

RESPONSIBLE GAMING AND SELF-EXCLUSION POLICY.

Policy Year 2026

NovaWave Technology N.V.

Company Registration Number: 162293

Legal Form: Private Limited Liability Company (N.V.)

Statutory Seat: Curaçao

Registered and Mailing Address:

Schottegatweg Oost 10, Unit 1–9

Bon Bini Business Center

Curaçao /Date of Incorporation: November 9, 2022

1. Introduction Regulatory Context and Purpose

NovaWave Technology N.V., a private limited liability company duly incorporated under the laws of Curaçao and registered with the Curaçao Chamber of Commerce and Industry under registration number 162293, hereby adopts this Responsible Gaming and Self-Exclusion Policy as a formal, binding and permanent governance instrument applicable to all remote gaming activities, betting services and gaming software solutions operated, managed, supported or supplied by the Company.

This Policy has been drafted, structured and implemented in strict compliance with the National Ordinance on Games of Chance of Curaçao (Landsverordening op de Kansspelen), all binding regulations, supervisory rules, policy documents and technical instructions issued by the Curaçao Gaming Authority, as well as internationally recognised best practices applicable to regulated remote gaming operators and gaming software providers.

The fundamental purpose of this Policy is to ensure that all gaming related activities supported by the Company are conducted exclusively as a lawful and responsible form of entertainment, preventing financial, emotional and social harm, protecting vulnerable individuals, ensuring the absolute prohibition of underage gambling and establishing effective mechanisms that allow players to control, limit or interrupt their gambling activity whenever necessary.

Responsible Gaming is treated by the Company not as a discretionary initiative, but as a continuous legal obligation, an essential element of regulatory compliance and a core component of operational integrity.

2. Definitions and Regulatory Interpretation

For the purposes of this Policy, games of chance include all gaming modalities in which monetary value is wagered with the expectation of gain, where the outcome

depends wholly or partially on chance, including but not limited to sports betting, casino games, poker, peer to peer games and interactive gaming products.

A minor is defined as any individual under eighteen years of age. Participation by minors in any gaming activity is strictly prohibited without exception.

A vulnerable person is any individual who, based on behavioural indicators, legal status or personal circumstances, lacks adequate control over gambling behaviour, is at risk of gambling related harm, has requested exclusion, or is subject to financial distress, including insolvency or bankruptcy.

Cooling off refers to a temporary and voluntary suspension of gambling activity initiated by the player. Self-exclusion refers to a long term voluntary exclusion mechanism that blocks access to all gambling activities offered under the Company's operational scope for a selected and irrevocable period.

3. Governance Structure and Allocation of Responsibilities

NovaWave Technology N.V. integrates Responsible Gaming principles into its corporate governance framework, operational processes and internal control systems.

The Company formally designates its Compliance Officer as the Responsible Gaming Officer, granting sufficient authority, independence and resources to implement, monitor, supervise, document and report all Responsible Gaming related measures.

The Responsible Gaming Officer is responsible for ensuring consistent application of this Policy across all operational areas, overseeing behavioural monitoring systems, supervising player protection interventions, coordinating staff training and preparing periodic internal reports for senior management. Any material amendment to this Policy is subject to internal assessment and regulatory alignment.

The Company expressly confirms that it does not offer credit, loans, deferred payment facilities or any financial mechanisms that would allow players to gamble with funds that do not belong to them.

4. Absolute Prevention of Underage Gambling

Participation in gambling activities by minors is strictly prohibited.

The Company implements a layered and continuously monitored age verification process that begins at account registration and continues throughout the duration of the player relationship. This process includes mandatory age declaration, submission and verification of valid government issued identification documents and additional electronic or third party database verification tools where necessary.

No withdrawal of funds is permitted unless identity and age verification have been fully completed. If an account is identified as belonging to a minor, the account is immediately closed, all gaming activity is terminated, funds are handled in accordance with applicable civil law and all records are retained for regulatory inspection.

5. Player Information Transparency and Accessibility

The Company maintains a clearly visible and permanently accessible Responsible Gaming section on all platforms supported or operated by NovaWave Technology N.V.

This section provides players with comprehensive information regarding the risks associated with gambling, practical guidance on responsible gambling behaviour, full access to all available control tools, direct contact channels with trained support staff and references to independent support and treatment organisations.

All information is presented in clear and understandable language, ensuring transparency and accessibility for all users.

6. Behavioural Monitoring and Risk Identification

The Company applies continuous behavioural monitoring using automated systems supported by trained personnel. Monitoring takes into account wagering frequency, deposit and withdrawal patterns, session duration, reversal attempts, repeated changes to limits, communication patterns with support staff and other relevant indicators.

No single indicator is assessed in isolation. Risk classification is based on the frequency, intensity and combination of indicators, applying proportionality and prioritising player protection.

All Responsible Gaming related observations and actions are properly documented to ensure traceability and auditability.

7. Graduated Interventions and Protective Measures

Where indicators of problematic gambling behaviour are identified, the Company applies graduated and proportionate interventions. These may include informational communications, personalised guidance, mandatory limits, activation of cooling off periods, temporary suspension or permanent exclusion.

Responsible Gaming measures are never used to delay, prevent or obstruct legitimate withdrawals. All interventions are implemented exclusively for the purpose of player protection and harm prevention.

8. Voluntary Cooling Off Periods

Players may activate voluntary cooling off periods at any time for predefined durations. During the cooling off period, gambling activity is immediately

suspended, deposits are disabled, wagering is blocked, withdrawals remain available and promotional communications are suspended.

Account access is automatically restored upon expiration of the selected period without the need for operator intervention.

9. Self-Exclusion Mechanism

The Company provides a self-exclusion mechanism that allows players to voluntarily exclude themselves from all gambling activities supported or operated by the Company for a selected and irrevocable period.

During self-exclusion, player accounts are closed, access is blocked, marketing communications are disabled, technical measures are implemented to prevent circumvention and records are retained in accordance with applicable legal and regulatory requirements.

Reactivation may only occur after the exclusion period has expired and must be expressly initiated by the player.

10. Operator Initiated Exclusion

The Company reserves the right and obligation to exclude players where consistent evidence of high risk behaviour, severe gambling related harm or suspected criminal activity is identified.

Such exclusions are fully documented, retained for a minimum of five years and made available to the Curaçao Gaming Authority upon request.

11. Financial and Operational Limits

Players are provided with tools allowing the definition of financial limits on deposits over specified periods. Requests to increase limits become effective only after a mandatory reflection period, while reductions take effect immediately.

Additional limits, including time based or loss based restrictions, may be applied based on the assessed risk profile of the player.

12. Training and Awareness

All employees who interact with players receive mandatory and periodic Responsible Gaming training covering behavioural risk indicators, ethical communication practices, intervention procedures and internal escalation protocols.

Training activities are documented and subject to internal review.

13. Advertising and Marketing Standards

The Company commits to responsible, ethical and transparent advertising practices. Gambling is never presented as a financial solution, a path to success

or a means of recovering losses. Marketing activities do not target minors or vulnerable individuals and include Responsible Gaming messaging.

Third parties acting on behalf of the Company are contractually required to comply with this Policy.

14. Review Continuous Improvement and Regulatory Cooperation

This Policy is subject to periodic review to ensure continued compliance with regulatory developments, supervisory expectations and best practices in Responsible Gaming.

The Company maintains open and transparent cooperation with the Curaçao Gaming Authority and promptly implements any required adjustments.

15. Final Provisions

NovaWave Technology N.V. reaffirms that Responsible Gaming constitutes a fundamental pillar of its regulated operations. Gambling must always remain a voluntary, informed and controlled activity. The Company is committed to protecting players, fulfilling its legal obligations and upholding the highest standards of regulatory integrity.

Policy written and reviewed by
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Compliance Officer