

DORC: Sanctions Policy and Screening Process

October 1st 2017

1. Introduction

DORC is committed to complying with relevant economic and trade sanctions laws in all jurisdictions in which it operates, as these may apply to its operations, through identifying, mitigating and managing the risks of sanctions violations.

This Policy sets out the principles and rules for screening Third Parties in order to identify any sanctions risks, and describes how they must be implemented.

2. Scope and Applicability

This Policy applies to all DORC employees including, sales representatives, or any other "Third Parties" conducting business for or on behalf of DORC. Third Parties includes distributors, customers, suppliers, independent contractors and agents.

3. Key Principles

The following key principles govern DORC's approach to complying with sanctions laws and regulations, and to identify, mitigate, and manage sanctions risk.

- DORC maintains a sanctions policy to meet its obligations under sanctions regimes of the jurisdictions in which it is registered and operates.
- DORC complies with the requirements of the US, UN and EU sanctions regimes wherever it operates, and will not undertake any business that would breach those regimes.
- In addition to the above, DORC complies with other sanctions regimes whenever they apply to particular DORC operations, and will not undertake any business that would breach those regimes.
- DORC may decide not to provide products or services even where it is permitted by law, particularly where the circumstances present potential reputational risk.

4. Sanctions

4.1 What are sanctions?

Sanctions are laws and regulations enacted by governments, such as the government of the United States, international organisations such as the United Nations and supranational bodies such as the European Union, to promote foreign policy and other objectives.

4.2 Why are sanctions used?

Sanctions are intended to deter a range of activities, which may include political or military aggression, providing sanctuary for criminals and terrorists, developing nuclear or other weapons programs, and abusing human rights. They are implemented largely by prohibiting companies and individuals from doing business with persons, entities, countries and governments that are the targets of the sanctions. Such restrictions can include:

- Bans on both imports and exports as well as the prohibitions on the provision of certain specified services;
- Barring the transfer of funds to and from a sanctioned country; and
- Prohibiting any dealings with governments, countries or designated companies or individuals.

Most sanctions regimes also prohibit actions to circumvent the applicable sanctions or to facilitate activities that may violate sanctions. All DORC employees and Third Parties should be careful not to inadvertently violate sanctions by facilitating or brokering a transaction that would be prohibited if conducted by DORC directly.

4.3 What are the consequences for failing to comply?

If DORC fails to comply with the applicable laws and regulations, it would constitute a violation of those laws and regulations. This could expose DORC to significant reputational damage, legal and regulatory actions, and financial loss.

In addition, it could also expose individual DORC employees and Third Parties involved in any violation to substantial fines and/or imprisonment.

5. Obligations of Employees and Third Parties

Employees and Third Parties must read and apply this Policy and ensure compliance. Employees should participate in periodically held training, including e-learning. Attendee lists should be signed, retained and archived for every mandatory training event.

If a DORC employee fails to comply with this Policy, then he/she may be subject to disciplinary and other actions up to and including termination of employment.

Under no circumstances may a DORC employee or Third Party act to avoid sanctions obligations or detection of a relationship or transaction that would breach this Policy. They cannot advise distributors, customers or others, as to how transactions may be structured or presented to evade applicable sanctions. This includes, but is not limited to, advising a party to:

- Amending documents to include false or misleading information;
- Omitting accurate information from documents; or
- Changing, removing or omitting information from a transaction or business record that would otherwise lead to detection of a sanctions issue.

Third Parties should provide access (with appropriate prior notice from DORC) to all relevant documents, records, systems, processes, policies and procedures in order to enable DORC to audit and verify compliance with this Policy. If an audit shows that a Third Party is in breach, then the Third Party should implement the necessary corrective action as determined by DORC.

6. Reporting Potential Violations/Non-Retaliation

Any employee who learns of a potential violation of sanctions laws or regulations or of this Policy, is required to report their suspicion promptly in accordance with the DORC Speak-Up Policy. The DORC Compliance Department should be notified immediately and the allegation investigated.

Employees who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliation. However, an employee who makes a report of potential policy violations is not automatically immune from disciplinary procedures, if he/she is involved in misconduct.

7. Screening of Third Parties

Before engaging in any commercial relationship or transaction, DORC ensures that these comply with applicable US, UN and EU sanctions laws, by screening those individuals or entities against appropriate sanctions lists.

8. Audit, Approval and Reporting Process

The reporting of results from the Sanctions Screening process should be appropriate to the potential risk identified. As a matter of course, all results with the necessary supporting documentation should be reported, irrespective of risk, to the Compliance Department for approval.

However, any indication that a possible violation may be, or has already been, undertaken then the results should be reported immediately to the Compliance Department further investigation.

It is the responsibility of the Compliance Department to ensure that this policy is properly applied. The Compliance Department should conduct periodic reviews to confirm full compliance with the required procedures.