

Sanctions & Export Controls Policy



1. Introduction

Sanctions are restrictions put in place by governments to limit the supply of certain goods, technologies, or services to specific countries, organisations, or individuals that are under sanctions, to prevent them from being used for harmful purposes. This Sanctions and Export Controls Policy (hereinafter “**Policy**”) clarifies the scope of applicable sanctions and export controls and describes the legal obligations that Advania Group must adhere to, and ultimately aims to prevent Advania Group’s involvement, whether direct or indirect, in unlawful activities through its business relationships. Failure to comply with these laws can lead to severe legal consequences for both Advania Group and the individuals involved, including fines, penalties, imprisonment, as well as business and reputational damage for Advania Group.

This Policy is supported by Group Guidelines on Sanctions and Export Controls, and Routine for Compliance Risk Assessment of Customers, Suppliers and Other Counterparties, and is available on www.advania.com and local intranets. The English version of this Policy is the official version. Should there be variations or discrepancies in translations, the English version takes precedence in determining its meaning and application.

2. Scope

This Policy applies to all Advania Group companies, including all employees, management, and board members as well as contractors, agents and persons engaged to act for or on behalf of Advania Group who are not directly employed by Advania (jointly “**Staff**”).

Most relevant to Advania Group are the sanctions and export control laws of the European Union (“EU”), the United Nations (“UN”), the United Kingdom (“UK”) and the United States of America (“US”).

3. Policy Statement

Advania Group is fully committed to conducting business in compliance with all relevant sanctions and export control laws of the EU, UN, UK, and US that govern the sale, supply, and export of Advania’s products, services, and technical data. We achieve this by:

1. Carrying out all transaction in compliance with applicable sanctions and export control laws and this Policy.
2. Never directly or indirectly making funds or other economic resources (e.g., products or services) available to persons or companies listed on the EU, UN, UK, and US asset freeze lists, including companies that are owned or controlled by such listed persons or organisations. This includes complying with relevant sectoral sanctions on the IT-industry restricting or limiting the direct and indirect export and transfer of laptops and computer peripherals, high-tech goods and technology and consultancy services to individuals, companies, or countries under sanctions. Advania Group shall exercise care if there is any indication that Advania’s products or services are or will be used by its customers in countries under such sanctions. Advania Group provides an up-to-date list of applicable countries on the local intranets.
3. Avoiding transactions involving Crimea, Cuba, Iran, North-Korea, Syria, and the Donetsk/Luhansk regions. Any activities related to these countries or regions must be escalated to the Head of Group Compliance for thorough assessment.
4. Implementing appropriate control procedures to ensure risk assessment and screening of all counterparties against applicable sanctions lists before engaging in any transaction or transferring any item or service of value. The screening process is described in the Routine for Compliance Risk Assessment of Customers, Suppliers, and Other Counterparties.
5. Enforcing local policies on business travel and remote work to countries or regions under applicable sanctions. Staff must obtain prior approval from the legal department or local compliance officer (whichever is applicable) before working remotely, accessing software, programs, or servers of Advania Group, and/or bringing any Advania-owned equipment, such as laptops or mobile phones, to such countries or regions.

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6. Ensuring that relevant Staff have a suitable degree of awareness of sanctions and export control laws. Training in this Policy shall be provided on a periodic basis to all Staff with a role or responsibility relevant to export control compliance.
7. Staff involved in developing new software or technology, or expanding Advania Group's product range to equipment should exercise caution. Staff seeing any indication that a direct customer will use or has permitted use of Advania's products and services in sanctioned countries (e.g., Russia), shall raise the issue with a manager or Compliance Officer to allow review.
8. Retaining records relating to all transactions to which sanctions and export control laws are applicable, including screening results, for at least six years. This is an obligation under applicable law.

4. Responsibilities

1. Staff with a role or responsibility relevant to sanctions and export control compliance have a duty to read, understand and follow this Policy as well as any supplementary guidelines adopted by Advania Group. Such Staff shall also undergo mandatory Sanctions and export controls training at the interval set by each Advania company.
2. Staff must report actual or suspected breaches of this Policy, either to a manager or anonymously via the whistleblowing function, as set out in the Whistleblowing Policy. Where needed, managers should consult the local compliance team or the Head of Group Compliance for guidance.
3. Local screening teams in Advania Group shall perform risk assessments and screen all new counterparties, including customers and suppliers, through Advania Groups external screening tool.
4. Local compliance officers are responsible for the implementation of group policies and processes in the local company. This is a delegated responsibility from the local CEO or CFO (whichever is applicable).
5. The Head of Group Compliance is responsible for reviewing this Policy at least annually, adopting necessary updates and ensuring its effective communication and implementation, including by raising relevant issues with the Group CEO. The Head of Group Compliance also has overall responsibility for the counterparty screening process and shall ensure that up-to-date screening routines are in place to be performed in accordance with this Policy.
6. The local CEO or CFO (whichever is applicable) of each Advania Group company is responsible for the local implementation of this Policy within each respective company.
7. The Group CEO has the overall responsibility for regulatory compliance within the Advania Group and acts as the escalation point for the Head of Group Compliance in case of severe breaches of Group policies.
8. The ultimate responsibility for the review and approval of this Policy lies with the Board of Directors of Advania Holding.

