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July 24, 2026

To: Internet Corporation for Assigned Names and Numbers (ICANN)

And To: The .Brand TLD Eligibility Evaluation Panel, c/o ICANN

Re: Confirmation of Common Control and Specification 13 Eligibility — Application by Intercap Registry Inc. for the .owl Top-Level Domain (.Brand TLD)

To ICANN and the .Brand TLD Eligibility Evaluation Panel:

We are corporate counsel to Intercap Inc. (“Intercap”) and certain of its affiliated entities, including Intercap Registry Inc. (the “Applicant” or “Intercap Registry”). We have been asked to provide this confirmation (this “Confirmation”) in connection with the relationship between the Applicant and Open World Learning Inc. (“OWL”), based on our review of the corporate records and related materials described below. This Confirmation is provided in connection with the application (the “Application”) submitted, or to be submitted, by the Applicant to ICANN under the 2026 round of ICANN’s New gTLD Program, governed by the 2026 Applicant Guidebook (the “Applicant Guidebook”), for the delegation of the .owl top-level domain (the “TLD”), which the Applicant intends to operate as a .Brand TLD pursuant to Specification 13 (.Brand TLD Provisions) to the Base Registry Agreement (“Specification 13” and the “Registry Agreement”, respectively).

Capitalized terms used but not otherwise defined in this Confirmation have the meanings given to them in the Trademark Licence and TLD Authorization Agreement between Open World Learning Inc., as Licensor, and Intercap Registry Inc., as Licensee (the “**Licence Agreement**”), or in Specification 13.

This Confirmation should be read together with the Licence Agreement, the Affiliate Confirmation Letter and the Trademark Owner Consent, each of which forms part of the Applicant’s Specification 13 evidentiary package.

1. Identification of Counsel and Capacity. We act as corporate counsel to Intercap Inc. and certain of its affiliated entities, including the Applicant, but not OWL. In that capacity, we have been asked to provide this Confirmation based on our review of the corporate records and related materials described below. We provide this Confirmation in our capacity as corporate counsel to Intercap Inc. and the Applicant, and not as counsel to OWL.

2. Nature of this Confirmation. This Confirmation is a factual confirmation based upon the corporate records reviewed by us. It is not, and should not be construed as, a legal opinion. It sets out objective facts concerning the ownership and control of the Applicant and OWL, from which

their common control within the meaning of the definition of “Affiliate” contained in the Registry Agreement (as incorporated by Specification 13) follows.

3. Documents and Records Reviewed. For purposes of this Confirmation, we have reviewed, among other things, the following:

- (a) the constating documents (articles or certificate of incorporation, as applicable, and by-laws) of the Applicant, of OWL, and of the intermediate holding entities described below;
- (b) the securities registers, share registers and registers of directors and officers of those entities;
- (c) the records (to the extent in our possession) evidencing the issued and outstanding securities of those entities and the ownership of those securities;
- (d) any unanimous shareholder agreements, shareholder agreements, voting agreements or similar arrangements affecting the control of those entities;
- (e) a search of the trademark register maintained by the Benelux Office for Intellectual Property (BOIP) as of July 24, 2026; and (f) the Licence Agreement.

4. The Parties. Based on our review:

- (a) OWL is a corporation existing under the laws of the Province of Ontario, Canada. The OWL trademark (the Licensed Marks, as defined and particularized in Schedule A to the Licence Agreement) is registered to OWL, which carries on the OWL Business, being the development, provision and operation of an online eLearning platform and hosted learning management system providing courses, learning paths and related educational resources and services for nonprofit organizations and registered charities. The OWL Business is conducted independently of, and is unrelated to, the provision of TLD Registry Services.
- (b) The Applicant is a corporation forming part of the Intercap group of companies and is the entity designated within that group to submit the Application and, if the Application is successful, to enter into the Registry Agreement and operate the TLD as Registry Operator.
- (c) Each of the Applicant and OWL forms part of the Intercap group of companies and is under common control with Intercap.

5. Ownership and Control Structure. Based upon the corporate records reviewed, Intercap, directly or indirectly, exercises control over both OWL and the Applicant, with the result that each of OWL and the Applicant is under common control. The corporate records reviewed constitute the evidentiary basis for this Confirmation.

6. Application of the Definition of Affiliate. Under the Registry Agreement (and as incorporated by Specification 13), “Affiliate” means a person or entity that, directly or indirectly, through one or more intermediaries, or in combination with one or more other persons or entities, controls, is controlled by, or is under common control with, the person or entity specified; and “control” means the possession, directly or indirectly, of the power to direct or cause the direction of the

management or policies of a person or entity, whether through the ownership of securities, as trustee or executor, by serving as an employee or member of a board of directors or equivalent governing body, by contract, by credit arrangement or otherwise. In considering whether this standard is met, we have had regard to the legal ownership of securities, voting rights, governance arrangements, and the practical ability to control the board of directors, such that Intercap can, if it so chose, direct the management and policies of each of OWL and the Applicant, consistent with the definition of “control” in the Registry Agreement. Based on the ownership and control structure described in Section 5, Intercap possesses the power to direct or cause the direction of the management or policies of each of OWL and the Applicant, and OWL and the Applicant are under common control.

7. Findings. Based upon the corporate records reviewed, and subject to the foregoing, those records establish that, as of the date of this Confirmation:

- (a) Intercap exercises control, directly or indirectly, over both OWL and the Applicant;
- (b) OWL and the Applicant are under common control and, accordingly, are Affiliates of one another within the meaning of the definition of “Affiliate” contained in the Registry Agreement (as incorporated by Specification 13);
- (c) the Licensed Marks are duly registered to OWL;
- (d) all corporate approvals necessary to authorize the Applicant’s execution of the Licence Agreement and submission of the Application have been duly obtained;
- (e) the Licence Agreement accurately reflects the relationship between OWL and the Applicant as described in this Confirmation; and
- (f) the Applicant is authorized to rely upon the Licence Agreement in connection with the Application and the operation of the TLD.

The matters set out above correspond to, and support, the matters addressed in the Specification 13 Compliance Matrix (Schedule D) to the Licence Agreement.

8. Accuracy. The information set out in this Confirmation is accurate as of the date hereof and as of the date of the Application.

Nothing has come to our attention during our review of the corporate records that would cause us to believe that the Applicant does not satisfy the common control requirements contemplated by the definition of “Affiliate” contained in the Registry Agreement.

9. Assumptions and Qualifications. In providing this Confirmation, we have assumed, without independent verification: (a) the genuineness of all signatures and the authenticity and completeness of all documents and records reviewed by us, whether originals or copies; (b) that the corporate records reviewed by us are accurate and complete and have been maintained in accordance with applicable requirements; and (c) the legal capacity of all natural persons. This Confirmation relates only to the matters expressly stated herein, is limited to the factual matters

confirmed, and does not constitute a legal opinion or any confirmation as to the validity, enforceability or scope of the Licensed Marks or the Licence Agreement.

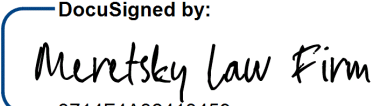
We are solicitors licensed to practice in the Province of Ontario, Canada and our opinions expressed herein are limited to such jurisdiction. We express no view as to the laws of any jurisdiction other than the Province of Ontario and the federal laws of Canada applicable therein. These assumptions and qualifications are customary for a confirmation of this nature and are not intended to, and do not, derogate from the substance of the findings set out in Section 7.

10. Reliance. This Confirmation is provided to, and may be relied upon by, ICANN and the .Brand TLD Eligibility Evaluation Panel in connection with the evaluation of the Application. Unless withdrawn or modified by us in writing following a material change in circumstances, this Confirmation may continue to be relied upon by ICANN and the .Brand TLD Eligibility Evaluation Panel throughout the evaluation of the Application. Except as stated above, this opinion letter may not be relied upon by or disclosed to anyone else or used for any other purpose, without our prior written consent.

11. Governing Law. This Confirmation is governed by and construed in accordance with the laws of the Province of Ontario and the federal laws of Canada applicable therein.

Yours truly,

MERETSKY LAW FIRM

DocuSigned by:

Per: 3714F4A32413459
Name: Jason Meretsky
Title: Partner