

MARK IT SERVICES N.V.

BUSINESS PLAN

(Prepared for submission to the Curaçao Gaming Control Board in support of a B2B
iGaming License Application)

April 1, 2026

1. Overview of the Business

1.1. Why Curacao

The decision to base operations in Curaçao aligns with strategic goals of operating under a reputable, business-friendly jurisdiction that offers a globally recognised Tier 1 license, low gaming duty, 0% corporation tax, and access to robust hosting infrastructure.

Curaçao's regulatory framework ensures operational credibility, while political stability and excellent international finance infrastructure make it an attractive hub for iGaming technology providers.

The founder's industry experience includes leading IT service and cybersecurity ventures, providing a strong technical foundation to deliver regulated gaming solutions. Previous engagements with gaming-adjacent projects inform the Company's understanding of gaming and betting platform performance, and scalability requirements for B2C operators in emerging markets.

1.2. Company Background & Formation

Mark IT Services N.V. ("**Mark IT**" or the "**Company**") is a Curaçao-registered company formed to provide regulated B2B iGaming technology and platform services to licensed B2C operators worldwide, with a primary commercial focus on South and Southeast Asia. The Company is applying for a B2B online gaming license under the Landsverordening op de Kansspelen (LOK) framework.

The Company's ultimate beneficial owner (UBO), Mr. Arth Kaushikbhai Pathak, is an experienced entrepreneur with a successful track record in IT services, cybersecurity, and gaming-adjacent industries through the Solarius Group. His expertise, combined with a robust technical foundation from Solarius' infrastructure, positions Mark IT to deliver enterprise-grade, secure, and scalable gaming solutions.

Mission Statement:

The Company's mission is to give licensed B2C gaming operators secure, compliant, and easy-to-scale technology that meets all regulatory rules. Since the founders have many years of experience in the Asian gaming industry and strong local connections, the Company can offer a setup that costs less than similar services in other parts of the world. This cost advantage, combined with reliable technology and clear governance, helps operators grow into new markets, run their businesses more efficiently, and stay profitable over the long term.

1.3. Product & Service Portfolio

- a) Betting Exchange White Label (WL) Product – Proprietary integration with the Betfair Global Exchange via API, coupled with an intuitive back-office for agent and player management.
- b) Casino & Live Dealer Game Aggregation – Unified integration with multiple premium RNG, slot, and live dealer providers.
- c) Custom Software Modules – Bespoke modules for agent commission systems, player retention tools, and regional odds feeds.
- d) Compliance & AML Toolkit – Transaction monitoring, player Enhanced Due Diligence processes, and jurisdictional compliance checks.

1.4. Proprietary IP

- a) Proprietary API connectors for betting exchange integration.
- b) Custom back-office interface for operator and agent management.
- c) Risk assessment algorithms for fraud prevention and responsible gaming monitoring.

1.5. Competitive Advantage

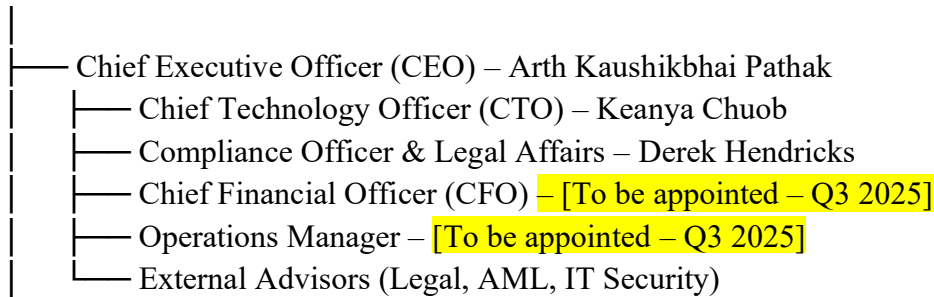
- a) The Company has direct access to Betfair integration in Asia, which is a strong advantage for B2C operators in the region.
- b) The founders' extensive experience and established connections in the Asian industry allow the Company to offer a setup that is faster, more efficient, and lower in cost than similar services in other regions.
- c) With Solarius IT's proven infrastructure, the Company can provide a fully hosted, end-to-end gaming platform that is scalable and reliable.
- d) The Company's compliance features are aligned with regulatory requirements from the start. This benefits operators who may have limited knowledge of legal obligations beyond technical integration. The Company's guidance and support

help operators secure licensing approvals more quickly and enter new markets with greater ease.

2. Company Management Structure

2.1 Organogram

Board of Directors / UBO



2.2 Key Roles & Responsibilities

- a) CEO – Strategic leadership, client acquisition, investor relations.
- b) CTO – Platform development, technical operations, integration management.
- c) Compliance Officer – AML/CFT oversight, regulatory reporting, license compliance.
- d) CFO – Financial planning, reporting, tax compliance, banking relationships.
- e) Operations Manager – Day-to-day client onboarding, vendor coordination

3. Business Forecasts (3 Years)

3.1 Revenue Streams

- a) One-time setup & integration fees – One-time charges paid by new B2C operators for the initial platform setup, Betfair integration, and system configuration. These fees cover technical deployment, security testing, and operational readiness.

- b) Revenue share– An ongoing percentage of the operator’s betting exchange turnover, providing the Company with a recurring income stream that grows in line with operator performance.
- c) Recurring monthly platform support & compliance fees:
 - Monthly or quarterly charges for secure hosting, server maintenance, and continuous system monitoring to ensure optimal platform uptime and speed.
 - Charges for providing ongoing compliance monitoring, reporting assistance, and advisory services to help operators meet their licensing and AML/CFT obligations.
 - Optional fees for additional features, bespoke integrations, or market-specific adaptations requested by operators.

3.2 Three Year Forecast (Placeholder)

[MARK IT TEAM IS PREPARING AN EXCEL SHEET FOR THIS WHICH WILL BE SHARED BY MONDAY AND CAN BE ATTACHED SEPARATELY]

3.3 Assumptions

- a) Year 1 focused on licensing, infrastructure, onboarding 3 anchor clients:
 - The B2B license application process is expected to be completed within the standard timeframe set by the Curacao Gaming Control Board, enabling operations to commence in Q4 2025.
 - The Company anticipates onboarding an initial set of 3 operators within the first six months post-license, with gradual growth as brand credibility and market visibility increase.
- b) Year 2 scales to 5-7 operators with increased recurring revenues.
 - Demand for betting exchange white label services in Asia is expected to remain steady, driven by the growth of regulated online betting markets and increasing interest in Betfair integration.
- c) Year 3 introduces ancillary products and geographic expansion.
 - The Company intends to establish a strong rapport with its operators and build a repository of customer feedback. This feedback will be used to develop new products and address operator needs and challenges.

- Operational costs are expected to remain lower than industry averages due to the Company's presence in Asia and access to competitive regional service providers.
- d) Conservative approach factoring in regulatory approval timelines and market entry barriers.
 - It is assumed that no major regulatory changes in Curacao or the primary target markets will adversely affect the Company's operations or its clients' ability to operate.

4. Growth Strategy & Market Share Plan

4.1. Implementation Strategy:

- a) Technology Deployment: The Company will deploy a modular API framework that allows B2C operators to integrate the platform into their existing systems with minimal development effort. The infrastructure will be cloud-based, incorporating redundancy measures and DDoS mitigation to ensure uninterrupted service and fast recovery in the event of disruptions. Blockchain technology will be integrated to provide transaction transparency, enabling immutable audit trails that enhance trust and regulatory compliance.
- b) Marketing & Partnerships: The Company will actively showcase its capabilities at major international industry events such as ICE London, gaining exposure to decision-makers and technology partners. The Company will focus on engaging mid-tier licensed operators in Asia, leveraging a mix of direct outreach and referral-based introductions. Strategic partnerships will be pursued with affiliates, payment providers, and content suppliers to create bundled offerings that add value for clients and strengthen market positioning.
- c) Compliance & Risk Management: The Company will actively showcase its capabilities at major international industry events such as ICE London, gaining exposure to decision-makers and technology partners. The Company will focus on engaging mid-tier licensed operators in Asia, leveraging a mix of direct outreach and referral-based introductions. Strategic partnerships will be pursued with affiliates, payment providers, and content suppliers to create bundled offerings that add value for clients and strengthen market positioning.

- d) Continuous Innovation: Ongoing investment will be made in AI-driven analytics to detect fraud patterns and analyse player behaviour, enabling data-driven improvements in operator performance. The platform will be enhanced with multilingual and multi-currency capabilities, ensuring adaptability across diverse markets and customer segments.

4.2. Growth Outlook:

- a) Years 1–2: Secure the B2B license, onboard three anchor operators, and refine the white label platform for operational stability and feature completeness.
- b) Years 3–5: Expand the client base across primary target regions and reduce dependency on third-party exchange APIs by introducing a proprietary exchange engine.
- c) Year 5+: Explore additional verticals such as esports betting and gamified sports trading solutions to diversify the product portfolio and capture emerging market demand.

4.3. Strategic Objectives

- a) Secure a B2B license and onboard initial clients within 6 months post-licensing.
- b) Establish Mark IT as the preferred Betfair integration partner in Asia.
- c) Introduce proprietary analytics and retention tools to increase client stickiness.

4.4. Market Focus

- a) Primary: South & Southeast Asia (India, Bangladesh, Sri Lanka, Vietnam, Philippines).
- b) Secondary: Africa (Kenya, Nigeria), LATAM (Brazil, Mexico) subject to licensing permissions.

4.5. Excluded Markets

The Company will not operate in the United States, the United Kingdom, EU member states, or any jurisdiction blacklisted under Curaçao guidelines and FATF advisories.

4.6. Marketing & Sales

The marketing strategy will center on targeted B2B outreach supported by a presence at industry expos, networking events, and trade fairs. This will be complemented by referral networks and partnerships with payment processors, content providers, and

affiliate networks, enabling the Company to offer complete and attractive packages to operators.

4.7. Funding Plan

Initial operations will be funded by equity injection from the UBO, ensuring a debt-free start. Early revenues will be reinvested into product development, platform enhancements, and expansion into new markets to support sustainable growth.

5. Key Suppliers & Dependencies

5.1. Betfair Exchange:

The Betfair Exchange integration forms key part of the Company's offering, providing essential liquidity, market pricing, and trading infrastructure for the betting exchange platform.

5.2. Ecorpp Management N.V.

Ecorpp Management N.V. will serve as the Company's primary provider of corporate services, including incorporation support, statutory filings, accounting, and compliance submissions to the Curaçao Gaming Control Board. This is considered a medium-level dependency. To reduce potential disruption, the Company has identified a secondary corporate services provider who can be engaged if required.

5.3. Third-party hosting & cybersecurity providers:

Specialist providers will manage platform hosting, cybersecurity, and DDoS protection to ensure uninterrupted service and secure operations. While these are medium dependencies, the Company will use multi-region hosting facilities with automatic failover capabilities to maintain uptime in case of technical issues or targeted attacks.

5.4. Banking partners:

Banking relationships are vital for handling multi-currency settlements with operators and facilitating smooth client transactions. Given the critical nature of payment processing, this is a high-level dependency. The Company will maintain accounts with at least two separate banks or electronic money institutions (EMIs) to ensure business continuity and mitigate risks associated with banking disruptions.

6. Risk Evaluation & Management

6.1. Additional Compliance & Internal Controls:

- a) KYC/CDD Protocols: The Company will implement strict Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures for all operators it engages. Enhanced due diligence measures will be applied to high-risk operators, including detailed verification of identity, beneficial ownership, and corporate structure. Industry-standard screening tools will be used to check for sanctions, PEP status, and adverse media.
- b) Agent & Operator Onboarding: All new operators and their designated agents will undergo mandatory Anti-Money Laundering (AML) training before integration. Their credentials and licensing status will be validated as part of the onboarding process. Ongoing audits will ensure continued compliance with both Curaçao and operator-jurisdiction regulations.
- c) Transaction Monitoring: The Company will employ real-time transaction monitoring systems to detect suspicious activity, unusual betting patterns, or early withdrawal behaviours. Alerts will be escalated for investigation by the compliance team, with findings recorded in the internal audit trail.
- d) Risk Based Approach: A risk assessment matrix will be maintained to classify transactions and jurisdictions according to their risk profile. This tailored approach allows the Company to apply proportionate controls, focusing resources on higher-risk areas without overburdening low-risk operations.
- e) Training & Awareness: Annual compliance refresher sessions will be mandatory for all employees and contracted agents. These sessions will reinforce AML/CFT obligations, regulatory updates, and emerging risk trends.
- f) Reporting:
Internal Suspicious Activity Reports (SARs) will be escalated to the Money Laundering Reporting Officer (MLRO) for review. Where necessary, the MLRO will file external reports with the Curaçao Gaming Control Board in accordance with statutory requirements.
- g) Responsible Gambling & Player Protection:

- i. The white label solution will include built-in responsible gambling tools such as self-exclusion features, spending limits, and robust age verification protocols.
- ii. Clear responsible gaming messages and links to recognised problem gambling support services will be displayed on all operator platforms using the Company's technology.

6.2 Oversight Mechanisms

- a) Internal risk register updated quarterly: The Company will maintain a comprehensive internal risk register that is reviewed and updated on a quarterly basis. This register will document identified risks, their assessed impact, mitigation measures in place, and any changes in the risk environment. The review process will involve key department heads to ensure risks are captured across all operational areas
- b) Annual external audits for financial and compliance functions: Independent external audits will be conducted annually for both financial reporting and compliance functions. These audits will assess adherence to Curaçao Gaming Control Board regulations, AML/CFT obligations, and internal policies. Findings and recommendations from the auditors will be formally reviewed by the board and integrated into the Company's continuous improvement framework.
- c) Incident response committee: An Incident Response Committee, chaired by the Compliance Officer, will be established to address urgent operational or compliance incidents. The committee will be responsible for investigating incidents, coordinating remedial actions, documenting findings, and ensuring timely reporting to relevant authorities when required. This mechanism ensures that significant issues are addressed swiftly and transparently, reducing potential impact on business continuity and regulatory standing

7. Legal & Governance Framework

Mark IT will operate under a structured legal and governance model designed to maintain regulatory compliance, transparency, and strategic discipline.

Additional Governance Practices

- **Quarterly Board Meetings** – Formal board meetings will be held every quarter, each with a defined agenda, performance review, and documented decisions to ensure accountability and consistent oversight.
- **Independent Legal Advice** – For significant market entries, new jurisdictional operations, or major product launches, the Company will seek independent legal opinions from recognised gaming law specialists.
- **Board Oversight** – The board will approve strategic initiatives, annual budgets, and all high-value contracts, ensuring that critical business decisions align with long-term objectives.
- **Reserved Matters** – Certain high-impact decisions, such as mergers and acquisitions, changes to the share capital structure, or disposal of intellectual property, will require explicit shareholder approval.
- **Legal Support** – Ongoing legal guidance will be provided by the in-house Compliance Officer in conjunction with external legal advisors who specialise in the gaming industry.

8. KPIs & Business Objectives

The Company's performance will be measured against clear operational, technical, compliance, and financial benchmarks:

- **Commercial** – Growth in the number of active operators: Year 1 target: 2 operators; Year 2 target: 5 operators; Year 3 target: 8 operators.
- **Technical** – Maintain platform uptime of at least 99.95% on a monthly basis, supported by proactive infrastructure monitoring and redundancy measures.
- **Compliance** – Achieve a 100% pass rate in all AML/CFT audits conducted by internal teams and external regulators.
- **Financial** – Reach an EBITDA margin of at least 25% by the end of Year 3, driven by operational efficiency and scalable revenue streams.

9. Policies & Procedures

Mark IT will establish a comprehensive framework of internal policies and procedures to ensure full compliance with Curaçao regulations, international AML/CFT standards, and data protection laws.

9.1. Expanded Policy Scope:

- a) AML/CFT – A robust framework aligned with FATF recommendations, incorporating sanctions screening, enhanced due diligence (EDD), and structured protocols for identifying and reporting suspicious transactions.
- b) Data Governance – GDPR-compliant policies designed to safeguard the privacy and security of both operator and player data, with defined access controls and encryption standards.
- c) Incident Management – A formalised process for identifying, reporting, and remediating security breaches or operational incidents, ensuring timely notification to relevant authorities.
- d) Internal Audit – Scheduled internal reviews covering operator onboarding, financial reconciliations, and compliance filings to maintain operational integrity.
- e) Technology Risk Assessment – Continuous assessment of new technology deployments to evaluate their AML/CFT implications and ensure regulatory alignment.

9.2. Preparation and Scope:

Policies will be drafted internally by the Compliance Officer with external legal review to ensure accuracy and adherence to international best practices. The scope will include AML/CFT, EDD, GDPR-compliant data governance, incident reporting, and IT security protocols.

9.3. Timeline and Independence:

The initial policy framework will be rolled out within three months of obtaining the B2B license, with the first Curaçao Gaming Control Board audit scheduled within six months. Policy authors will operate independently of day-to-day business operations, supported by accredited compliance consultants to ensure objectivity and credibility.