

# Sanctions Policy



## 1. Introduction

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The Landell Mills group of companies (Landell Mills)<sup>1</sup> is committed to complying with all applicable laws and regulations relating to international sanctions. This policy provides a framework for ensuring compliance with all applicable sanctions laws and regulations, and outlines our approach to managing and mitigating the risks associated with sanctions compliance.

## 2. Context

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### 2.1 What are sanctions?

Sanctions are political trade tools put in place by the United Nations (UN), the European Union (EU), national governments including the United States and the United Kingdom, as well as the Organisation for Security and Cooperation in Europe with the principal purpose usually to limit or change the behaviour of the target country's regimes, individuals or groups within that country.

### 2.2 Putting sanctions into practice

The UN Security Council imposes sanctions through Security Council Resolutions. When a sanction or embargo is set, the EU and national governments follow international procedure to place them into national law. The EU and national governments, such as that of the UK and USA, also set their own sanctions and embargoes.

In Ireland, the Department of Jobs, Enterprise and Innovation is responsible for trade sanctions and the Central Bank of Ireland is responsible for the administration, supervision, and enforcement of relevant aspects of financial sanctions in Ireland.

In the UK, the Foreign, Commonwealth and Development Office (FCDO) has overall responsibility for the UK's policy on sanctions and embargoes, including all international sanctions regimes and designations. The Office of Financial Sanctions Implementation (OFSI), part of HM Treasury, is the authority for the implementation of financial sanctions.

### 2.3 Types of sanctions

The most frequently applied sanctioning measures are:

- Embargoes on exporting or supplying arms and associated technical assistance, training and financing.
- A ban on exporting equipment that might be used for internal repression.
- Travel bans on named individuals.
- Bans on imports of raw materials or goods from the sanctions target.
- Financial sanctions on individuals in government, government bodies and associated companies, or terrorist groups and individuals associated with those groups.

Financial sanctions are the measures that carry the highest risk to Landell Mills and can vary from the comprehensive – prohibiting the transfer of funds to a sanctioned country and freezing the assets of a government, the corporate entities and residents of the target country – to targeted asset freezes on individuals/entities.

Certain financial sanctions may also prohibit providing or performing other financial services, such as insurance, to designated individuals or governments.

<sup>1</sup> Landell Mills International Ltd (Ir), Landell Mills Ltd (UK) and all subsidiary companies and branches.

An indirect payment to a sanctioned individual or other entity is also not normally permitted, e.g. payment to a non-sanctioned third party in the knowledge that the ultimate destination for the payment is sanctioned.

Other measures may be applied according to individual circumstances.

Most sanctions and embargo regimes are targeted. A 'targeted' restriction is focused on individual people or organisations. In some cases, a comprehensive restriction is put in place against a particular country's regime. Sanctions can also be targeted at a particular industry, such as banning the supply of petroleum and related products.

#### *2.4 Knowing who is sanctioned*

Consolidated lists of asset freeze targets designated by the UN and EU, under legislation relating to current financial sanctions regimes, i.e. those who have been sanctioned, is available here:

<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list> and here:

<https://www.sanctionsmap.eu/#/main> respectively.

The UK's list of those under sanction is here: [www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets](http://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets).

The United States Treasury Department also implements sanctions against individuals, entities or regimes, which may apply to projects in which Landell Mills is involved. See

<https://ofac.treasury.gov/sanctions-programs-and-country-information>.

For Ireland, The Central Bank of Ireland has further information here

<https://www.centralbank.ie/regulation/how-we-regulate/international-financial-sanctions/financial-sanctions-updates> and HM Treasury in the UK here:

[www.gov.uk/government/publications/financial-sanctions-faqs](http://www.gov.uk/government/publications/financial-sanctions-faqs).

Financial partners, e.g. banks and insurers, used by Landell Mills may have their own sanctions lists. These are often broader than the legal sanctions that are in force. See appendix A for detail.

### **3. Purpose**

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The primary purpose of this policy is to ensure that Landell Mills does not engage in any activities that would violate sanctions laws and regulations imposed by Ireland, the United Kingdom, the European Union, the USA, the United Nations, and other relevant jurisdictions.

The secondary purpose of this policy is to ensure that Landell Mills does not engage in activities that while not violating sanctions laws and regulations, as mentioned above, may violate the sanctions compliance regimes of our clients or essential partners, e.g. our bankers or insurers.

### **4. Scope**

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This policy applies to all employees and contracted staff (staff), consultants, partners and sub-contractors, and any other third parties acting on our behalf. It covers all business activities wheresoever in the world they are conducted.

## 4. Key principles

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### 4.1 Compliance with sanctions

- We will comply with all applicable sanctions laws and regulations in the jurisdictions in which we operate.
- We will not engage in any transactions or business activities that involve sanctioned countries (the governments thereof), entities, or individuals.

### 4.2 Risk assessment

- We will maintain a risk register that identifies and evaluates our potential exposure to sanctions risks. The risk register is appended as Appendix A to this policy (internal access only).
- We will implement appropriate controls to mitigate identified risks.

### 4.3 Due diligence

- Subject to an assessment of the sanctions risk, we will conduct due diligence on all potential partners, sub-contractors, staff, consultants and suppliers to ensure that we do not engage with sanctioned entities.

### 4.4 Training and awareness

- We will train our staff on sanctions compliance.
- Staff shall be informed of their responsibilities under this Policy and the potential consequences of non-compliance.

## 5. Procedures

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### 5.1 Screening

- Subject to a risk assessment, we will screen all potential partners and sub-contractors against relevant sanctions lists and will repeat as proposed within the risk assessment.
- We will screen all potential staff/consultants who are nationals of or resident within countries of a high sanctions risk.
- We will screen all suppliers operating from within countries of a high sanctions risk.

**Appendix A** identifies the countries that we consider high risk (internal access only).

### 5.2 Monitoring and reporting

- We will monitor and review compliance:
  - Through bi-weekly reviews of divisional “pipelines” of future work to ensure that any work in any sanctioned country is screened for sanctions compliance.
  - As part of our internal annual audit for ISO37001 to ensure that we have conducted appropriate risk assessments and due diligence to avoid any transaction with any individual or organisations on any sanction list.
- Staff will report any suspected violations of this policy to the Managing Director immediately.
- The Managing Director will investigate all reported incidents and take appropriate action.

## 6. Roles and responsibilities

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### 6.1 Board of Directors

- The Board of Directors is responsible for overseeing the implementation and effectiveness of the policy and accompany procedures.
- The Board will ensure that adequate resources are allocated to support sanctions compliance.
- The Managing Director is responsible for managing the Company's sanctions compliance.
- The Directors shall provide guidance and support to staff on sanctions-related matters.

### 6.3 Staff

- Staff are required to acknowledge and accept that they will adhere to this policy and any updates and will confirm their compliance annually via Factorial
- Staff will participate in training and stay informed about sanctions compliance requirements.
- Staff will report any suspected violations to the Managing Director.

## 7. Consequences of non-compliance

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- Non-compliance with this policy may result in disciplinary action, up to and including termination of employment.
- Landell Mills may also face legal and financial penalties for violations of sanctions laws.
- The penalties in Irish law for a breach of EU Financial Sanctions are contained in a statutory instrument signed by the Minister for Finance.
- It is a criminal offence in the UK to breach a financial sanction, without an appropriate licence or authorisation from HM Treasury.

## 8. Further information

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Enquiries relating to sanctions should be addressed to the Managing Director. Enquiries can also be submitted to:

- Central Bank of Ireland by email to: [sanctions@centralbank.ie](mailto:sanctions@centralbank.ie)
- UK HM Treasury by email to: [ofsi@hmtreasury.gov.uk](mailto:ofsi@hmtreasury.gov.uk).

## 9. Review and updates

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This policy shall be reviewed annually and updated as necessary to reflect changes in sanctions laws and regulations.

## 10. Approval

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This policy has been approved by the Board of Directors and is effective as of 25 June 2024.