



INTERNATIONAL ECONOMIC SANCTIONS COMPLIANCE POLICY

Compliance Policies - Policy 10.1- International economic sanctions compliance

Approved by	The Board of Managers
Origin Date:	August 24, 2014
Last Revised Date:	May 5, 2015
Policy Owner(s):	Acting Group Head of Compliance
Contact(s):	CPDD Manager

In this document, the “Company” or “ERG” means Eurasian Resources Group S.a.r.l. and includes, where applicable, all subsidiaries.

1. Policy Objective

1.1. The policy’s objectives are:

- 1.1.1. to ensure that the Company avoids breaching international economic sanctions imposed by relevant governments, supra-national or international organisations. For further guidance on the actual sanction list a reference is made to the point 4.6. and 4.7. of the Policy.
- 1.1.2. to provide Company employees with clear requirements and universal guidelines on prevention, detection and reporting of behaviour, which fails to comply with applicable international economic sanctions laws and regulations; The policy, however, is not intended to list all applicable economic sanctions regimes and their requirements.
- 1.2. The policy sets out:
 - 1.2.1. The Company position on compliance with international economic sanctions;
 - 1.2.2. roles and responsibilities in ensuring compliance with applicable international economic sanctions laws and regulations as well as with this Policy.

2. Scope

2.1. This policy applies to:

- 2.1.1. the Company, its business and agents;
- 2.1.2. all employees (including temporary or contract staff); and
- 2.1.3. all business dealings in all jurisdictions within which the Company conducts business.

3. Definitions

- 3.1. The Board – the Board of Managers of Eurasian Resources Group SARL.

4. Policy Statements

- 4.1. The Company does not engage in or tolerate any form of conduct which fails to comply with the requirements of applicable international economic sanctions laws and regulations.
- 4.2. It is contrary to the Company’s policy for any employee or agent acting on behalf of the Company to engage in any conduct, which may breach applicable international economic sanctions laws and regulations.
- 4.3. If any concerns or claims are raised regarding compliance with international economic sanctions by any governmental, supra-national or regulatory authorities or any other third parties in relation to the conduct of business by the Company, the Group General Counsel must be advised immediately.
- 4.4. If the Company employee has concerns around activities of other Company employees, which could contravene the international economic sanctions laws and regulations or be otherwise in breach of this Policy, they should report such concerns to the Company management, HR, Legal, Compliance or Whistleblower Hotline..
- 4.5. All Company employees and agents must exercise extra care in relation to potential sanction issues having regard in particular to the following in ensuring compliance with this policy:
 - 4.5.1. In order to identify third-party sanctions risks, due diligence should be performed on all third parties the Company is going to deal with including, but not limited to suppliers, customers and agents;



- 4.5.2. As a rule, it is prohibited to deal directly or indirectly with entities and persons covered by applicable international sanctions;
- 4.5.3. Screening transactions and respective supporting documents and records against applicable international sanctions target lists;
- 4.5.4. No funds or goods can be shipped directly or indirectly to/through entities or jurisdictions covered by international economic sanctions;
- 4.5.5. The business units should assess if equipment or products are not on applicable export control lists and ensure that all necessary licenses to export are obtained;
- 4.5.6. The business units should check if imported goods are in any way restricted;
- 4.5.7. Group General Counsel should define minimum requirements for such due diligence and screening procedures;
- 4.5.8. Contracts with suppliers, customers, agents, distributors and other third parties, should include sanctions exclusions and warranties;
- 4.5.9. While the Policy applies to all business activities of the Company, extra care should be taken in respect of activities in the following key areas of concern:
 - a) Sales incl. export
 - b) Procurement
 - c) Treasury and Payments
 - d) Transportation and Logistics
- 4.6. All Business Units should maintain tools and procedures ensuring staying current with development in applicable international sanctions regimes.
- 4.7. Group General Counsel should from time to time identify a list of countries which are subject to wider embargoes and from time to time should issue guidelines for these key jurisdictions as well as key areas of concern, which would provide examples of prohibited activities, permitted activities and activities requiring Group General Counsel clearance.
- 4.8. Employees should seek immediate legal advice in the event of any concerns or doubts regarding compliance with economic sanctions requirements.
- 4.9. All employees should be given trainings on Code of Business Conduct, which include main principles of sanctions compliance requirements. It is employee responsibility to undergo such training when provided by the Company.
- 4.10. Employees likely to be dealing in the Key Areas of Concern should be provided comprehensive trainings on economic sanctions compliance.
- 4.11. Group General Counsel should coordinate such Group-wide trainings, however it is the responsibility of each Business Unit Head to ensure that staff likely to be dealing in the key areas of concern undergo such trainings on a timely and regular basis. No employee should be allowed to conduct activities in the high-risk areas without being trained first.
- 4.12. Any employee found to have violated economic sanctions compliance laws or this Policy may be subject to disciplinary action, which could include summary dismissal.

5. Responsibilities

- 5.1. The Board of Managers of Eurasian Resources Group SARL (the Board) is responsible for establishing this Policy.
- 5.2. The Compliance Committee of the Board is responsible for oversight of compliance with this Policy.
- 5.3. The Group Chief Executive, supported by the Group General Counsel, has responsibility for implementing this policy in accordance with the requirements of the Board.
- 5.4. The Business Unit Heads are responsible for establishing appropriate responsibilities, procedures, training and internal controls within their respective operations to ensure the consistent implementation of this policy across all jurisdictions and compliance with its requirements.
- 5.5. It is the responsibility of each Business Unit Head to ensure that their respective employees and all third party service suppliers acting on behalf of the Company are made aware of this policy.
- 5.6. It is the responsibility of each Company employee to comply with the terms of this policy.

6. Monitoring



- 6.1. Group General Counsel should periodically, but not less than quarterly, report on the status of international economic sanctions laws and regulations to the Compliance Committee of the Board.
- 6.2. Regional Management is responsible for effective implementation of this Policy in their respective areas of responsibility and implementing adequate controls to ensure on-going compliance.
- 6.3. Internal Audit should periodically review compliance with this Policy and report any deficiencies and respective recommendations to the Group Management and the Compliance Committee of the Board.