



Sanctions Policy

Document History

Document Accountability

TERM	DEFINITION	POSITION / NAME
Owner	Accountable for approval and has authority to implement or significantly change the system.	Company Secretary & General Counsel
Custodian	Accountable for monitoring the application of the system and advising the owner of the monitoring outcomes	Legal Counsel & Compliance Manager

Document Version Control

REVISION	DATE	AUTHOR	CHANGE DESCRIPTION	APPROVED BY
0	2 May 2022	Rees Fleming		Rees Fleming

1. TERMS AND DEFINITIONS

In this Policy:

Sanctions	means the economic sanctions laws, regulations or restrictive measures administered, enacted or enforced from time to time by the US (including, without limitation, OFAC), the United Nations Security Council, the UK Treasury, the European Union (including its member states) and Australia.
Sectoral Sanctions Identifications Entity	means an entity that is subject to sectoral sanctions or any entity that is 50% or more owned directly.

2. PURPOSE

The aim of this Policy is to implement and embed a consistent approach to comply with sanctions regulations. This policy is designed to manage sanctions risk exposure through:

- A culture of transparency;
- Controls and processes;
- Due diligence on counterparties to transactions;
- Payment controls consistent with this policy;
- Employee compliance training; and
- A compliance management framework that includes overall compliance with sanction laws.

3. SCOPE

This Policy applies to all Stanmore directors and employees, and all contractors engaged by or under Stanmore's supervision.

Stanmore will also assert its influence on joint ventures that it does not control or operate to encourage acting consistent with the intent of this policy.

4. PRINCIPLES AND REQUIREMENTS

Stanmore has a commitment to:

- Complying with all sanctions applicable to all business activities;
- Not engaging in conduct that may intend to evade sanctions;
- Not conducting business in embargoed territory or sanctions targets;
- Not engaging in sanctionable activity that could result in the designation of Stanmore as a sanctions target including conducting business with Sectoral Sanctions Identifications Entities;
- Working to mitigate the risk of breaching sanctions regulations; and
- Monitor compliance with this policy and sanction regulations.

4.1 TRANSPARENCY

All Stanmore directors, employees, contractors and visitors are each responsible for ensuring compliance with this policy and applicable laws. There is an expectation that all concerns about possible non-compliance is raised with management.

Stanmore maintains an open report platform for employees, contractors and external parties on the Stanmore website.

4.2 BREACHING THIS POLICY

Stanmore takes any breach to this policy or applicable regulations seriously. A breach of this policy by a Stanmore employee may constitute misconduct which could result in disciplinary action, including possible termination of contract.

5. COMPLIANCE AND REVIEW

This Policy will be reviewed, along with other related policies and procedures, on an annual basis as well as at other times where any significant new information, legislative or organisational change warrants an update of these documents.