

## Sanctions Policy

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