

Sanctions Screening Information Request Form

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Financial sanctions are restrictions put in place by governments, international organizations and supranational bodies that limit the provision of certain financial services or restrict access to financial markets, funds and economic resources in order to achieve a specific foreign policy or national security objective.

Nasdaq will not enter into any business relationship that would be prohibited under financial or other applicable sanctions.

Applicant Information				
Legal Entity	Company Name	Full Registered Company Address	Business Industry (e.g. Finance, Gambling and betting, Export, Mining, Manufacture of precious metals etc.)	Registration Date
Applicant				
Natural Person	Name		Date of Birth	
Board of Directors	1.			
	2.			
	3.			
	4.			
	5.			
	6.			
	7.			
	8.			
	9.			
	10.			
Name				
Beneficial Owners (see Appendix 1 "Definitions" for further clarification)	1.			
	2.			
	3.			
	4.			
Legal Entity	Company Name	Country of Registration	Amount of Shares Owned (%)	
Shareholders (companies) owning equal to or >25% of the shares of the Applicant (see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)	1.			
	2.			
	3.			
	4.			
Natural Person	Name		Amount of Shares Owned (%)	
Shareholders (individuals only) owning directly or indirectly equal to or >25% of the shares of the Applicant	1.			
	2.			
	3.			
	4.			
Natural Person	Name			
Authorized Signatory(-ies) (see Appendix 1 "Definitions" for further clarification)	1.			
	2.			
	3.			
	4.			
	5.			
Mandatory Attachments				
1) Trade register, not older than past 2 months from the extraction date			2) Group structure chart (please see tab Exemplary Group Structure Chart with additional clarification)	

Ultimate Parent Company Information (of the Applicant)		
Legal Entity	Company Name	Country of Registration
Ultimate Parent Company of Applicant (see Appendix 1 "Definitions" for further clarification)		
Natural Person	Name	
Board of Directors	1.	
	2.	
	3.	
	4.	
	5.	
	6.	
	7.	
	8.	
	9.	
	10.	
Beneficial Owners (see Appendix 1 "Definitions" for further clarification)	1.	
	2.	
	3.	
	4.	
Legal Entity	Company Name	Amount of Shares Owned (%)
Shareholders (companies) owning equal to or >25% of the shares of the Applicant (see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)	1.	
	2.	
	3.	
	4.	
Natural Person	Name	Amount of Shares Owned (%)
Shareholders (individuals only) owning directly or indirectly equal to or >25% of the shares of the Applicant	1.	
	2.	
	3.	
	4.	

Intermediary Companies Information (in the group of companies, see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)	
Legal Entity	Company Name
Intermediary Company <i>(see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)</i>	
Natural Person	Name
Board of Directors	1.
	2.
	3.
	4.
	5.
	6.
	7.
	8.
	9.
	10.
Legal Entity	Company Name
Intermediary Company <i>(see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)</i>	
Natural Person	Name
Board of Directors	1.
	2.
	3.
	4.
	5.
	6.
	7.
	8.
	9.
	10.
Legal Entity	Company Name
Intermediary Company <i>(see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)</i>	
Natural Person	Name
Board of Directors	1.
	2.
	3.
	4.
	5.
	6.
	7.
	8.
	9.
	10.

Legal Entity	Company Name
Intermediary Company <i>(see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)</i>	
Natural Person	Name
Board of Directors	1.
	2.
	3.
	4.
	5.
	6.
	7.
	8.
	9.
	10.
Legal Entity	Company Name
Intermediary Company <i>(see Appendix 2 "Exemplary Group Structure Chart" with additional clarification)</i>	
Natural Person	Name
Board of Directors	1.
	2.
	3.
	4.
	5.
	6.
	7.
	8.
	9.
	10.

I certify that the information filled in *Sanctions Screening Information Request Form* is correct.

Contact Details of Applicant Representative Completing this Form:

Full Name:	Telephone no.:
Email address:	Date:

Information regarding processing of personal data

The personal data provided in this Sanctions Screening Information Request Form will be subject to processing by the above mentioned companies (collectively, "Nasdaq"). Nasdaq may collect and use personal data about the individual named herein for the purposes of performing sanctions screening in order to comply with the applicable sanctions laws and regulations of the European Union ("EU"), the United Nations ("UN") and the United States of America ("US"), as well as local sanctions laws and regulations in the jurisdictions in which Nasdaq operates. Such personal data may include biographical information, reputational information, information on the individual's background, legal filings, employment history, and relationships with government officials, criminal background, and financial information. Any personal data that is collected will be used solely for the Sanctions Screening purposes and will not be used for any other reason. Nasdaq may utilize third parties for the purpose of collecting relevant Personal Data; all such third parties will be subject to appropriate non-disclosure obligations and have in place appropriate security for such personal data. Any personal data that is collected will be retained for the duration of the contractual relationship between Nasdaq and your company and for a period of [five (5) years (in accordance with our records retention requirements)] following the termination of such contractual relationship .

The personal data obtained for the Sanctions Screening purposes may be transmitted to Nasdaq employees or agents, Nasdaq's external legal counsel and/or regulatory or other authorities in the United States or other countries outside your country of residence/business, whose laws protecting Personal Data may not be equivalent to those in your own country.

To the extent required by applicable law, Nasdaq may provide data subjects with certain rights to withdraw consent or request to access, rectify, erase, restrict, or object to certain processing or request data portability related to the processing of personal data that Nasdaq holds pertaining to such data subjects. Consenting to the collection, transfer, use, retention and other processing of Personal Data for the Sanctions Screening purposes as described herein is voluntary; however, failure to do so may preclude Nasdaq from doing business with your company and/or company(ies) associate with you. Withdrawing consent after it has been provided will not affect the lawfulness of the processing prior to such withdrawal of consent. If you have any questions or concerns about the above, please consult with your Nasdaq business contact. [Further information regarding our processing of Personal Data, as well as data subject rights and how to exercise them, is available in our privacy policy <http://business.nasdaq.com/privacy-statement>

By signing below, I hereby consent to the collection, transfer, use, and retention and other processing of my personal data (to the extent provided herein) as described herein. To the extent that I have provided or will provide any personal data about individuals other than myself to Nasdaq for the Sanctions Screening purposes, by signing below, I hereby confirm that I have provided the information in this statement to such individuals and have obtained their consent for the collection, transfer, use, retention and other processing of their personal data by Nasdaq as described herein.

To inquire about or exercise data subject rights, where applicable, please contact Nasdaq in writing with such requests at the following contacts: SanctionsScreeningVilnius@Nasdaq.com or Konstitucijos avenue 29, LT-08105, Vilnius, Lithuania with attention to Sanctions Screening Vilnius Team [with the subject line "Sanctions Screening Data Subject Rights"].

Appendix 1

Definitions

Beneficial Owner	<p>A beneficial owner is a natural person who exercises ownership or control over a legal entity. Percentage shareholding or ownership interest is one evidential factor among others to be taken into account when identifying beneficial ownership.</p> <p>Identification and verification of beneficial owners should, where relevant, extend to legal entities that own other legal entities, and obliged entities should look for the natural person(s) who ultimately exercises control through ownership or through other means of the legal entity that is the customer. Control through other means may, inter alia, include the criteria of control used for the purpose of preparing consolidated financial statements, such as through a shareholders' agreement, the exercise of dominant influence or the power to appoint senior management. There may be cases where no natural person is identifiable who ultimately owns or exerts control over a legal entity. In such exceptional cases, obliged entities, having exhausted all other means of identification, and provided there are no grounds for suspicion, may consider the senior managing official(s) to be the beneficial owner(s).</p> <p>Beneficial owner means any natural person(s) who ultimately owns or controls the customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted and includes at least, in the case of corporate entities:</p> <p>(i) the natural person(s) who ultimately owns or controls a legal entity through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a natural person shall be an indication of direct ownership. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership. This applies without prejudice to the right of Member States to decide that a lower percentage may be an indication of ownership or control. Control through other means may be determined, inter alia, in accordance with the criteria in Article 22(1) to (5) of Directive 2013/34/EU of the European Parliament and of the Council (3);</p> <p>(ii) if, after having exhausted all possible means and provided there are no grounds for suspicion, no person under point (i) is identified, or if there is any doubt that the person(s) identified are the beneficial owner(s), the natural person(s) who hold the position of senior managing official(s), the obliged entities shall keep records of the actions taken in order to identify the beneficial ownership under point (i) and this point.</p>
Authorized signatory	The person who is signing contracts/documents/forms on behalf of the Applicant
Parent Company	A parent company is a company that controls other, smaller businesses by owning an influential amount of voting stock or control. Parent companies are typically larger firms that exhibit control over one or more small subsidiaries in either the same industry or complimentary industries. Parent companies can be either hands-on or hands-off with subsidiaries, depending on the amount of managerial control given to subsidiary managers.

Appendix 2

Information required for Sanctions Screening based on "Exemplary Group Structure Chart":

- Board of Directors: Applicant, Parent Company.
- Intermediary Companies' Board of Directors: Company A, Company D, Company C and Company F, as their separate ownership is equal to or more than 25%.
- Natural Persons (may or may not be a Beneficial Owners) owning shares (if any): Full names of Shareholder #1, Shareholder #2 and Shareholder #3.

NOTE: Nasdaq will not require information on Company B, since it holds only 10% of shares of the Applicant, nor will Nasdaq require information on Shareholder #4, since they do not hold shares equal to or more than 25%.

