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# AS SKINEST GRUPP

## Sanctions Policy

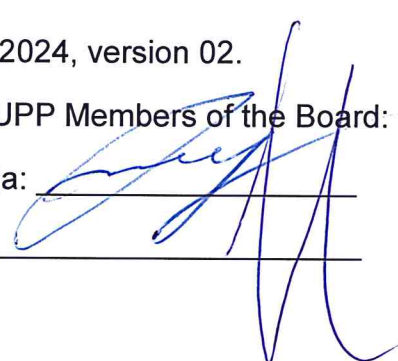
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Approved: 15.07.2024, version 02.

AS SKINEST GRUPP Members of the Board:

Juliana Poljanskaja: \_\_\_\_\_

Sergei Jakovlev: \_\_\_\_\_

A handwritten signature in blue ink, consisting of several loops and a long vertical stroke, is written over the signature lines for both Juliana Poljanskaja and Sergei Jakovlev.

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## 1. Introduction

AS Skinest Grupp and its subsidiaries companies (hereinafter jointly “Skinest” or the “Group”) are committed to comply with all applicable laws, regulations and international conventions in all jurisdictions in which they operate or have business interest.

In this regard, AS Skinest Grupp has defined a corporate model based on a culture of compliance and integrity that ensures fair, ethical and sustainable business practices throughout all of the Group’s operations. The objective is that duties within the Group are carried out with responsibility, diligence and transparency, ensuring the early detection and prevention of risks of non-compliance that may have a negative impact on the Group, and by extension, indirectly affect consumers, employees, suppliers, and all those involved in and affected by our operations.

According to the risks identification carried out by Skinest, the violation of Sanctions is among those risks against which the Group guards itself through the adoption of internal procedures (Schedule I).

States and supranational organizations impose sanctions against countries, organizations, individuals, legal entities, which infringe internationally accepted rules as they have been identified as being involved in fraudulent elections, repressions, military aggression, weapons proliferation, terrorist organizations, violations of human rights or other. The concept of Sanctions/Sanctions Regimes described in Schedule I of this Policy.

Non-compliance with Sanctions regulations can expose the Group as well as individual managers and employees to civil, regulatory and criminal penalties, including substantial economic fines and/or imprisonment. Further, any behavior contrary to the Sanctions regulations will result in the infringement of the values of the Group, which will not be tolerated.

Imposing of the Sanctions is an absolute requirement. It is a rule-based obligation that applies to both natural and legal persons and which must be fulfilled.

Skinest will carry out all its activities in accordance with the legislation in force in all fields of action and in all the countries in which it operates, in accordance with its spirit and purpose.

Accordingly, in compliance with sanctions applicable to Skinest and taken by the EU, any individual EU state, Skinest will refrain from breaching of sanctions adopted in the country where Skinest will have any kind of business interest.

In doing so, the Group has resolved to develop this sanctions policy (hereinafter “Policy”) which is in harmony with the high standards of the Group, provides general



guidelines that will support the Group's efforts to comply with International and National Sanctions regulations and to halt any conduct that does not comply as soon as reasonably possible after its discovery.

In this Policy, International Sanctions shall mean any international sanctions, like EU, UN sanctions. National Sanctions shall mean any sanctions adopted in particular country, like Ukraine, Estonia, Poland etc. Sanctions shall mean both International and National Sanctions.

## **2. Applicability**

This Policy was approved by the members of the board of AS Skinest Grupp at the meeting held on 2<sup>nd</sup> of May 2022 and was consistently supplemented on ongoing basis. It will remain in force until the members of the board of AS Skinest Grupp approve its update, review or derogation.

This Policy is applicable, without limitation, to all the Group companies, directors, officers, employees and contracted staff wherever located and any other associated persons performing activities in relation to the Group (hereinafter, the "Obligated Persons").

All the Obligated Persons shall comply with this Policy and its provisions and shall perform their business practices in compliance with this Policy. Subsidiary company of the Group may prepare its own Sanctions Policy according to the national legislation and which shall be in harmony with this Policy. Likewise, Obligated Persons are responsible for ensuring that risks are effectively managed in relation to activities falling within their responsibilities in order to comply with the applicable laws and internal and external regulations.

## **3. Objective and scope**

The aim of this Policy is to establish a regulatory framework regarding Sanctions for all the scenarios in which the Group may be involved in the performance of its business activities and to establish an authorization procedure that allows the Group to maintain control of all the relationships established with Third Parties (as defined below) as well as those responsible for such processes.

Likewise, the Group aims to protect the entities that comprise the Group from becoming involved in business activities with Third Parties such as employees, commercial suppliers, financial suppliers, agents and distributors (hereinafter a "Third Party" or "Third Parties") who may be subject to Sanctions.



International and National Sanctions are targeted against activities, countries, organizations or individuals contained in lists. This Policy requires, as a general rule, all potential business partners or new activities or business to be carried out by Skinest have to be checked against the relevant Sanctions lists before establishing a business relationship with them and monitored regularly during the course of the business relationship.

This Policy does not provide detailed guidance on the specific restrictions that exist under different Sanctions regimes, nor the extent to which licenses or authorizations are available that would permit activities that are otherwise prohibited by Sanctions.

#### **4. Principles**

The principles of action of the Policy are as follows:

1. Comply with current legislation and with internal regulations;
2. Provide the necessary human and material resources so that, in an efficient manner, the work of promotion of this Policy can be carried out, as well as implementing the methods for the prevention and detection of illegal actions;
3. Analyze and investigate, as quickly as possible, any report on conduct that is contrary to this Policy, or external or internal regulations, applying the principles of confidentiality, non-reprisal, and protection of personal information for all persons effected by the investigation process, with particular attention in relation to the reporting and reported person;
4. Collaborate and cooperate with any judicial or administrative body, in relation to the investigation of alleged violations by the Obligated Persons of the Group;
5. Provide suitable ongoing training, whether in person or through e-learning, to all of the directors and employees of the Group, placing special emphasis on the Sanctions related obligations;
6. Impose relevant disciplinary measures on persons responsible for any non-compliance with this Policy, and on those who, with their behavior, cover up or prevent the investigation or clarification of the alleged infringements, all of this in accordance with the penalty scheme applicable in each jurisdiction to each company of the Group.

## **5. Due Diligence and authorizations**

### **5.1. Introduction**

Due Diligence is established to assist with the identification of restricted individuals and organizations, as well as restricted activities to which the Group may be exposed. It helps identify areas of potential risks and assists in making appropriately compliant risk decisions. Due Diligence processes pursuant to this Policy may be carried out in connection with, and without conflict with, the rest of compliance procedures established within the Company.

It is important that the Obligated Persons violation of the Sanctions may present reputational risk to the Group and may lead to criminal charges, economic sanctions, embargoes, disqualification of directors, disqualification of the Group from being able to operate or trade, disqualification from public procurements, cancellations of contract, closures of the bank accounts etc., being brought against the Group and/or the Obligated Persons.

### **5.2. Due Diligence on new Third Parties**

During the preliminary process of contracting any Third Party, it is mandatory to carry out a Due Diligence process by means of asking to provide documentation and filling Know Your Client (KYC) form established in the Group (Schedule II).

Additionally, it is mandatory to obtain from the Third Party the International Sanctions exposure questionnaire included in page 6 of the Schedule II duly completed. With this questionnaire, Group is intended to obtain additional information with regard to any ties or links of the Third Party with any activity, country, organization, entity or persons affected by the Sanctions to the extent that this may imply a risk for Group's businesses.

It will be necessary to ensure that all information and documentation obtained regarding the Third Party and the goods or services that will be provided to the Group, are adequate and accurate.

All the information and documentation obtained from the Third Party as well as the International Sanctions exposure questionnaire must be stored as detailed in the record retention clause of this Policy (Section 7). The person in charge to carry out the transaction or responsible of the business relationship with the Third Party, i.e. member of the board, sales manager, specialist of particular department, director of particular department, manager, etc. (hereinafter, the "Relevant Specialist") is responsible for



ENGLISH version

performing all the duties related to the Due Diligence process and ensuring that the KYC form and Sanctions exposure questionnaire are duly completed by the Third Party.

Any other documentation or information additional to the one mentioned above, which is considered relevant depending on the case, may be requested and stored when obtained.

Once the preliminary process of Due Diligence process has been completed, and before any contract is signed with the Third Party and any relationship is begun, a screening process will be carried out in order to reduce or eliminate risk of violating Sanctions.

The Relevant Specialist must conduct the screening process, which means checking the details of the gathered documentation/information against the Sanctions.

Screening the documentation/information includes the following actions:

**1. Checking the partner.**

Finding out who the parties to the transaction are, including the company itself, shareholders, beneficiaries, directors (legal representatives), the owner of the goods, the supplier, the carrier, etc.

Answering questions:

- Whether sanctions have been imposed on any person?
- Whether sanctions have been imposed on any beneficiary and/or shareholder and what is the percentage of ownership?
- Is there any restriction, prohibition or obligation regarding the entities and/or individuals involved?

**2. Checking the bank.**

Answering question: Whether sanctions have been imposed on the bank?

**3. Checking the content and purpose of the transaction.**

Answering question: What is the purpose of the transaction for Group and for Third Party and whether there is any restriction, prohibition or obligation for such purpose?

Answering question: Whether Third Party agrees for inclusion of example clauses established in the Group (Schedule III) in contract?

**4. Checking goods or services against Sanction lists.**

Answering question: Is there any prohibition, restriction or obligation regarding the goods or services involved in the transaction?

**5. Checking the geographical risk.**



Answering question: Is there any prohibition, restriction or obligation on the territory for use, transfer, purpose or supply etc. (Russia, Ukraine, Belarus, Luhansk, Donetsk, Crimea, Iran etc.)?

**6. Checking publicly available data and information.**

In addition to the information received from the partner, checking the data on independent and reliable source (available database, google search, registries, etc.)

Answering question: Is there any publicly available information which can give a base to believe that there might be a risk of breaching the Sanctions?

**7. Checking exceptions.** Find out if there may be an exception (exception is granted by the competent authority);

**8. Collecting and keeping all the information and documentation.**

A written report with the result of the screening process (including answers to the questions above) shall be filled by the Relevant Specialist and must be stored with all the information resulting from the Due Diligence process as described in this Section and in the record retention clause of this Policy (Section 7).

**5.3. Results of the screening process and Authorization**

**5.3.1. Favorable Due Diligence procedure result**

If the answers to the questions 1- 6 in the Section 5.2 are negative (no Sanctions imposed, no risks detected), it can be considered as a 'safe party and transaction' and the transaction shall be authorized which means the company can enter into contractual relationship with the Third Party.

**5.3.2. Unfavorable Due Diligence procedure result**

If any answer(-s) to the questions 1- 6 in the Section 5.2 is/are positive (Sanctions imposed and/or risks detected), the transaction should be escalated for authorization to take a decision on whether to undertake the business relationship with the Third Party or not.

Thus, the Relevant Specialist shall prepare a report containing the main aspects of the proposed authorization, or for the contrary, the reasons why authorization must be denied and no business relationship with such Third Party should be maintained.

The report will be submitted to the member of the board of the company for his/her consideration and its approval or denial. Member of the board of the company takes the final decision.

ENGLISH version

In case of unfavorable Due Diligence, if there is any Sanction imposed on any aspect of the transaction (including partner, shareholders, beneficiaries, goods or services, banks etc.), the company shall apply the Sanction, and/or do not make financial means or economic resources available to the Third Party, or fulfill obligation established by Sanctions, and do not enter into contractual relationship with the Third Party. If the law requires, inform the governmental authority about application of Sanction. The member of the board shall check whether there is any exception for such transaction.

#### **5.4. Ongoing screening obligations**

In the event that the Group holds an ongoing business relationship with a Third Party, the Relevant Specialist must conduct a regular screening process additional to the initial screening established in Section 5.2 above and update the initially collected documentation with the new information from the Third Party.

This additional screening process will occur, at least:

- Before each renewal of a contract;
- when Group is or become aware about changes in Third Party (like change of shareholders, legal representatives, change of the source of the goods etc.); and
- in any case once a year.

#### **6. Contractual clause**

It will be mandatory for any Relevant Specialist to include the contractual clause drafted in Schedule III herein, in each of the contracts or transactions that are carried out by the Group with Third Parties. In this sense, the example of a contractual clause may be adapted to each case or transaction and any more restrictive determination may be added, but in no case may its scope be reduced, nor may its main content be modified if its purpose is distorted. A standard contractual clause is proposed in Schedule III. Where there is any doubt about the contractual clause, the Relevant Specialist must ask to the Country Legal Counsel that may raise the question to the Group's Legal Counsel if necessary.

#### **7. Implementation and review**

##### **7.1. Implementation**

The members of the board/directors of all subsidiary companies of the Group are responsible for implementing this Policy, and ensuring its compliance in the company, as well as monitoring its effectiveness.

Legal Counsel assists the Group's Relevant Specialists and members of the board/directors in any aspect of the implementation and compliance of the Policy.



## **7.2. Review**

This Policy shall be reviewed on a regular basis, but at least once a year in order to ensure that the Policy is up to date and reflects the reality of the Group and all changes in applicable laws and regulations. The overview of Sanctions regimes shall be updated at least annually, and on an ad hoc basis if considered appropriate due to changes in the applicable laws and regulations.

Any proposed changes to this Policy shall be submitted to the Group Legal Counsel or AS SKINEST GRUPP members of the management board.

## **8. Record retention**

Any information that may be needed in the future related to this Policy or its compliance will be duly stored by the Relevant Specialist. Each Relevant Specialist has to keep record of any information related to any Third Parties such as suppliers, customers and/or employees that has been requested or obtained during the Due Diligence procedure, as well as the refusal, suspension or termination of the business relationship.

The storage of the information and documentation shall be carried out in digitized manner.

The Group will retain the records either during the relationship with Third Parties and for at least two years after the relationship ends. The Group may increase this period if considered appropriate.

The information collected by the Relevant Specialist may be shared within the Group.

## **9. Reporting and investigations**

All the personnel should report immediately to its manager or member of the board of the company any suspicion, thought, breach or potential breach of this.

In case of a suspected breach of Sanctions, the company should carry out an investigation, in order to gather enough information about the breach.

The investigation should be approached as follows:

1. Identify which company, area or department may be affected.
2. Gather all the information in connection with the transaction and, in particular, to check if the Due Diligence processes have been carried out correctly.
3. In the event that the suspected breach is confirmed, identify the cause of the breach.



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4. Prepare recommendations for remedial actions to be taken, to address the breach or to mitigate its possible adverse effects and prevail from falling in the same breach once again.

If considered appropriate by the company or if it is required by law, anything that might constitute a breach or potential breach of Sanctions should be reported to the relevant public authorities for its investigation and clarification.

### **10. Adherence to the Policy**

The Group will ensure that all the Obligated Persons are familiar with the Policy and confirm their acknowledgement and understanding to the Policy.

Likewise, any Third Parties with which the Group holds business relationships will be made aware of the existence of this Policy and, when required, they will be requested to confirm acknowledgement and understanding of this Policy in writing.

### **11. Risk Tolerance**

The Group does not tolerate any breach of the requirements set forth in this Policy that could jeopardize the soundness and integrity of the Group or damage the public trust and confidence.

After applying internal control such as Due Diligence, the Group has established a robust control environment, which reduces the risk of a breach.

In the event that doubts or discrepancies arise regarding the risk that a Third Party or a specific business relationship may cause to the Group, the Group will assess the level of risk of the transaction with the Third Party, or can ask an opinion from the competent authorities. As a result of such, the transaction could be approved or for the contrary, be rejected.

### **12. Non-Compliance**

Any violation of the provisions included in this Policy may lead to disciplinary actions, up to and including termination of employment. Employees who, after consultation with appropriate personnel, decline to enter into a transaction because of concerns regarding sanctions will not be negatively affected.

SCHEDULE I TO AS SKINEST GRUPP SANCTIONS POLICY

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## CONCEPT OF SANCTIONS/ SANCTIONS REGIMES

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### 1. Introduction

The terms 'International Sanctions', 'trade sanctions' or 'sanctions' or 'national sanctions' refers to laws and regulations that restrict business or any other business relationship with targeted individuals, legal entities, governments, organizations, groups and non-state entities, with the aim of modifying a certain behavior or weakening the position of all those who pose a threat to international peace and security.

Such restrictions may include, but to limited to:

- General or partial prohibitions to trade with individuals or entities listed on applicable assets lists, or with entities owned or controlled by entities on the lists referred to above;
- Travel bans;
- Restrictions related to the export or import of some goods or services;
- Rejection of claims and other legal actions and contracts the performance of which is affected by restrictive measures will not be assessed;
- Financial embargoes that prohibit placing assets of any kind at the disposal of sanctioned parties or providing them with financial services of any kind;
- obligations of freeze of economic assets and funds, or some other obligations.

These measures are imposed by states and supranational organizations like the European Union (EU), which in many cases implement United Nations (UN) Security Council sanctions through a diversity of legal measures that whoever imposes them enforces with more or less severity, as required to achieve the ultimate objectives for which they have been imposed.

Moreover, the targets of Sanctions and nature of the restrictions imposed by Sanctions are subject to change on a regular basis and the modifications sometimes do not respond to the adaptation of the realities they regulate, but follow interests and events of a political (and, indirectly, economic) nature and are therefore especially exposed to sudden, immediate and (sometimes) unforeseeable changes.

For compliance purposes, it is therefore essential to maintain up-to-date information about all Sanctions that apply to the business as penalties for violating trade sanctions can be severe, including large fines or imprisonment, as well as posing substantial reputational risk for the Group.



Of particular importance are the UN, EU and the United States of America (US) sanctions, given that the latter implement, by transposition or extension, the restrictions proposed by the former and that the Group conducts a significant proportion of its business in those territories.

## **2. International Sanctions**

### **2.1. UN Sanctions Regime**

The implementation of sanctions imposed by the UN Security Council is based on Article 25 of the UN Charter and specific Security Council resolutions.

In accordance with section 8 of the International Sanctions Act, sanctions imposed by a resolution of the UN Security Council is temporarily provisionally on the basis of the resolution until the regulation of the Council of the European Union is updated or adopted.

UN Sanctions apply to any entity or national citizen of a UN member state.

For the effective application of UN sanctions throughout the European Union, the European Union has adopted all UN resolutions into EU law and they are implemented in the Member States through EU regulations. In the case of some regimes, the European Union has taken autonomous restrictive measures in addition to the UN sanctions, in which case the sanctions regimes are hybrid UN-EU regimes.

### **2.2. EU Sanctions Regime**

The Council of the European Union is one of the main decision-making bodies of the European Union, which adopts legislation, concludes agreements, and shapes the Common Foreign and Security Policy of the European Union. The ministers of the EU Member States, who have the right to assume obligations and vote on behalf of the government of their country, meet at the Council sessions.

In order to implement the Common Foreign and Security Policy, the Council of the European Union adopts decisions that establish obligations, prohibitions, and restrictions either for EU Member States or for natural and legal persons in the EU. If the decision contains prohibitions and restrictions that bind natural and legal persons in the EU, the Council of the EU adopts a regulation that has a similar effect to the national legislation of the Member States.

EU Sanctions apply to:



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- EU companies and nationals;
- Non-EU companies and non-EU national employees in relation to anything they do in the EU and any business conducted wholly or partly in the EU.

EU Sanctions Map <https://www.sanctionsmap.eu/#/main> gathers information about all sanctions regimes established by the European Union or the United Nations. The sanctions website provides an overview of all sanctions regimes that apply in the EU jurisdiction.

Decisions of the Council of the European Union imposing international sanctions and directly applicable regulations of the Council of the European Union, on the basis of which certain restrictive measures are implemented, are published in the Official Journal of the European Union <https://eur-lex.europa.eu/homepage.html?locale=en> in all official languages of the European Union. If changes have been made to the legislation imposing sanctions, this can also be checked in the Official Journal of the European Union.

More information about international sanctions valid in the European Union can also be found on the website of the Council of the European Union <https://www.consilium.europa.eu/en/policies/sanctions/>.

### **2.3. US Sanctions Regime**

The US sanctions regime is particularly complex, which makes it is very necessary to resort to the lists of sanctioned subjects published by the Office of Foreign Assets Control (OFAC), the government agency which takes action. In general, it is the Specially Designated Nationals and Blocked Persons List (SDN), and the OFAC publishes specific lists.

In the American system, the Congress delegates the power to impose embargoes to the President, who applies them through the so-called Executive Orders. In addition, there are laws that sanction specific countries (Cuba, Iran, Libya).

US Sanctions apply to:

- US companies and their overseas branches, including non-US subsidiaries, US citizens and permanent residents, in relation to anything they do anywhere in the world; and
- Non-US companies and non-US nationals in relation to anything they do in the US and in relation to any transaction that may concern the US (the so-called “secondary sanctions”).

General or specific licenses may be granted in order to carry out transactions with sanctioned countries or entities.

For further information about the US sanctions regime, you can visit the following sites:  
The United States Office of Foreign Assets Control (OFAC):

<http://www.treasury.gov>

OFAC Specially Designated Nationals and Blocked Persons List Search:

<https://sanctionssearch.ofac.treas.gov/>

### **3. National Sanctions**

Each country may impose its national sanctions according to its national legislation. Such sanctions are usually applied to the company registered in that country or doing business in that country.

The national sanctions shall be found in the official authorities' web pages.

For example, in accordance with section 27 of the International Sanctions Act, the sanctions of the Government of the Republic are imposed by a regulation of the Government of the Republic on the proposal of the Ministry of Foreign Affairs.

Information regarding Estonian national sanctions may be found on the Ministry of Foreign Affairs web page <https://www.vm.ee/en/activity/international-sanctions/sanctions-government-republic-estonia>.

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## Know Your Client (KYC) form

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The following form shall be sent to each Third Party before entering the business relationship. Filling this KYC form and obtaining the documentation required is part of Due Diligence process.

The KYC form will be sent to Third Party electronically in Excel by filling and signing.



PAGE 1 - COMPANY									
<b>SKINEST</b>									
<b>CUSTOMER/PARTNER KYC QUESTIONNAIRE</b>									
Full Legal Name of the Company:									
Trading Name: (if different)									
Registered Address:									
Office Address: (if different)									
Country of Incorporation:									
Date of Incorporation:									
VAT Number:									
Registered Company Number:									
Company Website URL:									
Telephone / Email:									
Legal Status:									
Other / Stock Exchange where the company shares are listed:									
Name of the bank, address									
Bank account number, incl IBAN, SWIFT/BIC									
Please indicate your core business activities and the countries of operation:									
Anticipated Trading/Service:	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 25%;">Product/Service</th> <th style="width: 25%;">Buying, selling or both</th> <th style="width: 25%;">Anticipated contract</th> <th style="width: 25%;">Volume</th> </tr> <tr> <td style="height: 20px;"></td> <td></td> <td></td> <td></td> </tr> </table>	Product/Service	Buying, selling or both	Anticipated contract	Volume				
Product/Service	Buying, selling or both	Anticipated contract	Volume						
Information about the origin of the monetary funds used in the transaction:	<input type="checkbox"/> Remuneration (average for the last six months): <input type="checkbox"/> Financing of a credit institution <input type="checkbox"/> Periodic income from other sources (indicate the source of the income): <input type="checkbox"/> Financing of beneficial owner <input type="checkbox"/> Other (indicate)								
Please list all members of the board of directors or partnership									
Full Name	Title	Date of Birth	Residency	Citizenship					
Client description (Please provide brief business description (elaborate on nature and extent of the business, presence outside of EU/EEA, products and services offered, turnover, financial position and your domestic bank)									
<p>Please note that if the requested information is not provided or if incomplete or misleading information is provided, Skinest has the right not to initiate or terminate the contract/negotiations and to request the Partner/Customer to fulfill its obligations early. Intentional provision of false information of ownership of the funds and beneficial owner is criminalized.</p> <p>By signing this questionnaire, I certify that no criminal proceedings have been initiated against either the Partner/Customer or the beneficial owner and that neither the client nor the beneficial owner has been convicted of money laundering or terrorist financing.</p> <p>The Client/Partner confirms that all information provided in this form is complete and true. The Client/Partner undertakes to notify Skinest immediately, but not later than within 5 (five) days from the moment the changes occur, of any changes to the data mentioned in this questionnaire.</p>									
Signed:									
Position:									
Print Name:									
Date:									
Questionnaire continues in page 2									

PAGE 2 - SHAREHOLDERS/CONTROL			
<b>SKINEST</b>			
<b>CUSTOMER/PARTNER KYC QUESTIONNAIRE</b>			
Please state the name of any shareholders who own more than 10% of your company			
Company/Full Name (Individuals)	Percentage Owned	Country of Incorporation or Residency (Individuals)	Registered Company Number or Date of Birth (Individuals)
<p>Please indicate the ultimate beneficial owner (-s) of your company *</p> <p>Do any of your company's directors, shareholders, beneficial owners or person (s) who has a control over the company listed in EU/USA/UK sanctions lists? (YES/NO), specify if the answer is "Yes".</p>			
	Full Name		Sanction list (EU, UK, USA)
<p>Are any of your company's directors, shareholders or beneficial owners are politically exposed? **</p>			
	Full Name		Political Exposure
<p>Does your company have formally documented policies on the following:</p> <p>Will any third parties/intermediaries or sub-contractors be used for the purpose of our business relationship?</p> <p>Please provide any other information that may be helpful in assisting us to complete our KYC:</p>			
		Anti-Money Laundering and Combatting Terrorist Financing	
		Anti-Bribery and Corruption (including Gifts and Hospitality)	
		Code of Conduct	
<p>*Any individual or company who owns or controls (directly or indirectly) more than 25% of the shares or voting rights of a company.</p> <p>**PEP as an individual who is currently or in the past year entrusted with a prominent public function and an immediate family member, or a known close associate of such a person.</p>			
Signed:			
Position:			
Print Name:			
Date:			
Questionnaire continues in page 3			

PAGE 3 - SUPPORTING EVIDENCES	
<b>SKINEST</b>	
<b>CUSTOMER/PARTNER KYC QUESTIONNAIRE</b>	
Please provide the following supporting evidence together with this form	
Document	Certification Required (Documents must be certified by a notary)
Certificate of Incorporation  Copy of your VAT certificate  Copy of your Memorandum and Articles of Association, or equivalent  Register of Directors or Board Resolution appointing the Directors  ID/Passport of the current Directors certified true copy	
ID/Passport of the Beneficial Owners certified true copy  Share Register/Certificates detailing shareholders who own 25% or more of the company shares. Detailed ownership Structure up to the Ultimate Beneficial Owner(s) ID** for any shareholders/beneficial owners with a 25% or more ownership certified true copy Banking relationships, i.e. name of bank, location of bank and beneficial bank account name  Bank Reference Letters  List of authorized signatories dated within the last 3 months duly signed and stamped  Counterparty/Trade Reference Letters	
Please provide an explanation if you are unable to provide any of the supporting evidence requested above:	
Signed:	
Position:	
Print Name:	
Date:	
* All documents shall be submitted in Estonian, English or Russian languages or with the translation to such languages ** All documents shall be submitted in scan copies by e-mail. The original documents shall be sent to Mõisa tn 4, Tallinn, 13522, Estonia *** All documents shall be notarized and apostilled, where applicable **** All documents shall reflect the actual data on the date of submission to Skinest and be not older than 2 months	
Signed:	
Position:	
Print Name:	
Date:	
Questionnaire continues in page 4	



**SKINEST**

**CUSTOMER/PARTNER KYC QUESTIONNAIRE**

Manufacturer/Producer name	
Manufacturer/Producer registered Address	
Manufacturer/Producer webpage	
Manufacturer/Producer Country of Incorporation	
Origin of raw materials:	
Country of Incorporation:	

Product (-s) name and CN Code	
-------------------------------	--

Signed:					
Position:					
Print Name:					
Date:					

Questionnaire continues in page 5

PAGE 5 - CONTACTS																																		
<b>SKINEST</b>																																		
<b>CUSTOMER/PARTNER KYC QUESTIONNAIRE</b>																																		
Please provide the contact points below:																																		
Department	Name	Surname	Gender	Phone N.	Mobile N.	Office address																												
KYC/ COMPLIANCE																																		
FINANCE/ TRADE FINANCE																																		
OPERATIONS																																		
TRADING																																		
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Print Name:																																		
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ENGLISH version

PAGE 6 -SANCTIONS RISK MANAGEMENT		
SKINEST		
CUSTOMER/PARTNER QUESTIONNAIRE		
Sanctions	Answer	Specification
Do/does you/your company, company's shareholder (stockholder) or group company carry out operations in a country subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: country, company name, country of registration, registration number and address.		
Do/does you/your company, company's shareholder or group company carry out operations or business activities or provide any services or assistance subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: country, company name, country of registration, registration number and address.		
Do/does you/your company, company's shareholder or group company operations or economic activities are related to the military industry, trade, production, exportation or importation of goods subject to sectoral sanctions or dual-use goods, specialised foreign agencies (military design office, space technology research agencies, etc.)? In the event of an affirmative reply, please specify: country, company name, country of registration, registration number and address.		
Are/is you/your company, company's shareholder or company's group company subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: type of sanctions, company name, country of registration, registration number and address.		
Are company's board members, council members or UBOs subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: type of sanctions, natural person's name and surname, personal ID number or date of birth, state affiliation, country of permanent domicile.		
Do you have any information as to that your business partners, their shareholders or group companies are subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: type of sanctions, company name, country of registration, registration number and address.		
Do you have any information as to that your business partner's board members, council members or UBOs are subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: type of sanctions, natural person's name and surname, personal ID number or date of birth, state affiliation, country of permanent domicile.		
Do you have any information as to that your business partners, their shareholders or group companies are related to (carry out operations or perform activities) a country subject to sanctions of the European Union, sanctions of the United Nations Organisation, US sanctions, and/or national sanctions of other countries? In the event of an affirmative reply, please specify: country, company name, country of registration, registration number and address.		
Do you have any information as to that economic or personal activities of any of your business partners, their shareholders or group companies are related to the military industry, trade, production, exportation or importation of goods subject to sectoral sanctions or dual-use goods, specialised foreign agencies (military design office, space technology research agencies, etc.)? In the event of an affirmative reply, please specify: country, company name, country of registration, registration number and address.		
Signed: _____		
Position: _____		
Print Name: _____		
Date: _____		



## SCHEDULE III TO AS SKINEST GRUPP SANCTIONS POLICY

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### Example clauses for inclusion in contracts as follows:

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- “[We/company name] hereby warrant that [We/company name] are not subject to, as at the date of this [Agreement/Contract], any sanction regime belonging to the EU, UN, Estonia, UK, USA and/or any individual EU state. Should [We/company name] become subject to any such sanction regime during the Term of this [Agreement/Contract], [We/company name] shall promptly notify Skinest, and promptly provide reasonable information requested by Skinest in connection with such matter.”
- “[Customer/Company] warrants that neither the [Customer/Company] nor any of its subsidiaries nor any of its or its subsidiaries’ directors, officers, agents, or employees, is a person that is, or is owned or controlled by persons that are the subject of any sanctions of EU, UN, Estonia, UK, USA and/or any individual EU state.”