APPROVED
CEO
LLC firm "Astarta-Kyiv"

Viktor IVANCHYK

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SANCTIONS POLICY

Business process code G.04.

1. GENERAL PROVISIONS

1.1. The Sanctions Policy (hereinafter referred to as **the "Policy")** defines the goals, principles, procedures for cooperation with counterparties, and the organization of the sanctions risk management process.

1.2. This Policy takes into account the interests of key stakeholders and interested parties.

1.3. The Policy is mandatory for Astarta, a vertically integrated agro-industrial holding "Astarta-Kyiv", which consists of a group of legal entities that carry out operational activities in various jurisdictions and are interconnected by relations of control, economic and/or organizational dependence.

1.4. Terms are used in the meaning provided in the current legislation of Ukraine, internal documents and the Glossary of Terms.

2. KEY TERMS OF THIS POLICY

2.1. **"Astarta or the Company"** means a vertically integrated agro-industrial holding "Astarta-Kyiv", which consists of a group of legal entities that carry out operational activities in various jurisdictions and are interconnected by relations of control, economic and/or organizational dependence.

2.2. **"Aggressor State"** means a state that has occupied part of the territory of Ukraine or is committing aggression against Ukraine. and has been recognized by the Verkhovna Rada of Ukraine as an aggressor state or an occupying state. For the purposes of this Policy, the aggressor states include the russian federation and the republic of belarus.

2.3. **"Ultimate Beneficial Owner"** means any individual who exercises decisive influence (control) over the activities of a legal entity in accordance with the Law of Ukraine "On Prevention and Counteraction to Legalization (Laundering) of Criminal Proceeds, Terrorism Financing and Financing of Proliferation of Weapons of Mass Destruction". A signof direct decisive influence is the direct ownership by an individual of at least 25% share of the authorized (contributed) capital or voting rights of a legal entity. For the purposes of this Policy, the ultimate beneficial owner also includes a person holding substantial participation, i.e. directly or indirectly owns, independently or jointly with other persons of a share in the amount of 10% or more of the authorized capital or voting rights in a legal entity, or, independent of formal ownership, has the possibility of significant influence on the management or activities of a legal entity.

2.4. **"Counterparty"** means one of the parties to civil-law (commercial) relations.

2.5. **"Sanctions Legislations"** means a set of regulatory legal acts governing the application of sanctions, including: the Constitution of Ukraine, international treaties of Ukraine, consent to be bound by which has been granted bythe Verkhovna Rada of Ukraine, laws of Ukraine, regulatory acts of the President of Ukraine, the Cabinet of Ministers of Ukraine, decisions of the National Security and Defense Council of Ukraine, or other international organization, decisions of interstate associations, international, intergovernmental organizations, groups of states or individual states that have extraterritorial effect and are subject to compliance in the territory of Ukraine, in the country of registration of Astarta or in other jurisdictions where the Company conducts business activities.

2.6. **“International Sanctions”** mean legal measures imposed by one or more states, international organizations, or other authorized bodies with the aim of influencing the behavior of a particular state, legal entity, or individual. Such measures may include freezing of assets, restrictions or blocking of financial transactions, trade embargoes, export or import bans, etc. (e.g., sanctions imposed by OFAC, the EU, the United Kingdom, the United Nations, etc.).

2.7. **“National Sanctions”** mean special economic and other restrictive measures adopted by decisions of the National Security and Defense Council of Ukraine and enacted by Decrees of the President of Ukraine. Such sanctions may be applied for the purpose of protecting national interests, national security, sovereignty, and territorial integrity of Ukraine, counteracting terrorist activities, and preventing violations and restoring violated rights, freedoms, and lawful interests of citizens of Ukraine, society, and the state.

2.8. **“Sanctioned Country/Territory”** means a country, territory, or government subject to international or national sanctions prohibiting or restricting interaction with such country, territory, or government.

2.9. **“Sanctions Risks”** mean any potential negative consequences for Astarta caused by cooperation with a Sanctioned Entity, a Sanctioned Country, an entity that has violated the requirements of Sanctions legislation, as well as with persons or structures located on the territory of the Aggressor State or associated with it, or located in the Temporarily Occupied Territory.

2.10. **“Sanctioned Entity”** means an individual or legal entity, a foreign state, its government or organization, as well as other entities subject to international or national sanctions. For the purposes of this Policy, if a country is a sanctioned entity, all legal entities and individuals located in the territory of such a country are considered as subject to sanctions, in particular:

- legal entities that are registered or actually located in such a country and the Ultimate Beneficial Owners or other persons exercising control over sucha legal entity, are citizens, residents of such a country, permanently reside in it, or are otherwise connected with the Sanctioned Country;
- individuals who are registered, reside in, are residents of a Sanctioned Country or are otherwise connected with such a country.

In particular, a legal entity is considered a sanctioned entity if:

- one or more persons subject to sanctions directly or indirectly (through holdings, branches, etc.) jointly own 50% or more of the ownership rights of that legal entity (for the purposes of the legislation of the United Kingdom – more than 50%). In this case, the sanctioned person is considered to exercise actual control over the company, and therefore sanctions are extended to the legal entity itself in accordance with the approaches of OFAC, the EU, and the United Kingdom ;
- a person subject to sanctions has the ability to exercise de facto control over a legal entity, in particular by appointing officials, granting contractual powers or through other control mechanisms, even if its share of ownership is less than 50%. This is in line with EU and UK standards, which take into account actual control in addition to formal ownership.
- its Ultimate Beneficial Owners (holding at least 25%) and/or substantial interest holders (holding 10% or more) are subject to sanctions.

2.11. **“Temporarily Occupied Territory”** means the part of the territory of Ukraine within which armed forces of the russian federation and the occupation administration of the russian federation have established and exercise effective control, or within whicharmed forces of the russian federation have established and exercise general control with the aim of establishing the occupation administration of the russian federation.

3. POLICY OBJECTIVES

3.1. Ensuring Astarta’s activities comply with the requirements of national and international sanctions legislation.

3.2. Identifying and preventing the establishment or continuation of cooperation with Counterparties that are subject to sanctions or have business, financial, or other ties with Sanctioned Countries, Aggressor State, or Temporarily Occupied Territories.

3.3. Establishing an effective system for managing Sanctions Risks within Astarta's internal business processes.

3.4. Implementation of mechanisms for comprehensive due diligence of Counterparties, their participants, Ultimate Beneficial Owners, managers, signatories, and related parties.

3.5. Implementation of preventive measures to minimize reputational, financial and legal risks associated with potential violations of sanctions legislation .

3.6. Improving decision-making processes regarding the conclusion, continuation, ot termination of contractual relationships with Counterparties with increased Sanctions Risks.

3.7. Ensuring the protection of Astarta's business reputation and the trust of investors, partners, and society.

4. PRINCIPLES OF SANCTIONS POLICY

4.1. **Compliance with regulatory requirements** — ensuring unconditional compliance with the current sanctions legislation of Ukraine, as well as international regulations governing the application of sanctions.

4.2. **Integration** — Sanctions risk management is an integral part of Astarta's overall corporate governance system, integrated into the Company's decision-making, planning, and daily operational activities.

4.3. **Preventiveness** — Sanctions risk management is based on the early identification of potential threats and the implementation of preventive measures (including sanctions screening, Counterparty verification procedures, relevant training/awareness of the Company's staff, etc.) aimed at reducing the likelihood of risks materialising and/or mitigating their consequences even before establishing or continuing business relationships.

4.4. **Comprehensive and risk-based approach** — Sanctions Risk Management is carried out on the basis of a structured, systematic, and proportionate approach, which involves the consistent identification, analysis, assessment, processing, monitoring, and control of risks depending on their level. The application of control measures is determined taking into account the identified risk level, communication with Sanctioned Entities, the jurisdiction of the Counterparty, and the nature of the relevant transactions.

4.5. **Controllability** — the internal control system ensures timely identification, escalation, prevention and blocking of risky transactions through the implementation of agreed policies, procedures, and control mechanisms.

4.6. **Transparency and accountability** — ensuring open communication regarding the application of the Sanctions Policy, maintaining proper documentation and transparency in providing information to key stakeholders and supervisory authorities.

5. POLICY ON COOPERATION WITH COUNTERPARTIES

5.1. Astarta strives to build business relations with Counterparties based on transparency, integrity and mutual trust. Astarta is open to cooperation with partners who share the objectives of this Policy and implement measures to prevent Sanctions Risks in their activities. At the same time, Astarta, as an integrity-driven company, conducts its activities in accordance with the highest ethical standards..

5.2. Astarta adheres to a zero-tolerance policy towards violations of sanctions legislation in its activities. Astarta undertakes to strictly comply with all applicable sanctions restrictions imposed by the United Nations Security Council, the United States of America, the European Union, Ukraine, the United Kingdom, and any other states or international bodies whose decisions are legally binding on the Company.

5.3. Astarta takes all necessary measures to conduct due diligence of Counterparties. Cooperation with Counterparties is excluded if it is established that they or persons related to them, their subsidiaries, Ultimate Beneficial Owners, officers, or authorized representatives are Sanctioned Entities and/or are registered or actually located in Sanctioned countries/territories, are under the direct or indirect control of such entities, engage in any economic or financial activities with them, or receive funds or other material assets from them.

5.4. Astarta expects Counterparties to continuously monitor their activities for compliance with the requirements of sanctions legislation, in particular with regard to interaction with Sanctioned Entities and Sanctioned Countries.

6. SANCTIONS RISK MANAGEMENT

6.1. Astarta undertakes to conduct a systematic assessment of Sanctions Risks in its activities. Such assessment includes identification and examination of Counterparties and related persons, analysis of ownership structures and control mechanisms, checking against international sanctions lists (UN, EU, UK OFSI, US OFAC, etc.) and national sanctions of Ukraine (National Security and Defense Council of Ukraine). At the same time, Astarta takes into account the place of registration and actual location of the Counterparty and related persons, the origin and transit of goods and services, as well as the legality of transactions concluded with Counterparties and their subject matter.

6.2. In order to comply with the requirements of the legislation of Ukraine, in the course its business activities, Astarta takes measures to prevent the establishment or continuation of business relations with Counterparties that are associated with the Aggressor State, registered, operate or are actually located on the territory of the Aggressor State or in the Temporarily Occupied Territory, as well as with Counterparties that have business relations with persons associated with the Aggressor State and the Temporarily Occupied Territories.

6.3. Astarta refrains from conducting business activities with Counterparties that engage in any business activities with the Aggressor State, illegal authorities established in the Temporarily Occupied Territories, including the occupation administration of the Aggressor State, and committing other actions that may be qualified as collaboration under Article 111-1 of the Criminal Code of Ukraine.

6.4. Astarta continuously monitors and regularly reviews Sanctions Risks throughout the entire period of business relations with Counterparties, as well as timely informs Astarta's responsible persons for making management decisions. In case Sanctions Risks are identified, Astarta applies appropriate response measures, including enhanced verification, temporary suspension of operations or refusal to cooperate with Counterparties.

6.5. Astarta ensures regular training, at least once a year, for employees involved in interaction with Counterparties on the requirements of international and national sanctions legislation, procedures for identifying and assessing Sanctions Risks and subsequent actions when Sanctions Risks are identified. The training is adapted to the functional responsibilities of employees and includes testing to assess acquired knowledge, and is updated after the indentification of deficiencies or changes to the Policy.

6.6. Astarta manages Sanctions Risks in accordance with the requirements of this Policy and the Sanctions Risk Management Regulation, which defines detailed procedures and processes for identification, assessment, monitoring, and response. The Sanctions Risk Management Policy and Regulations are applied in conjunction with each other and are complementary documents.

7. RESPONSIBILITY AND CONTROL

7.1. The Policy comes into force from the moment of its approval by the CEO of LLC firm “Astarta-Kyiv”.

7.2. The Policy is kept up to date by the Compliance Department and can be reviewed as necessary, but at least once every two years.

7.3. Control over the implementation and proper execution of this Policy is carried out by the Business Process Owner.