



Empowering business to do more

Sanctions Policy
INTEGRATED MANAGEMENT SYSTEMS

Policy

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Policy statement

Financial and Trade Sanctions (collectively Sanctions) are part of a package of measures applied by individual countries, International Organisations or Regional Bodies to fight aggression, terrorism, criminal behaviour, or human rights violations. These financial measures are intended to motivate a change in behaviour by the individual, regime or jurisdiction concerned or deprive terrorists and criminals of access to funds.

The purpose of this Policy is to ensure compliance with Sanctions, i.e., to ensure that Node4 and/or its employees do not establish or maintain business relations or process any transactions for/on behalf of sanctioned persons, entities, or countries.

Scope

This Policy applies to all employees in all countries and territories that Node4 operates in. Both suppliers and customers will be expected to comply with Node4's Sanction Policy.

Node4's commitment

Node4 are committed to:

- Comply with all UK legislation on Sanctions.
- Screen suppliers to ensure they are not on the UK Sanctions list.
- Screen customers to ensure they are not on the UK Sanctions list.

Sanctions screening

Sanctions list screening will be undertaken using the relevant published lists. People and entities subject to UK Financial Sanctions are listed on one of two lists:

- UK Sanctions list (Human Rights) - <https://www.gov.uk/government/publications/the-uk-sanctions-list>
- Consolidated List - <https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>

How to raise a concern

All Employees and Business Partners are encouraged to raise concerns about any issue or suspicion of a breach of Sanctions or other violations of the Policy at the earliest stage possible. Node4 encourages openness and will support anyone who raises genuine concerns in good faith.

Breaches of the Policy

An employee who breaches this Policy may face disciplinary action. Any breach of the Policy will be investigated and may result in relevant contracts being terminated at short notice.

Accountability and Governance

Node4 will regularly review the implementation of this Policy, considering its suitability, adequacy, and effectiveness and that any identified improvements are made as soon as possible.

Training and communication

All employees must familiarise themselves with this Policy and ensure that they have the appropriate level of knowledge for their specific roles to contribute and improve the effectiveness of the Sanctions Program. Training will be provided to support employees where applicable to carry out their specific roles/duties.

Signed:



Ian Thomas - COO 15/03/2022