

## ‘Know your counterparty’

### KYC Policy

#### I. Application

This “Know Your Counterparty” (KYC) policy (the Policy) applies to Levare International Limited, its subsidiaries, affiliates and branches worldwide (together, the Levare Group and each a Levare Company).

This Policy is in addition to any credit checks or other creditworthiness analyses that Levare Group policies may require to be performed in connection with an agreement or transaction. The Policy applies to participants with whom a Levare Company enters a joint venture, a consortium or a shareholders’ agreement and to potential customers, suppliers, agents, representatives and other contract counterparties (each, a Counterparty).

The Policy sets out KYC document requirements that apply to each region where the Levare Group currently operates and to Counterparties that are in those regions. In each case, the relevant Country Manager (as defined below) shall also look to and comply with the KYC document requirements for the relevant region.

The Policy also sets out the KYC document requirements that apply to new regions where Levare is developing business opportunities and to Counterparties that are in those relevant regions. In each case, the relevant Business Development Manager (as defined below) shall also look to and comply with the KYC document requirements for the relevant region.

#### II. Exceptions

This Policy does not apply to state-owned or public companies and organizations, except for the provisions under “VIII. Sanctions and Export Control Laws”, the related “Annex D – Sanctions Policy”, and the provisions of “Annex A – Anti-Money Laundering (AML) - Politically exposed person (PEP)” and “Related parties and their affiliates”.

This Policy does not apply to any non-binding preliminary agreements, such as term sheets, memoranda of understanding, letters of intent or similar type of agreements, as well as to confidentiality and non-disclosure agreements (each, a Preliminary Agreement), except as provided below under (i) “V. Required Documents – 1. Preliminary Agreements and Small Transactions” and (ii) “VIII. Sanctions and Export Control Laws” and the related “Annex D – Sanctions Policy” in respect of entities connected with certain sanctioned countries and sanctioned entities.

This Policy does not apply to transactions or agreements the value of which does not exceed US\$150,000 per transaction or agreement or where the total value of the transactions or agreements with that Counterparty in any one 12-month period does not exceed US\$150,000 (together Small Transactions), except as provided below under “V. Required Documents – 1. Preliminary Agreements and Small Transactions”. A different Small Transactions threshold may be established for separate Regions.

Whilst there are some exceptions as noted above, reasonable and appropriate measures should always be taken to understand the identity of Counterparties (and their beneficial ownership) to make an informed assessment of any reputational or ethical risks associated with entering into any contemplated business arrangement.



### III. Purpose

#### Why Levare has a KYC Policy

Know Your Counterparty, or KYC, is a business practice which standardizes the process of identifying and verifying the identity of our Counterparties.

Levare Group companies will identify and verify the identity of their proposed Counterparties to ensure that: (a) business may be undertaken with the proposed Counterparty in compliance with applicable laws, regulations and other legal obligations including anti-money laundering and anti-bribery controls and international sanctions; and (b) we can assess the financial, operational, reputation, political and other risks associated with undertaking business with the proposed Counterparty.

#### KYC Process

Levare Group companies will, before undertaking business with a proposed Counterparty: (i) obtain all relevant Counterparty identifying information; (ii) review such information against appropriate data bases (internal and external) to ensure that business may be lawfully undertaken with the proposed Counterparty; (iii) document the finding and conclusions of such review; and (iv) record the relevant corporate approval given in respect of undertaking business with the proposed Counterparty.

The KYC Policy shall be implemented through due diligence procedures which include:

- Obtaining background information on potential Counterparties including beneficial ownership;
- Performing appropriate screening;
- Evaluating the business reputational issues which may be associated with entering into relationships with a potential Counterparty, and documenting the reasons for concluding that the risks are acceptable; and
- Detecting, identifying and protecting against violations of applicable laws pertaining to anti-corruption, anti-money-laundering, applicable sanctions regimes, export controls and other similar measures and restrictions (Laws). Anti-Money laundering guidance is attached as Annex A. The Sanctions Policy is attached as Annex D.

### IV. Implementation of Policy

#### New Counterparties

In considering whether to enter into a joint venture, shareholder agreement, representation, agency, consultancy or other agreement, or upon the receipt of an order from a new customer, or the placing of an order with a new supplier, the identity of the Counterparty should be verified based on the procedures described in this Policy and specifically the region-relevant documents collected on the basis of Schedule 1. For documents to be collected by Levare Cable, please refer to Schedule 2.

#### Existing Counterparties

Each existing Counterparty which has a commercial relationship with the Levare Group as of the date of this Policy, and for which KYC has not previously been performed to date in the manner set out in this Policy, shall be subject to the KYC procedure set out herein. Subsequent KYC reviews shall be conducted on a periodic basis as set out below.

In addition to the information to be gathered regarding the transactions and Counterparty, both existing and new, shall also be screened for compliance with Laws. The Compliance Officer will assist in this screening process.

#### Who performs KYC – Regions in which Levare Currently Operates



KYC documentation required by this Policy shall be collected by the relevant Levare Company. The General Director/General Manager (Country Manager) of the Levare Company which proposes to enter into an agreement with a Counterparty is responsible for collecting KYC documentation and, during this process, for evaluating, documenting, and deciding the acceptability of that Counterparty considering this Policy and applicable Laws.

The Country Manager shall send the following documents to the Compliance Officer:

- Mandatory KYC documents (as set out in Schedule 1) as is relevant for the location or Counterparty.
- At the discretion and request of the Compliance Officer, a translation to English of the KYC documents, which are not in English.
- Compliance Report from the Country Manager (in the prescribed form as set out in Schedule 3) containing a summary of the information uncovered during the KYC process, including:
  - Any difficult or grey areas with the KYC process
  - Any red flags
  - Confirmation that all checks required by this Policy have been done and when
  - When the transaction or agreement is due to be put in place; and
  - Recommendation as to whether the Counterparty should be accepted or not.

In addition to the foregoing, the Country Manager shall coordinate with Levare's Finance Department regarding review of the Counterparty's financial information gathered by the Country Manager. The Finance Department shall send a report in the form of Schedule 4 to the Compliance Officer reflecting the results of the review and its recommendation as to whether the Counterparty should be accepted or not.

The Compliance Officer shall review these items and advise the relevant Country Manager whether the KYC process has been completed fully and whether the Counterparty has been accepted.

### Who performs KYC – Regions in which Levare Does Not Operate

KYC documentation required by this Policy shall be collected by the relevant Business Development Manager (Business Development Manager) who is responsible for the development of the Levare Group's business in any region where there is no Levare Company or Country Manager. The Business Development Manager is responsible for collecting KYC documentation and, during this process, for evaluating, documenting, and deciding the acceptability of a Counterparty considering this Policy and applicable Laws. The appropriate Levare Company to enter into an agreement with the Counterparty shall be determined by the Legal and other relevant departments of the Levare Group's Head Office.

The Business Development Manager shall send the following documents to the Compliance Officer:

- Mandatory KYC documents (as set out in Schedule 1), as is relevant for the location or Counterparty.
- At the discretion and request of the Compliance Officer, a translation to English of the KYC documents, which are not in English.
- A report from the Business Development Manager (in the prescribed template form as set out in Schedule 3) containing a summary of the information uncovered during the KYC process, including:
  - Any difficult or grey areas with the KYC process
  - Any red flags
  - Confirmation that all checks required by this Policy have been done and when
  - When the transaction or agreement is due to be put in place; and



- Recommendation as to whether the Counterparty should be accepted or not.

In addition to the foregoing, the Business Development Manager shall coordinate with Levare's Finance Department regarding review of the Counterparty's financial information gathered by the Business Development Manager. The Finance Department shall send a report in the form of Schedule 4 to the Compliance Officer reflecting the results of the review of the Counterparty's financial information and recommendation as to whether the Counterparty should be accepted or not.

The Compliance Officer shall review these items and advise the relevant Business Development Manager whether the KYC process has been completed fully and whether the Counterparty has been accepted.

The Business Development Manager may determine, or the Compliance Officer may recommend, that an outside professional corporate due diligence service provider (Service Provider) be retained to obtain an acceptable level of KYC information relating to a proposed Counterparty and its beneficial owners in regions where the Levare Group does not currently operate. In such case, the scope of work of the Service Provider shall be determined in consultation with the Compliance Officer and the fees to be charged by the Service Provider shall be approved as part of the regional business development budget following established Levare procedures.

### When is KYC performed

The KYC procedure is performed and must be completed prior to executing an agreement or entering a transaction with a Counterparty. No Levare Company shall enter such transactions before it receives written confirmation from the Compliance Officer that the KYC process has been successfully completed and that the proposed Counterparty is acceptable.

Because information received in a KYC review from a prospective or existing Counterparty can become outdated quickly, after the initial KYC, the due diligence shall be performed periodically, depending on the type of relationship with a Counterparty.

- For Joint Venture partners and parties to shareholder agreements, KYC shall be performed once every 12 months from the date that the KYC process commenced in the previous year.
- For suppliers and purchasers of goods or services from a Levare Company (a Supplier/Purchaser), KYC shall be performed once every three years from the date that the KYC process was commenced three years before.
- For all other Counterparties, KYC shall be performed once every two years from the date that the KYC process commenced two years before.

In connection with the rescreening process, the Country Managers, Business Development Managers, Finance Department, and any other person described in this Policy shall send the following documents to the Compliance Officer:

- Updated versions (if applicable) of any KYC documents required by Schedule 1 (or, in the case of Levare Cable, Schedule 2), as is relevant for the location or Counterparty.
- At the discretion and request of the Compliance Officer, a translation to English of the updated KYC documents, which are not in English.
- A report from the Country Managers, Business Development Managers, Finance Department and any other person described in this Policy containing a summary of the information uncovered during the KYC rescreening process (in the template form prescribed in Schedule 3).



The Compliance Officer shall review the report and advise the relevant Country Managers, Business Development Managers, Finance Department and any other person described in this Policy whether the KYC rescreening process has been completed fully and whether or not the Counterparty may continue as a counterparty for the relevant Levare Company.

If the Compliance Officer determines that the Counterparty should not continue, he or she shall advise the Legal Department and the Finance Department as soon as practicable to ensure that appropriate steps are taken to terminate any extant contractual relationships between the rejected Counterparty and the relevant Levare Company and collect any outstanding receivables, if applicable.

In the interim between review periods, Country Managers, Business Development Managers, the Finance Department and any other person described in this Policy, with the assistance of the Compliance Officer, are expected to maintain awareness regarding their Counterparties, including monitoring news, sanctions lists and publicly available information regarding the Counterparties and their beneficial owners and should institute a formal review whenever new information comes to light which may indicate that the acceptability of a Counterparty has changed. The Legal Department shall also be advised by the Country Managers, Business Development Managers, the Finance Department and any other person described in this Policy as soon as practicable in the event of any material changes in the status of a current Levare Company Counterparty.

Where an agreement or relationship has terminated or become inactive, in the event of a renewal or revival of the agreement or transaction where a period of over 12 months, 2 or 3 years has elapsed since the last KYC review of that Counterparty, KYC shall be updated again before the Levare Company recommences business dealings with that Counterparty.

The Country Manager at each Levare Company, the relevant Business Development Manager, the Finance Department and any other person described in this Policy is responsible for ensuring that the KYC process is followed and complied with at the local level and the Compliance Officer is responsible for promptly reviewing the KYC documents forwarded to him or her by the Country Manager, the relevant Business Development Manager, the Finance Department and any other person described in this Policy and informing the Country Manager, the relevant Business Development Manager and any other person described in this Policy of the result of the review.

Should any issues arise in the KYC process which the Compliance Officer is unable to determine him or herself, the matter shall be referred to joint consultation between the Audit Committee and the CEO (Management Consultation). Management Consultation shall occur as often as is required and shall be convened by teleconference. If Management Consultation is required, the Compliance Officer shall notify the members of the Audit Committee and arrange Management Consultation as soon as practicable of receiving such notice. At least two members of the Audit Committee must attend any Management Consultation, and the decision whether to proceed with a matter/counterparty or potential counterparty shall require unanimous approval of the group. The Compliance Officer shall be notified of the outcome following Management Consultation.

The Country Manager, the relevant Business Development Manager and any other person described in this Policy shall monitor which Counterparty is required to be re-screened. The Compliance Officer shall also maintain this information and make enquiries periodically within his or her discretion to check that Counterparties are being rescreened periodically.

Failure to perform the KYC process with respect to a subject agreement or transaction is strictly prohibited and may result in disciplinary action, dismissal, or other serious measures being taken.



## Special Circumstances – One-Off Orders, Suppliers, and Local Subsidiaries of State-Owned and Public Companies

Where a potential Counterparty approaches the Levare Group with a one-off purchase order or other inquiry regarding a potential product purchase transaction, the KYC process will be implemented by the Head Office in Dubai under the coordination of the Director for Business Planning and shall follow the procedure outlined under “[Who performs KYC – Regions in which Levare Does Not Operate.](#)”

In relation to suppliers only, if a Country Manager or the Vice President for Regional Development responsible for procurement considers that a transaction with a supplier is urgent and it is impracticable to obtain KYC information and carry out the required KYC processes in this Policy, then the Country Manager or the Vice President for Regional Development responsible for procurement shall have discretion to enter into a transaction with a supplier without having carried out the requisite KYC, on the condition that (a) he or she first informs the Compliance Officer of this intention in writing prior to entering into the transaction and (b) undertakes to procure and submit the required KYC documents promptly after entering into the transaction.

Where the Counterparty is a local direct or indirect subsidiary of either (i) a state-owned or public company or organization, or (ii) a parent company that has already undergone the KYC process under this Policy, the KYC process does not need to be repeated for the subsidiary; provided, however, the subsidiary, particularly if it is not wholly-owned, directly or indirectly, by the parent company, shall still be reviewed under the provisions of “[VIII. Sanctions and Export Control Laws](#)”, the related “[Annex D – Sanctions Policy](#)”, and the provisions of “[Annex A – Anti-Money Laundering \(AML\)](#)” and “[Related parties and their affiliates](#)”.

## V. Required Documents

### 1. Preliminary Agreements and Small Transactions

Each Country Manager, Business Development Manager or any other person referred to herein who is responsible for implementing this Policy at the Levare Company level shall obtain the following minimum level of information from Counterparties who enter into Preliminary Agreements and Small Transactions.

The minimum level information is:

- The name and address of the relevant Counterparty
- its jurisdiction of incorporation
- If the Counterparty is a corporation, the Counterparty should provide a certificate of incorporation or equivalent local document.
- Beneficial ownership of the entity

### 2. All Other Agreements or Transactions Subject to this Policy

Schedules 1 and 2 set out the mandatory KYC documents required from Counterparties in all locations where Levare currently operates or has operations. KYC documents listed in the Schedules shall not be required for Small Transactions.

To the extent that any Counterparty requires a license or other governmental consent or approval, or if on account of the Counterparty’s existing obligations it requires a waiver or consent from a third party to enter into an agreement or transaction with the Levare Company, a copy of such license, consent or approval should be requested and kept on file.



Due care should be exercised in obtaining the information listed in the Schedules to comply with all applicable personal data protection laws as enacted in each relevant jurisdiction.

In addition, for every Counterparty, including those Counterparties who are proposing to enter into a Preliminary Agreement or a Small Transaction, the Country Manager, Business Development Manager or any other person referred to herein should also perform an internet search on the Counterparty to obtain whatever relevant information about it may be present in the public domain in order to make an informed assessment of the acceptability of the Counterparty. The results of the internet search shall be reported by the Country Manager, Business Development Manager or any other person referred to herein in writing to the Compliance Officer.

In the event that a Counterparty fails to provide an item of documentation called for under this Policy, and provided (i) that no negative information has been identified based on an internet search relating to the Counterparty and (ii) taking into account the guidance under “VI. Issues to Look Out for During KYC Review,” the Compliance Officer may be able to make a decision on whether to recommend that the Levare Company enter into an agreement or transaction with the Counterparty based on the other information provided in the Country Manager’s, Business Development Manager’s or any other person’s referred to herein report and KYC documents.

## VI. Issues to Look Out for During KYC Review

The following guidance should be applied in identifying potentially problematic Counterparties or transactions. A Country Manager, Business Development Manager or any other person referred to herein should be on guard if:

A customer or agent:

- Is reluctant to provide end-use/user information
- Is willing to pay cash for high-value shipments
- Has little background or history in the relevant business
- Appears unfamiliar with the product or its use
- Declines normal warranty/service/installation
- Orders products/quantities incompatible with the relevant business
- Provides vague delivery dates or locations

A shipment involves:

- Freight forwarder designated as consignee/end-user
- Intermediate consignee’s business or location incompatible with end-user’s
- Shipments directed to trading companies, freight forwarders, or companies with no connection to buyer
- Requests for packing inconsistent with normal mode of shipping
- Choice of circuitous or economically illogical routing, or through multiple countries

The end-user requests

- Equipment inconsistent with inventory
- Spare parts in excess of projected needs
- Performance/design specs incompatible with resources or environment



- Technical capability/end-use incompatible with consignee's line of business
- End-use at variance with standard practices
- Middleman from third country to place order
- Refuses to state whether goods are for domestic use, export, or re-export

Please also refer to the Anti-Money Laundering guidance set out in Annex A, which deals with bribery, corruption and politically exposed person (PEP).

## VII. Issues Arising During KYC Review

Should the Country Manager, Business Development Manager or any other person referred to herein have any questions regarding the KYC process, encounter any difficulties in obtaining the documents or information specified above, or if any of the gathered or generally publicly available information regarding a Counterparty raises any questions or issues, for example, in the area of the Levare Company's need to comply with applicable sanctions regimes or internal policies, the Compliance Officer should be contacted to address these concerns and discuss what additional steps may need to be taken or additional information obtained in order to resolve them. This must be done before a contractual relationship (including a Preliminary Agreement) is entered into by a Levare Company.

Contact details for the Compliance Officer and Chief Legal Officer:

Michelle Pham

Tel: +44 7827 351 437

Email: [michelle.pham@levare.com](mailto:michelle.pham@levare.com)

Contact details for Finance Department:

Daniil Shapirovsky

Tel: +971 52 3269851

Email: [Daniil.Shapirovskiy@levare.com](mailto:Daniil.Shapirovskiy@levare.com)

Upon receipt of the KYC information described above, each Levare Company shall create and maintain a file for each Counterparty and shall forward the documents set out in "IV. Implementation of Policy – Who performs KYC" to the Compliance Officer. The Compliance Officer will advise the relevant Levare Company as to the acceptability of the proposed Counterparty, and if the Levare Company may proceed with the transaction.

Any Counterparty who has violated the law, or who has a past reputation for unethical or corrupt conduct, is disqualified from entering into agreements with a Levare Company.

## Other Issues

If any Counterparty is reputed to be "well-connected," it should be carefully reviewed in the KYC process (particularly having regard to Annex A – Politically exposed persons) to gain reasonable assurance that it will not engage in improper or questionable practices when performing under an agreement with a Levare Company. This is particularly relevant with respect to potential Joint Venture partners, who should be subjected to the highest level of scrutiny to ensure an appropriate business reputation and standing and lack of exposure to political or other liability.

For all cases where a prospective Counterparty is not a Joint Venture partner, should it prove not to be possible to obtain ownership information in respect of a prospective Counterparty, the Country





Manager may be permitted by the Compliance Officer to obtain a certificate in the form of Annex B, certifying that the stakeholders/beneficial owners have no criminal record, are not politically exposed persons or included on any sanctions list or list of specially designated nationals.

The certificate shall be executed by a duly authorized representative of the Counterparty who shall provide the Levare Company with evidence of their authority to make representations on behalf of the Counterparty.

For the avoidance of doubt, the Country Manager, Business Development Manager and any other person referred to herein should use his or her best endeavours to obtain ownership information in respect of a prospective Counterparty.

### Joint Venture partners

Beneficial ownership information must be obtained for potential Joint Venture partners.

## VIII. Sanctions and Export Control Laws

Prior to entering into a contractual relationship with a Counterparty, the identity of the Counterparty, its beneficial owners and the nature of the transaction itself should be screened against any applicable U.S. and E.U. sanctions, as well as any applicable export control regulations. Orders from new Counterparties will not be accepted until the Counterparty and the transaction have been screened against U.S. and E.U. sanctions and applicable export control laws.

Levare has a separate Sanctions Policy (Annex D), which employees and consultants with a role or responsibilities relevant to sanctions/trade control should refer to.

Sanctions lists are set out in the Sanctions Policy. Please note that sanctions lists are updated periodically. The most recent version of each sanction or export control list should be consulted in connection with evaluating a potential contractual relationship or transaction with a Counterparty.

Counterparties organized in countries that are subject to high levels of trade and commercial sanctions, such as but not limited to, Iran and North Korea, are subject to particularly high levels of scrutiny and decisions on whether to engage with a Counterparty located in (or whose beneficial owners are citizens or residents of) such a jurisdiction should be taken on a case-by-case basis, with Management Consultation. The Country Manager, Business Development Manager and any other person referred to herein should take all due care to protect the reputation of the Levare Group in connection with any such transaction and shall obtain beneficial ownership information for **such Counterparties to perform a sanctions check, even before entering into Preliminary Agreements.**

Please also note that sanctions may not apply to all Levare Companies in the same way. If there are any questions as to whether sanctions or export control regulations are applicable to a particular Levare Company or Counterparty, please contact a Legal Officer and refer to the Sanctions Policy in Annex D.

### End-User Forms

In screening the Counterparty or transaction for purposes of its compliance with Laws, the General Manager of a Levare Company, the Business Development Manager and any other person referred to herein shall collect end-user information by having the Counterparty certify as to the end-use of the ESP equipment being acquired from a Levare Company.



The End-User Form shall contain the information specified in Annex C hereto and shall be executed by a duly authorized representative of the Counterparty.

## IX. Training and Distribution

Training and a copy of this Policy will be provided to all senior employees including Regional and Country Managers and Business Development Managers and all other employees responsible for new or existing relationships with Levare Counterparties.

Levare may conduct internal audits to ensure that this Policy is being properly implemented throughout Levare. If any issues are identified in these audits Levare will consider whether it is necessary to adjust this Policy to increase the awareness of this Policy by relevant employees through training or other means.

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### Schedules

1. Mandatory KYC Documents
2. Levare Cable Mandatory KYC Documents
3. Template Form of Report from Country Managers/Business Dev. Managers
4. Template Form of Finance Department Report

### Annexes

- A. Anti-Money Laundering (AML)
- B. Beneficial Ownership Certification
- C. End-User Form
- D. Sanctions Policy

### Revision History

Last adopted	September 2022
Revised and approved	December 2023



## Schedule 1 Mandatory KYC Documents

For Corporation or Company
- Certificate of incorporation / registration / establishment
- Charter / Articles of Association / Memorandum
- Extract from commercial register confirming corporation existence / Certificate of Incumbency / Good Standing Certificate / Chamber of Commerce certificate or any other similar document
- Copy of tax identification/registration
- Audited financial statements for the last two years, including most recent reporting date balance sheet/profit & loss account
- Ownership information: information about ultimate beneficial owners, including passports and filled out Certificate regarding Beneficial Owners
- Full address and contact details of the primary contact at corporation.
For Partnership
- Certificate of incorporation / registration / establishment (if the partnership is registered)
- Partnership agreement
- Extract from commercial register confirming partnership existence / Certificate of Incumbency / Good Standing Certificate or any other similar document (if the partnership is registered)
- Copy of tax identification/registration (if the partnership is registered)
- Audited financial statements for the last two years, including most recent reporting date balance sheet/profit & loss account
- Partnership information: details of partners and their ownership, including passport details and filled out Certificate regarding Beneficial Owners
- Full address and contact details of the primary contact at partnership.
For Joint venture or consortium
- Joint venture agreement or consortium agreement
- Extract from commercial register / Certificate of Incumbency / Good Standing Certificate or any other similar document for participants
- Audited financial statements for the last two years, including most recent reporting date balance sheet/profit & loss account



- Shareholders information of the participants: details of JV or consortium participants and their ownership, including passport details and filled out Certificate regarding Beneficial Owners
- Full address and contact details of the primary contact at JV or consortium.
For an Individual
- Passport / or other similar ID;
- Proof of address: utility bill, bank statement or other evidence from government office;
- Copy of tax identification/registration;
- Financial documentation as appropriate given nature of the contract;
- Contact details.
Documents under KYC Policy
- Annex 2 - Certificate regarding Beneficial Owners
- Annex 3 - End-User Form
Other documents (if so required)
- A license or other governmental consent or approval, or waiver or third-party consent, if on account of the Counterparty's existing obligations it requires a waiver or consent from a third party in order to enter into an agreement or transaction with the Levare
- Vendors and customers form duly completed based on the Levare Group's Integrated Management Systems
- Scans of passports or other local ID documents for legal representatives
- Any other additional documents that may be required under applicable law of the region and/or requested at the discretion of the Compliance Officer.

All documents shall be duly certified by general manager, secretary or any other legal representative of the Counterparty.



Schedule 2  
Levare Cable  
Mandatory KYC Documents

Levare Cable only sells intra the Levare Group and only deals with a limited number of highly specialized raw material suppliers that it has worked with for years. Levare Cable has been using the following questionnaire in connection with any new supplier relationships.

SUPPLIER QUESTIONNAIRE

When entering into a new trading relationship, Levare Cable requests that a questionnaire is completed. Existing vendors will be asked to submit an updated questionnaire from time-to-time to ensure that Levare Cable is in possession of up-to-date information.

All information provided by a supplier will be treated in the strictest of confidence and will only be seen or used by those people responsible for supplier management. None of the information provided will be disclosed to third parties.

SUPPLIER INFORMATION

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1. Business trading name.
  2. Business trading address.
  3. Telephone number.
  4. Contact email address.
  5. Business registration number.
  6. Business VAT registration number (if applicable).
  7. Business website address (if available).
  8. Does the company belong to any group of companies? If yes, please state the name of the company/organisation.
  9. Please advise internal sales contact.
  10. Please advise the relevant internal quality assurance contact.
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GENERAL FINANCIAL INFORMATION

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11. Bank details for wire transfer.
  12. Your payment terms.
  13. Please indicate your annual financial period.
  14. Turnover for previous financial period.
  15. Please indicate your current financial status.
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CERTIFICATIONS

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16. Please specify any third party certification to formal quality systems held.
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QUALITY MANAGEMENT/SUPPLY CHAIN MANAGEMENT

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17. Do you audit your suppliers?
  18. Do you have a documented supplier selection process?
  19. Do you have a documented vendor performance monitoring system?
  20. Do you maintain traceability throughout your supply chain?
  21. Are there any risks to supply continuity associated with supplies of raw materials? If answer to question is yes, please provide more details.
  22. Do you have an internal audit process?
  23. Would Levare Cable personnel be allowed access to your business to undertake a quality assessment?
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HSE

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24. Do you have a health and safety policy?
25. Are all employees trained in this policy?



26. Do you have a site specific health and safety officer?
  27. Do you have an environmental policy?
  28. Are all employees trained in this policy?
  29. Do you have a site specific environmental officer?
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#### OTHERS

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Please specify any holidays or days off at your company during the year.

Please try to answer all of the questions and send the completed questionnaire to the following email address: [purchasing@zts.Levare.com](mailto:purchasing@zts.Levare.com). Paper signed copy of the completed questionnaire is also required. Please print the completed questionnaire, sign it where indicated and return to: *Levare Cable, Lieskovec 870/147, 018 41 Dubnica nad Vahom, Slovak Republic. If available, please include with your response electronic copies of your Quality Certificates, General Terms and Conditions.*



Schedule 3  
 Template Form  
 Country Manager/Business Development Manager Report

To: Compliance Officer  
 Levare International Limited

Country/Region	<i>Please insert country</i>
Counterparty name and address	<i>Please insert full Counterparty details (name, registration no., address and etc.)</i>
Details of proposed transaction (including relevant Levare entity)	<i>Please describe the proposed transaction, including sum of potential transaction</i>
Timing	<i>When the transaction or agreement is due to be put in place</i>
Information on End-Users	<i>Have you asked the question as to who the end-user will be and in what location products are to be used/services provided?</i>
List of documents requested	<i>Please indicate list of requested KYC documents</i>
List of documents provided	<i>Please attach KYC documents collected or please list documents not provided and why</i>
Additional KYC performed	<i>Please describe any additional measures undertaken, such as internet searches, accessing general industry knowledge in location, knowledge of reputation of Counterparty, etc.</i>
Any red flags/difficult grey areas	<i>Please provide details</i>
Confirmation of all KYC checks completed	<i>Please confirm that all checks required by KYC Policy have been done and when</i>
Recommendations	<i>Please describe why you would recommend this Counterparty should be accepted or not and any additional remarks</i>
Name of Country Manager/ Business Development Manager	
Date	
Signature	



Schedule 4  
Template Form  
Finance Department Report

To: Compliance Officer  
Levare International Limited

Country/Region	<i>Please insert country</i>
Counterparty name and address	<i>Please insert full Counterparty details (name, registration no., address etc.)</i>
List of finance documents provided	<i>Please attach finance documents provided and list finance documents requested and not provided (if any) and why</i>
Any red flags/difficult grey areas	<i>Please provide details</i>
Recommendations	<i>Please describe why you would recommend this Counterparty should be accepted or not and any additional remarks</i>
Name of Finance Department reviewer	
Date	
Signature	





## Annex A Anti-Money Laundering (AML)

The Levare Group is committed to Anti-Money Laundering (AML) compliance and fulfilling international standards as detailed in the recommendations of the Financial Action Task Force (FATF).

The Levare Group monitors its Counterparties to permit identification of patterns of unusual size, volume, pattern or type of transactions, geographic factors or any of the “red flags” identified below.

### Red Flags

Red flags that signal possible money laundering include, but are not limited to:

- The Counterparty exhibits unusual concern about the Levare Group’s or a Levare Company’s compliance with government reporting requirements and AML policies, particularly on his or her identity, type of business and assets, or is reluctant, or refuses to reveal any information concerning business activities, or furnishes unusual or suspect identification or business documents.
- The Counterparty wishes to engage in transactions that lack business sense or apparent strategy, or are inconsistent with the Counterparty’s stated business or strategy.
- The information provided by the Counterparty is false, misleading, or substantially incorrect.
- The Counterparty (or a person publicly associated with the Counterparty) has a questionable background, or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The Counterparty appears to be acting as an agent for an undisclosed principal, but declines, or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.
- The Counterparty requests that a transaction be processed to avoid Levare’s normal documentation requirements.
- The Counterparty exhibits a lack of concern regarding risks or transaction costs.
- The Counterparty engages in transactions involving cash or cash equivalents or other monetary instruments that appear to be structured to avoid government reporting requirements (if such exist), especially if the cash or monetary instruments are in an amount just below reporting or recording thresholds.
- The Counterparty has difficulty describing the nature of his or her business or lacks general knowledge of his or her industry.

It is evident that the above-stated Red Flags are unlikely to be completely addressed through an ordinary review and analysis of counterparty documents. An aggregate of document surveying, results of communications with the Counterparties, analysis of media and other public sources, personal impressions, judgement, and professional skepticism should be in place when monitoring the Counterparties.

### Monitoring signs of bribery and corruption when applying KYC Policy

The Levare Group has developed a clear policy outlining its anti-bribery and corruption general standards and principles. The detailed document ensures that these standards are implemented into day-to-day business.



The objective of the policy is to ensure that bribery and corruption risks identified by the Levare Group are appropriately mitigated.

Should the Country Manager, Business Development Manager or/and any employee responsible for implementation of this aspect of the KYC Policy have any questions, he or she should first refer to the anti-bribery and corruption provisions of the Group's Code of Conduct and then, should the issue remain unresolved, to the Compliance Officer.

### Politically exposed person (PEP)

A politically exposed person (PEP) is defined by the Financial Action Task Force (FATF) as an individual who is or has been entrusted with a prominent public function, as well as their immediate family and their close associates (either socially or professionally).

Due to their position and influence, it is recognized that many PEPs are in positions that potentially can be abused for the purpose of committing money laundering (ML) offences and related predicate offences, corruption and bribery and other illegal actions. Such actions constitute serious threats to business reputation and activities of the Levare Group and its individual Levare Companies.

Questions to ask when deciding on whether a Counterparty is a PEP:

- Official responsibilities of the individual's office
- Nature of the title (e.g., honorary or salaried)
- Level and nature of authority or influence over government and quasi-government activities or other officials
- Access to significant government and quasi-government assets or funds.

Examples of Counterparties who can be considered as PEPs:

- Heads of State or of government,
- senior politicians,
- senior government, judicial or military officials,
- senior executives of state-owned corporations,
- important political party officials,
- members of senior management or individuals of international corporations and organizations who have been entrusted with equivalent functions, i.e. directors, deputy directors and members of the board or equivalent functions.

The PEP could be the customer or the beneficial owner of a legal entity that is a Counterparty of any Levare Company.

Examples of sources of information about PEPs:

- Internet and media searches
- Commercial databases
- Open government related sources
- In-house databases and information sharing
- Assets, income, tax disclosure systems and requirements
- Self-declarations



- Information sharing by competent authorities.

The Levare Group and each Levare Company does not unconditionally refrain from dealing with PEPs, although the PEPs are always considered higher risk Counterparties. A Country Manager, Business Development Manager and any other person referred to herein should notify senior management of any proposed transaction with a PEP before entering into the transaction, discuss the circumstances and then follow procedures agreed with the Compliance Officer and the KYC Policy in all respects.

### Related parties and their affiliates

For the purpose of this KYC Policy a “Related Person” is any Director of any Levare Company, any “Senior Manager”, any nominee for a Director, any shareholder owning in excess of 5% of the total equity of the Levare Group or a Levare Company and any “Immediate Family Member” of any such person.

“Senior Manager” includes any individual who has been appointed an officer of a Levare Company and/or who is a member of operational/management bodies of a Levare Company.

“Immediate Family Member” means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of a Related Person, any other person who is related by blood or marriage and any other person (other than a tenant or an employee) sharing the household of such person.

Levare Companies are not prohibited from dealing with Related Persons and their affiliates. However, a Country Manager, Business Development Manager and any other person referred to herein should notify the Compliance Officer of any potential transactions with a Related Person and their affiliates before entering into such transaction discuss the circumstances and then follow the any procedures agreed with the Compliance Officer and the KYC Policy in all respects.



## Annex B Beneficial Ownership Certification

To: Compliance Officer  
Levare International Limited

I hereby confirm the following is true and correct as of the date below.

Section 1: Legal Entity Information			
Entity Name	Entity Registration Number	Entity Address	
Section 2: Ultimate Beneficial Ownership (UBO) Information			
<i>Note: Each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above. For some legal entities, this requirement extends to owners of 10 percent equity interest in the legal entity – your relationship manager will advise you if information from all owners of 10 percent or greater equity interest is required.</i>			
Beneficial Owner 1 Information: ____% of ownership			
Name and Residential Address	Percentage Owned	Date of Birth	Passport or other similar ID number, Country of Issuance
Beneficial Owner 2 Information: ____% of ownership			
Name and Residential Address	Percentage Owned	Date of Birth	Passport or other similar ID number, Country of Issuance
Beneficial Owner 3 Information: ____% of ownership			
Name and Residential Address	Percentage Owned	Date of Birth	Passport or other similar ID number, Country of Issuance
Beneficial Owner 4 Information: ____% of ownership			
Name and Residential Address	Percentage Owned	Date of Birth	Passport or other similar ID number, Country of Issuance
Beneficial Owner 5 Information: ____% of ownership			
Name and Residential Address	Percentage Owned	Date of Birth	Passport or other similar ID number, Country of Issuance

\_\_\_\_\_ (full company name) is a company registered on \_\_\_\_\_ (registration date) under registration number \_\_\_\_\_ (registration number), currently existing under the laws of \_\_\_\_\_



\_\_\_\_\_ (country of registration) and residing at: \_\_\_\_\_ (full current (factual) address)  
(hereinafter the “Company”).

Neither the Company, nor the stakeholders/beneficial owners of the Company (hereinafter the “Stakeholders”) have criminal records in \_\_\_\_ (country of origin, state of nationality and/or place of residence for natural person and place of incorporation for legal entity).

Neither the Company, nor the Stakeholders, any of their affiliates and subsidiaries (i) are the part of Specially Designated Nationals And Blocked Persons List (SDN List), Consolidated Sanctions List (Non-SDN Lists), Consolidated list of persons, groups and entities subject to EU sanctions and/or any other restricted lists as well as any blacklists of other countries, international organizations and national state agencies, (ii) are in violation of or under any U.S. sanctions, EU sanctions and/or any other restrictive measures, that limit legal capacity of Levare to enter into the contemplated commercial arrangements, (iii) are incorporated or organized in, or are resident of, a sanctioned country, (iv) have any business affiliation or commercial dealings with, or investments in, any sanctioned country or sanctioned person in violation of sanctions laws or (v) are in breach of or are the subject of any action or investigation under any applicable sanctions laws, anti-money laundering laws and/or export control laws.

The Stakeholders are not a politically exposed person (PEP) as defined by the Financial Action Task Force (FATF) as an individual who is or has been entrusted with a prominent public function, as well as their immediate family and close associates (either socially or professionally).

I hereby certify, to the best of my knowledge, that the information provided above is complete and correct. I undertake to advise Levare promptly of any change in circumstances, which causes the information contained herein to become incorrect and to provide Levare with a suitably updated Certificate within ten (10) days of such change in circumstances. This certificate is being given at the request of Levare and for its sole use in strict confidence.

Signature \_\_\_\_\_  
Print Name \_\_\_\_\_  
Title \_\_\_\_\_  
Company \_\_\_\_\_  
Date \_\_\_\_\_



## Annex C End-User Form

### Section 1 - Counterparty Information:

Company Name: \_\_\_\_\_  
Company Registration Number: \_\_\_\_\_  
Company Address and Country: \_\_\_\_\_

### Section 2 - Order Information:

Product Description and Quantity: \_\_\_\_\_  
Shipping Country: \_\_\_\_\_  
Re-export Country (if applicable): \_\_\_\_\_  
Product Will Be Used For: \_\_\_\_\_ civil-use or \_\_\_\_\_ military-use  
State the Purpose of Use: \_\_\_\_\_

### Section 3 - End User Information (if different from Counterparty):

Name of End User: \_\_\_\_\_  
End User Registration Number: \_\_\_\_\_  
End User Address and Country: \_\_\_\_\_  
State the Purpose of End Use: \_\_\_\_\_  
End-Use Country: \_\_\_\_\_

### Section 4 - Acknowledgement of End-Use Restrictions

- a. We hereby acknowledge, represent and warrant that (i) we will use the Product in full compliance with applicable export laws and regulations, (ii) the export, re-export or transfer of Product may be subject to the export laws and regulations and may require a license from the United States Government and possibly other applicable authorities, (iii) we are solely responsible for determining whether use or transfer of the Product requires an export license or approval from U.S. or other authorities, and for securing all required authorizations, (iv) applying and providing for a proper license from U.S. or other authorities is totally our responsibility, (v) we will not export, re-export or transfer, directly or indirectly, Product to sanctioned destinations (Cuba, Iran, North Korea, Sudan, Syria and etc.) as they defined on [bis.doc.gov](http://bis.doc.gov) and [ofac.treasury.gov](http://ofac.treasury.gov) from time to time or to any other country subject to restrictions under applicable laws and regulations, and (vi) we are not located in, under the control of, or a national resident of any sanctioned destination.
- b. I confirm that I am authorized to sign this End User Form, and that by doing so, I bind my Company to comply with all applicable U.S. and EU export restrictions and possibly other applicable authorities with regard to the distribution and use of the Product.
- c. Representations, warranties, requirements and obligations described in this form applies to the Counterparty mentioned above which includes all subsidiaries and affiliated companies.

The information contained herein will be used solely for the purpose of determining compliance with U.S., EU and other authorities' applicable export control laws.

Signature \_\_\_\_\_  
Print Name \_\_\_\_\_  
Title \_\_\_\_\_  
Company \_\_\_\_\_  
Date \_\_\_\_\_



## ANNEX D Sanctions Policy

### Overview

The United States, the European Union and many other countries including the United Kingdom authorities have imposed certain economic, trade and export control restrictions targeting various countries, governments, entities and individuals.

Levare International Limited (LIL) together with its affiliates and subsidiaries (collectively Levare) is committed to carrying on its business in accordance with the highest ethical standards and corporate governance standards (as outlined in the Code of Conduct). It is also committed to complying with its sanctions and export/trade control obligations through identifying, mitigating, and managing risk.

Sanctions laws may affect the business operations of LIL and its customers and counterparties by placing restrictions and controls on the movement of goods, services and funds involving a sanctions restricted person or in sanctions restricted territories (Sanctioned Matters). When considering new business opportunities or counterparties, in addition to KYC, LIL, shall screen counterparties, including new customers against U.S., E.U., and U.K. sanctions lists (Sanctions Lists).

The main sanctions lists are set out below:

1. General Overview of U.S. Sanctions Programs (with country information) available at: <https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>
2. U.S. SDN List available at: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>
3. U.S. SSI List available at: <https://www.treasury.gov/ofac/downloads/ssi/ssilist.pdf>
4. E.U. Sanctions information available at: <https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>
5. U.K Sanctions information available at: <https://www.europeansanctions.com/uk-sanctions-list/>

Please note that the Sanctions Lists are updated periodically. The most recent version of each sanctions or export control list should be consulted in connection with evaluating a potential contractual relationship or transaction with a counterparty. A significant number of Levare companies are not organized and do not operate in regions that having implemented sanctions regimes similar to those of the U.S., E.U. and U.K. and as such sanctions may not be applicable. If there are any questions as to whether sanctions or export control regulations are applicable to a particular Levare company or counterparty, please contact the Chief Legal Officer ([michelle.pham@levare.com](mailto:michelle.pham@levare.com)).

### Application

This Policy applies to all directors, officers and employees of LIL, and to all customers, suppliers, contractors, agents and other persons engaged to act for and on behalf of Levare in applicable jurisdictions. Failure to follow this Policy and Sanctions Laws may result in disciplinary action, termination of employment or referral to law enforcement.



## Board Members

To the extent that any directors, officers, employees or others within LIL are citizens and/or residents of the U.S., E.U. or U.K., they will as individuals be required to comply with sanctions and recuse themselves from any discussions, decisions or activities involving any Sanctioned Matters.

## Customers, suppliers, contractors and service providers

Levare will take reasonable steps to ensure that customers, suppliers, agents, consultants, and service providers are aware of this Policy, including by seeking to include sanctions related contractual provisions in relevant contracts, where appropriate. The Chief Legal Officer will need to be contacted to answer any questions or concerns regarding potential sanctions applying to any transaction or counterparty.

## Reporting

Any concerns relating to compliance with Sanctions Laws, including any reason to believe a violation of any Sanctions Laws may have occurred or may occur must be reported to the Chief Legal Officer.

## Training and updates

Training on and a copy of the Policy will be provided to the relevant employee with a role or responsibilities relevant to Sanctions compliance. The Chief Legal Officer will determine the frequency and content of any sanctions training, as required.

## Updates and approvals

The Board of Directors of LIL shall approve this Policy and any modifications or revisions as may be required following substantive changes to applicable sanctions legislation.

## Penalties

Penalties for violations of Sanction Laws (including export controls) vary depending on the regulations. Corporations and individuals face severe civil/and or criminal penalties including significant monetary fines and possible imprisonment. In addition, violations may also lead to damaging reputation and business relationships.

