

## TeraHop Pte. Ltd.

**2025 Trade Compliance Policy**(Last Updated: 31<sup>st</sup> August 2025)**1. Introduction**

TeraHop Pte. Ltd. and its majority owned or controlled subsidiaries and affiliates (collectively “**TeraHop**” or the “**Company**”) are committed to compliance with all applicable export control and economic sanctions laws and regulations (collectively “the **Applicable Trade Control Law**”). Accordingly, TeraHop promulgates this Trade Control Compliance Policy (the “**Policy**”), setting forth the compliance requirements that all TeraHop employees (“**TeraHop Personnel**”) must review, understand and follow. This Policy applies to TeraHop and all TeraHop Personnel. It is the responsibility of each TeraHop Personnel to fully support the Company’s compliance efforts.

**2. Policy Overview**

The “Applicable Trade Control Law” includes export control and economic sanctions laws and regulations administered by the authorities of United Nations, European Union, the United States, the People’s Republic of China, and other jurisdictions where TeraHop operates in. The “Applicable Trade Control Law” imposes export restrictions on the export, reexport or in-country transfer of certain commodities, software, technology and the provision of services (collectively, “**Items**”) for national security and foreign policy reasons. Controlled Items include Items for military use, “dual-use” Items with both civil and military applications, and Items for other restricted end uses, such as nuclear, chemical or biological weapons, or missile technology. The U.S., EU and other certain jurisdictions also impose territorial sanctions against designated countries and regions, as well as targeted restrictions against designated governments, companies, and individuals who have been placed on various restricted party lists under the “Applicable Trade Control Law” (“**Restricted Party**”).

As TeraHop engages in business activities that may involve items subject to the “Applicable Trade Control Law”, it is important that TeraHop Personnel are aware of, understand and comply with the “Applicable Trade Control Law”.

This Policy helps each TeraHop Personnel understand how the “Applicable Trade Control Law” impact our day-to-day work and provides guidance for complying with these laws and regulations.

**3. Key Policy Principles**

This Policy requires TeraHop Personnel to comply with the following obligations and principles.

- No transactions are to be conducted by or on behalf of TeraHop contrary to the “Applicable Trade Control Law”.
- No business dealings, directly or indirectly, with any parties located, headquartered, registered in certain restricted countries or regions that are subject to comprehensive territorial or other sanctions (“**Restricted Countries/Regions**”). Currently, Iran, Syria, North Korea, Cuba, Russia, Belarus, Crimea region, Donetsk People’s Republic region, Luhansk People’s Republic region are Restricted Countries/Regions.
- Any business dealings, directly or indirectly, with any parties located, headquartered, registered in certain high risk countries (“**High Risk Countries**”) must be reviewed by the Trade Compliance Director in advance. Currently, Armenia, Azerbaijan, Cambodia, Georgia, Kazakhstan, Kyrgyzstan, Laos, Mongolia, Tajikistan, Turkmenistan, Ukraine, Uzbekistan and Vietnam, Myanmar, Venezuela, Yemen and Nicaragua are High Risk Countries.
- No business dealings, directly or indirectly, with any Restricted Party of the following lists, to the extent such business is legally prohibited by the “Applicable Trade Control Law” or lacks required authorization or licensing.
  - i. Any party listed in the Denied Person List (“**DPL**”), Entity List (“**EL**”), Unverified List (“**UVL**”) and Military End User List (“**MEU**”) of the Bureau of Industry and Security (“**BIS**”) of U.S. Commerce Department;
  - ii. Any party listed in the Specially Designated Nationals and Blocked Persons List (“**SDN**”), Foreign Sanctions Evaders List, Non-SDN Menu-Based Sanctions List the Foreign Sanctions Evaders List (“**FSE**”), the Non-SDN Menu-Based (“**NS-MBS**”) Sanctions List, the Sectoral Sanctions Identifications (“**SSI**”) of OFAC, as well as any party owned (50% or more), directly or indirectly, individually or in the aggregate by any party listed in SDN and SSI;
  - iii. Any party listed in the European Union Consolidated List of Financial Sanctions published by the European Commission, Annex IV and Annex XIX of the Council Regulation (EU) No 833/2014 (“**EU Russia Sanctions Regulation**”), Annex V of the Council Regulation (EC) No 765/2006 (“**EU Belarus Sanctions Regulations**”), any list of sanctioned persons issued by EU Member States, and any party owned (50% or more) or controlled by, directly or indirectly, individually or in the aggregate, or acting for the interest of any of entities or individuals listed thereof;
  - iv. Any Party listed in the Consolidated List of Financial Sanctions Targets in the UK published by the Office of Financial Sanctions Implementation HM Treasury and any party owned (50% or more) or controlled by, directly or indirectly, individually

or in the aggregate, or acting for the interest of any of entities or individuals listed thereof;

- v. Any Party listed in the Export Control Controlled Parties List and Unreliable Entity List administered by the Ministry of Commerce of the PRC, and the Anti-Sanctions List administered by the Ministry of Foreign Affairs of the PRC;
  - vi. Any party listed in the other Restricted Party List as applicable, amended, supplemented or substituted from time to time pursuant to the “Applicable Trade Control Law”.
- Not knowingly export, reexport or in-country transfer TeraHop’s Items for any prohibited end user or end use under the “Applicable Trade Control Law”, including but not limited to the use in weapons of mass destruction, such as nuclear, chemical, or biological weapons or missiles, or in any activities supporting such weapons or missile technology, rocket systems and unmanned aerial vehicles (UAVs), military end-use and military intelligence end-use.
  - Complete an employee compliance certification regarding compliance with the “Applicable Trade Control Law”, this Policy as well as procedures promulgated by the Company to ensure compliance.
  - Understand how the Applicable Trade Control Law applies to the work you do, participate in and complete all required compliance trainings. TeraHop Personnel with export responsibilities are required to have a working knowledge of the “Applicable Trade Control Law”, especially those governing their specific job functions, as well as working knowledge of TeraHop’s trade compliance policies and procedures.
  - Before any export, reexport, in-country transfer of TeraHop’s Items or third party Items, proper due diligence and screening required in accordance with the relevant corporate procedures must be conducted and documented to ensure that no prior authorization or license is required from any government authority. To the extent a prior export authorization is required, TeraHop shall not proceed with such transaction without first obtaining the appropriate authorization.
  - Before any provision of service, repair, return or maintenance support of TeraHop’s Items, proper due diligence and screening must be conducted in advance and documented in accordance with applicable corporate procedures to ensure such aftersales activities may be lawfully performed under the “Applicable Trade Control Law”.

- Before engaging in research and development projects, including intra-company activities, personnel must comply with the “Applicable Trade Control Law”, such as in the procurement and use of software, technology and equipment.
- When procuring Items from suppliers, it is important to obtain export jurisdiction and export classification information about such Items. For example, if procured Items are subject to the U.S. Export Administration Regulations (“EAR”), TeraHop must obtain the Export Control Classification Number (“ECCN”) related to any such commodity, technology, or software.
- Take steps to record accurate and complete information related to export activities in your daily work operation, and maintain such records in the proper locations pursuant to the corporate procedures. TeraHop retains all export-related records for at least 5 years since the date of export activities.
- Be alert to circumstances or signs indicating TeraHop Items may be destined for an inappropriate destination, end use or end user (collectively “**Red Flags**”). Exercise due diligence in inquiring about Red Flags and/or escalate such situation to the Trade Compliance Director or relevant trade compliance personnel for awareness before taking further action.

Violations of the “Applicable Trade Control Law” may result in severe consequences for both TeraHop and responsible individuals, including but not limited to criminal and/or civil fines, restricted party designations under the “Applicable Trade Control Law” as well as reputational damage. Anyone found to be in violation of the “Applicable Trade Control Law” or the Policy will be subject to significant disciplinary actions by the Company, up to and including termination.

Please report any actual or potential compliance issues or violations to the dedicated compliance reporting channel at [trade.compliance@terahop.com](mailto:trade.compliance@terahop.com), if you suspect or become aware of any non-compliance action by TeraHop Personnel, that may allow you to remain anonymous.

#### 4. TeraHop’s Commitment to Trade Compliance and Expectation of Business Partners

TeraHop is dedicated to providing substantial resources, time, investment and personnel to ensure its compliance with the “Applicable Trade Control Law” and the implementation of an effective trade compliance program throughout its global business operations. TeraHop management fully supports the compliance efforts. The Company has implemented relevant compliance control measures and will continuously work to enhance its trade compliance program.

This Policy will be communicated to TeraHop's customers, suppliers and other business partners, such as contractors, consultants, freight forwarders, distributors, sales representatives or any party having business dealings with TeraHop (collectively, "**Business Partners**"). TeraHop expects and seeks strong support of its Business Partners to not only maintain compliance with the "Applicable Trade Control Law" for business dealings with TeraHop, but also cooperate with TeraHop to provide us with export control information (including export control classification, end user and end use information) specific to any Items supplied to or received from TeraHop. From time to time, TeraHop may send communications on important trade regulatory developments to provide our Business Partners with additional knowledge and increase awareness on trade compliance.

If you have any questions concerning this Policy, please contact us via [trade.compliance@terahop.com](mailto:trade.compliance@terahop.com).