

Sanctions Policy



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Introduction

As a company, we are committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations (“Sanctions Laws”) in the countries in which we operate. This Policy has been developed to help employees and contractors understand where issues related to sanctions regulations may arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.

The management of CR is committed to complying with all laws. Any employee who violates the rules in this Policy or who permits anyone to violate those rules may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil, criminal fines and/or regulatory consequences.

Definition of Sanctions

Sanctions are restrictions applied by countries or international organizations in connection with certain countries, territories, entities or individuals, consisting of asset blockages and/or commercial restrictions, whether in a comprehensive or selective manner, in order to achieve foreign policy or national security objectives, or the objectives of members of the sanctioning international organization. In this sense, it is important to consider the countries involved in the transactions (i.e. origin and destination of the product or service, location of the business or entity, among others)

The nature and extent of these restrictions may vary (i.e. limitations on import/export, controls on specific goods and services, restrictions on financial operations, etc.), and it is important that all CR employees and contractors duly read, familiarize, commit and observe this Policy in order to guide their conduct and avoid conflicts and violations.

The countries currently having sanctions applied is available in the attached link:

<https://www.dfat.gov.au/international-relations/security/sanctions/Pages/sanctions-regimes>

Please refer to this as required for the most current listing.

CR Policy Statement on Sanctions

It is CR's policy to comply with the laws and regulations in all jurisdictions where it operates and apply a consistent approach across its Global markets, including Sanctions and import and export controls legislation regulated by certain countries and international organizations. The enforcement of Sanctions regulations also reinforces CR's commitment to the United Nations' guidelines for maintaining or restoring international peace and international safety and fighting human rights violations.

This Policy is intended to help employees, suppliers, contractors, and other third parties acting on the company's behalf to understand where breaches of Sanctions Laws might arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.



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Board Endorsement

The Board of CR will not criticise management for any loss of business resulting from adherence to this Policy. No employee or contractor will suffer as a consequence of bringing to the attention of the Board or senior management, in good faith, a known or suspected breach of this Policy. Employees and contractors will not suffer any adverse employment consequence for abiding this Policy.

Scope of Policy

This Policy applies to CR's operations globally, including all legal entities worldwide owned or controlled by CR, and to all directors, officers, employees, contractors, and other third parties acting on behalf of CR.

Compliance of Policy

Compliance of this policy will ensure effective reporting, escalation and resolution of sanctions compliance issues.

All CR employees and contractors must be aware of and follow this policy guidelines in their respective countries and or business-related activities. The potential restrictions may be related to:

- Where we do business: ensuring compliance with sanctions on restricted countries/territories;
- Who we do business with: ensuring compliance with sanctions on restricted persons/entities;
- How we do business: ensuring we do not circumvent, evade, or facilitate the contravention of sanctions rules.
- Ensuring we report any suspicions which may raise sanctions concerns

If you are in any doubt or have any questions or concerns, please duly read the Sanctions Policy statements and consult with the senior management team before proceeding further.

Compliance Controls

In order to comply with the main Sanctions rules and regulations issued by respective jurisdictions where CR operates, CR's Executives and Employees must:

- Before undertaking any commercial transactions with Customers, Suppliers or Partners, seek to know the risks and the most relevant aspects of the transaction, with the aim of identifying potential violations to applicable Sanction Laws;
- Ensure that Sanctions Due Diligence is duly carried out;
- Ensure that CR does not deal with Customers, Suppliers and Partners listed as sanctioned entities or individuals in the Sanctions rules and regulations;
- Immediately suspend all activities and negotiations in progress in relation to a Customers, Suppliers and/or Partner, whenever there are suspicions or possibility of Sanctions violations;
- Ensure in a contractual instrument that Customers, Suppliers and Partners represent that they are not subject to and do not and will not violate Sanctions;



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- Continuously monitor and observe any risk or suspicions to Sanction violations throughout the course of the business relationship;
- Immediately report to CR's management any suspected or potential violation to Sanctions or to this Policy.

Violations of Sanction Laws

Violations of Sanctions Laws 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, violations of Sanctions Laws can lead to damaging practical consequences, including harm to reputation and commercial relationships, restrictions in the way we can do business, and extensive time and cost in conducting internal investigations and/or defending against government investigations and enforcement actions.

Updates and Review

This Policy may be updated from time to time to adapt to the relevance of the current legislations, and the updated version of the Policy will immediately be made available to our employees.

A handwritten signature in black ink that reads "John Barbagallo".

John Barbagallo
Chief Executive Officer
February 2021

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