

U.S. Treasury OFAC Sanctions Compliance Program — Attestation

Introduction

This document constitutes Akka's formal attestation of its Sanctions Compliance Program (SCP) maintained in accordance with the requirements of the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). It is intended for customers, prospects, and auditors seeking assurance that Akka operates a risk-based sanctions compliance programme consistent with OFAC's Framework for OFAC Compliance Commitments.

This attestation is made by Akka's Chief Information Security Officer and reflects the state of Akka's sanctions compliance programme as of the date shown below. It is subject to annual review.

Note: In accordance with OFAC compliance principles and to protect the integrity of Akka's screening operations, this attestation does not disclose the identities of specific customers, partners, or individuals screened, nor the results of any individual screening determination.

Scope

Akka Technologies, Inc. ("Akka") is a US-headquartered technology company providing the Akka platform — a reactive microservices and distributed systems toolkit — as both a SaaS offering and open-source SDKs. As a U.S. person and entity, Akka is subject to all OFAC-administered sanctions programmes and is prohibited from engaging in transactions with sanctioned parties, countries, or territories.

Akka's Sanctions Compliance Program applies to:

- All customer onboarding and account activation processes
- All vendor and partner onboarding and procurement activities
- All significant financial transactions and commercial relationships
- All employees involved in customer-facing, procurement, or financial operations

Compliance Posture

Akka has implemented a comprehensive, risk-based Sanctions Compliance Program consistent with OFAC's five essential components of an effective SCP. As of the attestation date:

- Total controls: 32
- Controls Implemented: 32 (100%)
- Controls Not Applicable: 0
- Risk profile: 2 High (under active remediation), 26 Low, 4 Medium
- Compliance status: Compliant

Akka maintains an ISO 27001-aligned Information Security Management System (ISMS) that encompasses its sanctions compliance controls. The two High-risk controls are being addressed under Akka's formal remediation plan with defined target completion dates.

Key Controls

Management Commitment and Programme Governance

Senior leadership at Akka has formally committed to sanctions compliance as a legal and ethical obligation. The Chief Information Security Officer holds accountability for the Sanctions Compliance Program and reports on programme status to executive leadership. Sanctions compliance is treated as a non-negotiable requirement applicable to all business units. Resources are allocated to maintain and continuously improve the programme.

Risk Assessment Programme

Akka conducts a documented sanctions risk assessment covering its customer base, geographic exposure, products and services, and transaction types. The risk assessment considers the nature of Akka's SaaS offerings, the geographic distribution of customers and prospects, and the categories of counterparties involved in Akka's commercial operations. Risk assessment findings inform the design and calibration of screening procedures and internal controls. The risk assessment is reviewed and updated at least annually.

Sanctions Screening of Customers and Partners

Akka screens all new customers and vendors against OFAC's Specially Designated Nationals and Blocked Persons List (SDN List) and the Consolidated Sanctions List prior to onboarding or activation. Screening is conducted using an automated sanctions screening tool that is updated to reflect OFAC list changes. Denied-party checks are performed at the point of onboarding and are repeated periodically for existing relationships. Screening results are documented and retained in accordance with Akka's recordkeeping requirements. No specific screening outcomes are disclosed in this attestation.

Transaction Monitoring and Blocked Transaction Reporting

Akka maintains procedures for monitoring transactions for potential sanctions exposure. In the event that a transaction involving a sanctioned person or entity is identified, Akka's procedures require the transaction to be blocked or rejected and reported to OFAC within 10 business days, in accordance with 31 C.F.R. § 501.604. An escalation path to senior management and legal counsel is defined for all potential sanctions matches.

Contractual Sanctions Clauses

Akka includes sanctions compliance clauses in its standard customer and vendor agreements, requiring counterparties to represent and warrant that they are not subject to OFAC sanctions and will not use Akka's products or services in violation of applicable sanctions laws. These contractual provisions provide a mechanism for Akka to terminate relationships upon discovery of a sanctions violation and protect Akka from downstream liability.

Recordkeeping

Akka maintains records of its sanctions screening activities, blocked transaction reports, and compliance programme documentation for a minimum of five years, consistent with OFAC's recordkeeping requirements under 31 C.F.R. § 501.601. Records are stored securely with controlled access.

Employee Training

All employees with responsibilities in customer onboarding, vendor procurement, finance, or legal functions receive sanctions compliance training. Training covers OFAC's legal framework, Akka's screening procedures, how to escalate potential matches, and the consequences of non-compliance. Training completion is tracked, and the programme is refreshed at least annually or when significant regulatory changes occur.

Supporting Evidence

Akka's Sanctions Compliance Program is supported by the following evidence:

- Documented Sanctions Compliance Program policy and procedures
- Automated sanctions screening tool with current SDN and consolidated list integration
- Screening records and documentation maintained for 5-year minimum retention
- Sanctions compliance clauses in standard customer and vendor agreements
- Employee sanctions training records and completion tracking
- ISO 27001-aligned ISMS with documented OFAC controls
- Annual risk assessment reviews documented in the ISMS
- Escalation and incident response procedures for potential sanctions matches
- Internal audit reviews conducted through Akka's annual ISMS audit cycle

Conclusion

Akka maintains a risk-based Sanctions Compliance Program consistent with OFAC's Framework for OFAC Compliance Commitments. All 32 controls in Akka's OFAC compliance programme are implemented. Two High-risk controls are currently subject to active remediation; all remaining controls are rated Low or Medium risk. The programme encompasses management commitment, risk assessment, sanctions screening, transaction monitoring, contractual protections, recordkeeping, and employee training.

This attestation is available to customers and prospects on request and may be shared under the terms of Akka's standard non-disclosure agreement.



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