

## SANCTIONS POLICY

### I. Objective

Castor & Pollux Consulting LLP ('Group/CNPC') is committed to carrying on business in accordance with the highest ethical standards. This Policy sets forth the guidelines for conducting business practices around the world in compliance with export controls and other foreign trade restrictions, as applicable.

### II. Scope & Coverage

This Policy applies to all the associate & sister concern companies of the Castor & Pollux Consulting LLP. This Policy provides for a minimum standard the Group companies should comply with in any country in which our Group does business.

In the event this Policy is stricter than the laws that are applicable, including both applicable local laws and those laws with extra-territorial application, this Policy will prevail. However, if any part of this Policy conflicts with local laws in any location, the local law of the appropriate jurisdiction will prevail. The same principle will apply in case this Policy conflicts with sectoral laws, as may be applicable to certain companies of the Group.

This Policy is applicable to all the employees of the Group including senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with the Company and such other persons, including those acting on behalf of the Company (collectively for the limited purpose of this Policy referred as 'Employees').

This Policy should be read in conjunction with the existing Group's Code of Conduct, Policies, Procedures and Guidelines, as issued from time to time.

The words and expressions used herein but not defined in this Policy shall have meaning as provided under applicable laws.

### III. Compliance Officer

Respective group companies shall appoint one of the Senior Manager conversant with the operations of the Company to be the Compliance officer to ensure compliance with the provisions of this Policy ("Compliance Officer"). Company Legal team will be responsible to ensure that the right Governance process is in place for the compliance of this policy. The



Compliance Officer should annually report the status of compliance of this Policy to the Business Review Committee for their respective businesses. Company Legal team will ensure that the right Governance process is in place for the compliance of this policy.

#### IV. Trade Restrictions

All the Companies of the Group should comply with Sanctions, as applicable to their activities. In certain cases, on account of contractual relationship, extra territorial Sanctions may additionally apply to one or more Group Companies. Before such a contractual relationship is honoured by any of the other Group Companies which are not subject to the Trade Sanctions, Business should seek counsel from the Legal & Compliance team. Generally, any such circumvention of the Trade Sanctions is also be covered by the Trade Sanctions Laws. All queries related to Group wide exposure should be referred to the Group Legal & Compliance of the Castor & Pollux Consulting LLP.

For the purpose of this Policy, “Sanctions” shall mean the trade control, sanctions, embargoes, prohibitions or restrictions as may be imposed by the host country of our operations or those as may be made applicable to a Company on account of contractual extension of obligations, save and except those may be permitted as an exception under the applicable Sanction laws.

#### V. Compliance Process

Every transaction involving operation must be evaluated for compliance with applicable trade restrictions before proceeding. Trade control laws can restrict:

- export of certain goods, services, and technologies;
- business dealings (including import, export, and investments) with certain countries, entities, and individuals;
- travel to certain countries;
- exchange of information; and
- dealing in debt/equity instruments of a particular company.

Therefore, before engaging in any commercial relationship or transaction with any person, particularly those having overseas operations, foreign individuals and entities, the Company should undertake appropriate screening and due diligence to mitigate the risk of non-compliance of applicable Sanction laws and restrictions. The level of screening and due diligence should be linked to the risk profile of the particular relationship or transaction. Compliance Officer along with relevant functional head should undertake enhanced screening and diligence if the risk is greater.



In the event, a transaction consequent to its execution/implementation is subjected to Trade Sanctions, it is unlikely to have any bearing under applicable Sanctions. However, if an ongoing transaction or any series of a particular transaction is subjected to trade sanctions, the Compliance Officer should look for appropriate transition period under applicable Sanctions, within which either the future transactions should be discontinued and/or alternate remedies should be explored, such that the Company is not found in breach of applicable Sanctions.

In case of any query on this Policy or under applicable Sanctions, you may reach out to the Compliance Officer of the Company.

Few examples of transactions requiring higher scrutiny along with Employees responsibilities may be referred from Annexure-I & II.



## VI. Non-Compliance

Any violation of this Policy may be subject to disciplinary action under the Group's Corporate Principles & Code of Conduct.

## VII. Breach

Any breach of this policy should be immediately notified to the General Counsel of the Company and the Group General Counsel.

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