

SANCTIONS 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 and Purpose

NovaWave Technology N.V., a private limited liability company duly incorporated and existing under the laws of Curaçao and registered with the Curaçao Chamber of Commerce & Industry under number 162293, operates as an international provider of remote gaming software and related technological services for clients established or residing outside of Curaçao.

Given the international nature of its activities, NovaWave Technology N.V. acknowledges that compliance with international economic and financial sanctions is a fundamental legal, regulatory, and ethical obligation. Sanctions constitute binding instruments of international law and public policy, designed to preserve global peace, international security, economic stability, and the protection of human rights.

This Sanctions Policy establishes a comprehensive and unified framework to ensure that NovaWave Technology N.V. conducts its business activities in full compliance with applicable sanctions regimes imposed by the United States of America, the European Union, the United Kingdom, and the United Nations Security Council, as well as any other relevant national or supranational authority whose sanctions may have extraterritorial effect.

The purpose of this Policy is to define responsibilities, principles, controls, and procedures aimed at preventing NovaWave Technology N.V. from directly or indirectly engaging in transactions, relationships, or activities involving sanctioned individuals, entities, organizations, vessels, jurisdictions, or sectors. This Policy also reinforces the Company's commitment to transparency, integrity, and responsible business conduct in all jurisdictions in which it operates.

2. Scope of Application

This Sanctions Policy applies to NovaWave Technology N.V. in its entirety and is binding upon all directors, officers, statutory directors, managers, employees, temporary staff, consultants, contractors, service providers, suppliers, business partners, intermediaries, and any third party acting on behalf of or in the interest of the Company.

The Policy covers all operational areas of the Company, including but not limited to software development, platform licensing, technical support, customer onboarding, payment processing, financial operations, marketing activities, commercial partnerships, risk management, compliance oversight, data processing, and corporate governance.

All third parties must comply with this Policy as a mandatory condition for establishing or maintaining any contractual or commercial relationship with NovaWave Technology N.V. The Company reserves the right to suspend or terminate any relationship that presents sanctions-related risks or violations.

3. United States Sanctions Compliance

NovaWave Technology N.V. complies with all applicable sanctions administered and enforced by the United States Department of the Treasury through the Office of Foreign Assets Control. These sanctions are primarily grounded in the International Emergency Economic Powers Act and other relevant U.S. federal statutes and executive orders.

The Company strictly prohibits any transaction, whether direct or indirect, involving individuals, entities, or organizations listed on the OFAC Specially Designated Nationals and Blocked Persons List or any other U.S. sanctions list. This prohibition extends to financial transactions, provision of services, software licensing, technological support, facilitation activities, and any form of economic benefit.

The Company also observes sectoral sanctions that restrict activities in specific industries or sectors related to sanctioned jurisdictions, including but not limited to finance, energy, oil and gas, defense, or strategic technologies. NovaWave Technology N.V. shall not engage in activities that may contribute to or support sanctioned sectors, even indirectly.

All clients, partners, and relevant transactions are subject to sanctions screening, and any potential match or exposure must be immediately escalated to the Compliance function for assessment, suspension of activities, and reporting where legally required.

4. European Union Sanctions Compliance

NovaWave Technology N.V. fully adheres to sanctions imposed by the Council of the European Union, including restrictive measures implemented through EU Regulations and Decisions. These sanctions may include asset freezing

measures, restrictions on the provision of services, trade prohibitions, travel bans, and limitations on access to financial resources.

In the event that any customer, partner, or counterparty is identified as a sanctioned person or entity under EU law, the Company shall immediately freeze any assets or resources under its control and ensure that no funds, services, or economic resources are made available.

The Company shall not provide software, technological services, or digital infrastructure to sanctioned jurisdictions or for prohibited purposes, including the transfer of dual-use technologies or services that could be misused for military or strategic objectives.

5. United Kingdom Sanctions Compliance

NovaWave Technology N.V. complies with the independent sanctions regime of the United Kingdom, enforced by the Office of Financial Sanctions Implementation. The Company recognizes that UK sanctions may apply extraterritorially and may impose obligations on foreign entities engaging with UK persons, markets, or financial systems.

All assets belonging to or controlled by UK-sanctioned individuals or entities must be frozen without delay. The Company is strictly prohibited from providing funds, economic resources, services, or any form of value to such sanctioned parties.

The Company also complies with UK trade and export restrictions, ensuring that its software, services, and technological solutions are not provided to prohibited jurisdictions or sectors under UK law.

6. United Nations Sanctions

Sanctions imposed by the United Nations Security Council are binding on all UN Member States and constitute mandatory international obligations. NovaWave Technology N.V. strictly observes all UN sanctions, including arms embargoes, travel bans, asset freezes, and sectoral or commodity restrictions.

The Company shall not provide any services, software, infrastructure, or technical assistance that could directly or indirectly support sanctioned regimes, organizations, or individuals, particularly where such support could undermine international peace and security.

7. Due Diligence and Monitoring

NovaWave Technology N.V. maintains a robust sanctions due diligence framework integrated into its broader compliance and risk management systems. This framework includes continuous screening of customers, partners, suppliers, and beneficial owners against applicable sanctions lists, enhanced due diligence for high-risk jurisdictions and complex ownership structures, and ongoing monitoring of transactions and business relationships.

No payments, winnings, bonuses, fees, or other financial movements shall be processed if there is any indication of a sanctions risk. All due diligence activities are documented and retained to demonstrate compliance to regulators, auditors, and licensing authorities.

8. Training and Awareness

The Company provides periodic and mandatory sanctions compliance training to relevant employees and stakeholders. Training covers legal foundations of sanctions, identification of red flags, real-world case studies, reporting obligations, and individual responsibilities.

Employees are required to acknowledge their understanding of and adherence to this Policy, reinforcing a culture of compliance and accountability throughout the organization.

9. Reporting and Enforcement

NovaWave Technology N.V. maintains confidential reporting mechanisms that allow employees and third parties to report suspected or actual sanctions violations without fear of retaliation. All reports are investigated promptly and impartially.

Confirmed violations may result in disciplinary measures, termination of contracts, notification to competent authorities, implementation of corrective actions, and enhancement of internal controls.

10. Review and Updates

This Sanctions Policy is subject to periodic review to reflect changes in international sanctions regimes, regulatory expectations, business activities, and risk assessments. Updates shall be communicated promptly to all relevant stakeholders.

11. Final Provisions

Compliance with sanctions laws is an essential component of NovaWave Technology N.V.'s commitment to lawful, ethical, and responsible global operations. This Policy ensures that the Company conducts its activities in alignment with international legal standards, safeguarding its reputation, its partners, and the integrity of the global financial and technological ecosystem.

Policy prepared and approved by:
Irati Aparecida Santos
Compliance Officer