



SANCTIONS AND TRADE CONTROL POLICY

Burjeel Holdings PLC



1. INTRODUCTION

National authorities and supranational organizations (e.g. UN, EU, US and UAE) impose restrictive measures against countries, organizations, group, entities and individuals (collectively referred to as “Parties”) who infringe against international, sectoral, financial or trade sanctions laws (Sanctions), and/ or regulations embargos and export control laws and/ or regulations (International Trade Controls). These apply especially to those who have been identified as being involved in weapons proliferation, as terrorists or supporters of terrorist organizations, as violators of human rights, or as being involved in corruption and bribery.

2. PURPOSE

Compliance with Sanctions and International Trade Controls is mandatory within Burjeel Holdings PLC, including its subsidiaries and affiliates (“Burjeel”), as Burjeel has committed itself to conduct all business activities responsibly, efficiently, transparently, with integrity and respect towards all stakeholders and in line with all applicable laws and regulations.

Non-compliance with Sanctions and International Trade Controls can expose Burjeel, as well as individual employees to civil, regulatory and criminal penalties, including substantial monetary fines and, in the case of individuals, prison. Lastly, non-compliance poses a substantial reputational risk for Burjeel.

3. SCOPE

This sanctions and trade control policy (“Policy”) applies to all Burjeel employees, officers contract staff, and directors, permitted assigns, and other third parties authorised to represent Burjeel (collectively referred to as the “Employees”). (collectively referred to as the “Employees”).

4. SANCTIONS

Comprehensive Sanctions have been imposed against certain countries (total embargo). Other Sanctions are partial, such as financial embargoes, or are Sanctions targeted against specific individuals, entities, groups, vessels and organizations contained in lists (referred to as “list-based sanctions”).

Financial sanctions usually prohibit placing assets of any kind at the disposal of Parties or providing them with financial services of any kind. Financial sanctions play a role in the fight against terrorism. Sectoral sanctions have been introduced because of the crisis in Ukraine and target only specific business or financial areas of Parties, whereas other areas are still unrestricted.

Sanctions targeting the above-mentioned restricted parties or individuals may extend to entities owned or otherwise controlled by these Parties. If there are indications that a client, supplier or third party is owned by 50% or more or otherwise controlled by a Party, or owned by 50% or more or otherwise controlled in the aggregate by several Parties, the General Counsel and the Compliance Officer need to be involved to assess the consequences.

The United Arab Emirates

The UAE does not publicize what sanctions are in force, but according to the UAE authorities, EU, UN, and US, sanctions will be enforced on an ad hoc basis upon the issuance of internal directives.



Non-UAE Sanctions

Other countries have also adopted Sanctions that may apply to Burjeel. These Sanctions may apply to certain operations even if those operations are outside of the countries that have adopted these Sanctions.

5. COMPLIANCE WITH SANCTIONS

As a UAE entity Burjeel is subject to and needs to comply with the UAE's sanctions regime and with the regimes in which all its subsidiaries, affiliates and business partners operate.

When there could be a conflict between different Sanctions laws, Burjeel's General Counsel must be contacted for advice and support before a business transaction is contemplated.

6. COMPLIANCE PROCESSES

New business partners for Burjeel must be screened in accordance with Burjeel's general screening procedures and screened against Embargo Lists Required for Filtering. Screening is conducted by the Finance Department in conjunction with the Compliance Officer.

7. POLICY APPROVAL

This Policy shall be reviewed and approved by Burjeel's Board. This Policy shall be effective from the date of approval by the Board. All amendments to this Policy will be done in compliance with applicable laws and will require approval by the Board. The Compliance officer is the custodian of this Policy.

8. DOCUMENTATION AND REGULAR REVIEW

Organization Scope	Burjeel
Parent Process	Compliance Program
Document owner	Compliance Officer
Approved by	Burjeel Board of Directors
Initial date published	February 10, 2023
Document effective date	February 10, 2023
Document updated as per	-
Contact person	Compliance Officer
Version	1.0

Burjeel's Compliance Officer shall periodically evaluate the effectiveness of this Policy, and review and revise it as necessary, including to reflect any changes required by applicable laws. You can direct any suggestions for improvements to this Policy to Burjeel's Compliance Officer at cs@burjeelholdings.com.



Appendix A

- **Links for Verification of Persons and Entities:**

a. UN Security Council Updated Consolidated List for Individuals and Entities:

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list#entities>

b. The UAE National List of Terrorist Individuals and Entities:

<https://www.uaecic.gov.ae/en-us/un-page#>

(C) The Authority's website, Link for Anti-Money Laundering and Counter Financing of Terrorism

<https://www.sca.gov.ae/ar/regulations/working-group-aml-counter-terrorism.aspx>

- **Links to verify the classification of dangerous countries and regions according to FATF:**

FATF High Risk countries/regions through using the following link: <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/call-for-action-june-2021.html>

FATF closely monitored countries/regions through using the following link: <https://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/documents/increased-monitoring-june-2021.html>

Other countries/regions targeted by UN sanctions for financial violations through using the following link: <https://www.uaecic.gov.ae/en-us/un-page>