

SANCTIONS COMPLIANCE POLICY

Purpose

This Sanctions Compliance Policy aims to set out the rules to be followed by CargoPoint to ensure that our company complies with global sanctions regimes and is able to identify and mitigate the sanctions risks confronting our business.

This Policy is intended to help our employees, contractors, and other third parties acting on our behalf to understand where breaches of sanctions might occur and to support them in making the right decisions in line with our corporate values.

Scope

This Policy applies to CargoPoint's operations globally, including all legal entities owned or controlled by CargoPoint and to all directors, officers, employees, contractors, and other third parties directly or indirectly controlled or operated by CargoPoint.

All CargoPoint employees are required to abide by this Policy to ensure compliance with economic sanctions and trade restrictions administered by governments and regulators globally, including the United Nations, the European Union, the United States of America as well as other jurisdictions.

We assert our influence over our business partners, customers and suppliers, which we do not control, to encourage them to act in a manner consistent with the intent of this Policy.

What Are Sanctions

Sanctions are penalties or regulatory restrictions used by governments or international bodies as a means to influence behavior or stop illicit activity, including terrorism, development of weapons of mass destruction, drug trafficking, human rights abuses or breach of national sovereignty.

Sanctions can include export/import restrictions, trade embargoes, asset seizures or capital controls. They may be comprehensive, or target certain industries. Sanctions can also target governments, businesses, individuals, aircraft or vessels, political groups, terrorist organizations.

It is important that all CargoPoint employees and contractors consult with our Compliance Team to understand the business implications sanctions can have on our Company and employees.

Our Policy

1. We comply with global sanctions laws and regulations in our business operations worldwide.
2. We do not conduct business with, or involving any, sanctioned countries, territories, entities, individuals or goods and services.
3. We do not participate in transactions that would expose our business or that of our counterparties to compliance risks.
4. We manage our sanctions risk exposure by training our employees on sanctions compliance, conducting due diligence on our counterparties and ongoing monitoring of sanctions regimes.

We require our employees to be alert to sanctions risks and to report any sanctions issues identified to our Compliance Team.

What Are The Risks

Violations of sanctions laws and regulations may lead to serious consequences for businesses and individuals, including financial penalties, asset seizures, criminal penalties or prison sentences.

Additional potential consequences of sanction breaches include:

- Broken relationships with customers and suppliers
- Loss of profits and potential loss of business
- Irrecoverable reputational damage
- Being cut off from the global financial system, including the ability to transact in U.S. dollars
- Extensive time and cost in conducting or defending against various investigations

Measures We Take To Ensure Compliance

All CargoPoint employees, partners and contractors must be aware of any potential sanctions restrictions relating to our business activities, including:

- **Who We Do Business With:** Screen all counterparties we do business with, understand exactly who we are in business with to avoid association with bad actors;
- **Where We Do Business:** Screen all jurisdictions we do business with to ensure compliance with sanctions on restricted countries or territories;
- **How We Do Business:** Monitor sanctions regimes on an ongoing basis and make sure we do not circumvent, evade or facilitate a breach of sanctions regulations;
- **Red Flags:** Report any suspicious activities or third parties which may raise sanctions concerns

If you are in any doubt or have any questions, please contact our Compliance Team before proceeding further.

Responsibilities

The responsibility to ensure compliance with this Policy falls on the following parties:

Board of Directors:

- Oversee the management of this Policy and overall compliance with sanctions regulations
- Ensure that the Company has adequate resources in place to manage our risk exposure
- Provide appropriate training to all business functions on sanctions compliance

Finance Manager:

- Ensure that financial transactions/operations are in line with economic and trade sanctions regulations, by following approved processes and controls
- Conduct due diligence checks on customers and vendors that we conduct business with

Compliance Team:

- Monitor global sanctions regulations and communicate any changes on time and efficiently
- Determine and approve controls to be followed in specific regions or types of transactions
- Provide legal advice and guidance on specific situations on request

- Conduct periodic risk assessments and monitor the processes and controls in place

All Employees:

- Read and follow this Policy, understand and identify any red flags that may arise in your business activities and to escalate potential compliance concerns to the Compliance Team
- Refrain from any actions prior to receiving advice and/or instructions on how to proceed

Non-Compliance

We will consider non-compliance of this Policy as a serious matter warranting disciplinary action, up to and including dismissal. If this Policy is violated by any third parties, customers or vendors, their contracts will be terminated immediately. Violations of sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment.

If you know or suspect that there has been a violation of this Policy and/or the applicable law, you should immediately report the violation or red flags to our Compliance Team. You may share your questions or concerns with us via the following reporting channels:

Web: www.cargopoint.one/contact

E-mail: compliance@cargopoint.one

Phone: +998 78 1500033

Updates and Ownership

This Policy will be periodically reviewed and updated by CargoPoint Management to ensure compliance with new or revised laws and regulations. The latest version of the Policy will be immediately made available on CargoPoint website.