

SANCTIONS POLICY
CORPORATE INTERNATIONAL SANCTIONS POLICY
Superbet88 International N.V.

Version: 2026 v.02

Effective Date: January 1, 2026

Prepared and Technically Responsible by:
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1. CONTEXT, PURPOSE AND STRUCTURAL BASIS OF THE POLICY

Superbet88 International N.V., a private legal entity duly incorporated and registered under number 161859 with the Commercial Register of the Curaçao Chamber of Commerce & Industry, with its statutory seat and operational address at Schottegatweg Oost 10, Unit 1-9, Bon Bini Business Center, Curaçao, operates as an international online gaming and betting operator, providing services to clients located in multiple jurisdictions worldwide.

Given the transnational, digital and highly regulated nature of its activities, the Company acknowledges that it is exposed to legal, regulatory, financial, reputational and operational risks related to non-compliance with international economic, financial, commercial and restrictive sanctions regimes.

International sanctions constitute formal instruments of public international law and foreign policy, adopted by sovereign states and multilateral organizations with the objective of:

- a) preserving international peace, security and stability
- b) preventing the financing of terrorism, weapons proliferation and transnational crime
- c) combating money laundering, corruption, trafficking and human rights violations
- d) restricting sanctioned regimes, entities or individuals from accessing financial, technological and economic resources

The purpose of this Policy is to establish a robust internal regulatory framework, defining principles, rules, procedures, controls, responsibilities and monitoring mechanisms, ensuring that Superbet88 International N.V. does not directly or indirectly engage in any activity prohibited by sanctions regimes, including those with extraterritorial effects.

2. GUIDING PRINCIPLES OF THE SANCTIONS POLICY

The Company's approach to international sanctions compliance is guided by the following structural principles:

- a) strict legality and full observance of applicable international norms
- b) preventive, risk-based compliance approach
- c) zero tolerance for sanctions violations
- d) corporate responsibility and accountability
- e) transparency, traceability and adequate documentation
- f) cooperation with regulatory, supervisory and financial authorities

These principles are embedded in the Company's corporate governance, decision-making processes and operational routines.

3. SCOPE OF APPLICATION AND COVERAGE

This Policy applies mandatorily, continuously and without exception to all persons and entities associated with Superbet88 International N.V., including:

- a) shareholders, Board members and Directors
- b) officers, managers and team leaders
- c) permanent, temporary and outsourced employees
- d) external consultants, auditors, agents and representatives
- e) suppliers, commercial partners, affiliates and intermediaries
- f) any third party acting in the name, interest or benefit of the Company

The Policy covers all business activities, including but not limited to:

- a) customer onboarding and management
- b) payment processing, deposits, withdrawals and winnings
- c) bonus programs, promotions and affiliate arrangements
- d) commercial, technological and marketing contracts
- e) provision of software, platforms and infrastructure
- f) strategic partnerships and international expansion

No exception shall be permitted without formal authorization from the Compliance function.

4. INTERNATIONAL SANCTIONS REGIMES OBSERVED

Superbet88 International N.V. adopts an integrated compliance model, simultaneously observing the following sanctions regimes:

- a) United States sanctions, administered by the Office of Foreign Assets Control (OFAC)
- b) European Union sanctions
- c) United Kingdom sanctions, administered by the Office of Financial Sanctions Implementation (OFSI)
- d) United Nations Security Council sanctions

Where any conflict or divergence exists, the most restrictive standard shall prevail, as a risk mitigation and institutional protection measure.

5. UNITED STATES SANCTIONS – OFAC

The Company fully complies with sanctions imposed by the Office of Foreign Assets Control (OFAC), including those enacted pursuant to the International Emergency Economic Powers Act (IEEPA) and other applicable U.S. legislation.

It is strictly prohibited to:

- a) maintain any commercial or financial relationship with individuals or entities listed on the Specially Designated Nationals and Blocked Persons List (SDN List)
- b) facilitate direct or indirect transactions involving sanctioned entities
- c) allow access to the platform, winnings, bonuses or financial resources to sanctioned persons

Any identification of a link to a sanctioned individual or entity shall result in immediate blocking, suspension of operations, and internal regulatory assessment.

6. EUROPEAN UNION SANCTIONS

The Company strictly observes European Union sanctions regulations, including:

- a) full freezing of assets and economic resources
- b) prohibition on the provision of digital, technological or operational services
- c) restrictions on the export or transfer of sensitive software and technologies

No transaction may be executed without prior validation when there is any connection to sanctioned individuals, entities or jurisdictions.

7. UNITED KINGDOM SANCTIONS – OFSI

Superbet88 International N.V. complies with the United Kingdom's autonomous sanctions regime, prohibiting:

- a) the provision of funds or economic resources
- b) the facilitation of payments or indirect benefits
- c) contractual relationships with sanctioned individuals or entities

These obligations apply even to operations conducted outside UK territory where regulatory impact exists.

8. UNITED NATIONS SANCTIONS

Sanctions imposed by the United Nations Security Council are considered mandatory and binding, including:

- a) economic and financial embargoes
- b) technological and service-related restrictions
- c) travel bans and logistical facilitation prohibitions

The Company commits not to provide any form of direct or indirect support to sanctioned regimes or entities.

9. DUE DILIGENCE, SCREENING AND CONTINUOUS MONITORING

Superbet88 International N.V. maintains a structured and continuous due diligence program, which includes:

- a) initial and periodic screening against sanctions lists
- b) jurisdictional analysis, corporate structure review and identification of beneficial owners
- c) enhanced due diligence for politically exposed persons (PEPs) and high-risk jurisdictions
- d) continuous monitoring of financial transactions
- e) documentation and retention of evidence for audit and inspection purposes

No commercial relationship shall be initiated without formal validation by the Compliance function.

10. TRAINING, AWARENESS AND COMPLIANCE CULTURE

All employees and relevant partners must participate in mandatory training programs, covering:

- a) legal foundations of international sanctions
- b) risks specific to the gaming and betting sector
- c) practical examples of violations and regulatory consequences
- d) internal reporting and escalation procedures

Training activities are documented, traceable and auditable.

11. REPORTING, INVESTIGATION AND DISCIPLINARY MEASURES

The Company maintains an independent and confidential reporting channel for suspected violations, ensuring:

- a) absolute confidentiality
- b) protection against retaliation
- c) impartial and documented investigations

Corrective measures may include warnings, termination of employment or contracts, suspension of business relationships and notification of competent authorities.

12. GOVERNANCE, REVIEW AND POLICY UPDATES

This Policy is subject to periodic review, taking into account:

- a) changes in international sanctions regimes
- b) regulatory developments
- c) business expansion and new markets
- d) findings from internal and external audits

All updates shall be formally communicated to relevant stakeholders.

13. FINAL STATEMENT OF COMMITMENT

Superbet88 International N.V. reaffirms its unequivocal commitment to ethics, legality, transparency and international responsibility. Strict compliance with international sanctions is an essential element of the Company's operational integrity, sustainability and global credibility.