<u>IN THE MATTER OF GCCIX W.L.L. v. ICANN</u>

I, Abdul Jawad Abo Muslim, hereby declare that:

1. I am a court-approved accounting and financial expert with 25 years of experience evaluating commercial cases as an expert assigned by the court to such matters including but not limited to court- ordered custodianship, liquidation and bankruptcy expert and liquidator, and court-appointed expert for resolution of shareholder disputes. I have been appointed an expert in such matters by the courts in Bahrain over 100 times in the past 25 years.

2. I am a qualified CPA, with substantial accounting experience in Bahrain.

3. I have extensive consulting experience for many various companies.

4. I am a shareholder in i2 Modern Accounting and Consulting W.L.L.

5. Our company has been engaged by GCCIX to complete GCCIX' audits and to communicate with the Ministry of Commerce and to satisfy the Ministry's audit requirements.

6. The primary requirement for GCCIX to regain its Active corporate status in Bahrain, is to produce acceptable audits to the MOIC for the years 2016 to 2024.

7. We have completed the 2018 audit and uploaded it along with previously prepared audits for 2016 and 2017 -- and those have been accepted by the Ministry. We need another 30 days to complete the Audits up to 2024.

8. Due to the time constraints in the IRP Procedural Order #10, i2 was asked to communicate with the Ministry and request a temporary exemption from the remaining audits. IRP Procedural Order #10 has been shared with the Ministry. The Ministry was understanding of the need for urgency, and have asked that a financial position of the company be prepared by us and uploaded for Ministry consideration .The financial position has been uploaded via the Ministry 'Sijilat' system in place of the 2024 Audit.

9. Further to this financial standing position, the Ministry very recently have asked us to obtain a declaration from the shareholders that in the event that the financial standing position shows that further capital is required from the shareholders, that we obtain and attest to a declaration by the ultimate shareholder that they will inject appropriate capital into the company as well as confirm that the ultimate beneficiary does indeed have the financial capabilities to do the same.

10. We have received the declaration from the ultimate shareholder and have also prepared the financial standing statement as per the request of our contact in the Ministry and have

uploaded in in place of the 2024 Audit. We then called the Ministry to confirm receipt and have received such a confirmation.

11. Based on the shareholder interactions with the Ministry as well as our own, we would have been confident that GCCIX will be returned to Active corporate status in the very near future -- it is only a matter of time. In fact, we expected this reinstatement to occur this week based on GCCIX having verbally received that exemption.

12. We are aware of several companies that have renewed their corporate status after being "Deleted by Law" in the past through court orders, but we are also aware that this is no longer necessary as the Ministry has corrected its regulation. However, we believe GCCIX to be the first company to apply for this renewal under the new corrected Regulation from October 2024. In fact, we are aware that this correction to the regulation happened after GCCIX engaged the Ministry in court not only to renew its own CR, but also to correct the regulation. As such, we are not surprised that they are the first to undergo the renewal through this new process. Please note that correcting the regulation does not automatically mean a process was ready and set by the Ministry. The Ministry is still developing this process and we believe it is being fine tuned through this back and forth with GCCIX.

13. We are aware that the Ministry asked the shareholders to send a copy of the engagements with our firm by email, something that is not part of the standard audit engagement process as that is usually done on the Ministry Sijilat system. We are aware that this was sent to the Ministry on the 13th of March.

14. We are aware that upon follow up with the Ministry, the Ministry asked for a shareholder resolution to renew the company as the final step in the renewal process. As this process is not documented anywhere and as it's the first time anyone has gone through it, this was a surprise to GCCIX and ourselves. It is by no means an onerous requirement, but it is one that requires time.

15. We are aware that such a resolution would have required an AGM be called and the Ministry of Industry and Commerce be invited to attend with a period of 15 days given between the invitation date and the Annual General Assembly meeting date, hence the time requirement. After receiving this email, GCCIX consulted us on whether or not there is any way to waive this notice period and we have advised them that while such a waiver is possible and that we can apply on their behalf, it would take several days to obtain acknowledgement from the Ministry and that we cannot guarantee that they would be able to renew on the deadline set by the Panel in the GCCIX vs ICANN case. We advised that the only remaining option is to approach the Court of Summary Matters (also known as Urgent Matters Court) and to explain to them the urgency of this renewal and ask that they award custodianship of the company to bypass the shareholders completely

-- and thus enable a court-appointed custodian to take all actions on behalf of the company, including signing a resolution to renew.

16. The custodianship route is very expensive for the company. However, we felt it was the only way to change GCCIX's corporate status in the time available under the circumstances in the GCCIX v ICANN case.

17. We are pleased to see GCCIX followed our advice and has now changed their corporate status, and that it is no longer Deleted by Law. There is now no doubt whatsoever that GCCIX has full rights, through the Custodian, to renew its CR as is already done, to enter into contracts, to complete the necessary audits, and otherwise to operate the company in the best interest of the shareholders.

18. However, we reaffirm that GCCIX would have still been able to enter into agreement with ICANN regardless of the Deleted by Law status and that status does not in any way mean the company no longer exists or cannot be renewed or that it loses its ability to conduct its business. In fact, various Regulations are in place placing responsibility on the Manager and the Board of Directors to continue operating the company despite the lack of renewal foremost of which is Article 17 which reads as follows:

> **Omission of Registration due to Failure to Renew or Suspension of Activity**
> Should the Registration Owner fail to renew the Registration before the expiration thereof or suspend the licensed activity for a consecutive period of time exceeding one year without an acceptable excuse, the Concerned Directorate shall omit that Owner's Registration and notify him of the decision of omission within thirty days from the issuance of such decision, and the decision shall be published on the Ministry's website. The omission of Registration shall not lead to ending the liability of the Owner thereof and the persons in charge of management, as their liabilities shall continue to exist as if the Registration is still valid.

I swear under penalty of perjury under the law of Bahrain, that the foregoing statements and attached evidence are true and correct, to the best of my knowledge.

Respectfully submitted, this 21st day of March, 2025, from Bahrain.

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Signature
Abdul Jawad Abo Muslim
Shareholder
i2 Modern Accounting and Consulting W.L.L