

GLOBAL SANCTIONS POLICY

1. Introduction

- a. As Al Mafraq International Trading FZC , we are 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 we operate. This Policy has been developed by Al Mafraq International Trading FZC to help employees understand where issues related to sanctions regulations may arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.
- b. The management of Al Mafraq International Trading FZC is committed to complying with all laws. Any employee who violates the rules in this Policy or who permits anyone to violate those rules may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil or criminal fines.

2. Policy Statement on Sanctions

- a. It is Al Mafraq International Trading FZC policy to comply with all Sanctions Laws in our operations worldwide. To this end, Al Mafraq International Trading FZC will comply with all economic and trade sanctions applicable to our business activities.
- b. This Policy is intended to help employees, contractors, and other third parties acting on the company’s behalf to understand where breaches of Sanctions Laws might arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.

3. Board endorsement

- a. The Board of Al Mafraq International Trading FZC will not criticize management for any loss of business resulting from adherence to this Policy. No employee or contractor will suffer as a consequence of bringing to the attention of the Board or senior management, in good faith, a known or suspected breach of this Policy. Also, employees and contractors will not suffer any adverse employment decision for abiding by this Policy.

4. Who is subject to this Policy?

- a. This Policy applies to Al Mafraq International Trading FZ, including all legal entities worldwide owned or controlled by Al Mafraq International Trading FZC (including all group companies), and to all directors, officers, employees, contractors, and other third parties acting on behalf of the foregoing.

5. What's the risk?

- a. 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 licenses, and disqualification of directors.
- b. 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.

6. What do we mean by sanctions?

- a. Sanctions are the regulatory restrictions applicable to dealings with certain countries/territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary (i.e. limitations on import/export, controls on specific goods and services, restrictions on financial operations, etc.), and it is important that all Al Mafraq International Trading FZC employees and contractors consult with the Ethics and Compliance or the Legal Department to understand the business implications.
- b. The following are some examples of countries/territories and groups that have been the target of economic trade sanctions: Crimea, Cuba, Iran, North Korea, Sudan, Syria, Russia, Belarus, Burundi, the Central African Republic, Libya, South Sudan, Venezuela, Zimbabwe, narcotics traffickers, Weapons of Mass Destruction Proliferation, human rights abusers, and terrorists, among others. This list is not meant to be exhaustive.

7. How can we ensure compliance with sanctions?

- a. All Al Mafraq International Trading FZC employees and contractors must be aware of and follow to their countries and or business-related activities. The potential restrictions may be related to:
 - Where we do business: ensuring compliance with sanctions on restricted countries/territories.
 - Who we do business with: ensuring compliance with sanctions on restricted persons/entities.
 - How we do business: ensuring we do not circumvent, evade, or facilitate the contravention of sanctions rules.
 - Red flags: ensuring we report any suspicions which may raise sanctions concerns
- b. Different countries or regions (e.g. the European Union) may impose different sanctions. Note that US Persons - US citizens and permanent residents / Green Card holders (wherever located or employed), entities organized under US law (including their non-US branches, employees, and, in certain circumstances, non-US subsidiaries) and even foreign nationals while present in the US – are subject to specific restrictions under US law.

8. Red Flags

- a. There are several issues, which should cause us to conduct further investigation into whether a particular transaction or relationship may present a potential economic trade sanctions regulation issue.
- b. Al Mafraq International Trading FZC employees shall look out 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.
- c. Some examples of red flags to be reported include:
 - The customer is reluctant to offer information or clear answers on routine commercial issues (including beneficial ownership, or locations of operation).
 - The consignee has a different name or location than the customer or ultimate end user.
 - The counterparty is evasive about its customers.
 - Unusual invoicing, shipping, or packaging requests.
 - Abnormal shipping route.
 - Unusual volume requests compared to the anticipated size of the market.
 - Unusually favorable payment terms or large cash payments.
 - Any suspicion or evidence to suggest the possible involvement of a Restricted Territory or Restricted Party.

- Any suspicion or evidence to suggest that supplied products to be exported, re-exported, or otherwise provided to a customer may be "dual-use".
- Any suspicion or evidence to suggest a military related end-use (e.g., military end-user). The above is not intended to be an exhaustive list. Any suspicion of the direct or indirect involvement of a restricted territory, restricted party, controlled item, service, end-use or any other sanctions compliance concern should alert you to further investigate the activity in accordance with this Policy.

9. Compliance controls

- a. The responsibility to provide Al Mafraq International Trading FZC employees with the necessary information to comply with this Policy falls with Legal, Finance, Procurement and the General Manager, as below:
 - Monitor economic trade sanctions regulations and update the business in case of any change.
 - Determine and approve controls to be followed in specific regions or types of transaction
 - Provide legal advice and guidance on specific situations on request, including on resolution of issues and follow up of red flag
 - Assist the business in obtaining necessary and appropriate licenses.
 - Conduct periodic risk assessments in high risk regions and monitor the processes and controls in place.
 - Conduct effective training and education to relevant business functions in relation to economic trade sanctions regulations Finance
 - Ensure that financial transactions/operations are in line with economic trade sanctions regulations, by following approved processes.
 - Conduct due diligence checks on vendors e.g. Specially Designated Nationals and Blocked Persons Lists searches required for Iran.
 - Ensure that suppliers are aware of the Al Mafraq International Trading FZC Global Sanctions Policy and monitor compliance on an ongoing basis.
 - Ultimate responsible for ensuring the local activities will comply with economic trade sanctions regulations, setting the right tone and providing appropriate support for compliance activities
 - Ensure that all employees acting on the company's behalf are properly trained and comply with economic trade sanctions regulations, following approved processes for compliance with economic trade sanctions regulations.

10. Employee Responsibility

- a. 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 the Legal Department. You should not take any actions prior to receiving advice and/or instructions.

11. Non-compliance

- a. Any Al Mafraq International Trading FZC employee who violates this Policy may be subject to appropriate disciplinary action, independently from potential other penalties resulting from their behavior.
- b. Internal Audit shall conduct regular checks on local businesses to ensure compliance with Sanctions Laws.

12. Updates, Review and Ownership

- a. This Policy may be updated from time, and the updated version of the Policy will be immediately made available on the Al Mafraq International Trading FZC website.