

# Sanctions Policy Statement

## Top things to takeaway



### **Sanctions Compliance**

Must comply with UK financial and trade sanctions.



### **No Sanctioned Relationships**

Do not deal with sanctioned people, entities, countries.



### **Universal Applicability**

Applies to all employees, suppliers, customers globally.



### **Mandatory Screening**

Suppliers and customers screened against UK lists.



### **Raise Concerns Promptly**

Report suspected sanctions breaches immediately.



### **Breaches Have Consequences**

Violations may lead to discipline or contract termination.

## Proprietary Notice

Information contained in the document is accurate to the best of Node4's knowledge at the time of publication and is required to be treated as confidential at all times. Information presented herein may not be used, copied, disclosed, reproduced, or transferred to any other document by the recipient, in whole or in part, without the prior written authorisation from a Node4 authorised representative.

## Version control and ownership

**Policy owner:** Kate Lincoln

Version no	Date	What changed	Changed by	Approver
1.0	06/02/2023	Approved version	Vicky Withey	Andy Gilbert
1.1	09/08/2024	Annual review	Eddie Adams	Kate Lincoln
1.2	12/03/2025	Rebrand	Eddie Adams	Kate Lincoln
1.3	15/04/2026	Rebrand	Eddie Adams	Kate Lincoln

## What is this policy for?

This policy sets out Node4's approach to complying with Financial and Trade Sanctions. It is designed to prevent Node4 and its employees from establishing or maintaining business relationships, or processing transactions, for or on behalf of sanctioned persons, entities, or countries, and to explain the screening and reporting expectations that support compliance.

## Who is this policy for?

This policy applies to all Node4 employees in all countries and territories where Node4 operates. It also sets expectations for Business Partners, including suppliers and customers, who are expected to comply with Node4's Sanctions Policy.

# Contents

<b>Top things to takeaway</b>	<b>1</b>
Proprietary Notice	2
<b>Version control and ownership</b>	<b>2</b>
<b>What is this policy for?</b>	<b>2</b>
<b>Who is this policy for?</b>	<b>2</b>
<b>Contents</b>	<b>3</b>
<b>Policy statement</b>	<b>4</b>
<b>Scope</b>	<b>4</b>
<b>Node4's commitment</b>	<b>4</b>
<b>Sanctions screening</b>	<b>4</b>
<b>How to raise a concern</b>	<b>4</b>
<b>Breaches of the Policy</b>	<b>4</b>
<b>Accountability and Governance</b>	<b>5</b>
<b>Training and communication</b>	<b>5</b>

## 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, 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.

## 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 the GOV.UK UK Sanctions list [The UK Sanctions List - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/uk-sanctions-list).

## 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.

Concerns can be raised to [compliance@node4.co.uk](mailto:compliance@node4.co.uk).

## 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 training will be provided to support employees where applicable to carry out their specific roles/duties.