



Aperion Energy Group LLC ("Aperion" or the "Company"), including all its subsidiaries and their branches ("Aperion Entities"), and their employees and contingent workers ("Employees"), wherever located, must comply with sanctions legally applicable to them in the jurisdictions in which they are located or do business. In the U.S., such sanctions include those administered and enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control and any other related U.S. laws and regulatory requirements (the "U.S. Sanctions"). Aperion Entities and its Employees may also be subject to additional prohibitions based on the non-U.S. sanctions in effect in the jurisdictions in which they are located.

The Company has established a Global Sanctions Compliance Program ("GSC Program") consisting of the following elements: (i) procedures, systems, and internal controls designed to comply with applicable sanctions; (ii) a designated person responsible for the day-to-day implementation and operation of the GSC Program; (iii) independent testing; (iv) an ongoing training program; and (v) reporting and recordkeeping. GSC is headed by the Director of Global Sanctions Compliance who is designated by the Head of Global Financial Crimes Compliance.

Under the OFAC regulations, Aperion Entities and its Employees are prohibited from engaging in transactions involving Specially Designated Nationals ("SDNs") and other activities such as:

- opening or maintaining accounts for SDNs or any other person subject to prohibitions of U.S. Sanctions;
- conducting transactions either directly or indirectly with SDNs or any other person, entity or country prohibited by U.S. Sanctions;
- facilitating any prohibited transaction by advising on ways to avoid U.S. Sanctions; or
- facilitating any non-U.S. person to engage in transactions prohibited by U.S. Sanctions.

To prevent dealings with sanctioned parties, Aperion requires screening of customer relationships and transactions against the SDN list or, depending on the jurisdiction of operations, other legally applicable sanctions lists, including those published or administered by the European Union and Her Majesty's Treasury of the United Kingdom. Aperion has adopted policies and procedures governing the maintenance of its screening systems and processes.

With respect to comprehensively sanctioned countries and regions—currently the Crimea region, Cuba, Iran, North Korea and Syria—Aperion is prohibited from engaging in or facilitating transactions that have any connection to these countries or region, unless such activity is exempt from the prohibitions or is subject to a general or specific OFAC license.

Sincerely,

Aaron Wheeler

CEO

Last Update / Review: July 2022