

Questionnaire on Compliance with Sanctions Laws

When conducting business with third parties anywhere in the world, it is Kanadevia Inova's ("we", "our", "KVI") policy to comply strictly with all applicable trade sanctions and export control laws and regulations, including, in particular but without limitation, those of Switzerland, Japan, the European Union ("EU"), the United States of America ("USA"), and the United Kingdom of Great Britain and Northern Ireland ("UK"), as well as United Nations Security Council ("UN").

In addition, we are committed to complying with all applicable customs, trade defence, and anti-dumping regulations in the countries where we import or export goods.

One of the important procedures for achieving such compliance is to clarify the identity of our business partners (hereinafter referred to as "**you**") and to confirm whether any restrictions apply to you or the products you supply.

Please review the following questions carefully, select the appropriate response by checking the corresponding box, provide additional information where necessary, sign the form, and return the completed document to us.

If you act as a trading company or trade agent and conduct business with any parties in order to fulfil your obligations under any contract with us, you are required to verify the identity of those parties and have them complete this form as well.

Being Listed on a Sanctions List

Question 1

Are you named on one or more lists of parties prohibited or subject to sanctions by Switzerland, Japan, the EU, the USA, the UK, the UN, or any jurisdiction to which you are subject (collectively, the "**Prohibited Party List**")?

☐ Yes ☐ No

(if YES, please provide additional details)

Ownership or Control by Companies / Persons on a Sanctions List

Question 2

Are you directly or indirectly owned, legally or beneficially, 25% or more in the aggregate by one or more persons or legal entities on the Prohibited Party List?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 3

Are you controlled by or acting on behalf of or for the benefit of, directly or indirectly, any one or more persons or legal entities included on the Prohibited Party List?

☐ Yes ☐ No

(if YES, please provide additional details)

Doing Business in Sanctioned Countries

Question 4

Does your company, or any member of your company's group of entities (that is, any entity directly or indirectly controlled by, or under common control with, your company – your "**Group Companies**"), reside in or have any offices, transactions, investments, activities, or planned activities in BELARUS, CUBA, IRAN, NORTH KOREA, RUSSIA, or NON-UKRAINIAN-GOVERNMENT-CONTROLLED AREAS OF UKRAINE ("**Sanctioned Countries**")?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 5

To the best of your knowledge, does your company, or any of your Group Companies, have any transactions, investments, activities, or planned activities ("**Dealings**"):

- (1) with any individual or entity located, resident, or organised in a Sanctioned Country; or
 - (2) with any entity directly or indirectly owned or controlled by an entity located, resident, or organised in a Sanctioned Country
- (including, in each case, intermediaries acting on behalf of, or engaging in related Dealings with, Sanctioned Countries or Sanctioned-Country-based entities)?

☐ Yes ☐ No

(if YES, please provide additional details)

Doing Business as a Trade Agent**Question 6**

If you are a trading company or trade agent, have you (i) checked the identities of the parties with which you may conduct business in accordance with the above requirements, and (ii) not identified any unusual circumstances?

If either (i) or (ii) is "No", answer "No" below.

☐ Yes ☐ No ☐ Not Applicable (Not a trading company or trade agent)

(if NO, please provide additional details)

Your Compliance Program**Question 7**

Do you carry out due diligence, including but not limited to sanctions screening, on third parties that you would use in connection with your business relationship with us?

☐ Yes ☐ No

(if NO, please provide additional details)

Question 8

Does your company have a compliance programme in place to ensure that it complies at all times with Swiss, Japanese, EU, US, UK, and UN economic and trade sanctions and export control regulations?

☐ Yes ☐ No

(if NO, please provide additional details including the reason why not)

Investigations**Question 9**

Is your company currently under investigation by, or subject to sanctions imposed by, Swiss, Japanese, EU, US, UK, UN, or other authorities in connection with economic or trade sanctions or export control matters?

☐ Yes ☐ No

(if YES, please provide additional details)

Your Products**Question 10**

Does your company have production or suppliers in any Sanctioned Country or other dealings that are subject to current economic and trade sanctions?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 11

Does your company manufacture, produce or trade goods or services subject to export control measures (e.g. common military goods, dual-use items, EAR, ITAR) or trade sanctions?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 12

Are you aware of any anti-dumping duties, countervailing duties, or trade defence measures currently applied to your products when imported into the EU or UK (or other territories, depending on the project location)?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 13

Have your products been subject to additional customs duties or tariff measures during the past three years in the EU or UK (or other territories, depending on the project location)?

☐ Yes ☐ No

(if YES, please provide additional details)

Question 14

Has your company, or any affiliated manufacturer, ever been named in an anti-dumping case by the European Commission, the UK Trade Remedies Authority, or the US International Trade Commission?

☐ Yes ☐ No

(if YES, please provide additional details)

Compliance with Swiss and EU Sanctions on Materials Origin

Iron and steel products that originate in, are consigned from, or incorporate iron and steel from Russia or Belarus are restricted under the sanctions laws of the EU, Switzerland, and other countries. Applicable legislation includes:

- for Russia: EU Regulation 833/2014 and Swiss Ordinance on Measures Connected with the Situation in Ukraine (SR 946.231.176.72)
- for Belarus: EU Council Regulation (EU) 765/2006 and Swiss Regulation on Measures Against Belarus (SR 946.231.116.9)

Question 15: The Supplier confirms and warrants that any iron and steel products supplied to KVI shall comply with all applicable EU, Swiss, and other relevant sanctions laws and regulations, including restrictions relating to products originating in, consigned from, or incorporating iron and steel originating in or consigned from Russia or Belarus.

☐ Confirmed

☐ Unable to confirm

Execution of this document shall not be construed as commitment to enter into any business relationship, sales agreement with you or create any contractual commitment to you in connection with our procurement activities.

_____ **[Company Name]** hereby confirms and warrants the accuracy and correctness of its answers.

If there are any changes to any of these answers, you will immediately (within no more than seven days) inform us of such changes with an updated answer.

Kanadevia Inova relies on the truth and accuracy of these answers for our own compliance purposes.

If we enter into a business relationship with you, this questionnaire and your answers shall be incorporated by reference into such agreement. Knowingly providing false information in this questionnaire, or failing to provide updated answer as required, shall be a material breach and can result in the termination of the business relationship.

Company Name _____

Company Address _____

City / Post Code _____

Country _____

Signature _____

Name _____

Position _____ (Must be a Senior Officer within the Company)

Date _____

Telephone Number: _____

Email _____