturally localized campaigns.
- Affiliate & Influencer Partnerships – Collaborate with trusted regional influencers, content creators, and affiliate networks to extend reach, build credibility, and drive cost-effective acquisition.
- Localized Promotions & Loyalty Programs – Offer country-specific bonuses, cashback, free spins, and culturally relevant campaigns tied to national holidays and major sporting events.
- Sports Sponsorships & Local Partnerships – Invest in sponsorships with sports teams, leagues, and esports events to deepen brand integration within local communities.

Competitive Edge

The Company's market leadership ambitions are anchored in two strategic pillars:

1. Marketing & Product Differentiation

- Hyper-localized product themes, promotions, and UI/UX;
- Aggressive yet targeted digital outreach, particularly to the 18–25 demographic;
- Content-rich brand positioning through live streams, reviews, and collaborations with industry influencers;
- Performance-driven affiliate marketing backed by measurable ROI metrics.

2. Compliance & Responsible Gaming

- Strict adherence to AML (Anti-Money Laundering) and KYC (Know Your Customer) requirements;
- Certified Random Number Generator (RNG) systems audited by third parties;
- Transparent payout rate (PRT) disclosures to reinforce player trust;

By integrating innovative marketing, localized content, and rigorous compliance, the Company is uniquely positioned to capture market share rapidly, build strong brand loyalty, and achieve sustainable, long-term growth in the Eastern European iGaming sector.

Regulatory Compliance and Market Access

The Company operates in strict adherence to license conditions and AML/TF (Anti-Money Laundering and Counter-Terrorist Financing) regulations. While players may technically be able to access the platform from outside the targeted region, technical restrictions will be in place to prevent use in prohibited jurisdictions.

The list of restricted countries will include:

- Nations subject to UN, US, or EU sanctions or blacklists;
- Markets prohibited under licensing conditions, such as Curaçao, the USA, the Netherlands, and others as applicable.

This approach ensures that market expansion is conducted responsibly, within all regulatory and ethical boundaries, thereby safeguarding both the Company's operational integrity and its relationships with licensing authorities.

Financial Considerations

The Company's financial projections reflect a balanced growth strategy across both Casino and Sports Betting verticals, as illustrated in the table below. While Casino Gross Gaming Revenue (GGR) is projected to grow steadily, Sports Betting is expected to maintain a strong performance year-on-year, benefiting from high engagement levels and the broader appeal of sportsbook products in the target markets. Importantly, the projected growth in Casino revenues is forecasted to outpace the rate of increase in royalties payable to content providers, ensuring stable margin preservation over the forecast period.

Thsd USD	Year1	Year2	Year3	Year4	Year5
Revenue total Incl:	433	913	1,930	4,098	8,718
Casino	269	586	1,284	2,813	6,159
Sport	164	326	646	1,286	2,559
COGC					
Royalties	126	265	560	1,189	2,528
Other Direct expenses	56	119	232	492	1,046
Gross Profit	251	529	1,139	2,418	5,144
Operating expenses (OPEX)					
Administrative expenses	35	82	232	492	1,046
Licensing Expenses	30	80	100	100	100
Marketing Expenses	165	319	637	1,230	2,180
Other Expenses	17	46	116	246	523
Total OPEX	247	527	1,085	2,067	3,849
PBIT	5	2	54	351	1,295

Cost Structure and Margin Strategy

The Company's cost structure is predominantly variable, with the majority of expenses directly linked to revenue performance. These include affiliate commissions, royalties to content providers, and Payment Service Provider (PSP) fees. All such costs are performance-driven, ensuring scalability without burdening fixed cost lines.

Fixed costs remain limited and are concentrated in administrative, licensing, and a portion of other operational expenses. This lean structure supports the Company's ability to adapt rapidly to market changes while maintaining operational efficiency.

Marketing receives a significant allocation in the early years to drive brand visibility and user acquisition. In Year 1, marketing will represent approximately 38% of GGR, decreasing to ~25% by Year 5 as customer acquisition costs fall and retention programs become more effective.

Administrative costs are expected to remain steady at 8–12% of total revenues, scaling proportionally with business growth. Licensing-related expenses primarily consist of the base license fee, reporting requirements, and potential future recruitment of a dedicated compliance officer should the Company internalize certain functions currently outsourced.

Investment Requirements

The total investment required to launch operations is assessed not to exceed EUR 150,000. This funding will cover initial operational setup, platform integration, regulatory licensing, compliance procedures, and marketing for brand launch.

The entire investment will be provided by the Ultimate Beneficial Owner (UBO) in the form of a loan agreement to the Company. This approach minimizes third-party financing risk, ensures swift capital deployment, and aligns the UBO's interests directly with the long-term success of the business.

Profitability Outlook

In the first two years, the Company will follow a measured growth strategy, aiming for nominal net profits while prioritizing market penetration and brand establishment. By Year 3, profitability is expected to accelerate in line with operational scaling, improved retention rates, and optimized marketing spend, delivering a projected PBIT of USD 1.3 million by Year 5.

Conclusions

The Company enters the Eastern European online gambling market with a clear vision, robust strategy, and a strong operational foundation. We are committed to building a globally recognized online casino and sportsbook brand—one defined by trust, innovation, and an exceptional player experience.

Throughout this plan, we have outlined a business model designed for scalability, compliance, and sustainable profitability. By combining a lean operational structure with strategic partnerships in technology, compliance, and corporate governance, we are well-positioned to execute a swift and efficient market entry. Our mobile-first approach, culturally localized content, and targeted marketing strategies will allow us to capture market share in an underdeveloped but fast-growing sector.

We have built our strategy around four foundational pillars:

- Innovation – Continually enhancing the platform, introducing new features, and shaping industry trends.
- Regulatory Compliance & Responsible Gaming – Operating to the highest standards of integrity, transparency, and player safety.
- Strategic Partnerships – Collaborating with leading service providers, platform developers, and compliance experts to expand capabilities and market reach.
- Sustainable Growth – Focusing on profitability, operational resilience, and long-term value creation for customers, partners, and stakeholders.

The financial projections demonstrate a disciplined approach to growth, with controlled operating expenses and a clear path to profitability. The initial investment, not exceeding EUR 150,000, will be fully provided by the Ultimate Beneficial Owner (UBO) via a loan agreement—ensuring operational readiness without the need for external financing.

With this foundation, the Company is ready to launch, grow, and endure. We are confident that our combination of market insight, operational excellence, and commitment to innovation will enable us to thrive in the competitive global gambling landscape and play a meaningful role in shaping its future.