

Flint Group Global Trade Controls Policy Overview

Trustworthy is one of Flint Group's core values. We are fully committed to conducting business in full compliance with global trade regulations across the regions where we operate. This policy overview reflects our commitment to adhering to the economic sanctions and import/export laws established by international and national authorities, including the European Union (EU), United States (U.S.), United Nations (UN), and United Kingdom (UK).

Key Principles / Commitments:

Compliance with Trade Laws: Flint Group aligns with trade control measures implemented for reasons such as foreign policy, national security, and human rights. These measures include restrictions on goods, software, or technology that can have both civilian and military uses (dualuse items) and sensitive commodities like those linked to weapons of mass destruction.

We comply with all relevant import/export regulations, including international trade agreements and sanctions.

Ethical Operations: Flint Group does not conduct business in regions subject to trade embargoes or with individuals/entities on restricted lists.

Risk Management: We thoroughly assess compliance risks before expanding into new markets.

Commitment to Training and Awareness: Our employees receive regular training to stay updated on compliance standards and ensure adherence to trade control laws across all areas of operation.

Reporting Concerns: We encourage all employees and associated parties to report any concerns related to trade controls through our dedicated <u>Integrity Assurance Hotline</u>. Reports are treated confidentially, and we do not tolerate retaliation against those who report in good faith.

Consequences of Non-Compliance: Violations of this policy may result in disciplinary action, up to and including termination of employment, as well as potential legal consequences.



Commitment to Ethical Business Practices

We expect all employees and partners to engage in business activities that reflect our commitment to integrity and ethical behaviour. Through regular training, monitoring, and audits, we aim to ensure compliance with and adherence to trade control laws across all areas of operation.