

Sasil SA

SASIL S.A. Sanctions Policy

I. Introduction

SASIL S.A. is steadfast in its commitment to conducting business in accordance with the highest ethical and legal standards. This commitment includes strict adherence to all applicable international sanctions regimes. Sanctions are a critical tool used by governments and international bodies to maintain global security, combat terrorism, and uphold human rights. SASIL S.A. recognizes the importance of sanctions compliance and has implemented this policy to ensure that all its activities are in full compliance with relevant sanctions laws and regulations.

II. Scope

This policy applies globally to all SASIL S.A. employees, directors, officers, and agents, as well as subsidiaries, affiliates, joint ventures, and any other business associations or entities effectively controlled by SASIL S.A., directly or indirectly.

III. Policy Objectives

- **Compliance:** To ensure full compliance with all applicable sanctions laws and regulations, including those issued by the United Nations, the European Union, the United States, and other relevant jurisdictions.
- **Prevention:** To prevent SASIL S.A. from engaging in any transactions or activities that would violate applicable sanctions.
- **Detection:** To detect and report any potential sanctions violations or suspicious activity.
- **Training:** To provide ongoing training and education to employees on sanctions compliance policies and procedures.

IV. Sanctions Compliance Procedures

- **Sanctions Screening:** SASIL S.A. will screen all customers, counterparties, and transactions against relevant sanctions lists to ensure that no prohibited activities are conducted.
- **Restricted Parties:** SASIL S.A. will not engage in any transactions with individuals or entities that are listed on any applicable sanctions lists.

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- **Restricted Countries:** SASIL S.A. will not engage in any transactions with countries or regions that are subject to comprehensive sanctions.
- **Due Diligence:** SASIL S.A. will conduct appropriate due diligence on all customers and counterparties to assess potential sanctions risks.
- **Suspicious Activity Reporting:** SASIL S.A. will promptly report any suspicious activity that may indicate a sanctions violation to the relevant authorities.
- **Record-Keeping:** SASIL S.A. will maintain accurate and complete records of all transactions and due diligence activities to demonstrate compliance with sanctions regulations.

V. Employee Training and Awareness

SASIL S.A. will provide regular training to all employees on sanctions compliance policies and procedures. This training will cover:

- **Sanctions regimes:** An overview of relevant sanctions regimes and lists.
- **Sanctions screening:** How to conduct sanctions screening and identify potential red flags.
- **Due diligence:** How to conduct due diligence on customers and counterparties to assess sanctions risks.
- **Reporting procedures:** How to report suspicious activity to the appropriate authorities.

VI. Compliance Officer

SASIL S.A. will consult an external Compliance Officer who will be responsible for overseeing the sanctions compliance program and ensuring compliance with all applicable laws and regulations.

VII. Policy Review and Updates

This policy will be reviewed and updated periodically to ensure that it remains current and aligned with evolving sanctions regimes and regulatory requirements.