

## Export Control and Sanctions Policy

At AkzoNobel we are committed to conducting our business in a fair and honest way.

Contents:

- Export Control & Sanctions

We comply with trade restrictions that arise from Export Control & Sanctions legislation because we care about global security, and:

- to align with the diligence of our stakeholders;
- to protect our employees from carrying out unlawful activities;
- to avoid penalties, fines, or possible trade restrictions and
- to maintain our reputation.

This policy gives a more detailed description of what we should and should not do related to Export Control & Sanctions and describe our responsibilities in dealing with controlled items, embargoed destinations and sanctioned persons and entities.

By following the policy we ensure that we conduct business in compliance with applicable Export Control & Sanctions laws, regulations and other international rules.

### 1. Export Control & Sanctions

#### 1.1 Prohibited End-use

We do not sell or deliver items such as materials, equipment, products, technologies or services, hereinafter referred to as “items”, for any of the following end-uses:

- proliferation of weapons of mass destruction (nuclear, chemical, biological);
- terrorism (incl. designated terrorist organizations and state sponsors of terrorism);
- items used for the death penalty, torture or other inhuman or degrading treatment or punishment;
- unlicensed military end-use by a sanctioned country.

#### 1.2 Prohibited End-users and End-use locations

We do not sell, supply, or otherwise make available any items to:

- individuals, entities, or organizations that are subject to sanctions, trade restrictions, or other prohibitions under any applicable sanctions or trade control regime;
- parties known or suspected to be acting on behalf of, or for the benefit of, a sanctioned or otherwise prohibited person or entity;
- customers or intermediaries who refuse to disclose the ultimate end-user or end-use of the items;
- end-users located in, or for use in, countries or territories subject to comprehensive sanctions or other trade restrictions, unless explicitly authorized under applicable law

#### 1.3 Training and Awareness

- If we are or may be involved in export of items, we must complete the export control e-learning on the AkzoNobel SuccessFactors platform.

#### 1.4 Classifications

- BU and Function management must ensure that their items are classified by the Export Control function. Management must embed item classification in procurement and R&D processes.

## 1.5 Screening & Licensing

- We are alert to 'Red flags' and are vigilant for signs of suspicious enquiries and orders.
- We do not commit to a sale of an item if the transaction is not permitted by export control or sanctions regulations, if the required export license has not yet been obtained or if we presume denial of a license.
- We follow the Sensitive Country Policy when considering a transaction to an embargoed, sanctioned or sensitive destination, or when our customer has the intention to (re-)export to such a destination.
- If an export license is required, the export license will be applied for according to the internal process or with permission of the Export Control function. If the export license is obtained, management must ensure that exports are made in accordance with the conditions of the license.

## 1.6 Record Keeping

- Records relating to export transactions must be retained in accordance with the company's common record retention policy.

## 1.7 Physical & Information Security

- We handle and store our items securely to prevent theft and/or tampering. We take care that items that are classified as controlled are traceable until the point of transferring ownership.

We take care that access to controlled information (technology like formulations and specifications) is adequately restricted, and persons with access are registered and individually identifiable. We are aware that an export license is needed prior to exporting controlled technology physically or digitally.

## 1.8 Competing Rules

- AkzoNobel is a company established in the European Union (EU), hence, we always consider EU export control & sanctions laws and regulations. On top of that we comply with all other legislation as far as applicable. In case of overlapping legislation, the most stringent standard applies. An emerging conflict between the applicable legislation and EU legislation, needs to be reported immediately.
- US Persons must recuse themselves from involvement in transactions which are subject to comprehensive sanctions by US authorities. Non-US Persons should not involve US Persons in such transactions.

## 1.9 Reporting & Measures

- We must report potential export control or sanctions violations to Legal and the Export Control function immediately.