

## **SANCTIONS COMPLIANCE POLICY**

### **1 POLICY**

#### **Our Commitment**

BCM Group (BCM) is committed to complying with relevant economic and trade sanctions laws (Sanctions) in all jurisdictions in which it operates. BCM maintains a Sanctions Compliance Policy to meet its obligations under United Nations, European Union, United Kingdom, African Union and other Sanctions regimes whenever they apply to BCM.

#### **1.1 Our Policy**

- BCM seeks to comply with the requirements of all Sanctions regimes in the jurisdictions in which it operates or intends to operate.
- BCM requires its vendors, contractors, consultants and other business partners not to engage in any activities that could lead to BCM breaching applicable Sanctions obligations.
- BCM avoids any business relationships that pose an unacceptable risk to BCM's compliance with applicable Sanctions obligations.
- BCM adequately investigates any credible allegations of Sanctions breaches within its business activities and reports such allegations (and their resolution) to the BCM Board of Directors/Executive Committee and any regulatory agency as required by law.
- BCM takes appropriate action against any individual or entity that has contributed to a compliance breach or has increased the potential for such a breach to an unacceptable level.

#### **1.2 Our Strategy**

BCM supports compliance with this Policy through:

- A clear and explicit commitment from the executive management and all senior management to compliance with all relevant Sanctions obligations;
- Counter-party and pre-employment due diligence and monitoring;
- International payment due diligence and transaction monitoring;
- Sanctions compliance declarations and contractual terms and conditions;
- Accurate and proper record keeping that is consistent with any relevant legal and/or regulatory obligations;



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- Training of employees and other relevant business partners; where appropriate
- Periodic risk assessments and audits of compliance with this Policy; and Effective escalation and reporting of actual or potential breaches of this Policy.

### **1.3 Responsibility**

All BCM employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this Policy and all related standards, guidelines and procedures.