TRADE & EXPORT SANCTIONS COMPLIANCE POLICY

This Policy applies to all AST Networks employees, contractors, partners, and subsidiaries globally, and covers the sale, shipment, installation, activation, support, financing, and use of all AST hardware, software, airtime and related services. It also applies to internal transfers of controlled technical data, remote support activities, and interactions with sanctioned individuals, entities, or vessels.

Trade restrictions in the form of embargoes and sanctions to different countries, territories, users, and products apply from time to time. All AST Networks locations will actively conduct due diligence to comply with these restrictions, embargoes and sanctions.

This policy document is intended to provide a basic guide for providing goods and services when exporting and trading in or with sanctioned and embargoed countries.

Export includes not only physical shipment of goods but also:

- the electronic transfer of software,
- remote configuration or activation of satellite services,
- providing technical assistance or support,
- transferring controlled technical information by email or phone,
- providing controlled technical information to non-UK persons, even if they are located inside the UK ("deemed export")

Service Provision includes the activation of airtime, bandwidth allocation, network support, and any other action enabling communication capability.

Main points to consider:

- AST Networks will comply with sanctions and embargoes.
- We require our customers, partners and suppliers to adhere to sanctions and embargoes.
- Restrictions vary – they can increase, be removed, or change at any time – always check for the latest information.
- Sanctions & embargoes can be country, sector, individual, entity, corporation, or product/service specific.
- There are financial restrictions such as receiving funds from a sanctioned country or territory and service user.

Applied Satellite Technology Ltd, Satellite House, Bessemer Way, Harfrey's Industrial Estate, Great Yarmouth NR31 0LX
Registered No: 2153172 England **VAT Registration No:** GB 720 1086 83 **EORI No**: GB720108683000 **Certified to:** ISO 9001 & ISO 14001

- Products that include encryption - such as encrypted radios, satellite terminals, modems, software-defined radios, and network management software - may fall under UK Dual-Use regulations and require an export licence or end-user documentation before shipment or activation, even if they are commercially available.
- The UK also applies End-Use Controls, meaning a licence may be required – or the export prohibited – if the goods or services may be used for military, WMD (Weapons of Mass Destruction), or prohibited maritime uses, regardless of whether the item is normally controlled.
- Software can also have export control status applied to it. We must be conscious of export control regulations with all AST Networks services.
- There may also be restrictions on the sending of information, making and receiving telephone calls or email messages, so the context, content, location, and use also needs to be considered.
- If applicable, service users will need to provide a full end user declaration prior to sale or any hardware or provision of any service.
- Under UK law, including the Export Control Act 2002, Export Control Order 2008, and the Sanctions and Anti-Money Laundering Act 2018, exporters are legally responsible for determining whether an export, transfer, software update, activation, or service provision requires a licence. AST Networks and its partners must therefore assess and comply with all applicable UK, UN, EU, and (where relevant) U.S. export control and sanctions regulations.
- AST Networks works through the appropriate official licensing body in each country where we have operations in order to obtain official export licensing information and export licenses.
- AST will notify customers of any changes in export control classification to products that have already shipped.

The most important issues to consider are:

- **What products or services are being provided?**
- **Who are they being sold to?**
- **Where are they shipping to?**
- **What is the purpose they are being used for?**

Selling goods or services to any party whom you know, or reasonably suspect, will resell or transfer them to a restricted destination, individual, or entity is prohibited. AST Networks will not 'turn a blind eye' to diversion risks. AST Networks also prohibits any action that has the object or effect of circumventing sanctions or export control regulations, including indirect shipments, third-country routing, or the use of front companies.

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AST Networks must conduct appropriate due diligence on our downstream supply chain before shipping to assure ourselves that we have all information pertaining to the above questions. We utilise a variety of tools in order to do so. Our overarching approach for our staff, partners, suppliers and customers is: IF IN DOUBT, STOP, DO NOT SHIP.

Mandatory Screening Requirements:

All customers, end-users, intermediaries, vessels, and transactions must be screened against, as a minimum:

- UK Sanctions List (OFSI)
- UK Export Control Organisation (ECJU) lists
- UN Consolidated List
- EU Sanctions List
- U.S. OFAC SDN List (for de-risking where relevant)

Screening must also include checks on ownership, control, and any intermediary entities to identify hidden sanctioned beneficial owners. Screening must be documented and retained.

There are many other sanctioned and embargoed countries, but at the time of issue the most sensitive countries or territories are:

AFGHANISTAN, IRAN, RUSSIA, BELARUS, SYRIA, SUDAN, NORTH KOREA, CUBA, MYANMAR.

AST Networks will not supply products to these countries or to individuals or companies based in, linked to, or owned by entities based in these countries. In addition, due to the broad and evolving international sanctions imposed under UK, EU, U.S., and UN regimes, we will not activate, support, or provide satellite communication services for any vessel flagged to:

CUBA, IRAN, NORTH KOREA, RUSSIA, SYRIA, OR SUDAN.

AST may also decline to activate or support services where a vessel has recently reflagged from a high-risk state, is beneficially owned by sanctioned parties, or operates in embargoed territorial waters. To ensure compliance, these flag states have been removed from our vessel-registration options and cannot be selected during the “Create Vessel” process in the MyASTportal.

This list may be updated from time to time in line with changes to international sanctions. It is the customer’s responsibility to ensure that their operations remain compliant with all applicable sanctions. If clarification is required, AST Networks’ customers should contact their account manager for guidance.

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AST Networks will retain all export-related documentation, including screening results, end-user declarations, licence applications, approvals, and shipping documents, for a minimum of six years, in line with UK export control record-keeping obligations.

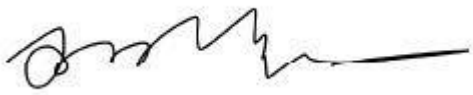
The following situations require immediate escalation to the Governance Risk & Compliance (GRC) team:

- Unwillingness by anyone in the supply chain to provide end-user details or refusal to complete an EUS (End User Statement),
- Requests for unusual shipping routes or transhipment via high-risk hubs,
- Customers recently incorporated with no trading history,
- Payments originating from or routed through sanctioned jurisdictions,
- Requests inconsistent with the customer's stated business or technical capability,
- Any customer or vessel with a recent change of ownership, control, or flag,
- Attempts to bypass screening or pressure to "ship urgently".

If any red flag or uncertainty arises, the matter must be escalated to AST's Governance Risk and Compliance team for review. No goods, software, activations, airtime, or support services may be provided until written approval is issued. The team can be contacted at grc@ast-networks.com.

AST Networks will provide periodic training to relevant staff on sanctions, export controls, due diligence, and recognising red flags.

All members of AST Networks, our customer, partners and suppliers are obliged to comply with applicable trade restrictions, sanctions, and embargoes. As a matter of policy, if there is any doubt do not provide the goods and services.



Dan Housego-Watts.

Head of Commercial Governance.

18th Nov 2025.

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Document Control

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Aug 2024	DHW	5	Branding
Nov 2025	DHW	6	Addition of flagged nations not supported

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