

## Global Export Controls and Sanctions Policy

### 1. Purpose

To ensure that:

- We understand how export controls and sanctions are relevant to our business.
- We know where our products / services are going so any sanctions can be identified in advance.
- We know our full product offerings so any export controls can be identified in advance.
- We do not engage in opportunities with a military nexus absent the receipt of approvals specified in the Guidance.
- We are aware of what we must do to remain in compliance with all aspects of UK, EU, US and UN Export Control and Sanctions regulations.

### 2. Definitions

Word	Definition
<b>Export Controls and Sanctions</b>	Includes: <ul style="list-style-type: none"> <li>• Legal controls on the movement of goods or transfer of technology across borders.</li> <li>• Financial, commercial or trade restrictions put in place against countries, groups, entities or individuals.</li> </ul>
<b>Denied Parties Lists</b>	Lists of specific persons or entities subject to restrictions implemented by a national, regional or multinational authority.
<b>Due Diligence</b>	The work performed to establish we know who we are working with and ensuring there are no known legal or reputational barriers to working with them that remain unaddressed.
<b>Export Control Classification</b>	The process of reviewing goods and technologies against classification criteria and lists to determine their control status.
<b>Export Licence</b>	A licence issued by a national, regional or multinational authority that permits the export of goods or technologies across an international border that would otherwise be restricted by export control rules.
<b>Technology/Technologies</b>	Specific information necessary for the development, production or use of a product. The information can take the form of technical data or technical assistance. Information generally available to the public is not usually considered 'technology' for the purposes of export controls.

### 3. Policy

- You must comply with all UK, EU, US and UN Export Controls and Sanctions regulations.
  - You must ensure that all products and Technologies (taking a risk-based approach) are assessed against Export Control Classification lists prior to any movement of goods or technologies.
  - You must obtain all relevant Export Licences or authorisations prior to any movement of export-controlled goods or Technologies
  - You must ensure screening and Due Diligence is conducted to identify entities / individuals restricted by Denied Party Lists / Sanctions and ensure they are not provided with goods, services or Technologies without a Licence or authorisation to do so.

- You must not provide products, services or Technologies to any nuclear weapons, biological weapons, or chemical weapons programme and must only provide products, Technologies or technical assistance for any other military end use after receiving approvals specified in the Guidance.
- You must review the Doing Business in Higher Risk Jurisdictions procedure to understand the countries where JM prohibits all business dealings and the countries where enhanced due diligence / authorisation are required.
- You must review the “red flags” list in the Guidance.