



FPS Economic and Trade Sanctions Policy

Introduction

FPS, and its subsidiaries are committed to compliance with all applicable laws, rules and regulations. This includes the regulations and economic sanctions programs in accordance with the European law and economic sanctions and anti- terrorism laws, anti-money laundering laws and anti-boycott laws, including but not limited to 5th anti-money laundering Directive (Directive (EU) 2018/843), the UK Bribery Act, Proceeds of Crimes Act 2002, and Foreign Corrupt Practices Act. These sanctions programs can be either comprehensive or selective and can target countries as well as individuals suspected of engaging in activities related to terrorism, narcotics trafficking, the proliferation of weapons of mass destruction and other threats to security. While some of these rules may be based on European policy or national security goals of third countries (e.g., UK, the U.S.), they may apply to FPS companies in every country because FPS is a European based company and also as a consequence of FPS's policy to apply these rules consistently across all subsidiaries and joint ventures.

Scope

This Policy applies to all directors, officers, employees and Contractors and Other Persons representing FPS ("**Covered Persons**"). "**Contractors and Other Persons**" include consultants, agents, sales representatives, distributors, independent contractors, sub-contractors and anyone who is hired to perform work for FPS or represent the interests of FPS. All Contractors and Other Persons should be made aware of this Policy. Before hiring a Contractor and Other Person to represent FPS, an assessment should be made of that person's willingness to comply with this Policy and whether that person presents a risk to FPS. The FPS Legal Department has access to various data bases that can assist the assessment process.

Policy

All Covered Persons must comply with all economic and trade sanctions laws that prohibit or limit doing business in certain countries and with designated individuals, entities, aircraft and vessels, and may not conduct business, directly or indirectly, in violation of those laws.

Further, Covered Persons:

1. Must not attempt to conceal the true origin and ownership of the proceeds of illegal activity such as: fraud, theft, corruption, drug trafficking, or any other crime.
2. Must not participate in foreign boycotts that the U.S., the United Kingdom and/or EU does not sanction.

3. Must maintain records and internal controls and practices in conformance with the sanctions lists from the European Union, the United Kingdom and OFAC; anti-bribery and corruption, anti-money laundering and anti-boycott laws to ensure that transactions are executed in accordance with this Policy.

Guidelines

Economic and Trade Sanctions

There are countries in which no FPS company may conduct business

Consolidated Financial Sanctions lists (CFSP, EURUDU and EUCM), the United Kingdom (the UK Sanctions List) and OFAC impose and administer economic sanctions against countries, entities and individuals believed to be a threat to the United States, the United Kingdom and EU and restricts the types of interactions that may be had with them. **Covered Persons may not engage in, whether directly or indirectly, any transaction involving the following countries: Cuba; Iran; North Korea; Sudan; and Syria.**

Transactions in or involving the Balkans, Belarus, Burma/Myanmar, Central African Republic, Cote d'Ivoire (Ivory Coast), Democratic Republic of Congo, Iraq, Lebanon, Libya, Somalia, South Sudan, Republic of Yemen and Zimbabwe are also subject to EU sanctions, but are generally permitted provided that such interactions do not involve (i) persons on the OFAC, the UK Sanctions List, and/or EU Sanction List of "Specially Designated Nationals and Blocked Persons" (the "SDN List"), (ii) persons owned or controlled by or acting for or on behalf of sanctions targets, and (iii) persons subject to other similar sanctions administered by other relevant government authorities (collectively, "Sanctioned Persons"). Before transacting business in the foregoing countries, you must contact the FPS Legal Department and provide all relevant background information.

There are other countries in which limitations on doing business exist

In addition, Covered Persons are prohibited from engaging in any transactions involving, or otherwise interacting with, Sanctioned Persons, whether directly or indirectly, and wherever located or any entity owned, directly or indirectly, 50% or more in the aggregate by one or more SDN-Listed persons. Further, no Covered Person may engage in, whether directly or indirectly, any transaction with a person who provides support for a Sanctioned Person sanctioned under the OFAC, the UK Sanctions List and/or EU List for weapons non-proliferation and terrorism sanctions. Covered Persons must notify the FPS Legal Department immediately if any property of an SDN-Listed person or entity comes within the possession or control of FPS.

FPS companies cannot conduct business with persons on the SDN-List

As sanctions programs evolve and related rules change, additional countries and persons could become subject to sanctions, or the nature and extent of permitted and prohibited activities with certain persons could change.

You should consult with the FPS Legal Department to confirm compliance with these requirements before entering into any contractual or business relationship with a Contractor or

Other Person that may be subject to these requirements.

The financial sanctions specifically prohibit “facilitation” or arrangement of prohibited transactions. No Covered Person may approve, finance, facilitate or guarantee any transaction by a third party where the transaction by that third party would be prohibited if performed by FPS.

Anti-Money Laundering

Money laundering is any process that conceals or seeks to conceal the existence, illegal source, or illegal use of income, and disguises such income to make it appear legitimate. FPS is prohibited from engaging in or facilitating, in any manner, money laundering or other suspicious activity.

Each FPS company must exercise a level of care and diligence when dealing with third-party companies to avoid being willfully blind to money laundering or other suspicious activity.

Covered Persons may not:

- Accept assets that are known or suspected to be the proceeds of criminal activity;
- Conduct business relationships, directly or indirectly, with persons or entities known or suspected as being terrorists, criminals, or their financiers; or
- Conduct business relationships with shell banks, unless they are part of a financial group subject to effective consolidated supervision.

Anti-Boycott

Anti-boycott regulations are administered by the U.S. Department of Commerce and the U.S. Internal Revenue Service.

The Department of Commerce regulations prohibit refusing to do business in a boycotted country or with a boycotted firm or national, discriminating based on race, religion, sex or national origin, furnishing discriminatory information regarding a person's associations or involvements with organizations supporting a boycotted country, or with a boycotted firm or national, and paying, honoring, confirming or otherwise implementing letters of credit containing any prohibited boycott-related terms or conditions, where the boycott is not sanctioned by the United States.

The anti-boycott regulations apply chiefly to activities in the following countries: Kuwait, Lebanon, Libya, Qatar, Syria, United Arab Emirates, and the Republic of Yemen. FPS will be considered to have participated in, or cooperated with, an international boycott, if any Covered Person agrees, directly or indirectly, as a condition of doing business with a boycotting country, or with a company or a national of such country: (i) to refrain from doing business with or in a country which is the object of the boycott or with the government, companies or nationals of that country, (ii) to refrain from doing business with any U.S. company or person engaged in trade in a country which is the object of a boycott or which is engaged in trade with the government, companies or nationals of that country, (iii) to refrain from doing business with any company whose ownership or management is made up, all or in part, of individuals of a particular nationality, race or religion or to remove (or refrain from selecting) corporate directors who are individuals of a particular nationality, race or religion, or (iv) to refrain from shipping or insuring the product on a carrier owned, leased or

operated by a person who does not participate in or cooperate with an international boycott.

In general, FPS is prohibited from agreeing to comply with the laws of a boycotting country. Agreeing to comply with laws of a boycotting country, even without reference to boycott laws, may result in FPS being deemed to have complied with the country's boycott laws and may subject FPS and the individual to fines and/or possible tax penalties (loss of foreign tax credit and/or tax deferral).

Even if FPS does not agree to participate in a boycott, receipt of a boycott request may be reportable to the U.S. Department of Commerce and the Internal Revenue Service. Covered Persons must notify the FPS Legal Department and the FPS Tax Department immediately if they receive any such request to participate in or cooperate with an international boycott not sanctioned by the United States. These requests are most likely to appear in transaction documents such as contracts, purchase orders, letters of credit and import documents. If you receive a boycott request, you must retain all related records until informed by the FPS Legal Department that you may dispose of them according to FPS policy.

Penalties

Violations of this Policy will lead to disciplinary actions by FPS against a violator, up to and including termination of employment. The consequences for violating economic and trade sanctions, anti-money laundering laws and anti-boycott laws include fines and penalties for the individuals involved and for FPS and can include prison terms for individuals involved, as well as serious damage to their reputation and career.

Report All Violations

Any individual who becomes aware or suspects of any violation of any law, rule or regulation or of this Policy, or who becomes aware of any suspicious activity or a process of violation thereof, has a responsibility to take action. Violations must not be ignored, hidden or covered up.

It is suggested that you contact one or more of the following:

- An appropriate supervisor or member of senior management;
- FPS's Legal Department at
- FPS' Leadership Team

The FPS Legal Department is available to review any potential transactions and discuss any concerns or questions involving this Policy



FPS will not tolerate retaliation against any individual for reports of any existing or potential violation of any laws, rules or regulations or of this Policy or other possible impropriety that are made in good faith or for cooperating in any investigation of the same.

***To report concerns on a confidential and anonymous basis,
you may place a call to the FPS HQ***

FPS encourages all its employees and Covered Persons to raise concerns and report suspicious circumstances as early as possible. Covered Person's failure to report any suspicion or violation will be considered a violation of this Policy.

Effective: April 1, 2022