



LEGACY EIGHT CURAÇÃO NV.

BUSINESS PLAN

APRIL 2026



BUSINESS PLAN

Legacy Eight Curaçao NV has been a reference in the Lottery industry for over 18 years, operating the websites www.trillionario.com, www.wintrillions.com, and www.lottokings.com, among others. Since 2016, it has held the sublicense through Antillephone NV and is currently licensed by the Curaçao Gaming Authority since 07/Jan/2026 to offer games of chance under license number **OGL/2024/956/0417**.

It has provided millions of clients a safe and reliable website for +18-year-old people to play the best and most exciting lotteries, raffles, and casino games worldwide. Proof of that is the over 500,000 winners that have received their prizes timely and safely. Our players trust us because we are a secure and verified site allowing them to play and claim their winnings.

We have a variety of payment methods and provide a seamless user experience with clear explanations of how to play each lottery. We comply with the most recent AML rules and Responsible Gaming regulations.

REVENUE MODEL

The business is based on three main types of business models:

- **Messenger Services** – Under this model, clients select the number of their choice for the most popular lotteries and raffles in the world, and the company buy those tickets on their behalf. For that, the process is the following:
 - The client selects the lottery and the numbers they want to play
 - Upon payment, the details are sent to agents who are actual ticket agents that receive the game and number selected and issue the tickets accordingly.
 - The tickets are saved until the day of the draw. If the numbers coincide with the ones drawn, making a winning for the player the client is reward directly or through us.
- **Insurance model** – Under the License issued by the Curaçao government, Legacy Eight Curaçao NV takes the bet on the outcome in the selected draw of the *Underlying Lottery*, a raffle and lottery conducted by an public institution or government. Clients have the same experience as if they were buying the actual tickets. The bet is insured through a Hedging Provider, a third party that provides insurance to Legacy Eight Curaçao NV. on potential winnings. In the case of small prizes, they are paid to the client by Legacy Eight Curaçao NV., and for bigger prizes, Legacy Eight Curaçao NV. claims the prize from the Hedging Provider, which pays the client the same amount as if they had won the underlying lottery.
 - **Other Games including Casino, Scratch Cards and raffles** —Through well-established and respected Casino providers, clients experience many types of games as if they were in a brick-and-mortar casino to play and entertain.

PRODUCTS

Lotteries

WinTrillions international most important lotteries like Powerball and Mega Millions to players to enjoy from the comfort of their homes. We also offer important European lotteries like SuperEnalotto, EuroMillions, EuroJackpot, and many more. We have over 22 lotteries for our players to choose from, including Mexico's Melate lottery.

Also, we can provide a product called magic number (which allows players to choose among the provided list of lotteries in the world and bet on a single number), and lottery teams so that you can win and share the winning among all the shares of the group.

Casino

Our casino can enjoy slots, table, and card games and in our live casino, they can play roulette, poker, game shows, and many other classical casino games live with real-time, real dealers. We currently have 24 slot games, 9 table games, and 5 card games available in our virtual casino and 6 classical games including game shows are available in our live casino.

Instant Win Games

For those customers who want to enjoy playing and getting their prize right away, we offer 16 instant-win games. Our strategy to engage players in these games is to offer free spins and later cross-promote other products once they log in to our sites.

Bingo

Our site has many bingo games available for everyone to play online. These include demos, so people can try them out before they decide to play with real money. Our games have fun themes to add a little something extra to this classic game.

OBJECTIVE

Legacy Eight Curaçao NV (LEC/the Company/we/us) aims to achieve sustainable and responsible growth, focusing on strengthening its position as a reliable lottery, raffle, and casino platform, particularly across LatAm and other selected markets. Rather than pursuing aggressive expansion, the Company's objective is to deliver moderate, controlled growth while reaching profitability in the short term and ensuring long-term financial stability.

The incorporation of the new UBO, who has been a trusted partner of the Company for many years and has an in-depth understanding of the commercial dynamics of the business—especially in relation to VIP clients—will be instrumental in achieving these goals. As the owner of our call centre partner, the new UBO brings hands-on operational expertise and a practical approach that will allow the Company to prioritize feasible, results-driven initiatives rather than previous overly ambitious strategies that were not successfully implemented under previous ownership. This transition is expected to reinforce a disciplined execution model, supporting sustainable performance and long-lasting financial health.

BUSINESS STRATEGY

Position

Legacy Eight Curaçao N.V. aims to consolidate its position as a reliable and compliant gaming and gambling operator, complementing the offering of larger market participants such as Lottoland, Zeal Networks and Annexio, among others.

The Company adopts a targeted marketing approach focused on client acquisition and retention, with particular emphasis on users, seeking a more responsive and personalised customer experience. Its size and operational structure allow for great flexibility in tailoring communications and services to specific client profiles, while maintaining appropriate oversight and control mechanisms.

Efficient synergies:

The Company collaborates with Can-Call (call centre) as a service provider to support client engagement and retention initiatives. While this interaction-driven model is less prevalent within the sector, it has proven effective for the Company's target segments and is conducted under defined internal controls and monitoring procedures. Following the change in ownership, the call centre and LEC (while remaining formally independent) will share the same ultimate beneficial owner, enabling a simplified governance structure and stronger operational and commercial alignment. In a context of financial constraints requiring prudent cost control and revenue optimisation, this alignment is expected to improve conversion and retention rates, increase cost efficiency, and support the strengthening of the Company's financial position and ongoing operational viability.

Furthermore, the progressive alignment of technological systems across both entities is expected to improve related costs in this pivotal area for both companies, contributing to a more controlled and scalable business operation, while strengthening client management.

CGA license

Regarding the Curaçao Gambling License, it constitutes a key operational and strategic enabler for us, supporting the development of a robust banking infrastructure and a diversified portfolio of payment methods. This license not only supports the Company's current activities but also its medium- to long-term expansion beyond LatAm markets.

LEC has implemented the updated regulatory and licensing requirements, incorporating responsible gaming tools and customer protection measures into its systems, processes, and user interface. These measures include, among others, strengthened onboarding controls, identity verification procedures, self-exclusion mechanisms, and the consistent inclusion of responsible gaming information and messaging across all relevant user touchpoints. Such controls have been embedded within the platform architecture to ensure effective compliance while maintaining functional usability. As a result, the Company reinforces its positioning as a compliant and trustworthy operator, providing a secure environment for customer interaction and financial transactions.

TARGET MARKET

South America

- Argentina
- Bolivia
- Brazil
- Chile
- Colombia
- Ecuador
- Guyana
- Paraguay
- Peru
- Suriname

North and Central America

- Belize
- Canada (Excluding Ontario)
- Costa Rica
- Dominican Republic
- El Salvador
- Guatemala
- Honduras
- Mexico
- Nicaragua
- Panama

TARGET PUBLIC

Individuals above 18 years of age with a strong concentration in people around 35-55 y/o. Middle and upper middle-class people belonging to no-vulnerable group.

LEADERSHIP AND OPERATIONS FLOW

Following the transition to the new ultimate beneficial owner (UBO), the Company benefits from the appointment of a long-standing strategic partner with an in-depth understanding of the business model, operational dynamics, and market positioning. This continuity of knowledge enables the definition and execution of realistic and feasible goals, aligned with the Company's current operational and financial context.

Legacy Eight Curaçao N.V. has assembled a management team with the experience and capabilities required to support sustainable growth, reinforce investor confidence, and maintain strong relationships with commercial partners, while fostering a high-performance culture across the organisation.

The management team combines seniority and technical expertise, enabling the Company to deliver a consistent client experience while supporting long-term value creation.

LEC operates as an international organisation with a geographically distributed team structure:

Mr. Michael Francis McLoughlin

UBO

Mr. McLoughlin brings over 15 years of experience in managing sales teams within call centre environments and has acted as a strategic partner to the Company for more than a decade. His expertise is expected to play a key role in streamlining processes, enhancing operational alignment, and identifying cost optimisation opportunities. In particular, his experience will support the prioritisation and implementation of operational, technical, and procedural improvements, with a focus on strengthening call centre-driven sales performance and the efficient management of contact databases.

eMoore NV

Director

eMoore (part of the EM Group) has been one of the most reputable legal service providers in Curaçao for over 15 years. They have been a critical player in the online gambling market since 2005. As one of the first corporate services providers in Curaçao to recognise the need for compliance services, they quickly established a reputable name in the industry.

George Van Zinnicq Bermann is the founder of EM Group, which includes not only the Curaçao branch but also offices in Malta, the Netherlands, and Cyprus.

COO

Daniel Emert has over 7 years of experience in the gaming and gambling industry and more than 20 years leading complex functions, with a strong focus on streamlining IT projects in international companies, including TCS.

In his role as COO, he acts as the primary liaison with the UBO while defining and driving the company's overall business strategy, ensuring alignment between long-term vision and day-to-day operations.

He combines strategic oversight with hands-on operational leadership, leveraging his extensive technical background to oversee the execution of strategic initiatives and directly supervise key functions, including the CTO, CX Manager, and CMO.

CFO

Germán Justh has over seven years of experience in the gambling industry and more than twenty years of experience in C-level positions in several international firms. He is accountable for the company's financial health, processing all bills and liabilities according to the strictest controls before sending them to the directors for final approval and payment. He also oversees the annual audit. He supervises two other strategic areas, Payments and AML Compliance.

CTO

Álvaro Restuccia brings over 20 years of experience in managerial roles focused on highly complex tech projects in companies such as Tata, leading teams to deliver outstanding software and infrastructure solutions.

As CTO, he leads our IT teams, ensuring the effective execution of development efforts, the delivery of high-quality products, and the continuous optimisation of our systems to ensure a safe environment for clients and protection against cyber-attacks which usually target our industry.

Affiliate and Mkt Manager

Patricia Papa is a proven and successful team leader, with experience overseeing teams at RCI and at top Uruguay-based grocery store chains, in addition to seven years leading sales teams in the gambling/gaming industry for MOTO and digital channels.

She plays a pivotal role in ensuring the quality and compliance of our most strategic suppliers, as well as in defining and implementing the offerings on our websites in coordination with the IT team.

She also oversees the Design and Marketing teams.

AMLR Officer:

Iván Piña has +20 years of experience as a Risk and Operations manager working with different companies in the gambling/gaming industry. He has a profound knowledge of international AMLR regulation, a keen eye for detecting online threats and solid experience training and leading AMLR teams.

He is responsible for the payment of prizes following the approved AML Policy, the execution of AML and the prevention of TF actions, and any additional measure that may be needed to keep the website as safe as humanly possible. He also checks games for any security crack that may allow abuse by players.

He oversees the Operations Team.

Payments Processing Manager and Compliance / Responsible Gambling Role.

Lee Martínez has over 8 years of experience as a Payment Methods Manager in the gaming industry and more than 10 years leading projects at Endeavor, a global organization dedicated to scaling high-impact entrepreneurs. During this time, he has advised over 10 companies across a wide range of industries, from retail to IT.

He leads negotiations with payment service providers and oversees first-level compliance requirements with the CGA, banks, and other strategic partners of LEC.

Customer Experience Manager / Complaint and Dispute Role:

Micaela Vives has over 10 years of experience within the company in roles related to customer assistance. She handles customer complaints, coordinating with other departments to deliver effective solutions and ensure a high-quality service experience.

She oversees the Customer Experience Team.

WORKFORCE LOCATION

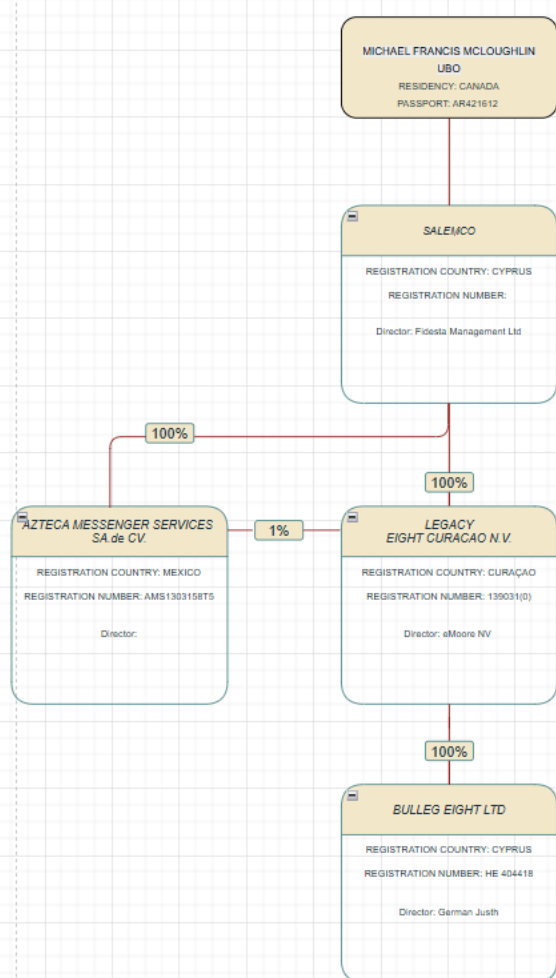
This is a 100% online company with team members working from home. Most of the operational team is based in Uruguay although our team members are actively selected from other South American countries.

Communications are done through Workspace by Google, Slack for projects with third parties and an internal online platform.

LEGAL STRUCTURE & CURAÇAO LICENSE

A Limited Liability entity (N.V. in Curaçao) is the perfect structure for the operations, allowing an effective and smooth change of shareholders, facilitating not only this transition to a new UBO but also the potential incorporation of new investors in the future.

A Curaçao License brings a series of operational benefits to the project. The new regulation provides a strong and reliable legal framework to work within and offers reassurance to partners in the industry. In addition, most of our clients reside in countries with little or no time difference, which facilitates communication with our director, eMoore N.V., and most of our LatAm-based partners.



Bulleg Eight Limited is a direct subsidiary, wholly owned (100%) by LEC, and acts as its primary agent, entering into agreements with most Payment Service Providers and contractors on behalf of LEC.

Azteca Messenger Services is a company in which LEC holds a 1% equity stake and acts as an agent of LEC for its Mexico-based operations.

MARKETING

The sales strategy is driven through three main channels:

- **Affiliate** — Legacy Eight Curaçao N.V. has created a network of affiliate partners through a technologically solid, win-win affiliate program to drive sales. Affiliates go through a rigorous selection process to ensure that their technology and service standards provide a friendly and exciting experience for clients and help Legacy Eight Curaçao N.V. strengthen its solid reputation as a reliable gaming/gambling website.
- **MOTO** — This channel is based on a database of VIP clients who receive personalised assistance, with the Company tailoring products, designs, and communications to their preferences. Each client is assigned a dedicated account manager to ensure a truly personalised experience. In addition, the Company collaborates with Can-Call (call centre) as a service provider to support client engagement and retention initiatives. While this interaction-driven model is less prevalent in the sector, it remains effective for the Company's target segments and is conducted under clear internal controls and monitoring procedures. This area will be further strengthened as the new UBO takes a more active role in daily operations.
- **Organic** — Legacy Eight Curaçao N.V. has a strong image as a proven platform where clients can trust and feel confident to play, enjoy the most exciting games, and participate in the largest jackpot lotteries. To support this, the Company develops a series of online campaigns to promote its brand across different geographies and target audiences.

TECHNOLOGY

LEGACY Eight Curaçao NV. has owned and operated websites wintrillions.com, trillonario.com and Lottokings.com for over 20 years. It has built a solid back end, technical systems, and an attractive and compelling front end to deliver a safe, enjoyable, and flexible environment.

Its systems allow easy integration with PSPs apart from other providers based on their technological requirements, reducing the need for new-from-scratch developments.

Its technology meets the requirements for complying with the security measures expected of a gambling website; thus, clients are assured that their personal data will be protected. The company conforms to the corresponding PCI DSS level to safeguard clients' credit card credentials.

The platform features natively integrated AMLR protocols aligned with industry benchmarks to neutralize ML/TF vectors through granular enforcement of client interaction logic.

The technology behind the site is *Angular* for the front end and *Laravel* for the back end. We have a back office in *PHP*, the database uses *MySQL*, and servers are hosted with *Amazon Web Services AWS* and located in *Frankfurt*.

Rest protocols are put in place to communicate with partners, including agents, insurance company affiliates and Payment Processors, to attain stable and reliable communication processes.

The in-house-built Admin Platform holds clients' information, including purchases, refunds, and chargebacks, as well as any relevant information collected through customer care. The Operations team uses that system to access the information collected by our hardcoded AMLR alerts regarding any potential threat detected. This Admin Platform is an interface that allows them to activate any necessary measures, from refunding a purchase to checking an account or presenting a report to the AMLR Officer for further measures.

In addition, the company has a centralised, user-friendly interface with the *QlikSense* platform. This platform allows management to access curated information and adapt reports as needed.

PAYMENT PROCESSING

We offer a safe environment with the highest security standards for clients to enter their personal information and payment method details. We have a seamless flow, making the payment process as easy and user-friendly as possible.

Among our partners are:

- **Nuvei Commerce, LLC** — One of the most trustworthy and reliable Payment Service Providers in the world, trusted by many of the largest companies in the industry.
- **Serti** — A Mexican leader in credit and debit card processing.
- **Paylux** — A Canadian PSP with a high approval rate, specialized in the Gaming/Gambling industry.
- **BVNBK** — An EU-based financial institution offering both FIAT and crypto services, with high-end technology for B2B transactions and a seamless flow for B2C integration, allowing clients to pay using their own cryptocurrencies.

Our strategy incorporates the most popular payment methods in several LatAm countries to provide clients with a culturally tailored experience, through agreements with:

- **DoPayment** — Chilean WebPay leader provider.
- **D24** — An international reference in providing a dynamic checkout experience associated with local payment methods in LatAm.
- **Astropay** — An online wallet positioned among the best in the world.

BANKING

The company does not collect payments directly from clients; 100% of all transactions are processed by Payment Service Providers (PSPs) and Alternative Payment Methods (APMs), and subsequently settled into the company's corporate bank accounts, ensuring full transparency of fund flows and enhanced security for all partners.

Legacy Eight Limited maintains corporate bank accounts with:

- <https://www.paymix.eu/>
- <https://wallter.com/>

MAIN SUPPLIERS

Commercial Services:

- Can-Call Management Inc. is a contact centre with highly experienced staff who possess the necessary skill sets for successful client-oriented inbound and outbound telemarketing and customer care interactions, including upsell, cross-sell, reactivation, customer retention, and loyalty programs.

Tickets and Insurance:

- <https://www.ltech.com/> is a ticket agent and lottery insurance provider with adaptive procedures and state-of-the-art technology, servicing gaming and gambling merchants around the world.
- Lotería Castillo is a Spanish-licensed seller of the official lottery and raffle issuer, Lotería y Apuestas del Estado.

Gaming Providers:

- G Gaming Ltd is a regulated gaming provider licensed by the UK Gambling Commission.
- Red Tiger / Evolution – Multi-licensed game provider for dozens of gaming and gambling merchants.
- Softwiss holds several licenses in the gaming industry.

CONTROLS

Legacy Eight Curacao N.V. adopts high accounting, administrative and internal control standards. The main guidelines are:

Operations and Finance

- The company generates monthly accounting reports to provide management with real-time information for decision-making.
- Monthly reports are issued to help management follow administrative and accounting procedures to guarantee the flow of information and documentation correctly and efficiently. These procedures can be adapted to the growth of the structure and the business in general.
- The invoices received are approved (signed) by the user of the corresponding service before being sent to Finance for registration and subsequent payment.
- No payment can be made without the corresponding support.
- The Head of Finance approves payments and sends them to the Directors for execution.

AML Controls:

The Company has implemented an AML/CFT framework based on a risk-based approach, aligned with Curaçao regulations and FATF standards, and overseen by a designated AML Officer. Customer risk is assessed at onboarding and on an ongoing basis, supported by KYC procedures combining automated and manual verification, including sanctions and PEP screening. Enhanced Due Diligence (EDD) is applied where higher risks are identified, including source of funds verification and escalation measures.

The Company maintains transaction monitoring controls to detect unusual or suspicious activity through automated alerts and Compliance review. Ongoing screening, behavioural analysis, and account monitoring support timely escalation and reporting where required. These controls are reinforced by record-keeping, staff training, and internal oversight, ensuring effective management of AML/CFT risks.

Responsible Gaming:

The Company has implemented a Responsible Gaming framework aligned with Curaçao regulatory requirements, aimed at promoting safe gambling behaviour and minimising harm. A designated Responsible Gaming officer oversees its implementation, supported by staff training and internal procedures.

Strict measures are in place to prevent underage gambling, including a clear prohibition of access to individuals under 18. Customers are also provided with tools to manage their activity, helping them monitor their behaviour. The Company has also implemented internal controls to identify potential problem gambling, using indicators such as deposit patterns, frequency of play, and session duration.

Where risks are identified, measures such as cooling-off periods, self-exclusion, and account restrictions may be applied. These controls are reinforced by responsible advertising practices and ongoing oversight to ensure effective customer protection.