

Sanctions Compliance Acknowledgment

All products on the platform are sold by a Merchant of Record (MoR), Number X (Number X Europe OU).

Avan.market cannot be used as a currency exchange service. Funds can only be withdrawn using the same payment method that was used to deposit them into the avan.market account. Currency exchange functionality is not supported in any way.

Avan.market (NX Digital limited, Hong Kong) will not enter business with, or facilitate the activities of any Client, or party that it believes to be subject to Sanctions, engaging in activities which are sanctioned, or seeking to circumvent the impact of Sanctions. Avan.market highlights the following and requires that you read, acknowledge, and confirm you are compliant with, and will continue to be compliant with these legal requirements.

As such, the signatory to this Acknowledgment confirms that:

- All customers are screened through a KYC platform **fincom.co**
- None of the avan.market, any of its subsidiaries, any director, officer, or employee of the avan.market is or any of its subsidiaries is a person or entity who is the target of any Sanctions.
- None of the avan.market, any of its subsidiaries, any director, officer, or employee of the avan.market is or any of its subsidiaries is a person who is directly or indirectly owned or controlled by any person or entity that is subject to Sanctions.
- None of the payments that will be used by the avan.market have been derived from, invested for the benefit of, or related in any way to the Government of Russia, the Government of Belarus, or any persons, jurisdictions or entities who is the target of any Sanctions.
- Avan.market will not, directly, or indirectly, use the proceeds of any funds available through avan.market to not loan, contribute, or otherwise make available to fund or facilitate any activities of or business or transaction with any Sanctioned person or entity or for any activities which may be captured by Sanctions.
- In complying with applicable sanctions laws or regulations, the processing of customer transactions may be delayed while we conduct additional due diligence on the underlying transaction and/or the parties involved.
- Avan.market will block/freeze or reject transactions that appear to violate sanctions laws or regulations, where required to do so under applicable sanctions laws or regulations or will return transactions where they fall outside Avan.market risk appetite.
- Furthermore, avan.market will comply with obligations to report sanctions violations to the relevant regulatory authority, including where a violation relates to any attempt by a customer to evade or circumvent sanctions laws and regulations.

For the reference, this is the non-exhaustive list below of activities which are strictly prohibited:

- Any payments to/from the Donetsk People's Republic or Luhansk People's Republic, the regions of Crimea, Kherson and Zaporizhzhia or the city of Sevastopol.
- Any payments to/from a party subject to Sanctions which have been announced in response to the invasion of Ukraine.

“Sanctions” means the economic or financial sanctions laws and/or regulations, trade embargoes, prohibitions, restrictive measures, decisions, executive orders, or notices from regulators implemented, adapted, imposed, administered, enacted and/or enforced by the Governments of the United Kingdom, the United States of America, the European Union, or member thereof.

- Payments linked to trade, business, service provision in sanctioned industries or sectors in Russia and Belarus (including, but not limited to: IT Consultancy Services, architectural services, engineering services, advertising services, transactional legal advisory services and auditing services, energy (oil, gas, nuclear), iron and steel, dual use goods, telecommunications, finance, aviation and space technology, maritime and radio communications, and luxury goods (new and second-hand cars, art) and import/export of these goods). Please note this includes directly or indirectly transacting with these industries.
- Payments to/from an account held by a legal entity or private individual with a bank subject to an asset freeze imposed by the EU, US, or the UK.
- Payments from or to the US, EU, or the UK from an account held by an entity or individual with a bank which has been excluded from US / UK / EU banking systems.

Should you require further information on the above you may find these on the US Government / UK Government / and EU Council's websites. Avan.market takes its responsibilities towards protecting its customers and its role in the

global community seriously and has in place a suite of controls to detect and prevent sanctions violations before they occur.

NX DIGITAL LIMITED

Director Evgheni Macoveev



11/03/2026