

Subject:	ABAC DUE DILIGENCE-COUNTERPARTY QUESTIONNAIRE-SCHEDULE D	Revision date:	12/20/2022
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SCH. D: COUNTERPARTY QUESTIONNAIRE

- ☐ This questionnaire needs to be completed by CSI Solar's Counterparty and all the questions need to be answered properly.
- ☐ The purpose of this questionnaire is to identify whether any "Red Flag" exists and to confirm compliance with CSI Solar's Anti-Bribery and Anti-Corruption (ABAC) Policies, Code of Business Conduct and Ethics and Sanctions Laws Compliance Policy that published on the website: <https://speakupcsolar.convercentecp.com/policies-and-resources>.
- ☐ Please return the completed questionnaire to your contact person at CSI Solar.

SECTION #	#	Counterparty Information	Details
1 Legal Entity Information	1.1	Legal Company Name:	Vega Energy
	1.2	Group Name (if any):	
	1.3	Business Registration Number:	44603551
	1.4	Tax ID # /VAT #:	446035526584
	1.5	Business type: (Proprietorship, Partnership, Corporation, LLC, etc.)	LLC
	1.6	Date of Incorporation:	05/10/2021
	1.7	Business Registered Address:	Kiev, Ukraine
2 Ownership Information	1.8	Business Operation Address:	Kiev, Ukraine
	1.9	Internet Address:	vegaenergy@ukr.net
	1.10	Telephone Number:	+38 (050) 301 3311
	1.11	Previous Company name(s) used within last 5 years:	Vega Energy
	1.12	Overview of the Company's business activity(ies):	sale of electricity, construction of solar power plants
	2.1	CEO/President:	Name: Volodymyr ZAVSEHOLOV
	2.2	Owners/Directors:	Please Provide the Name, Title and % of Shares for all Owners/Directors: 1. Name: Tetiana ROSSOLOVA % Ownership: 34 % 2. Name: Kseniia KOVAL % Ownership: 33% 3. Name: olha LARINA % Ownership: 33%
3 Competency	2.3	Key contact persons who will work with CSI Solar:	Please Provide the Name, Title and Email for all key contacts for this transaction: 1. Volodymyr ZAVSEHOLOV 2. 3.
	2.4	Is the Company State-owned or State-controlled?	No
	2.5	Is the Company or Parent Company Publicly listed on any stock exchange(s)? If Yes, Provide Ticker Symbol and name of the stock exchange.	No
	2.6	Has the Company or Parent Company issued American Depository Receipts or US Securities? If Yes, Provide Details.	No
	3.1	Describe the services to be provided:	sale of electricity, construction of solar power plants
	3.2	Qualification for the Service to be provided:	specialists with higher education and work experience
	3.3	Payment Amount and Term for this transaction:	In accordance with the agreement and the law
4 Government Affiliations	3.4	Does Company or any of its affiliates, or any Shareholder, Officer or Director of either, directly or indirectly, have interests in any party or projects which it intends to introduce to CSI Solar?	No
	4.1	Any family or business ties to Public officials ⁽¹⁾ ?	No
	4.2	Are any owner, officer, director or employee of the Company or associated person a Public Official?	No
	4.3	Do any of the owner, officer, director or employee of the Company or associated person have close personal or professional affiliations with a Public Official?	No
	4.4	Are any owner, officer, director or employee of the Company or associated person a Lobbyist?	No
	4.5	Does any Public Official or a member of a Public Official's family have any interest, or stand to benefit in any way, as a result of the proposed agreement? If yes, please explain.	No
	4.6	Would there be any Business Courtesies or other benefits directly or indirectly arranged and provided to any Public Official or a member of a Public Official's family/ close friends by the company? If yes, please explain. (Refer to CSI Solar Anti-Bribery and Anti-Corruption Policy requirements)	No
5 Associated Person ⁽²⁾ (including the subcontracts)	5.1	Would the Company work with any Associated Persons in providing services to CSI Solar?	Please provide Name, Role of the Associated persons and clarify the Business Justification/Reason: 1. 2. 3.
	5.2	Please describe the structure of the Company's compensation arrangement for each of its Associated Persons.	Please provide Name, Role of the Associated persons and clarify the Compensation Arrangement: 1. 2. 3.
	5.3	What steps you take to manage Anti-Bribery and Anti-Corruption risk in connection with your engagement with Associated persons?	
SECTION #	#	Counterparty Information	Details
	6.1	Please attach Company's financial statements (audited, if available) for the past three years, including balance sheets and	Please provide the operating Income: Last year (Year 1): 1 716 000 UAH Year before (Year 2): 8 309 300 UAH

6 Financials & Payment		profit and loss statements.	Year before (Year 3): 12 099 100 UAH
	6.2	Please describe the Company's standard method of payment (cheque, wire transfers...) for this transaction.	THE FEES WILL BE PAID AT 30 DAYS END MONTH EXCLUSIVELY WITH BANK TRANSFER
	6.3	Please provide the company's bank account details for this transaction.	Please provide the Bank Name, Account Holder Name, Bank Account No. : 1. Bank name: PJSC "BANK VOSTOK"; Account Holder: LLC "Vega Energy"; IBAN UA29307123000002600301135967 (EUR) 2. Bank name: JSC "OSCHADBANK"; Account Holder: LLC "Vega Energy"; IBAN UA323226690000026000300638205(UAH)
7 Legal Enforcements	7.1	Has the Company or any of its affiliates been the subject of current, past or pending legal, arbitral, or regulatory proceedings or investigation concerning fraud, misrepresentation, bribery, corruption, money laundering, sanctions violation or other similar activity?	No
	7.2	Has the Company or its owners, officers, directors, affiliates, associated persons ever been the subject of a criminal indictment or conviction for the crimes listed above?	No
	7.3	Is the Company or its owners, officers, directors, affiliates, associated persons Sanctioned Person ^(b) ?	No
	7.4	Has the Company engaged in or facilitated any transaction, directly or indirectly, with the Sanctioned Persons, At Risk Countries and Regions ^(a) , or Excluded Territories ^(c) as defined in CSI Solar Sanctions Laws Compliance Policy?	No
8 Compliance Program	8.1	Please describe the Company's compliance program, including compliance with Anti-Bribery and Anti-Corruption legal requirements.	THE COMPANY INTENDS TO APPROVE AN ETHICAL CODE OF CONDUCT TO BE SUBSCRIBED TO ALL SUPPLIERS
	8.2	Does the Company provide the Compliance Policies and Compliance Training to its employees and Associated Persons with respect to compliance with Anti-Bribery and Anti-Corruption legal requirements? If so, when, and how often?	Yes, once a year
9 Other Information	9.1	Please provide any additional information that will assist CSI Solar in evaluating your questionnaire response, including any information about policies for compliance and historical compliance with Anti-Bribery and Anti-Corruption legal requirements.	

CERTIFICATION	
The information above is provided by Company to the best of its knowledge at the time of signature. The Company shall inform CSI Solar about all relevant changes and amendments to the information as given above, especially in regard to acting or involved persons and/or entities. The obligation set out here applies up to the point of time in which all contractual performances under the contract between the Company and CSI Solar have been fully completed. In addition, the Company acknowledges and agrees that it is the written and established policy of CSI to comply fully with all applicable laws and regulations.	Questionnaire Completed By: Volodymyr ZAVSEHOLOV
A. The Company warrants and represents that it has not in the past, and will not in the period between now and execution of an agreement with CSI Solar, take any action that may constitute a violation, or implicate CSI Solar in a violation, of any Anti-Bribery and Anti-Corruption or similar law, including without limitation, the U.S. Foreign Corrupt Practices Act, and the U.K. Bribery Act.	Title: «ВЕГА ЕНЕРДЖІ»
B. The Company agrees that any Company agreement with CSI Solar will contain, among other Anti-Bribery and Anti-Corruption commitments, commitments that accord CSI Solar audit and termination rights in relation to bribery and corruption matters.	Signature & Company Seal: Ідентифікаційний код 44503551
The undersigned confirms that he or she is suitably qualified and authorized by the Company to give the certifications, warranties and agreements contained in this questionnaire and that the same has been authorized by all and any necessary corporate action.	Date: 28/01/2025
The undersigned acknowledges the processing of personal data by CSI Solar is necessary to ensure compliance with law, the prevention of money laundering and the financing of terrorism and to protect commercial interests. The undersigned herewith agrees that this questionnaire and the information provided herein may be processed by CSI Solar. He or she expressly acknowledges and agrees that this will include data transfer to other countries/ regions in which CSI Solar operates.	Comments:
The undersigned understands and acknowledges that any misrepresentations made in this questionnaire and any noncompliance with the above representations will constitute grounds for termination of the project, any business between CSI Solar and Company (including their respective affiliates) and any agreement into which the Company may enter with CSI Solar or any of each party's affiliates.	
I, _____, as an authorized officer of _____ (the "counterparty"), hereby authorize CSI Solar to conduct a complete pre-employment and/or background investigation of the suitability and trustworthiness of the counterparty and its directors, officers and employees who will provide services to CSI Solar under the questionnaire. I also authorize the counterparty's reference(s), as well as any government, law enforcement, credit reporting agency, educational institution, and their employees and/or agents to provide information to CSI Solar and/or to third parties acting on behalf of CSI Solar, and release them from liability relating to the legitimate conduct of this background investigation. In addition, I hereby request all agencies, representatives, and references to fully cooperate with this investigation.	

DEFINITIONS	
[1] Public Official	"Public Official" is any: (i) officer or employee of a government; (ii) officer or employee of an instrumentality of a government; (iii) person acting in an official capacity for or on behalf of a government or its instrumentality; (iv) officer or employee of a state-owned or controlled company; (v) political party; (vi) official of a political party; (vii) candidate for political office; (viii) employee of a public international organization, such as the United Nations; or (ix) an immediate family member of any of the foregoing.
[2] Associated Person	"Associated Person" is any affiliate, agent, sponsor, subcontractor, representative or consultant or other individual or entity that would assist with the project.
[3] Sanctioned Person	"Sanctioned Person" means an individual or entity who is the subject of restrictions or sanctions under applicable Sanctions Laws.
[4] At Risk Countries and Regions	"At Risk Countries and Regions" means those countries, territories and other jurisdictions which are not Excluded Territories but which have been identified by CSI Solar's Legal Department as being at risk of economic or trade sanctions. Please see Annex 1 to CSI Solar SANCTIONS LAWS COMPLIANCE POLICY for a current list of the At Risk Countries and Regions.
[5] Excluded Territories	"Excluded Territories" means certain countries, territories and other jurisdictions which CSI Solar has chosen not to deal with for multiple reasons including that some such territories are, from time to time, the subject of sanctions under applicable Sanctions Laws. Please see Annex 2 to CSI Solar SANCTIONS LAWS COMPLIANCE POLICY for a current list of the Excluded Territories