

## POLICY

The Company is committed to complying with its legal and regulatory responsibilities in relation to financial and trade sanctions.

The Company does not permit itself to maintain any relationships, process payments to or from or undertake commercial transactions with entities or individuals based in the countries listed on [www.gov.uk](http://www.gov.uk).

This prohibition applies to all transactions and payments in all currencies.

The Company requires compliance from all its Representatives to include Associates, Directors, Employees and Contractors.

At the present time, the Company must only contract with Associates, Clients and Contractors who have a legal entity within the UK and Europe. A client or contractor may have an American or European Parent but the client or contractor must have a legal UK operating entity.

### Due Diligence

The Company seeks to ensure that appropriate due diligence is undertaken to ensure that it is not dealing with a sanctioned entity or individual or an entity owned or controlled by a sanctioned entity or individual.

### Process

The Company must review its associate and client base and its contractor base on an ongoing basis and must be satisfied that all clients and contractors are operating legally in the UK. The Company must ensure this is the case by verifying its legal status by reference to Companies House if there is any doubt whatsoever.

Should any suspicion of non-compliance by any person or entity be held by any Representative, such suspicion must be reported to a Director immediately.

The Director must keep a record of the suspicion and outcome of action taken to resolve the situation.

### Training and Awareness

All current Representatives of Spring CCR Ltd. including Directors, Associates, Employees and Contractors must be made aware of this Policy on policy inception and contract initiation.

All new Representatives must be made aware on induction.

Changes to this Policy must be communicated to all Representatives within one month of change.

### Review

A Director or person nominated by a director must review compliance among all Representatives, Clients and Contractors yearly or on suspicion of non-compliance.

