

1. Introduction:

BBM Bommidala Group (BBM Group / Company) is a leading business conglomerate recognized for diverse businesses - As - One Group - One Brand - BBM. The products manufactured and marketed by our company are superior in quality and command tremendous reputation and goodwill among the consumers and general trade circle in India and abroad. This policy has been introduced by management of the Company in respect of compliances of sanctions law.

2. Objective:

As a company, we are committed to carrying on business in accordance with the highest ethical standards. Our objective is to complying with all applicable trade sanctions regulations (“Sanctions Laws”) in the countries in which we operate. We expect our business partners or counterparty including all its subsidiary, holding, associate, management shall comply with provisions of the Sanctions Laws, for the purpose we are introducing this Policy.

3. Policy applies to:

All employees, officers, directors, and contracted personnel of BBM Group, and to such other persons as designated by BBM Group from time to time (hereinafter referred as 'Employees') and all natural and legal persons (and their respective employees, officers and directors) that perform services for or on behalf of BBM Group, including without limitation, customers, supply chain business partners, suppliers, consultants, contractors, distributors, agents, shipping liner, shipping agent, logistics, freight forwarders or any third party involve in transactions with BBM Group (hereinafter referred to as 'Counterparty').

4. Definitions:

- ▶ **“Sanctioned Territory”** means any country or territory with which dealings are broadly and comprehensively prohibited by any country-wide or territory-wide Sanctions (as of the date hereof, **North Korea, Cuba, Iran, Syria, Crimea, Donetsk People's Republic (DNR) & Luhansk People's Republic (LNR) regions of Ukraine, Russia & Belarus**).
- ▶ **“Sanctioned Person”** means any Person with whom dealings are restricted or prohibited under any Sanctions, including as a result of that Person's: (a) being named on any list of Persons subject to Sanctions, (b) being located, organized, or resident in, or directly or indirectly owned or controlled by the government of, any Sanctioned Territory, or (c) having any direct or indirect relationship of ownership, control, or agency with a Person described in (a) or (b).
- ▶ **“Sanctions”** means all laws and regulations of India, the United States, the United Kingdom, or the European Union, or United Nations Security Council resolutions, concerning economic sanctions, embargoes, or the freezing or blocking of assets or transactions of targeted Persons.

5. Sanctions Compliances:

- (a) Neither the Counterparty nor any of its Subsidiaries is or will become a Sanctioned Person.
- (b) The Counterparty represents and warrants that it will not, directly or indirectly, deal with any Sanctioned Person or Sanctioned Territory in connection to the any transactions or the products or services to be supplied / Purchased by the BBM Group, nor will it violate or cause BBM Group to violate any Sanctions Laws.

6. Basic obligations and principles:

1. The counter party shall share the KYC (enclosed) for the purpose of compliances.
2. Our goods/services are not intended for export/import either directly or indirectly to/from sanctioned and/or embargoed countries, entities, or individuals, as designated by the U.S., U.K., EU, UN or any other applicable international body”.
3. The counter party shall acknowledge and agrees to comply this policy towards any business transactions.
4. The counter party shall follow the national laws in the countries in which they operate as well.
5. If counter party does not comply or show unwillingness, the BBM Group will ultimately end the business relationship without liability.
6. The BBM Group is committed to complying with all laws. Any employee who violates this Policy or who permits anyone to violate provision of this policy may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil or criminal fines.

7. Risk toward Violation of Sanctions Laws:

Any violations of provisions of the Sanctions Laws may lead to severe civil and/or criminal penalties against companies and individuals, including significant monetary fines, imprisonment, extradition, blacklisting etc.. and further it may lead to damaging practical consequences, such as harm to reputation and commercial relationships, restrictions in the way for doing business, time and cost expenditure towards conducting internal investigations and/or defending against government investigations and enforcement actions.

8. KYC – Submission by Party on Yearly Basis:

- ▶ EXHIBIT A : KYC information for Organization (Customer / Supplier / Other Counterparty)
- ▶ EXHIBIT B: KYC information for Person (Customer / Supplier / Other Counterparty)

9. Important Links to check the sanctions program

Link for US Sanctions Countries :

<https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information>

Link for US SDN sanctioned List :

<https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>

Link for UN Sanctioned List:

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

Link for UAE Sanctioned List:

<https://www.uaecic.gov.ae/en-us/un-page#>

Link for UK sanctioned List:

<https://www.gov.uk/government/publications/the-uk-sanctions-list>

Link for EU Sanctioned List:

https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en