



SC Group Sanctions Policy Statement

Standard Chartered, including its subsidiaries and affiliates (the “Group”), is firmly committed to complying with all applicable economic sanctions laws that are legally binding upon the Group and its businesses. Any breach of sanctions may have a serious impact on our reputation, franchise, regulatory relationships and could impair the Group’s ability to provide products and services to clients. The Group has therefore established a sanctions policy that may be more stringent than what is permitted by law and regulation.

The Group adopts a policy of not entering into any transaction that either directly or indirectly involves or is for the benefit of any Sanctioned Parties, even where this would be legally permitted. For these purposes, Sanctioned Parties are defined as:

- a) parties that any one or more of the United Kingdom (UK), the European Union (EU), the United States (US) or the United Nations (UN) has listed as the target or subject of sanctions; or
- b) parties which are 50% or more owned (individually or in aggregate) by, or otherwise controlled by, any party described in (a) above; or
- c) parties which have been internally identified as presenting an unacceptable level of sanctions risk to the Group.

The Group also prohibits and will not facilitate activity with certain governments or parties within certain geographies that are targeted under the sanctions programs of the UK, EU, US, or UN. The Group neither maintains a presence in these sanctioned geographies nor is it the target of these sanctions programs. As these are a direct consequence of international relations, the Group’s Sanctions Policy and specific prohibitions may change from time to time. Current prohibitions include the following:

- a) **Afghanistan** – The Group does not undertake any transaction involving the Government of Afghanistan or where there is a heightened risk that the transaction involves the Government of Afghanistan and/or a Sanctioned Party. Should you have attempted or want to undertake any transaction involving Afghanistan, please check with your Relationship Manager for further details/requirements.
- b) **Belarus** – The Group does not undertake any transaction involving:
 1. Belarus/the Republic of Belarus; or the Government of Belarus, its public bodies, corporations or agencies; or a Belarusian credit or financial institution; or any entity registered, incorporated or constituted under the law of Belarus, or domiciled in Belarus; or individuals located in, or normally resident in, Belarus; or Belarusian goods;
 2. the direct or indirect purchase, sale, provision of investment services for or assistance in the issuance of, or otherwise dealing with transferable securities and money-market instruments issued by Belarus/the Republic of Belarus; or the Government of Belarus, its public bodies, corporations or agencies; or a Belarusian credit or financial institution;
 3. the direct or indirect making or being part of any arrangement to make new loans or credit to Belarus/the Republic of Belarus; or the Government of Belarus, its public



bodies, corporations or agencies; or a Belarusian credit or financial institution; or any entity registered, incorporated or constituted under the law of Belarus, or domiciled in Belarus; or individuals located in, or normally resident in, Belarus; or Belarusian goods.

- c) **Cuba** – The Group does not undertake any transaction that has a US nexus (e.g. involving USD, US persons, US goods, etc), and involves Cuba, any party in Cuba, Cuban goods and services, or the Government of Cuba and its agencies and instrumentalities wherever located; except in very limited circumstances where permitted by an applicable US regulation or Office of Foreign Assets Control (OFAC) licence and approved in strict accordance with the Group's Policy and Standards;
- d) **Iran** – The Group does not undertake any transaction involving Iran, any party in Iran, exports to or imports from Iran or for use in Iran, or the Government of Iran and its agencies and instrumentalities wherever located;
- e) **North Korea** – The Group does not undertake any transaction involving North Korea, any party in North Korea, North Korean nationals wherever located, exports to or imports from North Korea or for use in North Korea, or the Government of North Korea and its agencies and instrumentalities wherever located; except in very limited circumstances where permitted by an applicable UK, EU, US, and UN regulation or license and approved in strict accordance with the Group's Policy and Standards;
- f) **Syria** – The Group does not undertake any transaction involving Syria, any party in Syria, exports to or imports from Syria or for use in Syria, or the Government of Syria and its agencies and instrumentalities wherever located; except in very limited circumstances where permitted by an applicable UK, EU, US, and UN regulation or licence and approved in strict accordance with the Group's Policy and Standards;
- g) **Crimea & Sevastopol** – The Group does not undertake any transaction involving Crimea or Sevastopol, any party in Crimea or Sevastopol, exports to or imports from Crimea or Sevastopol, investments in Crimea or Sevastopol relating to the creation, acquisition or development of transport, telecommunications, energy infrastructure, the exploitation of oil, gas and minerals; except in very limited circumstances where permitted by an applicable UK, EU, US, and UN regulation or licence and approved in strict accordance with the Group's Policy and Standards;
- h) **Russia** – The Group does not undertake any transaction involving:
 - 1. the Russian military, intelligence services, related to defence equipment, or any Russian government entity connected with the foregoing;
 - 2. the sale, supply, transfer or export to Russia or for use in Russia of technologies used in oil exploration/exploitation in Arctic, deep water or hydraulic shale projects;
 - 3. investments or the sale, lease, or delivery of goods or services that directly and significantly enhances the ability of Russia to construct, expand or modernize any energy export pipelines;



4. any entity subject to energy sectoral sanctions, where to do so would involve direct or indirect provision, exportation, or re-exportation of goods and/or services, or technology used in oil exploration or production in Arctic, deep water or shale projects;
 5. any entity subject to Sectoral Sanctions where to do so would involve:
 - (a) debt or equity issued, made or provided on or after the date upon which the entity subject to Sectoral Sanctions was designated, including the provision of services in support of the foregoing; and
 - (b) letters of credit in which the entity subject to Sectoral Sanctions is the issuing or applicant bank;
 6. investments in privatization of Russian state-owned assets;
 7. the primary market for bonds issued by the Russian sovereign in any currency;
 8. the direct or indirect lending of funds to the Russian sovereign in any currency;
 9. payments or other transactions involving Russia which relate to goods which are prohibited for export to the Russian Federation by EU or UK sanctions;
- i) **Venezuela** – The Group does not undertake any transaction related to the provision of financing for and any other dealings involving the Venezuelan military or the Venezuelan Government, including its property, or entities owned or controlled by the Venezuelan Government. These prohibitions also extend to all Venezuelan state-owned entities, including Petróleos de Venezuela S.A. and the Central Bank of Venezuela. The Group may, however, consider undertaking transactions that have been permitted by an applicable UK, EU, US, and UN regulation or licence.

The Group may change the prohibitions described here without notice at any time. If you have any queries in relation to the Group's Policy position in relation to Sanctions, please contact your Relationship Manager.