

## ResInvest Group KYC Directive

### 1. DEFINITIONS

For the purposes of this Directive the below mentioned terms are defined as follows:

<b>Business Partner</b>	means current and prospective non-retail client and customer, supplier, service provider, distributor, business contact, agent, advisor and governmental and public body;
<b>Compliance Department</b>	means a department or an individual (Compliance Officer) of ResInvest Group Company that ensures that ResInvest Group Company adheres to relevant laws and regulations and has in place internal procedures and controls to identify and manage regulatory risk; in case the ResInvest Group Company does not have a Compliance Department or Officer, the compliance function pertains to its statutory body;
<b>RIG</b>	means ResInvest II, a.s. and all companies that are directly or indirectly controlled by it;
<b>ResInvest Group Company</b>	means any company which forms part of RIG;
<b>KYC</b>	means Know your customer;
<b>KYC Questionnaire</b>	means KYC Questionnaire attached hereto as Annex 1 as a template to be adapted for the particular business transaction or relationship;
<b>Material Transaction</b>	means Material Transaction as defined in Article 3.3;
<b>Risk Department</b>	means a department or an individual (Risk Officer) of ResInvest Group Company that ensures the identification, evaluation, and prioritization of risks to which the ResInvest Group Company is exposed and coordinates the application of ResInvest Group Company resources to minimize, monitor, and control the probability or impact of unfortunate events or to maximize the realization of opportunities; in case the ResInvest Group Company does not have a Risk Department or Officer, the risk management function pertains to its statutory body.

### 2. PURPOSE OF THE KYC DIRECTIVE

It is essential to identify, analyse and understand exactly with whom RIG intends to enter into or maintains a business relationship. KYC means a process that seeks to verify and validate the Business Partner's identity and suitability in order to support RIG's actionable decisions to mitigate against financial, regulatory and reputational risk and ensure regulatory compliance.

The KYC procedure outlined in the KYC Directive is implemented by all ResInvest Group Companies into their internal processes and rules of operations.

### **3. STANDARD KYC PROCEDURE**

#### **3.1. KYC basic principle**

Whilst there is no legal requirement to put in place formal procedures for evidencing the identity of RIG Business Partners, in forming new business relationship or considering undertaking a significant one-off transaction, it is expected and prudent for management of ResInvest Group Companies to satisfy themselves as to the identity of the parties with whom they are transacting.

Therefore, before entering into a business relationship, ResInvest Group Company carefully checks its prospective Business Partners in accordance with the KYC Directive.

Should the KYC procedure reveal any concerns or irregularities as regards the Business Partner's identity and suitability, ResInvest Group Company adopts adequate mitigating measures outlined in the KYC Directive, including a decision not to enter into the business relationship or undertake the business transaction.

#### **3.2. KYC responsibilities**

The responsibility for performance of the KYC procedure according to the KYC Directive and for adoption of a decision on authorization of the Business Partner under Article 3.7 below is shared among the Risk Department and the Compliance Department of ResInvest Group Company that considers entering into contract with a prospective Business Partner. Other departments or bodies of ResInvest Group Company might be included in the authorization process based on the ResInvest Group Company's internal processes and rules of operations.

Division of powers and responsibilities among ResInvest Group Company's departments and bodies is set in its internal processes and rules of operations in line with the four eyes principle.

In the absence of such division of powers and responsibilities, the Compliance Department performs the KYC procedure according to the KYC Directive and submits the outcome of the KYC procedure together with its recommendation to the Risk Department which is responsible for making a decision on authorization of the Business Partner under Article 3.7 below. In case ResInvest Group Company does not have a Compliance Department or Officer, the responsibility for performance of the KYC procedure according to the KYC Directive as well as for a decision on authorization of the Business Partner under Article 3.7 below lies with its Risk Department.

#### **3.3. Information, data and documentation for the purpose of KYC**

As part of onboarding process of a Business Partner and risk assessment in accordance with the KYC Directive, ResInvest Group Company performs at least one of the following:

- i. collects information and data from public and/or other reliable sources (an online tool operated by a third party for the purpose of provision of access to multiple sources of compliance data may be used for this purpose),
- ii. requests a prospective Business Partner to complete a KYC Questionnaire and to provide necessary documentation.

A prospective Business Partner with whom ResInvest Group Company considers entering into a Material Transaction is always requested to complete a KYC Questionnaire and to provide necessary documentation.

ResInvest Group Company defines Material transactions in its internal processes and rules of operations taking into account its profile and character of its activities and business relationships. In the absence of such Material Transaction definition, any business transaction (or sum of transactions with the Business Partner per year) entered into by ResInvest Group Company in excess of EUR 200,000 (Two hundred thousand Euro) or its equivalent in the local currency is to be considered as material.

#### **3.4. Evaluation and verification of information and data by ResInvest Group Company**

In case of collection of information and data according to Article 3.3 (i) and 3.3 (ii), ResInvest Group Company verifies information and data collected directly against those obtained through KYC Questionnaire, provided documentation and other data and information sources regarding the prospective Business Partner.

ResInvest Group Company requires explanation and justification from the Business Partner if

- i. the information, data or documentation collected under Article 3.3 above raise any concerns as to the identity or suitability of the Business Partner in terms of the KYC Directive or
- ii. the verification of the completed KYC Questionnaire and documentation provided by the Business Partner against information and data collected directly by ResInvest Group Company raises concerns over their validity.

### **3.5. Consequences of the KYC check**

In case the Business Partner does not sufficiently explain the discrepancies or does not appropriately rebut the above-mentioned concerns according to Article 3.4, ResInvest Group Company decides to adopt adequate measures, including collecting additional information and data or refusing to issue authorization under Article 3.7 below.

### **3.6. Sanctions, money laundering, terrorist financing and tax governance fraud check**

ResInvest Group Company checks whether the Business Partner is subject to sanctions and assesses whether entering into a business relationship with the Business Partner may constitute a risk of non-compliance in the areas of money laundering, terrorist financing or tax governance fraud.

In case of any irregularities in this respect, ResInvest Group Company decides to adopt adequate measures, including refusing to issue authorization under Article 3.7 below or notifying the authorities.

### **3.7. Authorization of the Business Partner**

Once the KYC procedure according to the KYC Directive is duly performed, ResInvest Group Company issues an authorization that the Business Partner may be accepted.

Such authorization may only be issued if:

- i. there were no concerns over the collected or provided information, data and documentation or such concerns were dealt with under Articles 3.4 and 3.5 above and
- ii. the Business Partner passed the check under Article 3.6 above.

## **4. EXCEPTIONS TO THE STANDARD KYC PROCEDURE**

### **4.1. End clients and customers**

ResInvest Group Company may decide in its internal processes and rules of operations that a KYC procedure is in principle not carried out with regard to its end clients and customers to whom it supplies goods or provides services, unless it would be in contradiction with the purpose of the KYC Directive due to their significance, country of residence or another factor.

### **4.2. Generally trustworthy business partners**

A simplified KYC procedure (see Article 4.5.) may be carried out for Material Transactions with Business Partners commonly considered as trustworthy, such as universities, countries, governmental and public bodies, local authorities and renowned financial institutions, legal advisors, auditors, consultants and companies. ResInvest Group Company may decide in its internal processes and rules of operations that a KYC procedure is in principle not carried out with regard to its non-Material Transactions with Business Partners considered as trustworthy.

### **4.3. Low-value transactions**

Prior to entering into a business transaction (or sum of transactions with the Business Partner per year) below EUR 10,000 (Ten thousand Euro) or its equivalent in the local currency, ResInvest Group Company performs a check on whether the Business Partner is subject to sanctions. Authorization of the Business Partner may be issued solely on the basis of such check. However, in case of any unusual attribute of the transaction, such as offered pricing significantly below assumed fair value, a standard KYC procedure is followed.

#### **4.4. Extraordinary circumstances**

In case of extraordinary time constraints, simplified KYC procedure (see Article 4.5.) may be carried out prior to entering into the business transaction even in case of a Material Transaction.

As soon as practicable after entering into the business relationship with the respective Business Partner, a standard KYC procedure is duly performed, and authorization of the Business Partner under Article 3.7 issued. In case of irregularities or concerns revealed subsequently by the standard KYC procedure which could not be sufficiently dealt with under Articles 3.4 and 3.5, ResInvest Group Company terminates the business relationship or transaction with undue delay or, if such termination is impossible, decides to adopt appropriate measures to mitigate the consequences.

#### **4.5. Simplified KYC Procedure**

When carrying out a Simplified KYC Procedure ResInvest Group Company proceeds as follows: Prior to entering into the business transaction, ResInvest Group Company collects information and data under Article 3.3 above in order to identify the Business Partner's identity and suitability in terms of the KYC Directive and performs a check on whether the Business Partner is subject to sanctions. Authorization of the Business Partner may be issued solely on the basis of information obtained in accordance with Article 3.3 (i) or Article 3.3 (ii). However, should the simplified KYC procedure raise any concerns, a standard KYC procedure is followed.

### **5. UPDATE AND IMPLEMENTATION**

#### **5.1. Update of information/documentation**

ResInvest Group Company determines the frequency of update as concerns any changes to the information and/or documentation provided by the Business Partner during the initial KYC procedure (including identity of the ultimate beneficial owners, identity of the Business Partner, business activities of the Business Partner and countries and markets in which the Business Partner operates) in its internal processes and rules of operations.

#### **5.2. Implementation**

In order to support ResInvest Group's decision to mitigate against financial, regulatory and reputational risk and ensure regulatory compliance in accordance with the KYC Directive, ResInvest Group Company is responsible for implementation of measures and processes concerning Business Partner's identification and suitability that are necessary and appropriate with regard to the respective ResInvest Group Company's profile and character of its activities and business relationships. Such implementation includes also adoption of a definition of Material Transaction for the purpose of the KYC Directive and an appropriate adaptation of the KYC Questionnaire attached hereto as Annex 1.

ResInvest Group Company ensures that while implementing the KYC Directive (including the KYC Questionnaire) in its internal processes and rules of operations it is at least as prudent as the market standard for respective business transactions and relationships.

ResInvest Group Company shall implement this Directive no later than 30 June 2025.

## **6. APPLICATION**

This KYC Directive applies to business relationships and transactions entered into by ResInvest Group Company following the implementation of this Directive. Long-term business relationships entered into prior the implementation of this Directive and lasting after the implementation should be subject to review within 1 year of the implementation.

## **7. REPEAL**

This KYC Directive repeals the KYC Directive adopted as Annex 4 of ResInvest Group Policies in February 2017.

Annexes:

Annex 1: KYC Questionnaire

Annex 2: KYC Directive Scheme

*Document approved by the Board of Directors of ResInvest Group a.s. on February 27, 2025.*

### **Annex 1 - KYC Questionnaire**

Under the ResInvest Holding a.s. (hereinafter “ResInvest” and together with the subsidiaries “ResInvest Group”) internal policies, we only deal with counterparties duly accepted through the ‘know your customer’ due diligence. We kindly ask you to complete this KYC Questionnaire and submit all required documents to us. We will treat the provided data with confidence.

Information provided in this KYC Questionnaire covers ‘know your customer’ due diligence for all trading companies belonging to the ResInvest Group or any other company, which will belong to the ResInvest Group in the future. The information provided herein can be shared among the listed companies in order to open new trading line(s) and/or verify the counterparty’s details for internal compliance, risk and credit purposes.

We reserve the right to ask further questions and request additional documents. Please note that completion and final clearance of your ‘know your customer’ due diligence is solely based on our discretion, answers given in this KYC Questionnaire and provided documents. We also request that additional information is provided, if any changes occur in the future.

Registered name of the company	
Registered address	
Id No. / Reg. No.	
VAT No.	
Website address	
Legal form	
Country of incorporation	
LEI	
ACER code	
Branch (if applicable)	
Branch office’s address (if applicable)	

#### **Required documents**

- Audited financial statements for the previous three years;
- Shareholder and group structure;
- List of ultimate beneficial owners, i.e. those owning more than 25%, incl. their name, address and date of birth;
- VAT declaration / certificate;
- Commercial register excerpt or certificate of incorporation or equivalent registration document;
- Constitutional documents (e.g. memorandum of association, memorandum of incorporation) and articles of association or equivalent;
- Authorised trader list
- List of all information required for scheduling purposes (Shipper codes, EIC, EAN, etc.)

Documents shall be provided in English language and in the local language of the company initiating the ‘know your customer’ due diligence. Documents issued by public authorities (e.g. VAT declaration or commercial register excerpt) shall be also provided in original version, if not already in English language and in the local language of the company initiating the ‘know your customer’ due diligence.

Question	Answer
<b>GENERAL INFORMATION</b>	
When was your company incorporated?	
How many employees are currently working for your company?	
Please describe the principal business of your company? Please state the principal businesses, which generate more than 5% of your revenues.	
Please indicate the name and domicile of your commercial bank.	
Are any of your ultimate beneficial owners, members of the statutory bodies or senior management classed as 'politically exposed persons' within the meaning of the AML Directive 2005/60/EC and corresponding applicable law? If so, please indicate their names and their public function.	
<b>INFORMATION ON TRADING ACTIVITIES</b>	
In which countries are you active and for how long?	
What is the rationale of your trading activities? Please estimate the share for following activities: generation and customer portfolio hedging, proprietary trading, client flow trading and other (please specify). What are your principle reasons for establishing trading with a company belonging to the ResInvest Holding a.s.?	
How much volumes have you traded in the last two years per commodity and country?	
Who are your 5 biggest trading partners?	

Are you acting as an agent trader of any third parties? If so, please list the name, address, Id. No. / Reg. No., VAT No., legal form and country of incorporation of such third parties.	
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**SIGNATURE**

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Date:

Place:

Name:

Function:

**PLEASE SEND THE KYC QUESTIONNAIRE SIGNED BY AUTHORIZED REPRESENTATIVE OF YOUR COMPANY TOGETHER WITH THE REQUIRED DOCUMENTS IN .pdf FORMAT AS AN E-MAIL REPLY TO THE RESPONSIBLE TRADER INITIATING THE KYC DUE DILIGENCE.**