

QUESTIONNAIRE

For a counterparty's accreditation under the Company's sanction and anti-corruption policy

I Parties' Identification	
Please specify the full name of the following individuals or legal entities participating in the transaction ('Relevant persons'):	
1.1. Counterparty	Acetarc Welding & Engineering Co. Ltd
1.2. Counterparty's role in the transaction (Supplier, Buyer, Agent etc.)	Supplier
1.3. Agent (if any)	Implexlit Ltd
1.4. End user of the products (for sales contracts)	SKAD Ltd Divnogorsk Russia
1.5. Producer (upon purchase of fixed assets, raw materials, materials, goods)	Skad Ltd Divnogorsk Russia
1.6. Subject matter of the transaction	Ladle pre-heater
II Data on the Relevant Individuals (if there are several individuals, the relevant fields will be added to the Form)	
Provide the following information on the Relevant Individuals:	
2.1. All nationalities/citizenships (including permanent resident status or equivalent status)	UK
2.2. Alternate/previous names	N/A
2.3. Date of birth	08/12/1960
2.4. Address (permanent and temporary)	Atley Works, Dalton Lane Keighley West yorkshire BD21 4HT
III Data on the Relevant Legal Entities (if there are several legal entities, the relevant fields will be added to the Form)	
3.1. Provide the following information on the Relevant Legal Entities:	
3.2. Country of registration	UK
3.3. Date of registration	04/03/1966
3.4. Identifier type (for the Russian Federation: Taxpayer Identification Number (INN))	
3.5. ID number	TIN GB179366418
3.6. Principal place of business	UK
3.7. Surnames of officers and/or directors	Harker, Burrell
3.8. Individuals who signs the documents on behalf of the Relevant Person (full name, position, power of attorney)	Steven Harker
3.9. Shareholders/founders, specifying their share and jurisdiction	GK Harker 25% CEO, Peter Burrell 25% Financial Director, Steven Harker 12.5% Technical Director, Anthony Burrell 25% Director, Christopher Harker 12.5%, works Director
3.10. Ultimate beneficiaries* of the Relevant Person (specify the percentage of the direct or indirect interest)	Acetarc Welding & Engineering Co. Ltd
3.11. Individuals or legal entities controlling the Relevant Person	Technical Director
3.12. Website of your company (Group of Companies)	www.acetarc.co.uk
3.13. Affiliation with a Group of Companies (Persons)	N/A
3.14. Activities	Design and manufacture of foundry equipment
3.15. Banks involved in payments under the transaction	
IV Warranties and representations concerning the Sanctions	
4.1. Is any Relevant Person, any of its shareholders, beneficiaries*, affiliates**, officers and directors, as well as persons directly or indirectly controlling the Relevant Person, or in whose interest the Relevant Person operates, currently included in the sanctioned person list of EU, EU members, Russia, the UK, USA or any other country? ('Sanctions')? Select "YES" or "NO"	NO
If so, please provide information on the sanctions imposed.	
4.2. Does any Relevant Person operate in any sanctioned jurisdiction? (e.g., Iran, Syria, North Korea, Cuba, Sudan, Crimea)? Select "YES" or "NO"	NO
If it/he/she does, what is the nature of the activities in the mentioned jurisdictions?	
4.2.1. Does the Relevant Person concerned have any relationship with government authorities or entities controlled by the government in these jurisdictions? Select "YES" or "NO"	NO
4.2.2. Will the Counterparty's transaction with the Company be related in any way to a sanctioned jurisdiction (including the Goods supplied or purchased under the transaction, transport vehicles involved in the delivery, work or services related to the transaction). Select "YES" or "NO"	NO
4.3. Does the Relevant Person, including its subsidiaries, affiliates, joint ventures, branches and representative offices participate in transactions, investments, business, other interactions directly or indirectly related to the persons included by the Sanctions in the list of blocked entities or jurisdictions, or otherwise in violation of the Sanctions? Select "YES" or "NO"	NO
If so, specify the person blocked by the sanctions with whom the interaction is carried out and the nature of such interaction	
4.4. Will the Counterparty's transaction with the Company be related to any person blocked by the Sanctions (including intermediaries, agents, advisors, end users, consumers, beneficiaries). Select "YES" or "NO"	NO
If so, specify the nature of the relationship	
V Anti-corruption representations	
5.1. Is any of the Relevant Persons, its management bodies, controlling persons or close relatives included in any of the following categories: Select "YES" or "NO"	NO
5.1.1. Government official*** currently holding a post?	NO
5.1.2. Has been a Government Official during the last five years?	NO
5.1.3. A person holding a position which allows to control the procurement decisions of any Governmental Authority or affect such process?	NO
If you answered YES to any of the questions, specify the following: Government Official's name and his/her duties, and the relevant Governmental Authority**** Select "YES" or "NO"	

5.2. During the last five years with respect to the Relevant Person, including its subsidiaries, affiliates, joint ventures, branches and representative offices, as well as its controlling persons, were there any	NO
5.2.1. governmental investigations, inquiries or inspections concerning anti-corruption or anti-bribery laws (Select "YES" or "NO")	NO
5.2.2. notices to government bodies about actual or possible violations of anti-corruption or anti-bribery laws (Select "YES" or "NO")	NO
5.2.3 accusations of any violation, including bribery, corruption, kick-backs, money laundering or conflict of interest (Select "YES" or "NO")	NO
If you answered YES, describe the proceedings and whether the issue was resolved and, if it was, how	
5.3. Do you or your company know about any actual or possible violations of the current anti-corruption or anti-bribery laws committed by the company, its employees, officers or affiliates or agents? Select "YES" or "NO" If YES, please detail	NO

_____ (seal)

(Position) **STEVEN HAWKER**

**TECHNICAL
DIRECTION**

NOTE - For the purposes of answering the following questions, the following definitions are used:

****Beneficial owner:** an individual who ultimately, directly or indirectly (through a third party) owns (has the dominant participation of over 25 percent of the authorised capital) the organisation or has the ability to control the actions of the organisation and/or its CEO, chief accountant, member of the collegial executive body or founder.

****Affiliates:** individuals and legal entities who can influence the activities or legal entities and/or individuals carrying out business activities;

a legal entity's affiliates are:

a member of its board of directors (supervisory board) or other management body, a member of its collegial executive body, the person exercising the powers of its sole executive body;

persons belonging to the same group of persons to which the legal entities belongs;

persons having the right to dispose of more than 20 percent of the total number of votes associated to voting shares, or the contributions to the authorised or share capital, the participatory interest of such legal entity;

a legal entity in which the said legal entity has the right to dispose of more than 20 percent of the total number of votes associated to voting shares, or the contributions to the authorised or share capital, the participatory interest of such legal entity;

if the legal entity is a member of a financial and industrial group, its affiliates also include the members of the boards of directors (supervisory boards) or other collegial management bodies, collegial executive bodies of the financial and industrial group members, and the persons exercising the powers of the sole executive bodies of the financial and industrial group members

affiliates of an individual carrying out business activities are:

persons belonging to the same group of persons to which the individual belongs;

a legal entity in which the said individual has the right to dispose of more than 20 percent of the total number of votes associated to voting shares, or the contributions to the authorised or share capital, the participatory interest of such legal entity;

*****Government Official** means: (i) any employee or officer of a Governmental Authority (as defined above) (ii) any candidate to a political position, and (iii) any other individual or legal entity acting according to a proposal, request, instructions or in the interest of any of the persons specified above.

******Governmental Authority** means (i) any authority or institution of any national, regional or local government, (ii) any company or organisation owned fully or partially by the government or controlled by it (for example, public oil companies and healthcare systems controlled by the state); (ii) any public international organisation, such as the International Monetary Fund, the United Nations or the World Bank; (iv) any political party.

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