

BUSINESS PLAN

For operators of game of chance under
Curacao gaming license (GCB)

LEONTODO N.V

Business Plan Version: 1.0

Our Mission

The purpose of Leontodo N.V (hereinafter referred to as the “Company”) is to provide to our clients with a wide range of exciting, entertaining, and rewarding online casino and sportsbook options that help them enjoy the thrill and challenge of sports, games, and have fun while making informed and strategic decisions. Our mission is to become the leading provider of betting products in the region, offering a wide range of sports, games, and events to suit every taste and preference. We are committed to using only the finest technology and latest software, and to providing exceptional customer service, with knowledgeable and friendly staff who can help clients understand their options and make the best choices for their needs. To accommodate our goals the Company is planning to use the platform of the Softamber Limited, which is an experienced platform provider, that also supplies the Company the casino content from the tier one casino providers as well as sport book.

Company and Management

The company is currently in its startup phase, with its product at an early stage having been recently launched. As a result, the company's management team consists of limited personnel, who will hold key managerial positions while non-core services are outsourced.

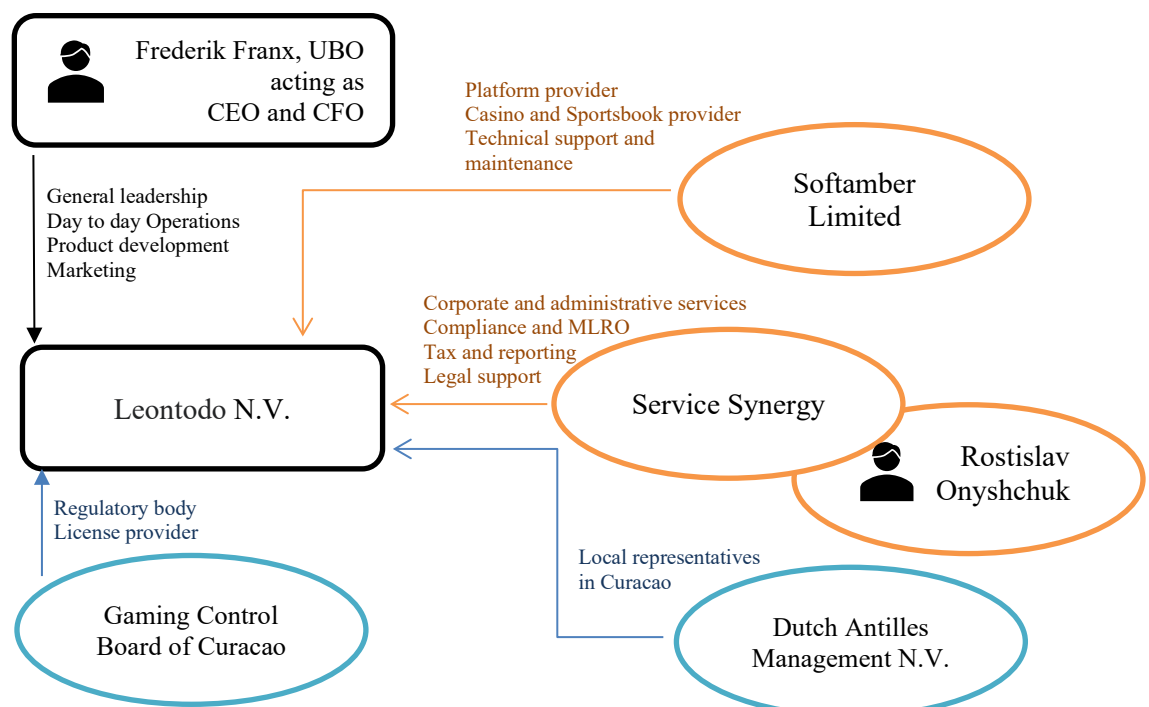
The Owner of the company, Mr. Frederik Franx, intends to apply for the Curacao Gaming License to replace a current sublicense held with Gaming Curacao. Mr. Franx, the sole shareholder, is a successful and innovative entrepreneur with extensive experience in both the payments and gambling industries. This expertise positions him to serve as a CEO and CFO of the Company.

The business model devised for the company aims to leverage the founder's extensive business network to negotiate favorable terms with counterparties such as Platform, Casino, and Sportsbook providers, payment solutions, and technical and customer support services. The core concept is to optimize variable costs to align with revenue generated, thereby

minimizing initial investment requirements.

The company has entrusted its routine corporate administration and compliance functions to Service Synergy, a provider with a proven track record of expertise in managing and supporting businesses, particularly within the gaming industry. A dedicated compliance team offers a comprehensive, turnkey solution, ensuring that all regulatory and industry-specific requirements—such as policy drafting, compliance processes, controls, AML (Anti-Money Laundering), KYC (Know Your Customer), and other key areas—are meticulously structured and seamlessly integrated into the business's day-to-day operations. The service provider also maintains a highly capable team dedicated to ensuring the optimal execution of additional non-core functions, including legal support, financial consulting, tax advisory, and reporting. As per requirement of the Gaming Control Board of Curacao, Rostislav Onyshchuk as a member of Service Synergy team was appointed as a Compliance officer for a Company.

In general, the Organizational and functional structure of the company can be described as follows:



As is common in early-stage companies, the majority of operational functions have been outsourced, while core strategic decisions are retained by the Ultimate Beneficial Owner

(UBO), who acts as both the business and product owner. This structure aligns with traditional startup models, where the focus remains on agility and core competencies, while leveraging specialized external expertise.

Softamber Limited, serving as the company's technical partner, provides essential platform, casino, and sportsbook services, while Service Synergy takes on the critical role of major sub-contractor. Service Synergy manages all corporate, administrative, and advisory functions, positioning itself as a strategic business partner that ensures smooth operational and governance practices. In addition, Service Synergy provides the company with Compliance and Money Laundering Reporting Officer (MLRO) services, ensuring that the company's policies, procedures, and controls are fully aligned with regulatory requirements. This safeguards the company's adherence to all relevant legal and compliance frameworks.

Key stakeholders also include Dutch Antilles Management (DAM) and the Gaming Control Board of Curaçao (GCB). DAM fulfills the mandatory role of local representative in Curaçao, ensuring compliance with the jurisdiction's regulatory framework. The GCB, as the new regulatory authority in Curaçao, is set to replace the previously utilized licensing provider, reflecting the evolving compliance landscape for companies operating under Curaçao law. These partnerships and regulatory bodies are fundamental to maintaining the company's legal standing and operational integrity within the global gaming market.

By entrusting key functions to these specialized partners, the company is able to focus on scaling its core business, while remaining compliant with both local and international regulations.

Corporate governance, Risks and Controls

The company has established a lean yet highly effective corporate governance structure, designed to support both operational efficiency and regulatory compliance. The Ultimate Beneficial Owner (UBO) currently serves as the Chief Executive Officer (CEO) and temporarily as the sole director of the company. However, the directorship role is intended to

be subcontracted to Emagnus, a reputable Corporate Service Provider based in Curaçao, who will assume full responsibility for the directorship duties. This transition will ensure a robust governance framework while maintaining compliance with local regulatory requirements.

Key operational and technical functions that demand specialized expertise, such as gaming platform development and maintenance, financial and tax reporting, internal audit, regulatory compliance, KYC and Anti-Money Laundering and Risk Oversight (AMRO) affairs are outsourced to trusted service providers. These partners, as outlined in previous sections, have a proven track record of delivering high-quality services in these areas, allowing the company to focus on its core business activities while ensuring these critical functions are expertly managed. By outsourcing these functions to experienced, certified teams, the company significantly reduces potential risks, ensuring that compliance and governance are handled by experts with in-depth knowledge of the gaming industry's regulatory landscape.

Our Services

Here's the revised and expanded version with additional details about the Brazilian market:

Currently, the company and its flagship products, Fortabet and Lucrassino, have demonstrated self-sustainability, setting the stage for future growth and brand development. A strong marketing strategy, driven by partnership programs and organic growth through social media platforms, has helped elevate these brands to become top-tier names in the Brazilian online gaming market, a rapidly growing and highly competitive space.

The global casino and online gambling industry has undergone significant transformation in recent years, largely due to technological advancements and shifting consumer behaviors. Brazil, in particular, has emerged as one of the most promising markets in Latin America. With a population of over 214 million people, approximately 70% of Brazilians now have access to the internet, and the number of online users continues to grow, supported by the rise of mobile technology. Brazil is also ranked as the third-largest internet market in the world, making it a key player in the expansion of digital industries, including online gambling.

In 2022, the online gambling market in Brazil was valued at around \$1.4 billion and is projected to continue growing, especially with the anticipated regulation of sports betting. Brazilians are known for their passion for sports, particularly football, which has fueled a surge in the popularity of online sports betting. As of 2021, nearly 20 million Brazilians participated in some form of online gaming or betting. The country is also experiencing a shift in attitudes towards online casinos and other forms of digital gaming, driven by an increasing number of platforms catering to local preferences and providing content in Portuguese.

Despite the absence of a fully regulated online casino market, the growth in mobile usage (which accounts for over 80% of internet traffic) has made online gambling increasingly accessible. Additionally, Brazilian players tend to favor sports betting, lotteries, and live dealer games, with a preference for platforms that offer local payment methods such as Boleto Bancário, PIX, and credit cards.

The company is well-positioned to capitalize on these trends, leveraging its robust product offerings and adaptable platform to appeal to the growing number of online gamers in Brazil. By focusing on user engagement through localized content, preferred payment solutions, and customer service in Portuguese, the company aims to cement its position as a leading player in Brazil's expanding online gambling market.

With the pending regulation of sports betting and the steady growth in the online casino sector, Brazil is poised to become a key hub for online gaming in Latin America. The company's investment in the market aligns perfectly with these emerging trends, setting the stage for sustained growth and long-term success.

Our Competitive Advantage

We are committed to building a strong, competitive edge in the gaming industry by focusing on two key pillars: Marketing and Product Differentiation and Compliance and Responsible Gaming. These strategies ensure that we not only deliver an engaging and tailored gaming experience but also operate in a manner that is ethical, safe, and fair to all players.

Marketing and Product Differentiation

Our marketing approach is designed to position us as a leading brand in the gaming industry by adapting our products to local markets, utilizing digital channels, and building partnerships that extend our reach. Key components include:

1. **Product Localization & Tailoring:** We tailor our gaming products to meet the preferences and tastes of local markets. This includes adjusting our game offerings, themes, and features to align with regional player behaviors and cultural trends, ensuring that our platform resonates with a diverse audience globally.
2. **Affiliate Programs:** Affiliate marketing is a cornerstone of our customer acquisition strategy. By partnering with established affiliates who have in-depth knowledge of local gaming markets, we can effectively promote our brand and expand our customer base. These affiliates will drive traffic to our platform by leveraging their existing networks, resulting in targeted and high-quality player acquisition.
3. **Partnerships with Influencers & Industry Leaders:** We plan to collaborate with gaming influencers and thought leaders within the industry to enhance our brand visibility and credibility. These partnerships will help us reach a broader audience, particularly through content-driven strategies like live streaming, gaming reviews, and sponsored social media content, which are popular with gaming enthusiasts.
4. **Social Media & Digital Marketing:** Social media platforms such as Facebook, Instagram, Twitter, and emerging channels will play a key role in our digital marketing strategy. Through targeted advertising, engaging content, and interactive campaigns, we will build a strong online presence that encourages user interaction and strengthens brand loyalty. Viral marketing campaigns, combined with influencer partnerships, will ensure widespread recognition and engagement.
5. **Localized Outreach:** In addition to digital efforts, we will focus on direct marketing initiatives, sending personalized communications to key demographic groups including sports clubs, households, and corporate organizations. This localized outreach will help build trust and loyalty within specific markets, reinforcing our commitment to offering tailored gaming experiences.

Compliance & Responsible Gaming

Our commitment to compliance and responsible gaming is at the heart of our operations, ensuring that our platform not only offers an entertaining experience but also adheres to the highest standards of fairness, safety, and accountability. We have implemented a range of advanced features and protocols to ensure the integrity of our gaming platform and the well-being of our players:

1. **Responsible Gaming Measures:** Our platform is designed with robust responsible gaming features to ensure player protection. These include:
 - **Loss Limits:** Players can set financial limits on their losses, helping them manage their spending.
 - **Cool-Off Periods:** Players can take short breaks from gaming to prevent impulsive behavior.
 - **Self-Exclusion:** Players have the option to self-exclude for longer periods if needed, giving them full control over their engagement with the platform.
 - **Self-Limitations:** We provide players with options to limit the time they spend on the platform, reducing the risk of excessive play.
2. **Fair Play and RNG (Random Number Generator) Compliance:** We collaborate with tier-one content providers who ensure that all our games operate under a fair and transparent Random Number Generator (RNG) system. These RNG systems are regularly tested and certified by independent auditors to guarantee fair play, building player trust in the fairness of our games.
3. **Certified Payout Rates (PRT):** Our platform offers favorable and transparent payout rates (PRT), ensuring that players have a clear understanding of their potential winnings. This transparency contributes to the trustworthiness of our brand, reinforcing our reputation as a fair and player-centric gaming provider.
4. **Compliance with Regulatory Standards:** Our operations comply with the highest industry standards and regulatory requirements. We have engaged external professionals who specialize in gaming compliance to develop and maintain our policies on Anti-Money Laundering (AML), Know Your Customer (KYC), and reporting obligations. These professionals are certified experts, ensuring our company meets all legal and regulatory obligations, reducing the risks associated with non-compliance.
5. **Third-Party Audits & Certifications:** We regularly subject our platform to independent third-party audits to verify compliance with industry standards and regulatory

frameworks. This includes thorough checks of our RNG systems, payout rates, and responsible gaming measures. These audits and certifications provide additional layers of assurance, helping us maintain a reputation as a trustworthy and responsible gaming provider.

By integrating responsible gaming measures, fair play compliance, and strong regulatory oversight into our operations, we not only protect our players but also strengthen our brand's reputation as a fair, loyal, and safe gaming platform. Combined with our strategic marketing efforts, these elements form the foundation of our long-term success in the highly competitive gaming industry.

Financial Considerations

As for the forecasted financials, for the first five years of operation we foresee the following:

Thsd USD	Year1	Year2	Year3	Year4	Year5
Revenue total Incl:	931	1,138	1,386	1,690	2,057
Casino	530	657	808	1,002	1,233
Sport	401	481	577	687	825
COGC					
Royalties	261	319	388	473	576
Other Direct expenses	121	148	180	203	247
Gross Profit	549	672	818	1,014	1,234
Operating expenses (OPEX)					
Administrative expenses	112	137	166	203	247
Licensing Expenses	65	70	90	100	100
Marketing Expenses	326	398	457	507	514
Other Expenses	47	57	83	101	123
Total OPEX	549	662	797	911	985
PBIT	0	10	21	103	250

The financial projections provide a detailed analysis of both Casino and Sports Betting Gross Gaming Revenue (GGR), as illustrated in the previous financial table. Projections indicate that while Casino GGR is expected to experience steady and consistent growth, Sports Betting

is forecasted to deliver stronger annual performance. The growth in Casino revenue, however, is anticipated to slightly outpace the percentage of royalties owed to casino providers each year, contributing positively to the overall profitability.

Royalties represent the direct expenses and are expected to remain stable at 28% of Casino GGR. Similarly, other direct costs, primarily consisting of bonuses aimed at boosting player engagement in the early phases, will be driven by commission fees paid to Payment Service Providers (PSPs). These costs, initially set at 14%, are forecasted to gradually decrease to 12% over time as the company leverages loyalty and volume discounts from PSPs, reflecting an optimization of operational expenses.

Marketing expenses are projected to constitute 35% of the GGR in the first year, with a gradual reduction to 25% as the company matures. This reduction reflects the fluctuating costs associated with user acquisition and retention, as early-stage investments are expected to taper off with the growth of a loyal customer base. Administrative expenses are anticipated to remain steady at around 12% of revenue per year, largely due to the company's strategic focus on product development rather than diversification into new markets or product lines. This steady rate of administrative costs should sufficiently support any additional needs as revenue increases. Licensing expenses are mostly related to the license cost and extra costs that might be associated with the reporting obligations of the company, including the potential recruitment of the dedicated employee as a replacement for current outsourcing model.

In the first two years of operations, the owner plans to adopt a cost-efficient strategy aimed at generating modest net profits while aggressively expanding market share. This approach highlights the company's commitment to building a strong market presence during its formative years, setting the stage for sustainable growth in the long term.

Conclusions

In conclusion, our business plan presents a comprehensive strategy for building a successful and responsible gaming company, with a primary emphasis on regulatory compliance. A key

component of this plan is obtaining a gaming license through the Curaçao Gaming Control Board, a vital step in ensuring that our operations meet the highest legal and regulatory standards. Securing this license is essential for positioning the company as a credible and compliant entity within the gaming industry.

By following Curaçao's strict licensing procedures and maintaining full compliance with its gaming regulations, we are laying a solid foundation of transparency and integrity, which is critical for long-term success. This license will not only validate our platform but also provide assurance to players, partners, and stakeholders that we operate in a highly regulated and secure environment.

Our overall strategy—encompassing product localization, data-driven marketing, and collaborations with leading content providers—is designed to work in tandem with our compliance efforts. By combining operational excellence with regulatory adherence, we aim to create a gaming platform that is not only innovative but also safe and fair. This holistic approach guarantees that we meet market demands while upholding the highest standards of responsible gaming and player protection.

Moving forward, the successful acquisition of the Curaçao gaming license will be a cornerstone of our business. It will allow us to build a brand that is trusted for its dedication to compliance, integrity, and delivering an exceptional customer experience.