

Effective date of the Disclosure: 1 July 2024

DISCLOSURE ON THE IDENTIFICATION OF PERSONS SUBJECT TO INTERNATIONAL SANCTIONS

Sanctioned Person, i.e. a person against whom or which international sanctions are applied, means any natural or legal person or other institution or grouping of property or persons:

- (a) That is listed on a Sanction List, or is owned or controlled by such person, or is a person acting on behalf of such person;
- (b) That has its registered office or place of business, or is organised or operates, in a Sanctioned Country, i.e., a state or territory that is subject to national or territorial Sanctions, or is organised under the laws of a Sanctioned Country, or that is owned by such person, is a controlled person of such person, or is a person acting on behalf of such person;
- (c) To whom or which the Sanctions otherwise apply;
- (d) Any natural or legal person owned or controlled by, or acting on behalf of, any of the aforementioned natural or legal persons.

Sanction means any trade, economic or financial sanctions, embargoes or other similar restrictive measures resulting from any legislation or other decision of any Sanctioning Authority.

Sanctioning Authority means:

- (a) The United Nations Security Council;
- (b) The European Union or any of its Member States;
- (c) The United States of America;
- (d) The United Kingdom of Great Britain and Northern Ireland;
- (e) The Swiss Confederation;
- (f) The European Economic Area (EEA) and European Free Trade Association (EFTA) countries;
- (g) The relevant governmental institutions and agencies of any of the foregoing; or

- (h) Any other relevant governmental or regulatory authority, institution or agency that administers applicable economic or financial sanctions, restrictive measures or trade embargoes, including the Office of Foreign Assets Control of the US Department of Treasury (“OFAC”), the US Department of State (USA), the HM Treasury and other government and regulatory authorities of the United Kingdom of Great Britain and Northern Ireland.

Sanctions List means any publicly available list of specifically designated nationals and blocked persons or individuals, or persons, entities or groups subject to Sanctions issued by a Sanctions Authority, as amended from time to time, including, without limitation:

- (a) The Consolidated Financial Sanctions List maintained by the European Commission;
- (b) The Specially Designated Nationals and Blocked Persons List maintained by the Office of Foreign Assets Control of the US Department of the Treasury (OFAC);
- (c) The Consolidated United Nations Security Council Sanctions List;
- (d) The *Consolidated List of Financial Sanctions Targets* and the *Investment Ban List* maintained by the *HM Treasury* (United Kingdom); or
- (e) Any other list maintained or publicly announced by the Sanctions Authority that contains identifying information of persons or institutions concerned by any Sanctions.