TRADE COMPLIANCE POLICY

1. Introduction

According to EU sanction legislation, INNA shall conduct sanction screenings about its business partners.

To the extent Money Laundering Act applies to INNA, 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, INNA 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 INNA.

Code of Conduct Policy is INNA´s top policy, which collects all other policies together. Different policies are described shortly in our Code of Conduct Policy with references made to each specific policy.

This Trade Compliance Policy applies to all employees and managers of companies belonging to INNA Group, which are INNA Finland, INNA Sweden and INNA Denmark ("INNA" or "INNA Group") and Boards of Directors of INNA companies.

INNA has detailed internal instructions and processes for its personnel on how sanctions screenings and KYC-obligations shall be conducted

INNA has also internal processes for its employees regarding 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. INNA shall not conduct any trade with Listed Persons.

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

INNA conducts comprehensive sanctions screening of all business partners, their representatives, and beneficial owners both proactively and reactively:

- **Initial Screening**: All new business partners undergo sanctions screening before establishing any business relationship
- **Ongoing Monitoring**: Existing business partners are screened at least annually and immediately when sanctions or freezing lists are updated

Any relevant matches trigger immediate escalation for enhanced review before proceeding with the relationship.

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 INNA 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. Asset Freezing and Transfer Prohibitions

All assets of persons, entities and groups subject to EU regulations and national freezing decisions must be frozen immediately upon designation. In addition, the transfer of funds and other economic resources to such entities, directly or indirectly, shall be prohibited.

INNA must take the necessary measures for regulations and freezing orders directly on the basis of the regulations themselves without any specific notification or order from authorities. Breaches of these obligations are punishable under applicable law.

In principle, the entire property of a designated person is covered by the freezing, meaning that such property may not be released or transferred. Asset freezing remains in force until the UN Security Council, EU institutions, or national authorities change or reverse their decisions.

4. 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.

4.1. Risk assessments

According to INNA´s risk management policy, INNA shall regularly perform risk assessments of its operations and strategies. According to the Money Laundering Act, INNA is obliged to keep a risk assessment. INNA conducts a regular risk assessment to identify and analyse potential risks concerning money laundering, terrorism financing, and trade sanctions violations.

The purpose of the risk assessment is to assist INNA in:

1) understanding what kind of risks relating to money laundering, terrorism financing and trade sanction violations may materialise in its business

2) analysing the risk level inherent in customers, business partners, services and geographical scope of its business

3) prioritizing the risks

4) planning procedures to monitor, avoid and mitigate the risks

5) developing and updating internal guidelines and processes to ensure compliance

The level of risk is assessed considering the nature, size and scope of INNA’s business and its clientele.

The risk assessment must be prepared in writing and if so requested, delivered promptly to the competent authorities.

4.1.1. 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 INNA discovers a party whose identification information matches that of those subject to international financial sanctions or national freezing decisions, INNA must freeze their assets or suspend the transaction and report the matter to the competent authorities. No transactions of any kind may be carried out with the Listed person, and no funds may be transferred to such a person, even in the form of a refund.

If at any point, suspicious behaviour 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. INNA Group’s country-specific CEO’s and legal advisors support INNA businesses in case of any unclear situations.

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

4.2. Know your customer studies

To the extent INNA 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.

INNA shall not establish or maintain a business relationship subject to Money Laundering Act obligations unless: (a) the applicable know your customer procedures have been completed in accordance with INNA's internal KYC guidelines and applicable law; (b) adequate customer due diligence information has been obtained and verified as specified in INNA's risk-based KYC framework; and (c) any enhanced due diligence requirements have been satisfied where applicable.

Where adequate information cannot be obtained or verified, or where KYC procedures cannot be completed satisfactorily, the business relationship shall not be established or, if already established, shall be terminated in accordance with applicable legal requirements.

All such decisions shall be documented and, where appropriate, escalated to INNA Group's country-specific CEO or legal advisors for guidance

4.3. Contractual undertakings and other compliance measures with business partners

It is recommended to include contractual clauses on trade compliance into INNA´s agreements entered into with business partners. For example, the business partner should warrant that neither 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 INNA immediately, if the situation changes.

5. Record keeping and internal audits

INNA 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 applicable law.

The processing of personal data must be permitted processing in accordance with the EU General Data Protection Regulation and the applicable data protection legislation. The proper storage, processing and confidentiality of personal data must be ensured in accordance with the EU GDPR and the applicable data protection legislation.

INNA may carry out internal controls, as appropriate, within relevant departments to assess compliance with this Policy, applicable regulations and any supplementary internal procedures and guidelines.

6. Implementation

6.1. Responsibilities and organisation

Each employee, top management and member of the Board of Directors in INNA Group 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 your INNA Group's country-specific CEO.

6.2. Training

INNA provides role-based trainings to its employees on trade compliance. Trainings are repeated at regular intervals or when necessary. The training shall follow the internal guidelines established by INNA . INNA will keep records of the attendance in order to demonstrate its compliance if so required.

7. Reporting concerns and consequences of violation

If you become aware or suspect a possible violation of law, rule, or regulation, or a violation of this Policy or any other of INNA's policies, you shall contact INNA Group's country-specific CEO, Head of business unit or your closest supervisor.

You can also raise concerns through INNA's whistleblowing system, available in country specific web pages. INNA 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.

INNA does not tolerate any illegal or unethical behaviour. Violations of this Policy is likely to damage INNA'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.

8. Review and follow-up

Compliance with this Trade Compliance Policy by all INNA entities and employees and business partners, is monitored and reviewed on an ongoing basis, as appropriate. Any relevant matters identified are followed up internally.

Effective date	Version	Change description
20 December 2023	v1	original
2026	v2	updated