

Trade Compliance Policy

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 the People’s Republic of China, United Nations, European Union, the United States, 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**”).

This Policy serves to help each TeraHop Personnel understand the baseline requirements stipulated under the Applicable Trade Control Law and offers guidance to ensure adherence to such 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 Personnel in advance. Currently, Armenia, Azerbaijan, Cambodia, Georgia, Kazakhstan, Kyrgyzstan, Laos, Mongolia, Tajikistan, Turkmenistan, Ukraine, Uzbekistan, 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 Export Control Restricted Namelist, Export Control Watch List, Unreliable Entity List and Anti-Sanctions 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;
 - ii. 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;
 - iii. Any party listed in the Specially Designated Nationals and Blocked Persons List ("**SDN**"), 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;
 - iv. 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;
 - v. Any Party listed in the UK Sanctions List published by the Foreign, Common Wealth & Development Office ("**FCDO**") 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;

- 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 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 confirm whether 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 equipment, hardware, software, and technology.
- 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.
- 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 Personnel or your entity/department’s designated trade compliance points of contact 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.

If you have any questions concerning this Policy, please contact us via trade.compliance@terahop.com.