

## Trade Compliance - Supplier Policy

### Introduction

We're delighted to be working with you as a supplier to Asda. Your partnership helps us serve more than 19 million customers every week.

We routinely review the countries, regions and persons that may be involved in transactions to supply goods, services or technology to Asda. The following outlines our policy in this regard.

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, the European Commission and the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury.

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 business partner.

### Policy

#### 1. Prohibited Countries or Regions

You must not supply to Asda any goods, services or technology from Cuba, Iran, Syria, the Crimean Region of Ukraine or North Korea (a "Prohibited Country or Region").

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.

#### 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, Montenegro, Serbia, Kosovo)
- Belarus
- Burundi
- Central African Republic
- Democratic Republic of the Congo
- Guinea
- Guinea-Bassau
- Iraq
- Lebanon

- Libya
- Mali
- Myanmar (Burma)
- Nicaragua
- Russia
- Somalia
- South Sudan
- Sudan
- Ukraine
- Venezuela
- Yemen
- Zimbabwe

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

### **3. Prohibited Persons**

You must not directly or indirectly in connection with supplying Asda, transact in any way with any individual or entity identified on any of the following lists (“Prohibited Persons”):

- the UK HM Treasury 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. Immediate Notification**

If you identify a transaction or potential transaction, directly or indirectly, involving Asda that may involve a Prohibited Country or Region; a Restricted Country or Region; or a Prohibited Person, you must immediately notify your Asda business partner.