



Approved: 05.06.2020	ANTI-MONEY LAUNDERING AND INTERNATIONAL TRADE COMPLIANCE POLICY OJSC AB INBEV EFES	
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1. Objective and Scope

1.1 AB InBev Efes (AB InBev Efes includes OJSC “AB InBev Efes”, LLC “Vostok Solod”, LLC “InBev Trade” and other subsidiaries, jointly named “Company”) commits to complying with applicable laws and maintaining the highest ethical standards of business conduct. To that end, this Global Anti-Money Laundering and International Trade Compliance Policy (“Policy”) supplements the general provisions set out in the Company’s Code of Business Conduct as they relate to compliance with applicable (i) anti-money laundering and anti-terrorist financing laws (collectively, “AML Laws”) and (ii) international trade laws and regulations. International trade laws and regulations covered in this Policy include export controls and economic sanctions.

1.2 This Policy applies to the Company’s employees and anyone authorized to act on behalf of the Company. Moreover, the Company encourages our business partners to follow the principles of this Policy and to implement policies and procedures establishing the same principles and rules. The Company’s personnel are expected to understand this Policy and any associated guidance, procedures and directions, and incorporate these compliance obligations into the regular course of business.


1.3 Policy is not intended to serve as legal advice on specific matters. Nor does the Policy intend to cover compliance with the whole spectrum of potentially applicable AML Laws or international trade laws and regulations that may apply to the Company’s operations. If an employee has questions regarding whether a particular transaction or other activity complies with applicable AML Laws or international trade laws and regulations, he should consult the Public & Regulatory affairs department or Compliance department.

1.4 The Company is committed to achieving compliance with all applicable AML Laws and international trade laws and regulations. However, the way through which these laws apply to our Company is complex. More detailed guidance on these laws can be found in Appendix A, and employees are required to familiarize themselves with these laws and comply with the requirements thereunder.

2. Action Items for All Colleagues

2.1 The following activities require **pre-approval** from the Public & Regulatory affairs department or Compliance department:

2.1.1 Any business dealings with countries and territories, targeted by US or US

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sanctions, including dealings with entities and nationals from these countries.

2.1.2 Any business dealings involving any organization, person, or vessel that may be on a sanctions list, or any entity or vessel that may be owned or controlled by any organization or person that is on a sanctions list, including any dealing with a “Specially Designated National” sanctioned by the U.S. Department of the Treasury, or any dealing with a “Designated Person” under European Union (“EU”) sanctions or any person designated by the United Nation Security Council.

2.1.3 All approvals are subject to the recusal process described in Appendix C.


2.2 If any colleague requests the engagement of any Touch Point Vendor (as defined in the Anti-Corruption Policy), he must provide accurate and complete information, including known ownership and control information and any known exposure to sanctioned countries or persons, or other potentially criminal activities, during the due diligence process.

2.3 Colleagues must help to ensure that corporate books and records accurately and fairly reflect all transactions in reasonable detail. No colleagues shall participate in falsifying any accounting or other business record. All supporting documentation in connection with compliance with applicable AML Laws and international trade laws or regulations or this Policy should be kept for at least five years unless approved by the Compliance department.

2.4 The Company may also undertake formal or informal audits, investigations, or inquiries concerning compliance with applicable AML Laws, international trade laws and regulations, or this Policy. The Company requires that all colleagues fully cooperate with the Company and its representatives in all such audits, investigations, and inquiries. Failure to cooperate or act honestly constitutes a breach of this Policy and, in addition to other applicable legal obligations.

3. Action Items for Colleagues in the Finance department, BBP RUK and Financing Services or Responsible for Interacting with Financial Institutions

3.1 The Company seeks to do business with financial institutions that have risk management programs and internal controls in place designed to combat money laundering, terrorist financing and violations of international trade laws and regulations.

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Persons responsible for engaging with financial institutions on behalf of the Company shall be responsible for being familiar themselves with guidance made by the Financial Action Task Force (“FATF”).

3.2 FATF is an inter-governmental standards-setting body that evaluates its member states’ compliance with FATF recommendations regarding anti-money laundering legal requirements and controls and identifies jurisdictions that are not in compliance with these recommendations. For more information, refer to FATF’s website at <https://www.fatf-gafi.org/>.

3.3 Unless otherwise approved by the Global Compliance Committee, the Company will engage a financial institution to provide services to the Company only if the institution is not located in a jurisdiction that has been (1) designated by the FATF as having “strategic deficiencies” in its legal requirements for preventing money laundering and terrorist financing or (2) subject to an FATF call to action by its member states to apply counter-measures to prevent money laundering and terrorist financing.


3.4 In addition, the Company may not do business with a “shell bank” – i.e., a bank without a physical presence in any country. Any engagement of financial institutions shall document at least one physical address or location the financial institution operates.

3.5 Finally, the Company will not do business with a financial institution if doing so would violate applicable international trade law.

3.6 Any colleague working in the Finance department, BBK RUK or Financial Services department with knowledge or suspicion that a transaction might violate applicable laws or regulations, or this Policy, is required to promptly report the issue to the Public & Regulatory affairs department or Compliance department.

4. Minimum Procedures to Be Implemented locally to be in Alignment with Global Ethics & Compliance requirements.

4.1 Risk Assessment: The Company operates in many different jurisdictions and operational environments with different risk profiles from an economic sanctions and anti-money laundering perspective. Zone Ethics & Compliance teams may conduct periodic risk assessments of its value chain in a scope and manner that is approved by the Global Ethics & Compliance team. Targeted Transaction Monitoring: Zone Ethics & Compliance teams are responsible for ensuring that the Company is monitoring transactional activity

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for compliance with applicable AML Laws in a scope and manner approved by Global Ethics & Compliance. As a general rule, all Touch Point Vendors (as defined in Anti-Corruption Policy of the Company) are subject to on-boarding and periodic background check, which includes screening against various sanctions lists and other lists used for assessing business integrity. Any potential match will be addressed by the Public & Regulatory affairs department or Compliance department.

4.2 Transactional Protocols: Zone Ethics & Compliance team are responsible for implementing a due diligence protocol that is approved by Global Ethics and Compliance over certain investment transactions, and may delegate the due diligence exercise to local the Public & Regulatory affairs department or Compliance department, or outside counsel, depending on the nature and the size of the transaction. For other types of corporate finance transactions under which the Company will receive proceeds (e.g. a divestiture of a subsidiary), the Global Ethics & Compliance team must be consulted to ensure that appropriate due diligence will be taken to identify and address potential money laundering and international trade compliance risks prior to the conclusion of the transaction.

4.3 Contractual Terms: Contractual terms are an important tool to further mitigate our money laundering and international trade compliance risks. Business Partners are generally required to agree in writing that they will comply with requirements on anti-money laundering and international trade law compliance. For other types of transactions, involving counterparties, which are not Business Partners of the Company (e.g. sales agreement with customers), the Public & Regulatory affairs department or Compliance department should be consulted, and if necessary, appropriate language regarding compliance with AML Laws or international trade laws should be included in the written agreement. The Compliance department may also determine to impose additional risk mitigating measures, such as requesting certification, or requiring auditing or training from counterparties, as needed. In certain cases, the Public & Regulatory affairs department or Compliance department may determine to suspend, restrict or terminate existing or proposed business relationship to ensure compliance with AML Laws and international trade laws and regulations.

5. Seeking Advice and Reporting Potential Violations


5.1 Money laundering and international trade compliance issues can be complex – violations can lead to severe penalties for the Company and individual liabilities, and the relevant laws are evolving rapidly. Therefore, it is of utmost importance that an employee actively seeks advice and raise concerns in this area.

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5.2 If an employee has any questions regarding the application of this Policy, he should seek advice from the Public & Regulatory affairs department or Compliance department. An employee can also use the Compliance Channel (<http://compliancechannelglobal.ab-inbev.com/>) to submit any questions he may have.

5.3 If an employee has any concerns regarding a potential violation of applicable laws or this Policy, he is encouraged to submit a report through a Hot Line <http://talkopenly.ab-inbev.com>. The Hot Line allows to submit a report confidentially and anonymously about any suspicion, potential and occurred violations. To ensure that concerns can be fully investigated, an employee should provide as detailed an account as possible including any supporting evidence.

Dos	Don't's
Be aware of the jurisdictional reach of U.S. and EU sanctions.	Do not assume that a transaction is not conducted in the U.S. or EU is not subject to U.S. or EU sanctions
Do consult with the Public & Regulatory affairs department or Compliance department before any dealings with embargoed or sanctioned countries or territories, unless such dealings have been otherwise approved.	Do not conceal information relating to sanctioned countries or parties to circumvent sanctions or AML Laws, including any reporting obligation
Do provide accurate and complete information during the due diligence process.	Do not overlook ownership and control information.
Do keep proper business record in accordance with applicable record retention requirements and special instructions provided by the Public &	Do not falsify any business record.

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Regulatory affairs department or Compliance department	
Do watch out for red flags for tax evasion by counterparties	Do not assume that counterparties' tax compliance is irrelevant to the Company.
Do raise concerns relating to potential criminal proceeds or terrorist activity	Do not participate in activity that might constitute facilitation of tax evasion

5.4 The Company prohibits and will not tolerate any actual or threatened retaliation against any colleague, or her or his legitimate representative, who reports a possible violation of law, regulation or this Policy in good faith. Similarly, any colleague who discourages or prevents another either from making such a report or seeking the help or assistance he needs to report the matter could be subject to disciplinary action. Retaliation is a violation of our Code of Business Conduct and can be reported to our Hot Line <http://talkopenly.ab-inbev.com>.

5.5 The outcome of an investigation can range from no further action being taken (e.g., where allegations are not substantiated) to formal disciplinary action against a colleague, up to and including termination of employment, in addition to other applicable legal obligations.

6. Dos and Don'ts

6.1 This following section serves as a quick reference for our colleagues on the key expectations from this Policy. It does not cover all relevant provisions in the Policy, and therefore should be read in conjunction with the Policy in its entirety.

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Appendix A – Guidance on Relevant Laws and Compliance Obligations

1. Anti-Money Laundering and Terrorist Financing

1.1 Money laundering is the process of transferring illegally obtained money through legitimate people or accounts so that its original source cannot be traced. Terrorist financing is the process by which terrorists fund their operations, through legally or illegally obtained funds, in order to perform terrorist acts. For the purpose of this Policy, controls that are used to prevent, detect and report both types of activity have been grouped within the term “AML.”

1.2 It is the policy of the Company to comply fully and continuously with all applicable AML Laws and related regulations.

1.3 The Company’s employees, agents, and third-party service providers are prohibited from

1.3.1 conducting a financial transaction involving the proceeds of unlawful activity with actual or constructive knowledge (i.e. “should have known”) that the transaction is designed to conceal or disguise the nature of the proceeds.

1.3.2 conducting a financial transaction with actual or constructive knowledge that the transaction could help fund terrorist activity.


1.4 In certain cases, the Company may be required under applicable AML Laws to report suspicious activity to some government authorities. All such reports should be handled by the Public & Regulatory affairs department or Compliance department. Therefore, it is important that, if an employee suspects that a proposed or ongoing transaction may involve criminal proceeds, he notifies the Public & Regulatory affairs department or Compliance department of the suspicious activity immediately to ensure full compliance.

1.5 Employees are also prohibited from knowingly participating in any activity that circumvents applicable AML Laws, including any reporting obligation.

2. Anti-Tax Evasion

2.1 Tax evasion is the illegal evasion of taxes by individuals, corporations, and trusts

2.2 Tax evasion is a criminal offense in most countries. Conduct that *facilitates* tax

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evasion could be a separate criminal offense, and such conduct can also constitute illegal money laundering.

2.3 Employees should not participate in any fraudulent evasion of tax by another person, or aid, abet, counsel or procure the commission of that offence.

2.4 Tax evasion involves dishonest conduct. Some red flags for tax evasion include


- A party knowingly makes a false statement about taxable income;
- A party refuses to provide legitimate invoices;
- A party asks for payment in cash without justification;
- A party requests that payments be made to a country or region different from where the goods or services are provided; and
- A party requests us to issue invoices to a different entity which does not benefit from the services invoiced.

2.5 As tax laws are complex, employees should always consult the Tax department, the Public & Regulatory affairs department or Compliance department if an employee has any question regarding tax compliance. The employee should also report to the line manager, the Public & Regulatory affairs department or Compliance department if the employee has any knowledge or suspicion of potential or ongoing tax evasion schemes, whether such schemes benefit the Company or not.

3. Trade Compliance

3.1 International trade laws that may be applicable to the Company, its subsidiaries, joint ventures, affiliates and these entities' directors, officers, employees and counterparties include:

- 3.1.1 comprehensive economic and trade sanctions or more targeted measures such as arms embargoes, travel bans, and financial or commodity restrictions imposed by United Nation Security Council, which are often implemented through national legislation;
- 3.1.2 restrictive measures adopted under the European Union's ("EU") Common Union and Security Policy, which can include asset freezes, arms embargoes, general or specific sectoral trade or export restrictions – these measures are applicable across EU member states, although each member state has its own enforcement authority;
- 3.1.3 the laws and regulations administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), which include

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prohibitions and restrictions on business and financial dealings with, certain countries, governments, entities, vessels and individuals that are the targets of U.S. economic sanctions programs;


3.1.4 certain “secondary sanctions” administered by OFAC or the U.S. Department of State pursuant to certain legislation; and

3.1.5 similar laws and regulations in other jurisdictions (e.g. Canadian or Australian sanctions).

3.2 The application of such international trade laws depends on many factors. For example, EU sanctions apply (i) within the territory of the member states of the EU; (ii) to any person inside or outside the territory of the EU who is a national of a member state; (iii) to any legal person, entity or body which is incorporated or constituted under the law of an EU member state whether acting inside or outside of the EU; and (iv) to any legal person, entity or body in respect of any business done in whole or in part within the EU. Therefore, certain transactions that are conducted by an EU national colleague, even when on behalf of a non-EU subsidiary of AB InBev, may be subject to EU sanctions.

3.3 There are two types of U.S. sanctions – “primary sanctions” and “secondary sanctions.” Primary sanctions apply to “U.S. Persons” – including all companies and other legal entities organized under U.S. laws, including their branch offices located outside the U.S.; U.S.-based branches and subsidiaries of non-U.S. companies; individuals who are U.S. citizens or permanent residents (“green-card” holders), regardless of their place of domicile or work; and any individuals while physically present in the U.S. “Primary sanctions” also apply to most transactions denominated in U.S. dollars and transactions involving goods or services from or to the U.S., even if conducted entirely by non-U.S. Persons. Furthermore, non-U.S. Persons that cause a U.S. Person to violate U.S. primary sanctions also violate the U.S. primary sanctions and risk civil and criminal penalties under applicable U.S. laws. “Secondary sanctions” have even broader effect, and could apply to persons and transactions that have no U.S. nexus.

3.4 It is the policy of the Company to comply with all applicable international trade laws. For information, two primary types of economic sanctions are discussed in detail below. However, whether a specific activity or transaction complies with applicable international trade law requires case-by-case analysis examining the parties participating in the transaction and the nature of the transaction. Furthermore, the scope of economic sanctions can often change with short notice, and there are cases in which a conflict exists between applicable international trade laws. **If an employee has any question in this aspect, he should always contact** the Public & Regulatory affairs department or

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Compliance department **before proceeding with a transaction.**

3.5 It would be rare, but still possible, that non-U.S. Persons of the Company can be permitted to participate in a transaction or business matter that would violate U.S. primary sanctions if participated by U.S. Persons. In such cases, non-U.S. Persons should be mindful of not causing U.S. Persons to violate primary sanctions (including by involving any director, officer or colleague of the Company, or any third party, who is a U.S. Person (such as a U.S. bank)). Seek specific guidance from the Public & Regulatory affairs department or Compliance department if an employee has any question.


Country- and Territory- Based Embargo and Sectoral Sanctions

3.6 Country- and territory-based sanctions prohibit a specific range of activities with countries or territories, as well as their governments and, in some cases, their nationals. The prohibitions can be quite broad (thus referred to as an “embargo”), or they can be narrower and only focus on certain sectors (often referred to as “sectoral sanctions”).

3.7 Currently, a range of countries and territories are targeted by comprehensive U.S. and/or EU sanctions, as well as U.S. export controls. U.S. authorities also administer “secondary sanctions” for certain dealing with Iran by non-U.S. Persons. In addition, Venezuela is subject to a broad range of U.S. sanctions. Therefore, the Company requires advance consultation with the Public & Regulatory affairs department or Compliance department before any dealings of any type by the Company with these countries or territories. This includes proposed sales, provision or receipt of samples or promotional materials, purchases, payments, donations, receipt of funds, gathering market intelligence, business development activities, and any other proposed direct or indirect transactions or dealings with the country or territory, its government, or any counterparties that are based in or organized under the laws of these countries or territories (e.g. an Iranian company).

3.8 Certain products manufactured or sold by the Company may be exported or sold to these countries under a general license or a specific license exempting such transactions from the applicable sanctions. With such exceptions, the Company still needs to be mindful of other types of sanctions (including list-based sanctions discussed below), and specific guidance and controls provided by the Public & Regulatory affairs department or Compliance department need to be followed at all time for such transactions.

3.9 Russia faces certain sectoral sanctions imposed by the U.S. authorities, including

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both primary sanctions and secondary sanctions. These prohibitions target, among other things, certain capital market and financing restrictions, participated by certain critical conglomerates and financial institutions in Russia, and therefore have wide-reaching influence over the Russia economy. Our normal course of business in Russia and with Russian counterparties is subject to heightened scrutiny implemented through relevant Zone Ethics & Compliance team. If an employee has any question, he should contact them immediately.

3.10 The specific requirements discussed above may be subject to revision to reflect new, amended, or updated sanctions programs or prohibitions imposed on targeted countries, territories or governments.


List-based Sanctions

3.11 Sanctions laws can also prohibit broad or specific dealings with targeted persons, organizations, and vessels. The Company prohibits dealings with parties designated by the U.S., UN, or EU where such dealings are prohibited by applicable law.

3.12 Under U.S. sanctions, the key lists are the List of Specially Designated Nationals and Blocked Persons (the “SDN List”), which identifies thousands of sanctioned persons, entities, and vessels worldwide and prohibit virtually all transactions by U.S. Persons with such persons (subject to limited exceptions), and the Sectoral Sanctions Identifications List (“SSI List”), which restricts U.S. Persons from certain types of trade and financial dealings with particular Russian financial institutions, defense and energy companies. By designating a person on the SDN List, the property and property interests of the person must be blocked (i.e., “frozen”) when they come into the United States or the possession or control of a U.S. Person.

3.13 Under EU sanctions, the key lists include the EU Consolidated Sanctions List and the annex of the European Council Regulation No. 833/2014 (as amended), the latter of which identify certain Russian financial institutions, defense companies, and energy companies subject to financial restrictions that are similar to the restrictions imposed under the U.S. sanctions against Russian parties on the SSI List.


3.14 List-based sanctions go broader than merely restricting transactions with the listed persons. U.S. Persons are not only prohibited from engaging in virtually all business dealings with or for the benefit SDNs, but also with or for the benefit of entities in which one or more SDNs own, directly or indirectly, individually or in the aggregate, 50% or more interest — even if the company with the SDN ownership is not itself listed on the

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SDN List. Additionally, the restrictions on certain types of U.S. trade and financial dealings with persons on the SSI List apply equally to trade and financial dealings with entities in which one or more persons on the SSI List own, directly or indirectly, a 50% or greater interest (and in some cases, a 33% or greater interest).

3.15 Along similar lines, EU asset-freezing sanctions generally extend not only to any specifically designated entity, but also to any non-listed entity that is majority-owned, or otherwise controlled, by a listed entity, directly or indirectly.

3.16 The Company requires pre-approval from the Public & Regulatory affairs department or Compliance department for any dealings involving any organization, person, or vessel that may be on a sanctions list, or any entity or vessel that may be owned or controlled by any organization or person that is on a sanctions list. Such pre-approval requirements apply to cases in which an employee has actual knowledge or suspicion of potentially impermissible transactions, or if the Company's risk-based compliance program identifies such impermissible transactions. In some cases, property or assets of a designated party that come into the Company's possession may need to be frozen and reported with the relevant government authority.

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Appendix B - Quick Reference Guide to the Anti-Money Laundering and International Trade Compliance Policy

Why the Company has this Policy?

The Company, as a part of a global company AB InBev, has global operations and therefore is subject to a broad range of anti-money laundering, anti-terrorist financing, economic sanctions and other international trade compliance laws. These laws tend to be far-reaching, complex and evolving quickly, and therefore this Policy have been implemented to help employees comply with these laws and protect our Company from relevant risks.


Why are these laws? What do they prohibit?

- **AML Laws:** These laws prohibit money laundering and terrorist financing. **Money laundering** is the process of transferring illegally obtained money through legitimate people or accounts so that its original source cannot be traced. **Terrorist financing** is the process by which terrorists fund their operations, through legally or illegally obtained funds, in order to perform terrorist acts.
- **Tax evasion and facilitation of tax evasion:** Tax evasion is a criminal offense in most countries. **Conduct that facilitates tax evasion** could be a separate criminal offense, and such conduct can also constitute illegal money laundering.
- **International trade laws and regulations:** These include **economic sanctions, and export controls**. The most relevant laws for our company are UN, U.S. and EU economic sanctions, which prohibit or restrict trade and financial dealings with, certain countries, governments, entities and individuals.

How does the Company support compliance with international trade legislation, anti-money laundering and terrorism financing and anti-tax evasion legislation?

The Company employs a risk-based compliance approach that includes the following components:

- **Financial institution relationship:** The Company seeks to do business with financial institutions that have risk management programs and internal controls in place designed to combat money laundering, terrorist financing and violations of international trade laws and regulations. Engaging a financial institution in certain risky jurisdictions require pre-approval by the Compliance department.
- **Risk-based screening:** The Company conducts periodic risk assessments of our value chain and determine screening and due diligence procedures to

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identify potential money laundering and international trade compliance risks. Currently, dealing involving countries and territories, targeted by the US or EU sanctions, or **certain sanctioned individuals, vessels or entities** require pre-approval. If requested, an employee must provide accurate and complete information, including known ownership and control information and any known exposure to sanctioned countries or persons, or other potentially criminal activities, during the screening and due diligence process.


- **Other risk mitigating measures:** The Company uses several other different measures to further mitigate risks in these aspects, including contractual terms, requesting certification, conducting audits, etc. Always keep the Public & Regulatory affairs department or Compliance department informed so they can provide employees with proper guidance.
- **The Company expects the following from its employees:** If an employee has knowledge or suspicion that a transaction might violate applicable laws or regulations, or this Policy, the employee must raise the issue to the Public & Regulatory affairs department or Compliance department regardless of the Company's own screening results. Employees should be alert of different red flags, even if they are not directly dealing with a sanctioned party or a sanctioned country. For example, there could be a risk where products are exported to a non-sanctioned country with knowledge that it will be re-exported to a sanctioned country or end-user; or where the immediate counterparty to a transaction is owned or controlled by a sanctioned party.

If an employee is not a U.S. Person, why does he need to care about U.S. sanctions?

There are still many ways U.S. sanctions could apply to transactions that an employee participates in, either on his own or on behalf of the Company. The transaction could involve dealings in or with U.S. persons, the U.S. financial system, or U.S.-origin goods and technology. In particular, most financial transactions denominated in USD are processed to or through U.S. financial institutions, so these transactions and the underlying commercial activity would be subject to U.S. primary sanctions. Don't forget that there are also secondary sanctions – which do not even need a U.S. nexus to apply.

What should employees do if they suspect a violation of this Policy or relevant laws?

If an employee has any concerns regarding a potential violation of this Policy or relevant laws, he is encouraged to submit a report confidentially and anonymously through the Hot Line <http://talkopenly.ab-inbev.com>.


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What about other questions?

If an employee has any questions regarding the application of AML Laws, international trade law, or this Policy, he should seek advice from the Public & Regulatory affairs department or Compliance department. An employee can also use the [Compliance Channel](#) to submit any questions he may have.

Appendix C – Recusal Process for U.S. Persons

1. In addition to the general prohibitions described in the Policy, U.S. Persons may not “facilitate” or in any way approve or assist any transaction that violates U.S. primary sanctions. “Facilitation” is a very broad concept and can include referring a transaction prohibited by U.S. primary sanctions to non-U.S. Persons.
2. If a director, officer or colleague of the Company who is a U.S. Person is assigned to work on a transaction or business matter that could potentially violate U.S. primary sanctions, that director, officer or colleague must immediately notify the Public & Regulatory affairs department or Compliance department through Compliance Channel to enable formal recusal from the transaction or business matter. This can be of particular concern to individuals who serve as directors or officers of companies not controlled by the Company.
3. In making the notification, the director, officer or colleague should not further refer the transaction or matter to a non-U.S. Person, as doing so might constitute prohibited facilitation.
4. The Company may also decide to recuse U.S. Persons from any transaction on its own.
5. Once a recusal is documented, all non-U.S. Persons working on the relevant matter or transaction should be alerted of the potential sanctions risks, and should be prohibited from further involving any U.S. person (including U.S. persons who are third parties, such as a U.S. bank) in the transaction or matter.
6. Where national laws prohibit the recusal of a U.S. person director, officer or colleague from the decision-making processes, one should consult with the Public & Regulatory affairs department or Compliance department, who might, if proper, approach OFAC for additional guidance.
7. the Public & Regulatory affairs department or Compliance department may issue a notice of recusal to persons being recused from a matter to set out their obligations. In general, recused U.S. Persons should comply with the following:
 - a. They cannot send or forward any correspondence, documents or other materials

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related to the transaction or matter they are recused from. Nor can they provide any approval, assistance, advice, support or guarantee for the transaction or matter.

b. They can still receive reports about activities they are recused from, if they do not take any action that might facilitate the transaction or activity.

c. Even though they can possibly attend a meeting where a matter in violation of primary sanctions would be discussed without violating primary sanctions (by not contributing to the discussion in any way), the Company may request that U.S. Persons not participate in such a meeting.