

Sanctions Policy

Document ref:	CG13
Issue no:	03
Date:	29 October 2025
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Approved by:	Board of Directors

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Purpose

Sanctions are used by a variety of organisations such as Governments, the UN and the EU, to assist in the pursuance of foreign policy objectives. They use sanctions in this manner to target individuals or territories involved in violations of human rights or international law.

Scope

Company	Country	
Advanced Innergy Holdings Ltd	Australia UK	<input checked="" type="checkbox"/>
Advanced Innergy Holdings Ltd		<input checked="" type="checkbox"/>
Advanced Innergy Ltd		<input checked="" type="checkbox"/>
Advanced Innergy Testing Ltd		<input checked="" type="checkbox"/>
AIS Covertherm Ltd		<input checked="" type="checkbox"/>
AIS Marine Ltd		<input checked="" type="checkbox"/>
CRP Subsea Ltd		<input checked="" type="checkbox"/>
Advanced Innergy Solutions Ltd	UK	<input checked="" type="checkbox"/>
Advanced Innergy Solutions do Brasil Ltda	Bulgaria	<input checked="" type="checkbox"/>
AIS Bardot Ltd	Portugal	<input checked="" type="checkbox"/>
ContraFlex Kazakhstan	Brazil	<input checked="" type="checkbox"/>
AIS FZE	France	<input checked="" type="checkbox"/>
Advanced Innergy Solutions Middle East Pipes and Tubes Trading – L.L.C – S.P.C	Kazakhstan	<input checked="" type="checkbox"/>
AIS Korea Ltd	UAE	<input checked="" type="checkbox"/>
AIS US Inc	Korea	<input checked="" type="checkbox"/>
AIS Integral Ltd	USA	<input checked="" type="checkbox"/>
AIS Malaysia SDN BHD	Canada	<input checked="" type="checkbox"/>
Advanced Innergy Solutions Angola Ltda	Malaysia	<input checked="" type="checkbox"/>
Ovun AS	Angola	<input checked="" type="checkbox"/>
Clients, Customers, Consultants, Contractors, and Suppliers	Norway	<input checked="" type="checkbox"/>
	All	<input checked="" type="checkbox"/>

Responsibility

The policy applies to all business provisions including products and services.

It should also be noted that adherence to the Sanctions Policy is required if any of the following; customer, agent, distributor or end user are based in a sanctioned country or territory.

Policy

Sanctions are used by a variety of organisations such as Governments, the UN and the EU, to assist in the pursuance of foreign policy objectives. They use sanctions in this manner to target individuals or territories involved in violations of human rights or international law.

1.1 Statement of policy

AIS is committed to comply with international sanctions, and as such no group company shall undertake any transaction that would breach any sanctions as currently imposed by the following entities:

- The Government of the United Kingdom
- The Government of the United States of America
- The European Union
- The United Nations

Please note that all group companies must observe sanctions imposed by any of the above, even if it would appear that there is no direct jurisdiction. The policy applies to all business provisions including products and services.

It should also be noted that adherence to the Sanctions Policy is required if any of the following; customer, agent, distributor or end user are based in a sanctioned country or territory.

1.2 Countries / territories

The following are countries or territories that AIS will not normally sell to:

- Afghanistan
- Iran
- Sudan
- North Korea
- Syria
- Cuba
- Venezuela

If an opportunity is presented from one of the above, advice should be taken at an early stage from the Managing Director as to whether the opportunity can be proceeded. It is highly likely that AIS will not proceed with such opportunities.

1.3 Mandatory country / territory sanctions check

If an opportunity arises in the following countries or territories, then a Sanction Check Form should be completed and submitted to the Commercial Manager for their approval. It will subsequently need to be

approved by the Group Financial Director and Managing Director in order to proceed. To complete the form, information regarding the project end user and intermediary supply chain companies will be required.

- Russia
- Belarus
- Zimbabwe
- Bosnia & Herzegovina
- Macedonia
- Kosovo
- Burundi
- Central African Republic
- Democratic Republic Congo
- Guinea / Guinea Bassau
- Iraq
- Lebanon
- Libya
- Mali
- Myanmar
- Nicaragua
- Somalia
- Sudan / South Sudan
- Ukraine
- Yemen

1.4 Sanctioned entities

In line with sanction adherence as laid out above, AIS commits to ensure any business transactions proposed are not undertaken with any entity subject to sanctions. This is facilitated through our financial checking procedures and is managed by the Group Financial Controller.

1.5 Training

AIS commits to ensuring that relevant staff are trained to the required level in sanctions adherence and its role within their work.

If any member of staff has any further questions in relation to sanction adherence, they should contact the Commercial Manager in the first instance.

Log of changes

Iss.	Section	Description of change
01	All	Initial Issue
02	Title page	Change of company address
03	Scope	Addition of new Companies