

Trade Compliance Policy - Nammo Group

PURPOSE and SCOPE

This Policy provides a standardized process for trade compliance in Nammo. This Policy applies to all employees of Nammo AS, and its subsidiaries under direct or indirect control (hereinafter "Nammo").

STATEMENT

Trade Compliance at Nammo reflects our commitment and obligation to operate responsibly and in accordance with national and international trade laws and regulatory requirements in the countries where we conduct business. Our comprehensive approach to trade compliance is integrated into the Nammo Compliance Program.

POLICY

At Nammo, our trade compliance is a cornerstone of our practices in the entire value chain in our business operations and includes compliance with:

- A. Export and import laws and regulations,
 - a. All exports and imports must be accurately declared and necessary licenses must be approved and, if required, signed by parties prior to export and import.
- B. Sanctions,
 - a. Nammo does not participate in unlawful transactions in which the destination, end-use, or end user is subject to a sanctions program.
- C. Anti-boycott measures,
 - a. It is not a violation of law to receive boycott requests, but it is a violation to act upon the request.
- D. Representation and Brokering,
 - a. All engagement of third party representation of Nammo must be conducted in a lawful and transparent manner, subject to one of Nammo's due diligence processes and in accordance with the Nammo Code of Conduct. Nammo must ensure any third party who is obligated to register as a broker will do so according to the laws and regulations governing the business transactions.
- E. Combatting modern slavery and human trafficking,
 - a. Nammo has zero-tolerance to modern slavery and human trafficking in our business, our supply chain and our distribution network.

To navigate these complex trade compliance requirements, Nammo companies integrate into day-to-day operations the necessary procedures to operationalize trade compliance with the desired outcomes;

- A. Promoting coordination between Nammo, business partners – customers and suppliers, the regulatory authorities, and industry organizations,
- B. Developing organizational competence whereby Nammo builds and maintains knowledge to meet trade requirements, which subsequently mitigates risks during business operations, and

- C. Localizing and embedding procedures and recordkeeping requirements into functional areas to comply with all relevant laws and regulations.

Failure to adhere to trade compliance laws and regulations can have severe consequences for Nammo, with potential consequences to include; reputational risk, financial loss, loss of import and export privileges, banned as a government contractor, civil fines and/or criminal penalties. All violations of import and export violations are reported to the national authorities according to the Nammo Disclosure Procedures.

OTHER RELEVANT DOCUMENTS

- Code of Conduct
- Nammo Disclosure Procedures
- Nammo Trade Compliance Toolbox
- Nammo Management System
- Nammo Compliance Program



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