



# YINSON HOLDINGS BERHAD

## Sanction

### POLICY

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### **Revision Details**

Rev. No.	Section	Details
01		New Policy Adoption



## POLICY STATEMENT

YINSON is fully committed to conducting its business in compliance with all Sanctions requirement including laws and trade restrictions imposed by United Nations, United States, European Union and other national and supranational authorities and legislators.

This Policy is intended to serve as a guide to all working for or with YINSON to understand where breaches of the Sanctions requirements might arise and to guide them in making the right decisions in line with our Policy.

This Policy also summarizes restrictive measures imposed by the Sanctions Authorities which restrict the ability of Yinson to undertake any activity in specific territories or with specific persons targeted by the Sanctions. This Policy also outlines the restrictions and protective measures to be consistently followed by each employee of Yinson.

## 1 OBJECTIVES AND DEFINITION

### 1.1 Objective

The objectives of this Policy are as follows:

- Employees are made aware of the restrictive measures imposed by the Sanctions Authorities which restrict the ability of Yinson to undertake any activity in specific territories or with specific persons targeted by the Sanctions.
- Employees are made aware of such requirements and sources of information.
- Employees will escalate a report if any of the Sanctions are breached, to the appropriate reporting channels.

### 1.2 Ownership

The YINSON Legal Department has overall responsibility for ensuring this Policy complies with applicable laws and sanctions.

The YINSON Legal Department will regularly monitor the effectiveness and implementation of this policy and make any necessary changes as soon as identified.

Employees at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are adequately informed and communicated to.



### 1.3 Scope

This Policy applies to:

- All YINSON employees;
- All Board of Directors of Yinson Holdings Berhad (executive and non-executive);
- All Board of Directors of YINSON subsidiaries; and
- Joint venture companies of YINSON over which YINSON has management control, and to every employee, officer and director of such joint ventures.

Business Partners, Third Parties and International Commercial Representatives should act consistently with the policy when representing or in collaboration with Yinson.

### 1.4 General

Sanctions are the regulatory restrictions applicable to dealings with certain countries/territories, governments, groups, entities, individuals, or controlled goods or services. The nature and extent of these restrictions may vary (e.g., limitations on import/export, controls on specific goods and services, restrictions on financial operations, etc.), and it is important that all YINSON employees consult with the YINSON Legal Department to understand the business implications.

Guided by an interest in protecting our employees and reputation, YINSON may go beyond what is required by the Sanctions and decide not to provide services even where it is permitted by law. If such an event arises, this will be made known to all YINSON employees.

### 1.5 Abbreviations & Definitions

**“OFAC”** refers to Office of Foreign Assets Control of the US Department of the Treasury.

**“Person”** refers to an individual or a corporate body.

**“Sanctioned Country”** refers to a country or territory that is, or whose government is, the subject of Sanctions broadly prohibiting dealings with such government, country or territory.

**“Sanctions”** shall mean any economic or trade sanctions, laws, regulations, embargoes, freezing provisions, prohibitions or restrictive measures relating to trading, doing business, investment, exporting, financing or making assets available (or other activities similar to or connected with any of the foregoing):

- (a) administered, enacted, enforced or imposed by law or regulation by the US Government (including CISADA), the United Nations Security Council, the European Union or its Member States, Switzerland or the respective governmental institutions and agencies of any of the foregoing, including without limitation, OFAC, the US Department of State, and Her Majesty’s Treasury (HMT) and the State Secretariat for Economic Affairs of Switzerland (SECO) (together, the **“Sanctions Authorities”**); or



- (b) otherwise imposed by any law or regulation (and, as regards a regulation, compliance with which is reasonable in the ordinary course of business of YINSON).

“**Sanctions List**” refers to the Specially Designated Nationals and Blocked Persons list maintained by OFAC, the Consolidated List of Financial Sanctions Targets maintained by Her Majesty’s Treasury, or any similar list maintained or made public by the United Nations Security Council or any of the Sanctions Authorities with their respective official links as follows:

- OFAC (<https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>)
- Consolidated List of Financial Sanctions Targets maintained by Her Majesty’s Treasury (<https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>)
- United Nations Security Council (<https://www.un.org/securitycouncil/sanctions/information>)
- State Secretariat for Economic Affairs of Switzerland (SECO) ([https://www.seco.admin.ch/seco/en/home/Aussenwirtschaftspolitik\\_Wirtschaftliche\\_Zusammenarbeit/Wirtschaftsbeziehungen/exportkontrollen-und-sanktionen/sanktionen-embargos.html](https://www.seco.admin.ch/seco/en/home/Aussenwirtschaftspolitik_Wirtschaftliche_Zusammenarbeit/Wirtschaftsbeziehungen/exportkontrollen-und-sanktionen/sanktionen-embargos.html))
- EU Asset Freeze List (<https://data.europa.eu/euodp/en/data/dataset/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions>)

“**YINSON**” refers to YINSON Holdings Berhad and its subsidiaries.

## 2 WHAT BUSINESS MUST NOT BE UNDERTAKEN

YINSON will not engage in business or transactions with a Person:

- (a) that is listed on, owned or controlled by a person listed on, or acting on behalf of a person listed on, any Sanctions List in the manner of which the prohibitions or restrictive measures are imposed in the Sanctions; or
- (b) is located, organised or resident in a Sanctioned Country unless it does not fall within the prohibitions or restrictive measures are imposed in the Sanctions; or
- (c) otherwise a target of Sanctions (being a person with whom a national under the jurisdiction of a Sanctioned Authority would be prohibited or restricted by law from engaging in trade, business or other activities or against whom Sanctions are otherwise directed).

If there is any uncertainty as to the appropriateness of a transaction, you should seek advice from YINSON Legal Department.



### **3 WHAT HAPPENS IF SANCTIONS ARE IGNORED?**

Violations of any of the Sanctions requirement may lead to severe civil and/or criminal penalties against companies and individuals, including significant monetary fines, imprisonment, extradition, blacklisting, revocation of licences, and disqualification of directors.

In addition, such violations can lead to damaging practical consequences, including harm to YINSON's reputation and commercial relationships, restrictions in the way YINSON can do business, and extensive time and cost in conducting internal investigations and/or defending against government investigations and enforcement action.

It is important to keep in mind that Sanctions imposed by one country (for example, the United States), may influence individuals and companies both inside and outside its borders.

Banks play a vital role in the enforcement of Sanctions. Any violation may severely damage YINSON's banking relationships and its ability to transact.

### **4 WHAT ARE YOUR RESPONSIBILITIES?**

All parties have the obligation to read and follow this Policy, to understand and identify any red flags that may arise in your business activities and to escalate potential concerns related to sanctions to the Legal Department.

It is the responsibility of all YINSON employees involved in international transactions to understand this Policy.

All YINSON employees should be consistently kept up to date with laws and regulations applicable to the countries in which you operate.

All YINSON employees should think carefully about the potential impact of Sanctions before contracting with any parties.

All YINSON employees should know your customers – who they are, what they do, where they are based and how they will use YINSON's services. This is important because YINSON could become involved in a prohibited transaction without realizing it.

Do not proceed with a transaction if you have any doubts. We promote an open culture where if you are unsure what this policy means to a particular transaction you should seek advice from YINSON Legal Department.