



SANCTIONS & EXPORT CONTROLS POLICY

At MARITECH®, we are committed to conducting business with integrity, in full compliance with applicable international trade laws and regulations. This includes adherence to all relevant sanctions regimes and export control frameworks. We recognize that failing to comply with these regulations can lead to significant legal, financial, and reputational consequences.

This policy outlines our commitment to responsible global operations and provides guidance to ensure compliance with sanctions and export controls in every jurisdiction in which we operate.

Purpose & Scope

The purpose of this policy is to:

- Prevent violations of international sanctions and export control laws
- Ensure that Maritech products, services, and technologies are not used in prohibited or unauthorized ways
- Promote awareness and accountability across our business units and supply chain

This policy applies to all MARITECH employees, officers, directors, subsidiaries, joint ventures, contractors, suppliers, and partners globally.

Key Definitions

- **Sanctions:** Restrictions imposed by governments or international bodies that limit or prohibit trade and financial dealings with specific countries, entities, or individuals.
- **Export Controls:** Laws and regulations governing the transfer of goods, software, or technology across borders—including dual-use items that have both civilian and military applications.

Policy Commitments

MARITECH commits to:

- Comply with all applicable sanctions regimes (e.g., UN, EU, US OFAC, UK HMT, and national sanctions regulations)
- Identify and restrict dealings with embargoed countries, designated individuals/entities, and prohibited end-uses or end-users
- Maintain controls over the export and re-export of goods, software, services, and technical data, in accordance with applicable licensing requirements
- Conduct screening of customers, partners, vendors, and third parties against global watchlists

Employee & Partner Responsibilities

All employees and third parties acting on Maritech's behalf are required to:

- Understand and follow relevant sanctions and export control obligations
- Immediately report any potential or suspected violations
- Avoid transactions involving sanctioned entities, jurisdictions, or prohibited activities

Procurement, sales, logistics, and compliance personnel have enhanced obligations to ensure regulatory adherence in high-risk transactions.

Due Diligence & Risk-Based Approach

We apply a risk-based due diligence approach that includes:

- Screening parties through automated systems integrated with global sanctions lists
- Assessing the nature and destination of transactions
- Requiring export licenses where applicable and documenting relevant approvals

Training & Awareness

MARITECH provides periodic training to employees involved in international operations, trade compliance, and customer-facing roles. Employees are encouraged to seek guidance when unsure about export control or sanctions obligations.

Monitoring & Enforcement

Violations of this policy or related laws may result in disciplinary action, including termination of employment or business relationships. We also cooperate fully with regulatory authorities in any investigations.

Governance, Communication & Review

This policy:

- Is approved by the Company's Sustainability Committee
- Is reviewed every two years or earlier if needed by the Corporate Governance and Sustainable Development Division, in cooperation with the Legal and Compliance teams
- Applies to all Business Units of Maritech Group, including suppliers and business partners where relevant
- Is communicated internally and externally and publicly available
- The Company is committed to allocating the necessary resources to ensure implementation, training, and compliance monitoring

For questions or concerns, contact: **compliance@maritechgroup.com**

MARITECH GROUP HOLDING LTD

Chen YiJie, Executive BoD member