

GROUP SANCTIONS POLICY STATEMENT

This Policy sets out overarching requirements that apply across the Group relating to Sanctions and Export Control laws and regulations and the standard of compliance, which is a key component of our Corporate Integrity programme. As a truly international business we have designed and maintain a Sanctions Programme that ensures we understand and apply, as and when required:

- the sanctions laws, rules, and regulations imposed by the United Nations (UN), United States (US), European Union (EU), United Kingdom (UK), Canada (CA) and other country-specific or international sanctions (collectively, “International Sanctions”); and
- export control laws, rules and regulations (“Export Controls”)

Among other requirements, the Group will ensure that if an entity or individual becomes sanctioned, any business with such entity or individual will either be terminated or duly restricted, as required

The key objective of the Policy and Sanctions Programme is to ensure that at all times, the Company and Group personnel, act in accordance with the relevant International Sanctions and Export Controls, to help prevent organised crime and terrorism and protect the reputation of the Group. The Sanctions compliance programme includes;

- Screening of all Group customers/clients, suppliers, affiliates and active transactions globally against relevant International Sanctions and Export Control Lists on a daily basis
- Where screening identifies a potential sanctions or export control issue or possible breaches of International Sanctions, Export Controls, or this Policy, promptly reporting such issues to the Regional Head of Corporate Integrity and conducting further due diligence to clarify and determine whether International Sanctions or Export Controls apply and what action should be taken
- Prohibition of all business activity, including commencing or continuing customer relationships, purchasing or providing items (goods, technology, software) or services, or facilitating any transactions that would breach applicable International Sanctions, Export Controls or this Policy. Such prohibition may apply to business activity with individuals or entities named in a Sanctions and Export Control List, directly or indirectly, or with their subsidiaries or affiliates, or involving countries or territories that are sanctioned
- Providing training to appropriate staff on the identification and management of International Sanctions and Export Control matters, including information concerning the scope and content of International Sanctions, risk factors and “red flags” to watch for, and the procedures to follow when an issue arises, along with penalties for non-compliance
- An International Sanctions and Export Control incident and risk exposure control and response plan; whereby investigations are conducted, and incidents reported as appropriate to the relevant regulatory authorities, seeking appropriate licenses or waivers, and takes other actions to ensure full compliance with all applicable laws and regulations. Periodically review of compliance and training programs as well as incident and risk exposure control and response plan relating to International Sanctions and Export Controls to secure ongoing relevance and accuracy