

TRADE COMPLIANCE POLICY

1. Introduction

According to EU sanction legislation, Retta shall conduct sanction screening about its business partners.

To the extent Money Laundering Act applies to Retta, we shall, in addition to sanction screenings, know our customers and their business ("KYC-obligation"). This KYC-obligation is much broader than sanction screening obligation. According to the Money Laundering Act, Retta is obliged to know its customers and their business when we provide brokerage, accounting, enterprise and asset management services to our customers and when we provide insurance services, acting as insurance broker.

Trade sanctions refer to laws and regulations imposed by countries that restrict dealings with targeted individuals, entities, and governments, or restrict trade involving certain controlled goods or services. Violations of sanctions can result in substantial monetary penalties or imprisonment as well as significant reputational damage for Retta.

Code of Conduct Policy is Retta's top policy, which collects all other policies together. Different policies are described shortly in our Code of Conduct Police and made reference to each specific policy.

This Trade Compliance Policy applies to all employees and managers of companies belonging to Retta group ("Retta") and Boards of Directors of Retta companies. Retta has detailed internal instructions and processes for its personnel, how sanctions screenings and KYC-obligations shall be conducted in Retta.

Retta has also internal processes for its employees about trade compliance. In case of any discrepancies between this Policy and other instructions, this Policy prevails.

2. Trade sanctions

The UN, the EU, and the US, as well as several other jurisdictions, frequently use trade sanctions to advance national security and foreign policy interests. Sanctions prohibit or restrict direct and indirect trade with individuals, companies or organizations targeted or designated under trade sanctions ("**Listed Persons**", each a "**Listed Person**"), or trade in certain goods or services with a sanctioned country or region. Retta shall not conduct any trade with Listed Persons.

Retta is consequently required to conduct sanction screenings of its business partners. We have bought a service from an external service provider, by which we can do sanction screenings and fulfill our KYC-obligations. The service covers sanction checks of UN, EU, UK, US and national sanction lists in countries where Retta operates.

The US sanctions are often more far-reaching than the EU rules. As for sanctions, US sanctions can be divided into *primary* and *secondary* sanctions. Generally, primary sanctions apply only to US persons (i.e. US citizens, companies organized under the laws of the US, and non-US persons located in the territory of the US). In certain cases, however, even non-US persons can violate US sanctions if there is a US nexus. Examples of this include conducting transactions in US dollars.

In certain US sanctions programs, the US employs secondary sanctions, which aim to influence the behavior of non-US companies acting outside of US jurisdiction. In the worst case, engaging in activities covered by US secondary sanctions could result in Retta being blacklisted, i.e. losing access to the US market and having its assets in the US frozen.

It shall be noted that indirect business may also be considered prohibited under trade sanctions. It may be prohibited to export related services to a specific country. It is noteworthy that such indirect business may sometimes be difficult to detect. Complying with such prohibitions therefore requires careful due diligence and imposing of certain contractual restrictions or verifications.

A risk-based approach shall therefore be taken to avoid indirect transactions with Listed Persons, or in any other way in violation of sanctions, such as sanctions related to an item or services.

3. Risk mitigation

Risk assessments, due diligence and contractual undertakings can be used to help mitigate trade sanction risks in relation to customers, suppliers and other business partners.

3.1 Risk assessments

According to Retta's risk management policy, Retta shall regularly perform risk assessments of its operations and strategies.

According to the Money Laundering Act, Retta is obliged to keep a risk assessment.

3.1.1 Minimum due diligence measures regarding sanction screening

As a minimum, it is advisable to screen all business partners (customers and suppliers) at least once per year against sanction lists. All new business partners shall be checked before committing to contract.

If the screening results contain a match that appears to be relevant, the transaction shall be escalated for further review before proceeding with the transaction.

If at any point, suspicious behavior or triggering factors are identified (for example reluctance to provide information, indications that the business party is acting on behalf of an undisclosed third party, or requests for unusual payment terms) or there are obvious risks related to the business partner, enhanced due diligence should be conducted. Retta's legal team supports business in case of any unclear situations.

Records of screening results and other due diligence measures shall be maintained in order to evidence compliance.

3.2 Know your customer studies

To the extent Retta performs services, under which we are obliged to comply with Money Laundering Act, we conduct know your customer investigations before we make a decision whether or not to commit to a contract with business partner.

3.3 Contractual undertakings and other compliance measures with business partners

It is recommended to include contractual clauses on trade compliance into Retta's agreements entered into with business partners. For example, the business partner should warrant that itself nor any of its

responsible persons, owners or ultimate beneficiary owners is not on any sanction lists and it should further commit to inform Retta immediately, if the situation changes.

4. Record keeping and internal audits

Retta shall ensure that it maintains records of compliance activities, in particular those required herein, i.e. risk assessment, sanction screening and compliance with KYC-obligations, and that correct information is provided, upon request, to other Company entities.

Records and documentation shall be kept at least for the time required by law.

The internal auditor is authorized to carry out internal controls in the relevant departments to ensure compliance with the requirements herein, the relevant regulations, and any complementing internal procedures and guidelines.

5. Implementation

5.1 Responsibilities and organisation

Each employee, top management and member of the Board of Directors in Retta companies must understand and comply with this Trade Compliance Policy.

If any questions arise about the content of this Trade Compliance Policy, or how it should influence the everyday work or a specific matter, please reach out to Retta's Chief Compliance Officer.

5.2 Training

Retta provides role-based trainings to its employees on trade compliance. Trainings are repeated at regular intervals or when necessary.

6. Reporting concerns and consequences of violation

If you become aware of or suspect a possible violation of law, rule, regulation you are required to promptly contact Retta's Head of Legal.

If you become aware of violation of this Policy or any other of Retta's policies, you shall contact Chief Compliance Officer, CEO, Head of business unit or your closest supervisor.

You can also raise concerns through Retta's whistleblowing system, available in Retta's web pages. Retta will not tolerate any attempt to take adverse action against an employee for reporting a genuine concern regarding suspected wrongdoings. Retaliation against anyone who speaks up is a violation of the Code of Conduct and will not be tolerated.

Retta does not tolerate any illegal or unethical behavior. Violations of this Policy is likely to damage Retta's brand and reputation. Failure to follow this Policy is taken seriously and may result in disciplinary action appropriate to the violation, including, but not limited to, termination of the employment.

7. Review and follow-up

Compliance with this Trade Compliance Policy by all Retta entities and employees, and business partners, will be monitored through internal and external audits, and routine follow-ups of all reported matters.

Effective date	Version	Change description
20 December 2023	v1	original

