

# Anti-money Laundering and Export Control Policy

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Policy owner: René von Staffeldt Beck

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For the purposes of this policy, 'Egiss' and 'Egiss Group' refers to Egiss A/S and its global affiliates.



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## Guidelines and measures to prevent money laundering

This policy defines the guidelines and measures of Egiss related to Money Laundering and Export Control.

### Measures to prevent money laundering

The purpose is to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable requirements under the Anti-Money Laundering Laws, including Danish and EU sanctions regulations and the U.S Department of Treasury Office of Foreign Assets Control sanctions regulations.

### Definitions

Money laundering is generally defined as engaging in actions designed to conceal or hide the true origin of criminally derived proceeds, so that revenue is apparently derived from legitimate origin or constitute legal assets.

### Our Policy

It is the policy of Egiss to prohibit and prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities by complying with all applicable requirements under the Anti-Money laundering Act (AML) and its implementing regulations.

## Enhanced Due Diligence - for new accounts



### Know Your Customer (KYC)

We properly identify new customers when their account is opened. Accordingly, the minimum identification requirements for opening a new account are listed below. If a customer refuses or is unable to provide the requested information, the account will not be created in our financial system and will therefore not be able to buy our products.

#### Minimum identification requirements

A minimum of four data items is required for all new accounts. These are:

- Name and complete invoicing address (Street name and number, postcode)

- Complete delivery address if different from invoicing address
- Telephone number, contact person, email
- Tax Identification Number (VAT)
- Ultimate beneficial owner which is defined as the person(s) or company having the controlling interest (which is defined as more than 20% of the capital or the votes)

#### Customer cash payments

Egiss does not accept cash payments.

## Guidelines concerning export control

We do not sell goods to customers if we suspect that the customer intends to distribute the goods to countries subject to export control.

When in doubt, we consult the Danish Business Authority (or a similar national authority) to make sure that our products may not be used as weapons or parts of weapons (dual use).

All transactions to high-risk countries and to entities unknown to us must be cleared with our Bank in order to secure compliance with current regulations.

### Agreements with other contracting parties

The agreements entered into with our business partners (new agreements or upon revision of long-term agreements) must include provisions on:

- Actions or omissions contrary to the standards stated in this program constituting material breach of the agreement.
- The business partner being obliged to inform Egiss of incidents which may potentially constitute violation of the standards.

In the event of material breach, Egiss will terminate the business relationship with the relevant business partner.

### Screening of external parties

The CFO/Compliance Officer must, on an annual basis, make a risk assessment of our business partners in order to assess whether these guidelines must be imposed in particular on one or more undertakings or whether such undertakings must be subjected to an inspection to the extent allowed by the agreements entered into.

### Special risk areas in relevant divisions

The CFO/Compliance Officer will on an annual basis – or upon changes to current circumstances make a risk assessment of the trade with suppliers/distributors in specific countries or areas.

The most recent risk assessment will be shared with relevant key employees at Egiss

## Procedure for adoption and amendments



This policy, and any amendments to it, must be adopted by the Board of Directors of Egiss Group.

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Approved and adopted by the Board of Directors,

*René von Staffeldt Beck, Chairman of the Board*

