

## Sanctions programs and countries business policy

Sogefi needs to strictly **comply** with regulations relating to doing business in countries and with entities under international sanctions. International sanctions refer to United States (U.S.) & European Union (E.U.) sanctions.

Please note that the U.S. Office of Foreign Assets Control (OFAC) does not maintain a specific list of sanctioned countries but a list of active sanctions programs. As explained on OFAC's website, the reason is that "U.S. sanctions programs vary in scope. Some are broad-based and oriented geographically (i.e. Cuba, Iran). Others are "targeted" (i.e. counter-terrorism, counter-narcotics) and focus on specific individuals and entities. These programs may encompass broad prohibitions at the country level as well as targeted sanctions. Due to the diversity among sanctions, there are specific programs available on the "Sanctions Programs and Country Information" webpage.

**1. It is therefore strictly forbidden to do any direct or indirect business with:**

**List nr. 1: North Korea, Iran, Syria, Sudan, Cuba, Crimea, Afghanistan, Yemen and Venezuela.**

**2. U.S. active sanctions programs currently also include:**

List nr. 2: Belarus, Donbass, Burma (Myanmar), Burundi, Cote d'Ivoire (Ivory Coast), Democratic Republic of Congo, Iraq, Liberia, Lebanon, Libya, Nicaragua, Somalia, Sudan, Zimbabwe, Mali, Ethiopia, Central Africa, Hong-Kong, Russia.

The list of U.S. active sanctions programs is updated periodically and is available [here](#).

The E.U. sanctions map is available [here](#).

Doing business in the countries in list nr. 2 is subject to a specific, case by case, prior written authorization by the Group CEO, based on assessment regarding possible legal constraints.

Please be aware that all Sogefi personnel worldwide is required to strictly comply with these instructions. Any breach of these instructions will trigger appropriate measures, including but not limited to, disciplinary sanctions and, possibly, employment termination.

A handwritten signature in black ink, consisting of a large, stylized initial 'S' followed by a few horizontal strokes.

Guyancourt, February 24th 2022