

ASBISC Enterprises PLC

Update on Export Compliance Policy

It is the policy of ASBIS group to fully comply with all laws and regulations governing the export of both, products, services, software and technical data as contracted by ASBIS with its numerous suppliers, and our own products, services, software and technical data. Each employee must be dedicated to ensure such compliance. All sales, service, shipping, accounting and other personnel that may be involved in export shall be familiar with and review regularly:

- EU trade policy web site: <https://www.consilium.europa.eu/en/policies/trade-policy/> ,
- U.S. Bureau of Industry and Security's website at: <http://www.bis.doc.gov/>, and
- Websites of national export control authorities.

to ensure compliance with regulations. Particular attention should be taken when releasing technical information to foreign nationals, whether abroad or not, in electronic transmission of data/software and when hand carrying exports.

Under no circumstances shall ASBIS personnel sell or ship any product contrary to applicable export laws or shall these laws be compromised for personal gain. Neither sales nor shipments are to be made to any individual and/or firm appearing in the Denied Parties Lists of the U.S., and/or in EU sanctions database, and/or in any applicable export controls and regulations and/or to any firms owned by or associated with the individuals of firms therein listed. Moreover, no orders or shipments are to be made to any country subject to economic or trade sanctions imposed by the U.S. and/or EU unless otherwise authorized by applicable laws. Failure to comply with these regulations may result in the imposition of criminal and/or civil fines and penalties, including imposition of huge penalties on ASBIS.

In addition, regulations are in effect that place emphasis on the end-use and/or end-user of exported items (see United States 15 CFR 744.1 General Prohibition 4). As a result, ASBIS need to be vigilant in screening our customers and transactions. It is, therefore, more important than ever that the "Know Your Customer" principals are understood and implemented in order that ASBIS can meet the required "know" standard.

In particular, no transaction can be made when dealing with individuals, companies and countries involved with the proliferation of nuclear missile and chemical/biological related processes and/or weapons without a license from the U.S. Department of Commerce and/or applicable EU authority.

The General Managers and Sales Directors of every ASBIS Group entity are jointly responsible for formal adoption of the policy in its respective entities, its implementation and compliance. This policy shall be brought to attention of every employee related to export (PLMs, PLSM, sales, service, logistics, accounting, etc) and made available to any employee of the company by placing it at the announcement board, incorporating into the staff manual or by other means at the discretion of the GMs. On a regular basis all such personnel shall be trained on the scope and application of export control compliance.

Non-compliance or possible non-compliance with any of the export laws and regulations that becomes known to any ASBIS employee shall be immediately reported to the Board of Directors of ASBISC Enterprises PLC.