

Amendment to MAT Code of Conduct

1. Purpose

The purpose of this amendment is to ensure that Roulunds Braking ApS and its subsidiaries, at all times comply with applicable international sanctions and export control regulations. The amendment is intended to prevent Roulunds from directly or indirectly engaging in trade, payments, or other business activities involving sanctioned countries, entities, or individuals, including Russia.

2. Scope

This amendment applies to:

- All companies within Roulunds Braking ApS
- All employees, managers, and members of the board
- All third parties with whom Roulunds does business, including customers, suppliers, agents, distributors, and other business partners

3. Sanctions Regimes

Roulunds is committed to complying with the following sanctions regimes, as amended from time to time:

- **European Union (EU) sanctions regimes**
- **United Nations (UN) sanctions regimes**
- **United States sanctions regimes** (including OFAC)
- **United Kingdom sanctions regimes**

This includes, but is not limited to, sanctions targeting Russia, Russian state bodies, companies, financial institutions, individuals, and any entity directly or indirectly owned or controlled by sanctioned parties.

4. Fundamental Principles

Roulunds must not:

- Enter into new business relationships with sanctioned countries, entities, or individuals
- Make or receive payments where sanctioned parties are directly or indirectly involved

- Structure transactions, payments, or deliveries in a way that circumvents sanctions
- Accept payments or ship goods via third countries with the purpose of concealing sanctioned involvement

5. Customer Screening and Due Diligence

- New customers and business partners must be screened against relevant international sanctions lists
- Existing customers must be reassessed if there are changes in ownership structure, geographic footprint, or payment patterns
- Transactions involving customers in or near high-risk jurisdictions require heightened scrutiny and management approval

6. Payments and Financial Transactions

- Payments may only be made through known and approved financial institutions
- Payments involving high-risk jurisdictions or unusual payment structures must be escalated to Finance and management prior to execution
- Roulunds cooperates closely with its banking partners to ensure compliance with applicable sanctions regulations

7. Roles and Responsibilities

- **Management** is responsible for implementing and enforcing this amendment
- **Finance and Legal/Compliance** are responsible for advisory support, risk assessments, and dialogue with banks and authorities
- **All employees** are responsible for complying with this amendment and for immediately reporting any suspected violations

8. Reporting Violations

Any suspected violation of this amendment must be reported immediately to the employee's manager, Finance, or through applicable whistleblower channels. No retaliation will occur against employees who report concerns in good faith.

9. Consequences of Non-Compliance

Violations of this amendment may result in disciplinary action, including termination of employment, and may expose both the company and the individual to serious legal and financial consequences.

