

Sanctions policy

HR Wallingford is committed to conducting its business in an ethical and responsible manner, in compliance with all applicable laws and regulations. This Sanctions Policy outlines the principles and procedures HR Wallingford follows when it comes to sanctions imposed by governments or international organisations. The purpose of this policy is to ensure that HR Wallingford avoids engaging in any activities that would violate applicable sanctions regimes including the relevant laws and regulations.

Scope

This policy applies to all employees, contractors, and business partners of HR Wallingford who conduct business with or on behalf of the organisation.

Policy objectives

Compliance: HR Wallingford is committed to complying with all applicable sanctions laws and regulations, including those imposed by the United Kingdom, the United Nations, the European Union, the United States, and other relevant authorities.

Risk Mitigation: To identify and mitigate risks associated with conducting business in areas subject to sanctions, and to prevent HR Wallingford from inadvertently engaging in prohibited transactions.

Accountability: To establish clear accountability and responsibilities for ensuring compliance with sanctions laws and regulations.

Policy guidelines

Prohibited transactions: HR Wallingford prohibits any transactions, business activities, or dealings that are in violation of sanctions laws and regulations. This includes engaging in any form of prohibited or proscribed form of business with individuals, entities, or countries subject to sanctions, as well as facilitating transactions for such parties.

Screening: HR Wallingford implements robust screening procedures to check all business partners, clients, and transactions against relevant sanctions lists, including government and international lists. HR Wallingford will promptly report and investigate any potential matches and take appropriate actions as required by applicable laws and regulations.

Due diligence: HR Wallingford conducts due diligence on all new business partners and clients to assess their compliance with sanctions laws and regulations. This due diligence process may include, but is not limited to, background checks and verifying the ownership structure of entities.

Reporting and communication: HR Wallingford employees must promptly report any suspicious activity, potential violations of sanctions laws, or requests for actions that may be in violation of this policy to the Head of Legal or another designated authority within the organisation. HR Wallingford shall maintain open lines of communication with relevant authorities when necessary using the Whistleblowing Policy.

Training: HR Wallingford shall provide appropriate training and resources to employees to ensure they are aware of and understand sanctions laws and regulations and their obligations under this policy.

Record keeping: HR Wallingford maintains records related to sanctions compliance, including screening results, due diligence reports, and any communications or actions taken to address potential sanctions violations.

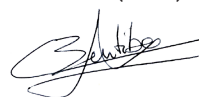
Penalties for non-compliance: HR Wallingford takes sanctions compliance seriously. Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship, and may also expose individuals to civil or criminal liability.

Review and revision

This Sanctions Policy will be reviewed periodically and updated as necessary to reflect changes in applicable laws and regulations or changes in HR Wallingford's business operations.

Ridha Bentiba
Chief Executive Officer (Joint), HR Wallingford Ltd

Signed:

A handwritten signature in black ink, appearing to read 'Ridha Bentiba'.

Date: 10 July 2025

Review date: 10 July 2026