

POLICY ON THE PREVENTION, IDENTIFICATION AND MANAGEMENT OF CONFLICTS OF INTEREST

1. GENERAL PROVISIONS

- 1.1. This policy on the prevention, identification and management of conflicts of interest (the “Policy”) of UAB Nordstreet (the “Company”) sets out the measures designed to identify and prevent conflicts of interest that may arise where the Company acts as a crowdfunding service provider and that may adversely affect the interests of the Company's Clients. The Policy also sets out the measures the Company takes in order to properly manage conflicts of interest arising in the Company's activities.
- 1.2. The Policy has been prepared having regard to the nature, scale and complexity of the crowdfunding services provided by the Company, as well as to the Company's size and the particular features of the organisation of its activities (business).
- 1.3. The purpose of this Policy is to provide reasonable assurance that damage to the interests of the Company's Clients is avoided or, where that is not possible, that such damage is properly managed and minimised to the greatest extent possible.
- 1.4. The Policy has been prepared in accordance with Regulation (EU) 2020/1503 of the European Parliament and of the Council on European crowdfunding service providers for business, and amending Regulation (EU) 2017/1129 and Directive (EU) 2019/1937 (the “Regulation”), Commission Delegated Regulation (EU) 2022/2111 and other legal acts applicable to the Company and governing its activities.
- 1.5. The Policy applies in all cases where a conflict of interest arises or may arise between the Company, Related Persons and Clients, or between one Client and another Client. The Policy also applies throughout the entire life cycle of a Project – from the assessment of the Project and its publication on the Platform through to its administration, restructuring, recovery and the enforcement of collateral.

2. DEFINITIONS

- 2.1. Capitalised terms used in this Policy have the meanings set out below, unless the context of their use requires otherwise:
 - 2.1.1. **Company** – UAB Nordstreet, legal entity code 304565690, registered office at Naugarduko g. 19, Vilnius;
 - 2.1.2. **Investor** – a natural or legal person who provides financing (in the form of loans) through the Platform to Projects (Project Owners) published on the Platform;
 - 2.1.3. **Client** – a Project Owner or an Investor;
 - 2.1.4. **Control Links** – a situation in which two or more natural or legal persons are linked by control, that is to say, linked by a parent–subsidiary relationship in all the cases referred to in Article 22(1) and (2) of Directive 2013/34/EU, or where any natural or legal persons and an undertaking are linked by a similar relationship; all subsidiaries of subsidiary undertakings are also considered to be subsidiaries of the parent undertaking at the head of those undertakings;
 - 2.1.5. **Independent Decision-Maker** – an employee of the Company or a collegial body appointed by the director of the Company which takes decisions on the prevention, identification and management of conflicts of interest in cases where the potential conflict of interest involves the director of the Company or a shareholder holding 20 per

cent or more of the Company's share capital or voting rights, and which is not linked by Control Links to such person;

- 2.1.6. **Acquired Assets – pledged or other assets which the Company, acting as the representative of and for the benefit of the Investors, acquires in enforcement proceedings or on another legal basis in the course of recovery from the Project Owner;**
- 2.1.7. **Platform – the publicly accessible online information system (<https://nordstreet.com/lt>) administered and operated by the Company;**
- 2.1.8. **Policy – this document;**
- 2.1.9. **Project – one or several types of business activity for which a Project Owner seeks to obtain financing by submitting a crowdfunding offer;**
- 2.1.10. **Project Owner – a legal person or a natural person (entrepreneur) seeking to obtain financing through the Platform;**
- 2.1.11. **Regulation – Regulation (EU) 2020/1503 of the European Parliament and of the Council on European crowdfunding service providers for business, and amending Regulation (EU) 2017/1129 and Directive (EU) 2019/1937;**
- 2.1.12. **Related Persons – the following persons are considered to be related persons:**
 - 2.1.12.1. any shareholder of the Company holding 20 per cent or more of the Company's share capital or voting rights;
 - 2.1.12.2. the directors or employees of the Company;
 - 2.1.12.3. other natural or legal persons linked by Control Links to the persons referred to in paragraphs 2.1.12.1–2.1.12.2 of this Policy.
- 2.2. Other terms used in this Policy have the meanings given to them in the Regulation or in other documents of the Company, unless the context requires otherwise.

3. PREVENTION OF CONFLICTS OF INTEREST

- 3.1. In order to prevent conflicts of interest, the Company implements at least the following measures:
 - 3.1.1. It does not participate, directly or indirectly, in the crowdfunding offers (Projects) published on the Platform administered by the Company. This prohibition is observed at all stages of a Project – both at the financing stage and at the subsequent stages of its administration, restructuring, recovery and enforcement of collateral;
 - 3.1.2. The Company does not, directly or indirectly and in any form, secure the obligations of the owners of Projects published on the Platform and administered by the Company towards their creditors, including by way of suretyship, the granting of a guarantee, the assumption of debt or other obligations, or the application of other security measures that are analogous in substance. This prohibition applies at all stages of a Project, including the administration, restructuring and recovery of the Project and the enforcement of collateral, and also in cases where such action would be intended to protect the interests of the Investors, to facilitate the satisfaction of their claims or to preserve the value of assets material to securing the Investors' claims;
 - 3.1.3. it does not publish on the Platform administered by the Company any Projects whose owners are any of the Related Persons;
 - 3.1.4. it determines whether any of the Related Persons has been an Investor in a Project published on the Platform;

- 3.1.5. it requires Related Persons to declare and update information on the persons with whom they are linked by Control Links, in accordance with the procedure set out in paragraph 3.5 of this Policy;
 - 3.1.6. it requires all Related Persons, when performing their functions in the Company's activities, to monitor on an ongoing basis whether their activities and/or the decisions they take give rise to a conflict of interest;
 - 3.1.7. it requires Related Persons, upon identifying a possible risk of a conflict of interest, to inform the director of the Company immediately and, in the cases referred to in paragraph 3.3 of this Policy, the Independent Decision-Maker, and to state the cause and nature of the possible conflict of interest;
 - 3.1.8. it requires Related Persons to carry out all actions they take in relation to Clients objectively and impartially towards the relevant persons;
 - 3.1.9. it obliges Related Persons to comply with confidentiality requirements, to act honestly and professionally towards Clients and to seek at all times to take account of the interests of Clients independently of other Clients, of their other activities, or of the interests of the Company or other Related Persons;
 - 3.1.10. it ensures that the remuneration system applied to Related Persons does not create conditions for Related Persons to obtain financial benefit from situations which give rise, or may give rise, to a conflict of interest and prejudice the interests of Clients;
 - 3.1.11. it prohibits Related Persons from disclosing or exchanging information known to them about Clients which may adversely affect a Client's interests, and from disclosing or exchanging information which is not publicly available and any other information relating to a Client which is not necessary for the performance of the direct functions of the Related Persons;
 - 3.1.12. it ensures that all Investors are offered the same terms when financing Projects published on the Platform, except where differentiated interest rates are applied according to the amount (size) invested by an Investor in a Project;
 - 3.1.13. it ensures that identical information about the Projects published on the Platform and their owners is available to all Clients, and that Related Persons are unable to obtain additional non-public information for their own benefit or for the benefit of third parties;
 - 3.1.14. the director of the Company monitors and ensures on an ongoing basis that the Company's employees have access only to the information necessary for the performance of their direct functions;
 - 3.1.15. it ensures that the Company's organisational structure does not create conditions for any Related Person to exert any influence over other Related Persons which could give rise to a conflict of interest;
 - 3.1.16. it identifies any other circumstances which may give rise to an actual or potential conflict of interest between the Company, Related Persons and Clients, or between one Client and another Client;
 - 3.1.17. before each Project is published on the Platform, it carries out a check as to whether the Project Owner, its shareholders, its director and its ultimate beneficial owners are Related Persons and whether they have any proprietary or other links with the Company, its directors, shareholders or employees. The result of the check is recorded in writing and retained for not less than 5 years, unless legal acts provide for a different period.
- 3.2. Upon receiving a notification referred to in paragraph 3.1.6 of this Policy, the director of the Company must consider its merits without delay and, having established that a conflict of interest has in fact arisen or that there is a real risk of one arising, take a decision setting out all the measures which, in the director's assessment, are necessary to prevent or manage the conflict of interest (for

example, to remove an employee from certain functions, to transfer the employee's functions temporarily to another employee, and so on). Where a conflict of interest cannot be entirely avoided, the director of the Company must take all measures to manage that conflict, striving to the greatest extent possible to act objectively and fairly with regard to the interests of Clients.3.1.7

3.3. Independent Decision-Maker and recusal. Where a potential conflict of interest involves the director of the Company or a shareholder holding 20 per cent or more of the Company's share capital or voting rights, the following procedure applies:

- 3.3.1. notification of the potential conflict of interest is submitted to the Independent Decision-Maker and not to the director of the Company;
- 3.3.2. the director of the Company or the shareholder concerned immediately recuses himself or herself from the consideration of, and the taking of a decision on, the matter concerned; the recusal and its scope are recorded in writing;
- 3.3.3. the decision on the measures for managing the conflict of interest is taken by the Independent Decision-Maker; the decision is recorded in writing and states the cause and nature of the conflict of interest, the measures applied and the reasons for them;
- 3.3.4. documents prepared on the basis of this paragraph are retained for not less than 5 years from the date on which they were drawn up, unless legal acts provide for a different period;
- 3.3.5. where the Independent Decision-Maker establishes that the conflict of interest cannot be managed and that a risk to the Investors' interests arises, the transaction concerned is not entered into or the business relationship is not continued.

3.4. Where the Company permits Related Persons to be Investors in Projects published on the Platform, the Company takes the following measures:

- 3.4.1. it fully discloses that fact on the Platform administered by it, including information on the specific Projects in which the Related Persons concerned have invested;
- 3.4.2. it ensures that the investments of the Related Persons concerned are made on the same terms as those applicable to other Investors;
- 3.4.3. it ensures that no preferential terms are applied to the Related Persons concerned and that they are not granted privileged access to information about specific Projects published on the Platform.

3.5. Procedure for declarations by Related Persons. Related Persons complete a conflict-of-interest declaration in the form approved by the director of the Company, stating the persons with whom they are linked by Control Links, as well as indirect links through companies controlled or managed by them, and legal persons in which they are shareholders, directors or members of collegial bodies. The declaration is completed before commencing functions in the Company or before acquiring the status of a Related Person and is updated at least every 6 months, and also immediately upon any change in the declared data. The Company maintains a register of declarations; the declarations and the register data are retained for not less than 5 years, unless legal acts provide for a different period.

4. IDENTIFICATION AND MANAGEMENT OF CONFLICTS OF INTEREST

4.1. In order to identify and manage conflicts of interest between the Company, Related Persons and Clients, or between one Client and another Client, the Company assesses whether the persons concerned:

- 4.1.1. may obtain a financial benefit or avoid a financial loss at the expense of a Client;
- 4.1.2. have an interest in the outcome of a service provided to a Client which differs from that Client's interest in that outcome;

- 4.1.3. have a financial or other incentive to favour the interests of a Client or a group of Clients over the interests of another Client.
- 4.2. Conflicts of interest may potentially arise in the following principal areas of the Company's activities:
 - 4.2.1. priority is given to Projects and Project Owners connected with the Company or with Related Persons;
 - 4.2.2. Clients may be treated differently from other Clients on account of their direct or indirect links with the Company or with Related Persons;
 - 4.2.3. Related Persons may enter into crowdfunding transactions on the Platform for their own account, making use of information known to them;
 - 4.2.4. certain Clients are given the opportunity to publish and/or finance Projects on more favourable terms than other Clients;
- the Company manages and realises Acquired Assets, where the interests of the Company and of the Investors as regards the realisation price, timing or method may diverge.
- 4.3. Where the Company establishes that a conflict of interest cannot be avoided and that it may adversely affect a Client's interests, the Client must be informed of the conflict of interest, stating the nature and source of that conflict of interest and the measures for its proper management.
- 4.4. Where a Project Owner has proprietary or other links with the Company (with the Company's directors, shareholders, employees and so on), the Company applies at least the following measures for managing conflicts of interest:
 - 4.4.1. Investors are informed of the link between the Project Owner and the Company in the Project description provided on the Platform and, where the link arises or becomes known to the Company after the Project has been published, by a separate notice on the Platform no later than within 10 working days from the day on which the Company became aware of it;
 - 4.4.2. the Project Owner's Project is assessed in accordance with the internal procedures in force in the Company by those employees of the Company who have no links with the Project Owner concerned; where such links are held by the director of the Company or by a shareholder holding 20 per cent or more, the procedure set out in paragraph 3.3 of this Policy applies;
 - 4.4.3. contracts with the Project Owner are signed, performed and supervised, and decisions on their termination and referral for recovery are taken, by those employees of the Company who have no links with the Project Owner concerned; where such links are held by the director of the Company or by a shareholder holding 20 per cent or more, the procedure set out in paragraph 3.3 of this Policy applies;
 - 4.4.4. the measures taken to manage the conflict of interest are documented and retained for not less than 5 years, unless legal acts provide for a different period;
 - 4.4.5. where it is not possible to manage a potential conflict of interest and a risk arises that the Investors' interests may be harmed, the Company declines to enter into or to continue a business relationship with the Project Owner concerned;
 - 4.4.6. where the director, shareholders or ultimate beneficial owners of a Project Owner change, the Company reassesses its links with the Project Owner without delay, and in any event no later than within 10 working days from the day on which it became aware of the change, and records the assessment in writing. This requirement also applies where the financing of the Project has already been completed and the Company continues to administer the Project.
- 4.5. In order to properly manage conflicts of interest, the Company also ensures that:
 - 4.5.1. Related Persons are unable, with a view to obtaining personal benefit, to exert adverse influence over the Company, over other Related Persons or over Clients;

- 4.5.2. Related Persons are unable to take part in taking specific decisions concerning a Client where such participation would undermine the effective management of a conflict of interest;
- 4.5.3. where a Related Person seeks to finance a Project published on the Platform, it is ensured that the person concerned is offered the same terms as other Investors.
- 4.6. **Management and realisation of Acquired Assets. When enforcing collateral and when acquiring, managing or realising Acquired Assets, the Company:**
- 4.6.1. takes decisions on the management, safekeeping, insurance, operation and realisation of the assets on a collegial basis;
- 4.6.2. seeks the highest reasonably attainable realisation price and documents the reasons for the choice of the method of realisation and of the price;
- 4.6.3. does not acquire Acquired Assets from, or transfer them to, Related Persons, save in exceptional cases where this is done on market terms and is disclosed to the Investors in advance;
- 4.6.4. informs the Investors of the Project concerned about the condition of the Acquired Assets, the actions taken, the costs incurred and the prospects for realisation at least once every 3 months;
- 4.6.5. where the services of managing or realising the Acquired Assets are provided by a person having links with the Project Owner or with the Company, the reasons for the choice of that person and the conformity of the terms with market conditions are assessed in writing and disclosed to the Investors no later than within 10 working days from the date of conclusion of the transaction or of the taking of the decision. The notice states the substance and date of the transaction, the scope of the obligation assumed by the Company and the reason for the transaction.
5. **MONITORING OF THE MEASURES APPLIED FOR THE PREVENTION, IDENTIFICATION AND MANAGEMENT OF CONFLICTS OF INTEREST**
- 5.1. The director of the Company, or a responsible person appointed by the director of the Company, supervises on an ongoing basis whether the measures applied by the Company for the prevention, identification and management of conflicts of interest are sufficiently effective to secure and protect the interests of Clients.
- 5.2. The director of the Company, or a responsible person appointed by the director of the Company, reviews the provisions of this Policy periodically, and in any event at least once a year, and assesses whether the measures for the prevention, identification and management of conflicts of interest established by the Policy are appropriate and ensure the interests of the Company's Clients. The results of the review, including a conclusion that no amendments to the Policy are required, are recorded by an order of the director of the Company or by an internal memorandum and retained for not less than 5 years, unless legal acts provide for a different period.
- 5.3. The director of the Company, or a responsible person appointed by the director of the Company, informs the Company's employees and shareholders about the conflict-of-interest management procedures and measures implemented in the Company.
- 5.4. The director of the Company, or a responsible person appointed by the director of the Company, also advises Related Persons as to whether a potential or actual conflict of interest exists in a particular situation and assists in avoiding it or, where the conflict of interest concerned cannot be avoided, takes measures to manage that conflict of interest.

- 5.5. The Company maintains a register of identified conflicts of interest recording: the date of notification of the potential conflict of interest, the nature of the conflict, the person or body that took the decision, the measures applied, the fact of recusal and the date of disclosure to the Investors. The register data are retained for not less than 5 years, unless legal acts provide for a different period.
- 5.6. In the case referred to in paragraph 3.3 of this Policy, the functions set out in paragraphs 5.1, 5.2, 5.4 and 5.5 are performed by the Independent Decision-Maker.5.15.25.45.5

6. DISCLOSURE OF INFORMATION ON CONFLICTS OF INTEREST

- 6.1. The Company publishes on the website of the Platform administered by it information for Clients on the general nature and sources of conflicts of interest, as well as on the steps taken to mitigate them.
- 6.2. The Company ensures that any information provided to Clients in relation to conflicts of interest is sufficiently detailed to enable each Client to take an informed decision on the use of the crowdfunding services provided by the Company in the provision of which a conflict of interest may arise.
- 6.3. Information on conflicts of interest relating to a particular Project and on the management of Acquired Assets is provided to the Investors of that Project on the Platform in accordance with the procedure and within the time limits set out in paragraphs 4.4.1 and 4.6.4 of this Policy.4.4.14.6.4

7. FINAL PROVISIONS

- 7.1. This Policy is approved and/or amended by an order of the director of the Company. Amendments to the Policy enter into force on the date of the Company's order, unless otherwise stated in that order.
- 7.2. This Policy is published on the website of the Platform administered by the Company.
- 7.3. All employees and shareholders of the Company must be familiarised with this Policy against signature.
- 7.4. An Independent Decision-Maker and a person deputising for him or her are appointed by an order of the director of the Company. The order is reviewed at least once a year and each time the appointed persons change.
- 7.5. Upon the entry into force of this Policy, the policy on the prevention, identification and management of conflicts of interest approved by order of the director of the Company No. 2026-09-22 VĽ-1 of 22 September 2026 ceases to apply.