

Trade Sanctions – Supplier Policy

Policy Owner: Financial Crime & Trade Compliance Team

Purpose:

Our policy is designed to help you ensure that goods, services or technology supplied to Asda do not involve certain countries, entities or individuals identified as prohibited because, for example, they may be engaged in terrorist financing, have a poor record on human rights, stifle democracy or support narcotics trafficking. We take guidance from the UK Government (OFSI), the European Commission (EC) and the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury.

Scope:

All Asda suppliers buying or selling goods, services or technology on behalf of Asda, or entering into any transaction with, or on behalf of, Asda, must ensure that they comply with this policy. If you are unable to immediately comply with the terms of this policy, please contact your Asda / IPL business partner.

Roles & Responsibilities:

The Compliance Team will:

- Consult with the Asda Legal Team to support the preparation and implementation of the Trade Compliance Programme as applicable
- Provide Policies and Procedures to support compliance with the Trade Programme
- Develop and deliver Trade Compliance training and instruction for relevant colleagues
- Supervise and monitor the implementation of Trade controls

Managers and the Leadership Team will:

- Lead by example and comply with laws and regulations
- Communicate the importance of following our policies and procedures
- Encourage “Do the Right Thing” and take appropriate action when questions are raised, concerns are identified, or issues are reported by colleagues

All suppliers will:

- Follow established Trade Policy and Procedures
- Report any issues or concerns relating to Trade
- Complete all relevant training

Key Points:

1. Prohibited Countries or Regions

You must not, directly or indirectly in connection with supplying Asda, transact in any way with:

- (1) the Government of a Prohibited Country or Region nor
- (2) any person(s) located in a Prohibited Country or Region.

You must not supply Asda any goods, services, or technology that originate from, are exported from, or are otherwise associated with any of the following jurisdictions:

- Cuba
- Iran
- Syria
- North Korea or
- the Ukraine regions of Crimea, Donetsk, Luhansk, Kherson and Zaporizhzhia (a “Prohibited Country or Region”)

2. Restricted Countries or Regions

You must not, on behalf of Asda, transact in any way with the countries listed below (a “Restricted Country or Region”), unless the transaction is first screened and approved by Asda’s Trade Compliance team.

- Afghanistan
- W. Balkans Countries:

Albania	Serbia	Bosnia and Herzegovina
Montenegro	Kosovo	Republic of North Macedonia

Belarus	Hong Kong	Somalia
Burundi	Iraq	South Sudan
Central African Republic	Lebanon	Sudan
Democratic Republic of the Congo	Libya	Ukraine
Ethiopia	Mali	Venezuela
Guinea	Myanmar (Burma)	Yemen
Guinea-Bassau	Nicaragua	Zimbabwe
Haiti	Russia	

You must cooperate with any requests made by Asda to provide information to check compliance with the above.

Where approval is granted, such approval shall remain valid for a maximum period of 12 months (unless otherwise stated) from the date of issuance, following which you must submit a new request for approval.

3. Prohibited Persons

In the course of conducting any activities associated with the supply of goods or services to Asda, you are strictly prohibited from engaging, whether directly or indirectly, in any form of transaction or interaction with any individual or entity designated on any applicable sanctions, embargo, or restricted party lists (collectively referred to as 'Prohibited Persons') identified in the following lists:

- the UK OFSI Consolidated List
- the US OFAC Specially Designated Nationals List

- the US OFAC Consolidated List
- any other list(s), from time to time, deemed appropriate for screening by Asda's Trade Compliance team

4. Notification of Changes to Supply Chain

If you become aware of any changes within your supply chain, including products previously approved by Asda, that could lead to an actual or potential breach of this policy, whether directly or indirectly involving Asda, or that involve any of the following:

- a Prohibited Country or Region
- a Restricted Country or Region or
- a Prohibited Person

You must immediately notify both your Asda business partner and the Asda Financial Crime & Trade Compliance team via tradecompliance@asda.uk.

Other Asda business areas may have additional restrictions or prohibitions on certain sourcing countries and regions. For example, if you are looking to source from a country that may be impacted by responsible sourcing concerns, please contact responsiblesourcingqueries@asda.uk.

Contact Us:

For any queries or if you require further information about this policy, please contact Financial Crime & Trade Compliance at tradecompliance@asda.uk.

If you have any concerns relating to the ethical behaviour or actions of anyone within the business or suspect there has been a breach of this policy, you can contact the ASDA Ethics Hotline confidentially on Email: aethic@asda.uk.