

# STRAKER GLOBAL SANCTIONS POLICY

Last Updated July 2024

## Introduction

This Global Sanctions Policy (“Policy”) applies to Straker Limited and its Affiliates (“Straker”). “Affiliates” means any legal entity or other business organization anywhere in the world in which Straker Translations Limited holds a twenty-five per cent or higher equity interest whether directly or indirectly, and whether the interest is shares, debentures or otherwise, voting or non-voting.)

The Straker Management Team is committed to complying with the terms set out in the Policy.

If you have any questions about this Policy, you should contact our Straker Management Team or the Legal team through Slack HQ or via email at [legal@strakergroup.com](mailto:legal@strakergroup.com).

## Policy Statement on Sanctions

As a company, Straker is committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations (“Sanctions Laws”) in the countries in which it operates.

This Policy is intended to help employees and any third party acting on Straker’s behalf to understand where breaches of Sanctions Laws might arise and to support them in making the right decisions in line with the Straker’s position as stated in this Policy.

No employee or third party shall suffer as a consequence of bringing to the attention of the Straker Management Team or the Legal team, in good faith, a known or suspected breach of this Policy.

## Who must comply with this Policy?

This Policy applies to Straker's operations globally, including all legal entities worldwide owned or controlled by Straker (including all group companies), and to all directors, officers, employees, contractors, and other third parties acting on behalf of the foregoing.

## What Sanctions Laws are this Policy based on?

The Policy is derived from the sanctions resolutions, laws, regulations and regulatory guidance of the United Nations Security Council (“UN”), the United Kingdom (“UK”), the European Union (“EU”) and the United States of America (“US”).

Straker is required to comply with applicable Sanctions Laws and regulations in all the jurisdictions in which we operate from.

Further the Policy seeks, subject to the primacy of local law, to establish a globally consistent standard to effectively manage sanctions compliance risk across Straker in all jurisdictions in which Straker operates from. For this reason, we may not be able to support certain business activity even if it is permitted under local laws and regulations.

### **What are the key obligations of this Policy?**

The Policy defines the key obligations that Straker, its employees and contractors must comply with, including:

1. Prohibiting or restricting customer relationships with:
  - parties named on sanctions lists issued by the UN, UK, EU or US.
  - parties named on a sanctions list issued by the competent authority in the jurisdictions Straker operates from; and
  - any entity owned directly or indirectly 50% or more (individually or in the aggregate) or controlled by any of the parties described above, even if the entity is not named on a sanctions list.
  - any parties from countries listed in point 4 below.
  
2. Prohibiting or restricting vendors where the vendors are:
  - named on sanctions lists issued by the UN, UK, EU or US.
  - named on a sanctions list issued by the competent authority in the jurisdictions Straker operates from; and
  - from countries specifically listed in point 4 below.
  
3. Prohibiting or restricting suppliers:
  - named on sanctions lists issued by the UN, UK, EU or US;
  - are parties named on a sanctions list issued by the competent authority in the jurisdictions Straker operates from; and
  - who are owned directly or indirectly, 50% or more (individually or in the aggregate), or controlled by any of the parties described above, even if the entity is not named on a sanctions list.
  - are from countries specifically listed in point 4 below.

4. Prohibiting any relationships, or engaging in transactions or business activity, involving the following countries and governments:

Countries	Limited Prohibition
Afghanistan	
Belarus	
Bosnia & Herzegovina	
Burundi	
Central African Republic	
Cuba	
Democratic People's Republic of Korea	
Democratic Republic of Congo	
Ethiopia	
Guatemala	
Guinea	
Guinea-Bissau	
Haiti	
Iran	
Iraq	
Lebanon	
Libya	
Mali	
Moldova (limited prohibition)	Restrictive measures in view of actions of persons and entities destabilising the Republic of Moldova. <a href="https://sanctionsmap.eu/#/main/details/55/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D">https://sanctionsmap.eu/#/main/details/55/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D</a>
Myanmar (Burma)	
Nicaragua	
Niger	
Russia	
Somalia	
Sudan & South Sudan	
Syria	
Tunisia (limited prohibition)	Restrictive measures on persons in relation to the misappropriation of state funds of Tunisia. <a href="https://sanctionsmap.eu/#/main/details/33/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D">https://sanctionsmap.eu/#/main/details/33/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D</a>
Ukraine (on the following regions only) - Crimea Region	

- Donetsk Region - Kherson Region - Luhansk Region - Zaporizhzhia Region	
Venezuela	
Yemen	
Western Balkan	
Zimbabwe	

*This list is not exhaustive and is subject to change without notice.*

5. Except in limited and pre-approved circumstances does not enter, or remain involved in, transactions that have any connection with some sectors of the economy (e.g., the Energy Sector (Oil, Gas, Petrochemical), Telecommunications, Information Technology and Software, Defence, Intelligence and Security and Aerospace sectors) in the jurisdictions stated in point 4 above.
6. Straker reserves the right not to process transactions involving certain jurisdictions, products, or services, for Straker's Policy or risk appetite reasons.
7. Straker does not enter, or remain involved in, a transaction or relationship that directly or indirectly involves a sanctioned party or product.
8. Straker conducts customer, vendor or supplier identification and verification activities in proportion to the sanctions risk posed by that customer, vendor, supplier or product.
9. Straker monitors customer, vendor or supplier for evidence of suspicious activity and report such activity where it suspects a person or company may be acting illegally.
10. Straker will retain all records that may be relevant to this Policy for a minimum of 7 years.

## What are the risks?

Violations of Sanctions Laws may lead to severe civil and/or criminal penalties against companies and individuals, including significant monetary fines, imprisonment, extradition, blacklisting, revocation of licences, and disqualification of directors.

In addition, violations of Sanctions Laws can lead to damaging practical consequences, including harm to reputation and commercial relationships, restrictions in the way we can do business, and extensive time and cost in conducting internal investigations and/or defending against government investigations and enforcement actions.

## Red Flag Review

There are a number of issues which should cause us to conduct further investigation into whether a particular transaction or relationship may present a potential economic trade sanctions regulatory issue.

All employees shall look for any red flags or suspicions that may indicate the direct or indirect involvement of a restricted territory, restricted party, controlled item, service, end-use or any other sanctions compliance concern.

Examples of Red Flags to be reported include:

- a) A lack of information as to the identity of the customer, vendor or supplier and/or the reluctance of these parties to provide any relevant and requested information.
- b) Customers, vendors and suppliers providing false information e.g., information that is unverifiable.
- c) Unusual invoicing requests e.g., split payment across multiple bank accounts, offline payments via an alternate means i.e., not in accordance with Straker's standard payment processes.
- (c) Unusually favourable payment terms e.g., vendors accepting a substantially discounted rate if Straker 'overlooks' that they operate from a sanctioned country.
- (d) Any suspicion or evidence to suggest the possible involvement of a restricted territory or restricted party.

*The examples provided above is not an exhaustive list.*

Any suspicion of the direct or indirect involvement of a restricted territory or party should alert you to further investigate the activity in accordance with this Policy and report it to our Straker Management Team or Legal.

Straker is also refining its ISO17100 policies and procedures to factor these Red Flag events, in line with the requirements under this Policy.

## Training

All employees and contractors will receive training.

New starters will receive training as part of their induction process. Further training will be provided at least every two years or whenever there is a substantial change in the law or to this Policy.

Training will cover:

- Sanctions Laws
- Our sanctions policy and procedures
- Completion of training is compulsory.

### **Employee Responsibility**

You have the obligation to read and follow this Policy, to understand and identify any Red Flags that may arise in your business activities and to escalate potential compliance concerns related to sanctions to Straker's Management team or the Legal team. You should not take any actions prior to receiving advice and/or instructions.

### **Non-Compliance**

Any employee or contractor who violates the rules in this Policy or who permits anyone to violate those rules may be subject to disciplinary action, up to and including dismissal and may be subject to personal civil or criminal fines.

### **Updates, Review and Ownership**

This Policy will be reviewed on a quarterly basis, and any updated version of the Policy will be immediately made available on Straker's intranet – Knowledge Library section.