

SANCTIONS & EXPORT CONTROLS POLICY

POLICY STATEMENT

M&S is committed to complying with its legal obligations relating to trade sanctions and export controls. We take appropriate steps to ensure that we are not:

- doing business with individuals or entities which are subject to sanctions regimes; or
- involved or implicated in the movement of goods which are subject to export controls.

WHAT ARE SANCTIONS & EXPORT CONTROLS?

Sanctions

Sanctions are legal restrictions which prohibit doing business with specified individuals, companies and organisations ("**Restricted Parties**"). They are used as a political tool targeted at regimes, and associated organisations and individuals implicated in terrorism, serious violations of human rights, war crimes.

Sanctions are imposed by many countries, but the key sanctions regimes of relevance to M&S are those which are implemented by the UK, the EU and the US. The legislation which imposes the sanctions include lists of the Restricted Parties.

Export controls

Export controls are a form of trade restriction which target the exportation, transfer, sale and purchase of controlled goods and technology, typically those which can be used for military purposes.

Licences are required to be able to move these controlled goods from country to country.

HOW DOES THIS IMPACT M&S?

M&S buys and sells products and services from entities across the globe. Accordingly, we need to take appropriate steps to avoid doing business with Restricted Parties or importing or exporting goods subject to export controls.

Breach of sanctions and export controls requirements can have severe consequences, including major fines and the imprisonment of culpable individuals.

YOUR RESPONSIBILITIES

High Risk Jurisdictions

Although sanctions are targeted against Restricted Persons rather than jurisdictions, for practical purposes virtually all Restricted Persons are

connected to a relatively small number of countries. For the purposes of this Policy we have identified the following High Risk Jurisdictions:

- Afghanistan
- Belarus
- Burma / Myanmar
- Cuba
- Democratic People's Republic of Korea (aka North Korea or DPRK)
- Iran
- Libya
- Russia including Crimea and Sevastopol
- South Sudan
- Sudan
- Syria
- Venezuela
- Zimbabwe

Responsibilities of colleagues

In order to help M&S comply with relevant legal obligations, colleagues should:

- not do business with, or supply products to, a person / entity which you know or believe to be a Restricted Party;
- not knowingly do business with, or supply products to, any entity in a High Risk Jurisdiction, or a business owned or controlled by a Restricted Party, without obtaining prior approval from the Sanctions Compliance Team at sanctions.compliance@marks-and-spencer.com; and
- inform the Sanctions Compliance Team at sanctions.compliance@marks-and-spencer.com immediately if they become aware that a prospective supplier, customer, or other business partner is based in a High Risk Jurisdiction.

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COMPLIANCE

M&S complies with its obligations and monitors compliance by taking the following steps:

- Standard terms of trade and contract templates contain sanctions and export control compliance provisions.
- M&S monitors the jurisdiction of origin and dispatch for all imports.
- Key members of the Indirect Tax team are signed up to receive the list of sanctions targets

which are issued by HMRC and OFAC.

REPORTING AND QUERIES

If you have any general queries or if you need to notify or gain approval relating to business dealings with an entity in a High Risk Jurisdiction please contact sanctions.compliance@marks-and-spencer.com or the Senior Global Customs Manger, Karen Coventry Karen.Coventry@marks-and-spencer.com.

FURTHER INFORMATION

Policy Owner	Nick Folland, General Counsel
Compliance Lead	Clare Towers, Head of Regulatory and Compliance
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