



International Trade & Financial Sanctions Policy

TABLE OF CONTENT

1. PURPOSE3

2. SCOPE3

3. DEFINITIONS AND CLARIFICATIONS.....4

4. POLICY OVERVIEW6

5. POLICY STATEMENT6

6. IMPLEMENTATION AND RESPONSIBILITIES.....7

7. REPORTING VIOLATIONS.....9

1. PURPOSE

Ooredoo Palestine (hereinafter referred to as the “OP”) is committed to conduct business in a professional and ethical manner, with integrity in all of its business dealings.

This International Trade & Financial Sanctions Policy (“**Policy**”) illustrates the OP’s policy for ensuring that it conducts its business in compliance with the economic sanctions programs administered by relevant Sanctions Authorities. Ooredoo does not engage in transactions or conduct in violation of applicable sanctions or export controls laws.

2. SCOPE

This policy applies to all OP Personnel and all Business Partners, and must be read, understood and applied in the broader context of responsibilities listed under the Code of Conduct. This Policy may also be applied and adapted to entities in which OP has an interest in. OP Personnel and all Business Partners must read and comply with this Policy as well as all applicable supporting policies and procedures including but not limited to the OP’s:

- a) Code of Business Conduct & Ethics;
- b) Anti-Money Laundering (AML);
- c) Conflict of Interest Policy; and
- d) Anti-Bribery and Anti-Corruption Policy.

Where local customs, standards, laws or other local policies apply and are stricter than the provisions of this Policy then the stricter rules must be complied with. However, if this Policy provides for stricter rules than the local customs, standards, laws or other local policies then the stricter provisions of this Policy shall continue to apply.

3. DEFINITIONS AND CLARIFICATIONS

The following terms and acronyms are used within this document and are defined as follows:

50 Percent Rule:	A rule administered by OFAC which states that the restrictive measures applicable to an SDN apply automatically to any entity owned directly or indirectly 50 percent or more by one or more SDNs, even if not specifically named to the SDN List (i.e. the entity will be deemed to be an SDN by OFAC).
Business Partner	An individual or company who has some degree of involvement with OP's business dealings, whether as supplier / vendor, service provider or otherwise.
EU	The European Union.
OP	Ooredoo Palestine
OP Personnel	All employees of the OP at all levels and grades, whether permanent or temporary, as well as any officers, directors, consultants, agents or other representatives of the OP, whether or not employed, and any other persons acting on behalf of or in the interests of the Group.
OFAC	The US Department of the Treasury's Office of Foreign Assets Control, which administers and enforces US economic and trade sanctions programs, including against countries, entities and individuals.
OFSI	The Office of Financial Sanctions Implementation within His Majesty's Treasury of the United Kingdom, which ensures that financial sanctions are implemented and enforced in the UK.
Palestine	The state of Palestine.
Sanctions Authority	<ul style="list-style-type: none"> • Public Prosecution of the State of Palestine. • The United Nations Security Council (the Council as a whole and not its individual members); • The US Department of State; • The US Department of Commerce's Bureau of Industry and Security; • The US Department of the Treasury's Office of Foreign Assets Control; • The European Union Council and/or Commission (including any present or future member state of the European Union); • The Office of Financial Sanctions Implementation within His Majesty's Treasury of the United Kingdom; • The United Kingdom Department of Business and Trade; • other Sanctions Authorities that operate in other jurisdictions where Ooredoo OpCos are based and • Any other applicable government or regulatory body, institution or agency having similar jurisdiction.

Sanctions Laws	Means economic or financial sanctions together with any other law, regulation, order, directive, or guidance (with the effect of law) imposed by a Sanctions Authority that imposes trade or economic restrictive measures against countries, territories, individuals or entities.
Sanctions Target	means - <ul style="list-style-type: none"> a) the government of any Sanctioned Territory; b) to the extent restricted under Sanctions Laws, any individual or entity that is (or was at the relevant time) resident in, located in, organized under the laws of, or subject to the jurisdiction of, a Sanctioned Territory; c) any individual or entity that is designated on any list promulgated administered, or enforced by a Sanctions Authority; or d) (d)any entity that is owned or controlled directly or indirectly by, or any individual or entity acting for or on behalf of, any of the foregoing or otherwise targeted under any Sanctions Laws.
Sanctioned Territory	Means any country or territory that is, or whose government is, the target of comprehensive economic or trade sanctions or restrictive measures imposed by any Sanctions Authority, which currently include Cuba, Iran, North Korea, Syria and various constituent territorial regions of Ukraine, including Crimea, Kherson, Zaporizhzhia, the so-called Donetsk People's Republic, and the so-called Luhansk People's Republic
SDN	A Specially Designated National and Blocked Person under OFAC's framework
UK	United Kingdom of Great Britain
UNSC	United Nations Security Council
US	United States of America

4. POLICY OVERVIEW

While the OP's activities are largely focused on OP and the other jurisdictions where it operates through subsidiaries or joint ventures, there are a number of Sanctions Laws which may dictate (directly or indirectly) where and with whom OP can conduct business activities. The OP may also be subject to prohibitions or restrictions on conducting business in certain territories or with certain third parties based on the provisions of agreements entered into with Business Partners, or the terms and conditions of arrangements entered into with banks and other financial institutions. Failure to comply with these programs and contractual obligations could have serious financial consequences and reputational risk for the OP and may result in disciplinary action being taken against any OP Personnel who approved, directed, facilitated or had knowledge of such violations or breaches. The purpose of this Policy is to ensure that all business transactions are conducted in compliance with all applicable Sanctions Laws and regulations.

Sanctions is a complex area of the law and as such all OP Personnel are required to not only ensure that they understand this policy but must also actively engage with the Head of Compliance at the beginning of each business transaction to ensure that transactions do not breach any Sanctions program or the provisions of agreements entered into by OP with third parties.

The rationale to impose Sanctions on a third party is based on diverse interests, including political, economic and national security interests. These interests change rapidly and therefore Sanctions are subject to significant and constant change.

Under no circumstances should any international business transactions be conducted contrary to this Policy.

You must contact the Compliance Unit if you have questions or if you need to screen or undertake other due diligence on a Business Partner.

5. POLICY STATEMENT

The OP will comply with all applicable Sanctions Laws at all times.

Prior to engaging in any particular business activity or proposed transaction, OP will assess whether or not that business activity or proposed transaction is in compliance with applicable Sanctions Laws. Where a business undertaking or proposed transaction may not be in compliance with Sanctions Laws or a business unit is unsure as to whether the business undertaking or proposed transaction is in compliance with Sanctions Laws, then the Head of Compliance must be notified immediately in writing and all engagement in the business undertaking or proposed transaction must immediately cease until advice has been provided as to whether or not the business undertaking or proposed transaction complies with Sanctions Laws.

OP will not employ a Sanctions Target or appoint a Sanctions Target as a director or officer.

OP will not assist or support a transaction by or with a Sanctions Target where to do so would be in breach of an applicable Sanctions Laws.

OP will not assist or support a transaction by or with a Sanctions Target where to do so would be in breach of any Sanctions Laws, unless explicit prior approval has been obtained in writing from the Head of Compliance and General Counsel.

OP is committed to providing full transparency with respect to financial information to the banks that it works with. This means that the OP will provide accurate and complete details of the nature of transactions as required by the banks that it works with.

OP and OP Personnel will not knowingly assist any third party in breaching Sanctions Laws. OP Personnel should not make statements or engage in conduct that is designed to evade applicable Sanctions Laws or this Policy.

OP will further support compliance of this Policy through its integrity due diligence procedures.

By way of further guidance and further Policy Statements, including specific restrictions on activities by the Group and any OP Personnel, please refer to Annex A. Outline of Sanctions Regimes, which forms an integral part of this Policy.

6. IMPLEMENTATION AND RESPONSIBILITIES

Responsibility

The Finance and Procurement Departments of OP or operating companies should refrain from engaging with any third parties in contract or principle until all screening and KYC requirements have been met by the third party. Furthermore, no payments should be made to third parties until they have been whitelisted by OP's engagement standards.

Training and Awareness

To promote awareness of OP's obligations under applicable Sanctions Laws, and to help all OP Personnel understand their roles and responsibilities under this Policy, the OP will provide periodic training. All designated OP Personnel are required to participate in and complete the OP's general sanctions training program. New hires will receive training during orientation as appropriate. OP will maintain records of training materials and attendance at training sessions.

Managers

It is the responsibility of every manager to adhere to this Policy within his or her area of functional responsibility, to lead by example, and to provide guidance to those employees reporting to him or her.

Managers and the Executive Leadership shall:

- (a) set the tone with respect to acting with integrity at OP;
- (b) ensure that senior management and business units are aware of the applicable international Sanctions Law(s) that apply to their business units;
- (c) ensure that business units understand and comply with this Policy;
- (d) encourage questions and reports of concern, and promote corrective actions when needed;

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- (e) ensure that the requirements of this Policy are reflected in key operating procedures and processes and assign ownership of the compliance risks identified in this Policy; and
 - (f) ensure a culture of compliance and effective controls and communicate the serious consequences of non-compliance to OP Personnel.

Employees

All OP Personnel are responsible for adhering to the principles and rules set out in this Policy and seek clarification on any questions or concerns related to the content of this Policy.

All OP Personnel must:

- (a) read, understand and comply this Policy;
- (b) familiarize themselves and have a sound understanding as to how this Policy applies to their function/business group and their role/responsibilities;
- (c) promptly report any actual or potential breaches of this Policy;
- (d) seek guidance and ask questions relating to this Policy from their line manager, senior management or OP Compliance Unit ; and
- (e) undertake all training and participate in awareness sessions in relation to this Policy.

Employees may contact, at any time, the Human Resources Department or the Local Compliance Officer or the Group Compliance Department in case of any inquiries.

OP Legal, and Corporate Governance Department

OP Compliance Unit is responsible for ensuring all sanctions-related matters described within this Policy that have been reported, documented, reviewed and addressed. OP Legal, and Corporate Governance Department is the custodian of this Policy and is responsible for:

- (a) periodically evaluating the effectiveness of this Policy; and
- (b) reviewing and revising as necessary to reflect any changes required by applicable laws, policies and procedures.

OP Compliance unit shall be responsible for:

- (a) ensuring awareness and understanding of this Policy through training and awareness programs;
- (b) making reasonable steps to assess if this Policy is complied with including appropriate monitoring of activities where necessary;
- (c) working with the Group's companies to assess, where applicable, any risks, develop and monitor controls that have been implemented to ensure compliance with this Policy and any related policies and procedures;
- (d) reviewing all requests for clarifications related to this Policy; and
- (e) developing training and communication initiatives related to this Policy.

The Compliance Unit shall report any actual or suspected non-compliance or red flags immediately to the Head of Compliance.

Audit and Assurance

The OP Compliance Unit shall undertake periodic audits and advise of any non-compliance to the Group head of Compliance.

7. REPORTING VIOLATIONS

Any employee who learns of a potential violation of applicable Sanctions Laws or this Policy is required to report his or her suspicions promptly and as soon as possible.

OP Personnel agree to uphold OP's commitment to do what is right and to follow this Policy and the Code of Business Conduct & Ethics. OP Personnel who fail to uphold this commitment put themselves, their colleagues, and OP at risk of fines, penalties, and reputational damage and personally may be subject to disciplinary action, up to and including, loss of employment.

OP reserves the right, at its sole discretion, to disclose information about violations of law to relevant authorities. Any OP Personnel who have violated applicable laws may be personally liable for penalties or fines or may be subject to imprisonment.

Violations can be reported through the following:

1. Ooredoo Website: ooredoo.ps/Whistleblowing
2. Ooredoo Palestine Website: [ooredoo.ps/about-us/ Violation-Form](https://ooredoo.ps/about-us/Violation-Form)
3. Email: WhistleBlowing@Ooredoo.ps
4. Email: Internal.Audit@Ooredoo.ps
5. Post: OP Chief Audit Executive, Ooredoo Headquarters P.O.Box 4236, Palestine - Sateh Marhaba, Al Bireh

At all time, Ooredoo Palestine will ensure that:

1. There is a ZERO tolerance for retaliation. OP will not retaliate or permit retaliation against anyone who, in good faith, raises questions or concerns about possible misconduct or violations.
2. All reported incidents will be investigated thoroughly without any bias or pressure and in accordance with high level investigation standards and procedures.
3. Confidentiality is respected, and you may choose to remain anonymous after voicing your concerns. However, if you identify yourself, we will be able to follow up with you and provide feedback. Your identity and information will only be shared in line with our strict internal protocols to safeguard our employees privacy.

If you have reason to believe you've been subjected to unjust treatment or a form of retaliation as a result of a concern or refusal to accept a bribe, you should inform the Compliance OP immediately or use one of the Ooredoo Palestine whistleblowing channels listed above to report the concern.

8. Approvals and review

This policy has been preliminarily reviewed and approved by ARC and finally approved by the BOD. This policy will be periodically reviewed, taking into consideration any organizational, business or legal changes that may occur.