

**SANCTIONS COMPLIANCE POLICY****BCM-MKC-PLC-006_v3.0**

Revision Number	Issue Date	Prepared By	Approved By	Signature
3.0	8/06/2026	Adwoa Yeboah	Kinta Petonia	

Revision History			
Version	Date	Created/Reviewed By	Description of Change
0.1	1st June 2024	Kinta Petonia – HOD Marketing	Initial Draft
1.0	15 Nov 2024	Kinta Petonia – HOD Marketing	Approved
2.0	21 st March 2025	Ama Duose-Bansah – QMS Officer	New logo
3.0	8 th June 2026	Kinta Petonia – HOD Marketing	New template update

Company

BCM Group

Accra Office: No.74 Ndabaningi Sithole Street

North Labone Estate, Accra, Ghana

Telephone No#: +233 307010300

Email: info@bcm-group.com

Web: www.bcm-group.com

TABLE OF CONTENTS

1.	BCM SANCTIONS COMPLIANCE POLICY	4
1.1	Our Policy	4
1.2	Our Strategy	4
1.3	Responsibility	4

1. BCM SANCTIONS COMPLIANCE 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;
- 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.