



Sanctions Compliance Provisions

1. Aim of this Sanctions Compliance Clause

Mayr-Melnhof Group (“**MM Group**”) holds itself to the highest standards of ethical behavior and corporate citizenship. To that end, it is MM Group’s policy to fully comply with all applicable laws and regulations, including any applicable economic or financial sanctions, trade embargoes or other comprehensive prohibitions against transaction activity pursuant to anti-terrorism laws or export controls laws and regulations administered, enacted or enforced by any sanctions authority of the countries in which it operates (“**Sanctions**”).

Further, MM Group’s policy is to abstain from conducting any business with any contractual partner that is itself not compliant with Sanctions. To that end, before entering into any contractual relationship between MM Group and a potential customer (“**Customer**”), each Customer confirms compliance with Sanctions by accepting the following provisions (“**Sanctions Compliance Provisions**”).

2. Sanctions Compliance Provisions

*None of the **Customer** and its subsidiaries is, or is owned or controlled by, any sanctioned Person (meaning any person or entity that is listed on any EU / UK / US / UN Sanctions list or any other Sanctions list applicable to the respective business¹ or owned or controlled by such person or entity) (“**Sanctioned Person**”), and no officer, director nor any employee, agent, representative or affiliate of any such person, is a Sanctioned Person.*

The Customer, its subsidiaries, respective directors and officers and their respective employees and agents (acting on their behalf), are in compliance with EU / UK / US / UN Sanctions (meaning any economic or financial sanctions laws, export control laws, or trade embargoes imposed, administered or enforced by the EU and any member state thereof, UK, US or UN or any other Sanctions applicable to the respective business) in all material respects and are not knowingly engaged in any activity that would reasonably be expected to result in the Customer and/or MM Group being designated as a Sanctioned Person.

The Customer and its subsidiaries will not directly or indirectly provide or otherwise use the goods and services (or funds /payments, if any) provided by MM Group for the benefit of any Sanctioned Person to the extent that this would lead to a violation of any EU / UK / US / UN Sanctions or any other Sanctions applicable to the respective business.

The Customer has implemented and maintains policies and procedures designed to ensure compliance by the Customer and its affiliates, as well as business partners appointed in connection with the provision of goods and services provided by MM Group with applicable EU / UK/ US / UN Sanctions or any other Sanctions applicable to the respective business.

¹ Including, but not limited to (i) the Consolidated list of persons, groups and entities subject to economic sanctions of the European Union or any such list of EU Member States; (ii) the OFAC list of Specially Designated Nationals and Blocked Persons (SDN list) for the US; (iii) the Consolidated List of Financial Sanctions Targets in the UK; or (iv) any similar list of sanctioned persons as e.g. maintained by the UN, applicable to the business activities of a company of MM Group.



The Customer will inform MM Group in writing without undue delay if the Customer or any of its affiliates becomes a Sanctioned Person or in the case the Customer or an affiliate has been found to be in violation of EU/ UK /US / UN Sanctions or any other Sanctions applicable to the respective business in relation to its business relationship with MM Group.

MM Group is entitled to terminate any business relationship and cancel any obligations towards the Customer with immediate effect if the Customer or any of its subsidiaries becomes a Sanctioned Person or if the Customer has been found to be in violation of EU / UK /US / UN Sanctions or any other Sanctions applicable to the respective business in relation to this its business relationship with MM Group.