

UNITED HERITAGE FINANCE Sp. z o.o.

Defence and Dual Use Advisory Compliance Policy

Version 1.0 – Adopted by the Management Board on 1 December 2025

1. Purpose of the Policy

This Defence and Dual Use Advisory Compliance Policy (the “Policy”) sets out the regulatory framework, compliance principles and operational guidelines governing the activities of United Heritage Finance sp. z o.o. (“UHF”) in relation to clients operating in the defence and dual-use technology sectors.

The purpose of this Policy is to ensure that all activities conducted by UHF comply with applicable laws and regulations relating to defence industries, export control, sanctions and anti-corruption.

2. Scope of Activities

UHF is an independent advisory and consulting firm providing services in the areas of:

- strategic advisory
- business development support
- corporate finance and fundraising
- mergers and acquisitions
- joint venture structuring
- partnership facilitation
- market development and international expansion

UHF may provide advisory services to companies operating in the defence and dual-use sectors.

Such services may include:

- identifying potential strategic partners or investors
- supporting the structuring of commercial partnerships or joint ventures
- assisting in capital raising processes
- providing strategic and market advisory services

3. Activities Not Performed by UHF

UHF does not engage in any of the following activities:

- manufacturing weapons, ammunition or military equipment
- trading, purchasing or selling military equipment
- acting as a distributor of military equipment
- acting as a commercial sales representative for defence products
- brokering or intermediating the sale, transfer or export of military or dual-use goods
- arranging or negotiating defence procurement contracts

UHF does not participate in the physical transfer, export, import or distribution of military or dual-use goods.

4. Regulatory Position

UHF operates exclusively as an independent advisory and consulting firm.

The services provided by UHF are limited to advisory, strategic, financial and corporate development activities.

UHF does not operate as a defence broker, arms dealer or defence trading entity.

Where UHF introduces potential partners, investors or business counterparties, the resulting commercial transactions are conducted solely between the relevant contracting parties.

5. Export Control Compliance

UHF conducts its activities in accordance with applicable export control regulations, including:

- applicable regulations of the European Union
- applicable laws of the Republic of Poland
- other relevant international export control regimes

Responsibility for compliance with export control requirements, including obtaining any necessary licenses or permits, remains with the relevant manufacturers, exporters or contracting parties.

UHF does not apply for export licenses on behalf of clients and does not act as an exporter or broker of controlled goods.

6. Sanctions Compliance

UHF is committed to complying with applicable sanctions regimes, including sanctions administered by:

- the European Union
- the United Nations
- the United States
- the United Kingdom

UHF undertakes reasonable efforts to ensure that it does not knowingly engage with sanctioned individuals, entities or jurisdictions.

Clients and partners are expected to comply with all applicable sanctions regulations in connection with their activities.

7. Anti-Bribery and Anti-Corruption

UHF maintains a zero-tolerance policy towards bribery and corruption.

UHF conducts its activities in compliance with applicable anti-corruption laws, including:

- relevant provisions of Polish law
- international anti-corruption standards
- the UK Bribery Act and the U.S. Foreign Corrupt Practices Act where applicable

UHF does not offer, promise or provide any improper advantage to public officials or private parties in connection with its activities.

8. Compensation Structure

The remuneration received by UHF from clients constitutes payment for advisory, consulting and business development services only.

Such remuneration may include:

- advisory retainers
- strategic advisory fees
- transaction-based success fees
- advisory participation in joint ventures or commercial cooperation structures

Any fees payable to UHF do not constitute commission for the sale, export or transfer of military or dual-use goods.

9. Responsibility for Defence Transactions

Any transactions involving the manufacture, sale, export, transfer or procurement of military equipment or dual-use goods are conducted solely by the relevant manufacturers, exporters or contracting parties.

UHF is not a party to such transactions and does not assume responsibility for regulatory compliance obligations associated with defence trade.

10. Ethical Standards

UHF is committed to maintaining high standards of professional integrity, transparency and lawful conduct in all business activities.

All employees, advisors and representatives of UHF are expected to adhere to this Policy and conduct their activities in accordance with applicable laws and ethical standards.

Date of Adoption: 1 December 2025