Policy Statement on Sanctions

POL.04

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POLICY STATEMENT ON SANCTIONS

We commit to the following principles to ensure adherence to the International Sanctions Policy, in line with national and international legal requirements:

- We fully comply with economic sanctions and export controls in regions and countries where we operate.
- We do not maintain business relations with countries, companies, and individuals subject to international sanctions and embargoes.
- We regularly review this policy for compliance with all applicable legislation and adjust implementation accordingly.
- We ensure employees and third parties acting on behalf of the Company, comply with applicable laws, regulations and this policy.
- We comply with all legal document retention requirements and facilitate cooperation in trade control investigations.
- We implement procedures to determine if third parties acting on our behalf are subject to sanctions.
- We take reasonable steps to protect information confidentiality as per our Information Security Policy.
- We inform employees and stakeholders to avoid activities that may breach this policy and report compliance concerns.
- We ensure confidential reporting of policy breaches or concerns via available we speakup reporting channels and wespeakup@wesoda.com. We evaluate reports from an ethical and legal perspective and protect whistleblowers from reprisals.
- We enforce disciplinary actions, up to contract termination, for policy breaches by any employee or third party.

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