



TC GROUP HOLDING COMPLIANCE POLICY

1. Policy Standards, Governance and Management Procedures

- The present policy represents the firm commitment of the company to high ethical standards in conjunction with transparency of all its stakeholders through its corporate governance under the macroconcept of ESG – Environmental Social Governance. Moreover, TC GROUP HOLDING, LLC, abides fully to the Corporate Transparency Act (CTA), having filed its BOIR (Beneficial Owner Information Report) / FinCEN.

- Management Accountability and Transparency Norms: Senior management is responsible for implementing compliance policies across all subsidiaries and ensuring accountability within their teams. All affiliated companies, under the present holding company legal structure, further abide with all relevant transparency norms and corporate ethics and responsibilities, thus ensuring high standards of conduct all across its business chain.

2. Legal Compliance

- Adherence to Laws: TC GROUP HOLDING will operate in accordance with all local, national, and international laws, including but not limited to corporate governance, securities regulations, and labor laws.

3. Financial Regulations

- Financial Conduct: The Group shall comply with financial reporting standards in accordance with generally accepted accounting principles (GAAP) and International Financial Reporting Standards (IFRS).

- Auditing Standards: Regular independent audits will be conducted to ensure transparency and accountability in financial reporting.

4. Ethics and Integrity

- *Code of Ethics*: TC GROUP HOLDING will establish a comprehensive Code of Ethics, which all employees and directors must adhere to, promoting honesty, transparency, and integrity in all business dealings.



- *Anti-Corruption Policy and Anti-Bribery Policy:* There shall be a strict no-tolerance policy for bribery and corruption. Compliance training will be provided to minimize risks associated with unethical practices with all related stakeholders.

5. Risk & Crisis Management

- *Risk Assessment:* The Group will regularly assess its risk exposure, including operational, financial, and reputational risks, and implement necessary mitigation strategies.

- *Crisis Management Plan:* A crisis management plan will be developed to prepare for and respond to potential compliance violations or other crises with TC GROUP HOLDING and its affiliated companies.

6. Data Protection and Privacy

- *Compliance with Data Protection Laws:* TC GROUP HOLDING will adhere to all applicable data protection regulations, including GDPR or CCPA, ensuring the confidentiality and integrity of personal information.

- *Cybersecurity Standards:* Implement robust cybersecurity measures to protect sensitive data from unauthorized access or breaches.

7. Environmental Standards

- *Sustainability Practices:* The Group will commit to environmentally sustainable practices in its operations and encourage subsidiaries to reduce their environmental impact. TC GROUP HOLDING practices ESG (environmental social governance) in all its routines and procedures.

- *Compliance with Environmental Laws:* Ensure all subsidiaries comply with relevant environmental regulations and standards.

8. Compliance Training and Awareness

- *Training Programs:* Regular compliance training will be provided to all employees and stakeholders to promote awareness of compliance standards and ethical obligations. Institutional assessments will be also carried as part of this specific point.



- Reporting Mechanisms: Establish clear channels for reporting compliance concerns or violations without fear of retaliation.

9. Monitoring and Enforcement

- Compliance Audits: Conduct regular compliance audits and assessments to evaluate adherence to established standards and regulations.

- Enforcement Procedures: Clearly defined procedures for addressing compliance breaches, including disciplinary actions and corrective measures.

10. Commitment to Improvement

- Continuous Improvement: TC GROUP HOLDING is committed to continuously improving its compliance framework by regularly reviewing policies and adapting to new laws, regulations, and industry standards. Compliance with these statements and standards is crucial for TC GROUP HOLDING's long-term success and integrity. It reflects the Group's commitment to ethical business practices, legal adherence, and accountability in all operations.

The present compliance policy is in its 2.0 version dated: November 1st, 2024. For any questions or comments, please contact us at info@tccorporategroup.com.

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