NovaLink

Sanctions & OFAC Compliance Policy

Lists screened, prohibited persons and jurisdictions, monitoring

---

Document ID: NL-SANC-01

Version: 1.0

Status: Issued

Issuing entity: Group-wide policy — adopted by each NovaLink entity listed in the Corporate Structure & Entity Register (NL-ORG-01); a directly binding legal obligation of NodeLink USA, Inc. as a US person

Applies to: the NovaLink product, network and Nx1/Hx1 Home Stations, regardless of which Community Platform a participant joined through

The NovaLink entities: Ntech Link Technologies Ltd, Co. No. 2195904 (Store Operator) · Auralink Nova Technology L.L.C, Dubai, Reg. No. 1607764 (Technology Provider) · NodeLink USA, Inc., Delaware, File No. 10606222 (US Distribution)

Effective date: 22 May 2026

Contact: support@novalink.tech

---

1. Introduction

The Company ("the Company") is committed to compliance with all applicable economic sanctions, trade restrictions, and counter-terrorist-financing regimes. This Sanctions Compliance Policy describes the controls that the Company applies at onboarding, on an ongoing basis, and to Workload Publishers and counterparties.

This policy supplements Section 2 of the Company Terms and Conditions ("Eligibility"), Section 5 ("AML/KYC Compliance"), and Section 4 of the Risk Disclosure Policy.

The Company operates as a group of three entities (the "The Link Group"): the Company (British Virgin Islands), the platform operating entity; the Company (Delaware), responsible for United States market entry, distribution and sales; and Auralink Nova Technology L.L.C (Dubai, UAE), which operates the group's technology platform under the Company brand and holds the group's technology intellectual property.

Because the Company is a United States person, it is directly and primarily subject to the sanctions administered by the United States Office of Foreign Assets Control (OFAC); compliance with OFAC sanctions is a binding legal obligation of the Company, not merely a voluntary control. This policy is applied on a group-wide basis so that the standard set by the most stringent applicable regime is observed across all The Link Group entities.

2. Sanctions lists screened

The Company screens Users, Node Operators, Workload Publishers, and Country Distributors against, at a minimum, the following lists:

- United States Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List, the Foreign Sanctions Evaders List, the Sectoral Sanctions Identifications List, and the Non-SDN Menu-Based Sanctions List.
- United Nations Security Council Consolidated Sanctions List.
- European Union Consolidated List of Persons, Groups and Entities Subject to EU Financial Sanctions.
- United Kingdom OFSI Consolidated List of Financial Sanctions Targets.
- Australian Department of Foreign Affairs and Trade (DFAT) Consolidated List under the Charter of the United Nations Act 1945 (Cth) and the Autonomous Sanctions Regulations 2011 (Cth).
- Hong Kong Monetary Authority list of designated persons and entities; Monetary Authority of Singapore list.
- The Financial Action Task Force (FATF) High-Risk Jurisdictions and Jurisdictions under Increased Monitoring lists, which inform the Company's country-risk classification.

3. Prohibited persons

The Company will not knowingly:

- Provide the Platform, Services, USDN, an Nx1/Hx1 Home Station, or any benefit thereunder to a person or entity that appears on any of the lists in Section 2.
- Accept funds from, or pay rewards to, any such person or entity.
- Permit a Workload Publisher to schedule a Workload on the network where the Workload is directed at a sanctioned jurisdiction or sanctioned end-user.

4. Prohibited jurisdictions

As at the date of this policy, the Company does not onboard or knowingly serve Users or Node Operators ordinarily resident in, or operating from, the following jurisdictions: Cuba, the so-called Donetsk People's Republic and Luhansk People's Republic, Iran, North Korea (DPRK), the Crimea region of Ukraine, Russia (subject to specific case-by-case carve-outs consistent with EU/UK/US law), Syria, and Belarus to the extent prohibited by applicable sectoral sanctions. The list of Prohibited Jurisdictions is reviewed quarterly and is updated to reflect changes in applicable law.

5. Onboarding screening

- User registration: name, date of birth, country of residence are screened against the Section 2 lists in real time before account activation.
- Country Distributors and Workload Publishers: full KYB, including beneficial owner identification (UBO threshold: 25%) and director screening.
- Hits trigger holds; the Compliance Officer reviews each hit and either clears, escalates, or rejects.

6. Ongoing monitoring

- The Company re-screens its active customer base against updated lists at least weekly, and within 24 hours of any material update to the OFAC SDN List, the UN List, or the EU Consolidated List.
- Transactions are subject to additional behavioural monitoring (velocity, geo-anomaly, source-of-funds inconsistency) consistent with BVI AML Regulations 2008.

7. Reporting and disclosure

A confirmed sanctions match results in:

1. Immediate freeze of the affected account, in accordance with Section 5.2 of the Terms and Conditions.
2. Report to the BVI Financial Investigation Agency where required under the Proceeds of Criminal Conduct Act.
3. Report to OFAC where required under 31 CFR Part 501 (within 10 business days of blocking).
4. Report to the UK OFSI where required under The Sanctions and Anti-Money Laundering Act 2018.
5. Report to AUSTRAC where the User is or appears to be in Australia.

8. Roles and responsibilities

- Compliance Officer (the Company): owns this policy, sign-off on all sanctions matches.
- MLRO (Money Laundering Reporting Officer): files Suspicious Activity Reports and engages with the BVI FIA.
- Board of Directors: receives an annual sanctions-compliance report and any material exception.

9. Training

- All the Company personnel complete sanctions and AML training within 30 days of hire and refresh annually.
- A training log is retained for 5 years.

10. Review

This policy is reviewed at least annually, and additionally upon any material change to applicable sanctions law.

11. Contact

Compliance Officer: support@novalink.tech | Sanctions queries: support@novalink.tech

> *Status note. Live screening at User onboarding is operational via the Company's third-party KYC provider. Ongoing weekly re-screening of the full base is being rolled out, with full coverage targeted by December 2027. Quarterly Board sanctions reporting begins on completion of that rollout (target: 2028).*