

# Trade Compliance Policy - Nammo Group

## **PURPOSE and SCOPE**

This Policy provides a standardized process for trade compliance in Nammo. Nammo is committed to ensure compliance with international trade and exporting control laws within the jurisdictions in which we operate, to ensure that national security and foreign policy interests are protected.

Several export control regimes, such as, but not limited to, the Export Administration Regulations (EAR) and International Traffic In Arms (ITAR) may apply to our business operations and our products.

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 Management System.

## **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 or interactions in which any party, destination, end-use, or end user is subject to a sanction.
- C. Anti-boycott measures,
  - a. Nammo will may receive boycott requests, but will not act upon such requests, as doing is a violation of law.
- 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 for modern slavery and human trafficking in our business, our supply chain and our distribution network.

To navigate 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.

### **GUIDANCE and REPORTING**

On a day-to-day basis, seek guidance from – and direct trade compliance inquiries to – the closest manager or compliance resource. Nammo’s Legal & Regulatory Affairs Department can be contacted with any questions about this policy or Trade Compliance laws at [compliance@nammo.com](mailto:compliance@nammo.com).

Non-compliance with trade compliance laws and regulations, Nammo’s Trade Compliance policy and Code of Conduct is a serious breach of Nammo’s business principles and may cause severe damage to Nammo such as; financial loss, loss of import and export privileges, being banned as a government contractor, reputational risk, civil fines and/or criminal penalties for both Nammo and its employees. All violations of import and export violations are reported to the national authorities according to the Nammo Disclosure Procedures.

Any concerns of non-compliance with trade compliance laws and regulations must be duly reported. Reference is made to Nammo’s guideline for reporting concerns “Do the right thing”. (SpeakUp channel for European employees and Ethicspoint channel for US employees).

### **OTHER RELEVANT DOCUMENTS**

- Code of Conduct
- Nammo Directive on Trade and Export Controls
- Nammo Disclosure Procedures
- Nammo Management System



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