

Third Party Management Manual

Approved by the Management

This is a summary version of Probi's internal policy. This document only presents the main objectives of the policy.

The "Third Party Management Manual" for Probi AB outlines procedures for managing and assessing risks related to sanctions, trade restrictions, money laundering, and corruption when engaging with third-party counterparties. Here's a summary of the key elements:

Purpose

The manual enforces Probi's Trade Sanctions Policy and Anti-money Laundering Policy globally. It aims to prevent Probi from being involved in illicit activities related to sanctions, trade restrictions, money laundering, or corruption.

Procedures

There are two main procedures:

1. **Counterparty Procedure:** This applies when onboarding a new counterparty or updating information for existing ones. It ensures counterparties are not subject to sanctions or export control restrictions. It also includes money laundering risk assessments.
2. **Transaction Procedure:** This is applied to transactions, especially those involving higher-risk countries, identified as "Red" or "Yellow" countries. The procedure helps assess risks of sanctions or money laundering for specific transactions.

Steps for Using the Manual

1. **Select the Appropriate Procedure:** Based on whether you're onboarding a counterparty or processing a transaction.
2. **Follow the Procedure Steps:** Review the relevant schedules, which provide guidance on red flags for money laundering, investigative measures, high-risk countries, and appropriate contractual clauses.
3. **Corruption Assessment:** Ensure there are no signs of corruption before entering into a business relationship or transaction. This assessment must consider the counterparty's background and the countries involved.

4. **Document Efforts:** Keep written records of all measures taken. Records must be maintained for at least five years.

Responsible Oversight

The CFO is responsible for overseeing the implementation and day-to-day compliance with the manual. All suspicious activities or red flags must be reported to the CFO for further guidance.

Key Schedules

1. **Money Laundering Red Flags:** A list of warning signs that may indicate money laundering risks.
2. **Investigative Measures:** Steps to resolve uncertainties about counterparties.
3. **List of High-Risk Countries:** Countries where heightened diligence is required due to elevated risks of sanctions, money laundering, or corruption.
4. **Template Clauses:** Standard contractual clauses to ensure compliance with export control and sanctions laws.

This manual ensures Probi conducts business with transparency and in compliance with global regulations.