

## Vantage Towers Global Supplier Policy Sanctions & Trade Control

Last Update:  
25.08.2021

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### Scope:

This Policy applies to all agreements between Vantage Towers and Supplier.

All references to "Supplier" or "Supplier personnel" in this Supplier Policy shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier and other persons under its influence or control. Supplier shall procure compliance by such persons.

All references to "Vantage Towers" include the relevant Vantage Towers contracting entity and other Vantage Towers group companies that benefit from the goods and services being provided.

This Vantage Towers Supplier Policy sets out Supplier's obligations in relation to Sanctions and Trade Control.

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### Table of Contents

1. Introduction	1
2. Compliance	1

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## 1. Introduction

Vantage Towers is committed to complying with all host nation laws and regulations applicable to the exporting/importing of Suppliers' products and technologies. Vantage Towers maintains a companywide compliance programme that is dependent upon the continued cooperation of its Suppliers. This collaborative effort will ensure that compliance of the export/import laws and regulations of the host nations are properly applied by Vantage Towers and Suppliers.

In this Supplier Policy, references to:

- (i) "Trade Control Laws" are all applicable export and import control laws and regulations;
  - (ii) "Sanctions" are all economic, trade and financial sanctions laws, regulations, embargoes or restrictive measures of any Relevant States;
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## 2. Compliance

Supplier shall, in connection with Vantage Towers' procurement activities with Supplier:

- (i) comply with all Trade Control Laws and Sanctions;
  - (ii) not do anything which may cause Vantage Towers to breach Trade Control Laws or Sanctions;
  - (iii) keep Vantage Towers apprised at all times of such information as Vantage Towers may need in order to comply with Trade Control Laws and Sanctions, including details and copies of applicable restrictions and export
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classification numbers, export licences or equivalent documentation, exemptions or exception and conditions relating to export, transfer or use, and provide Vantage Towers with such assistance as Vantage Towers may reasonably request in this respect; and

(iv) keep Vantage Towers apprised at all times (as soon as reasonably practicable in the given circumstances) of all relevant information on:

- any changes in circumstances relevant to Supplier's compliance with Trade Control Laws and Sanctions;
- actual or potential breaches of Supplier's obligations in relation to Trade Control and Sanctions;
- loss, suspension or invalidation of any relevant licence, authorisation, approval or export control privileges, including by being placed on a restricted party list; or
- it becoming aware that any relevant authority has initiated or will initiate any investigation or proceedings against Supplier relating to an actual or potential breach of any Trade Control Laws or Sanctions.

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