



# Policy Statement

## Financial and Trade Sanctions Policy

Ross-shire engineering (RSE) Policy regarding financial and Trade Sanctions applies across the whole of RSE group of companies.

RSE are fully aware of our requirements and our responsibility to ensure that the risk of working with suppliers and sub-contractors who have been subject to financial, or trade sanctions are mitigated.

Under this policy the company will:

- ◆ Implement a risk-based preventive approach, using practices that identify, manage, and mitigate sanctions risk in all jurisdictions of Company's operations.
- ◆ Not enter or remain involved in transactions that have any connection with countries and regions which are or come to be included in the sanctions of:
  - ◆ UNSC-United Nations Security Council
  - ◆ DDTC- Directorate of Defence Trade Controls  
and/or
  - ◆ CFSP- Customs Freight Simplified Procedureswhile international sanctions are applicable to such countries.
- ◆ Not enter, or remain involved in, a transaction that directly or indirectly involves a sanctioned party or product.
- ◆ Conduct customer identification and verification activities in proportion to the sanctions risk posed by that customer or product.
- ◆ Monitor targeted customers with suspicious activity and report such activity when it suspects this customer may be acting illegally.
- ◆ File all reports it deems appropriate with the relevant authorities of the jurisdictions.
- ◆ Ensure that third parties acting for the Company comply with this policy.
- ◆ Retain all records that may be relevant to this policy for a minimum of 5 years.

The Directors will review this policy annually, and revise or update it as necessary.

A handwritten signature in black ink, appearing to read 'Allan Dallas', is positioned above the printed name.

Allan Dallas  
Managing Director  
Ross-shire Engineering Ltd