

## SANCTIONS POLICY



Version 2.2 - 2025

## INTRODUCTION

At DUTCH HEALTH B.V. and within our subsidiaries (together 'DUTCH HEALTH '), we are committed to conduct our business with integrity, honesty and fairness. We, being all DUTCH HEALTH employees throughout the world, do this in compliance with applicable laws, the Code of Conduct and its underlying policies.

DUTCH HEALTH is a responsible international operating enterprise. Our purpose is to create and protect wellbeing and aim to advance the medical services.

DUTCH HEALTH does not perform any activities that are subject to international and/or national sanctions and does not have dealings with sanctioned persons. We furthermore follow the laws concerning export control for military and dual-use goods and services (together the 'Sanctions Laws').

The Sanctions Policy takes account of the interests of our various stakeholders. They include employees, shareholders and financial institutions, suppliers, clients, government bodies, educational and knowledge institutes, industry and society associations (including NGOs) and the communities in which DUTCH HEALTH operates.

## TO WHOM DOES THIS POLICY APPLY

The Sanctions Policy applies to DUTCH HEALTH , its subsidiaries and all its employees performing work for DUTCH HEALTH throughout the world. This includes current employees and persons working for DUTCH HEALTH through an employment agreement, as a (statutory) director, worker through an employment agency or as an intern. Any reference to 'you' in this policy refers to persons in this group.

Compliance with the Sanctions Laws is a fundamental part of the way we do business, and we promote the same principles in our relationships with customers, suppliers and other business partners.

## WHAT ARE OUR SANCTIONS PRINCIPLES

### a. Sanctions

Many countries and international organizations around the world, like for instance the European Union, the United Nations and the United States, have enacted sanctions or embargo laws against other countries or territories for geopolitical or economic reasons. Sanctions or embargoes are restrictive measures, which take various forms in nature or extent, including prohibitions to conduct business with certain countries or individuals, prohibitions to perform certain activities in certain countries, restrictions on financial transactions or insurance and limitations on export and import.

DUTCH HEALTH does not perform any activities that are subject to international and/or national sanctions and does not have dealings with sanctioned persons.

A list of restricted territories where Sanctions Laws apply for activities and designated persons may be found on the DUTCH HEALTH intranet.

The Compliance Officer will perform a screening process confirming whether any restrictions are applicable for your planned business under the Sanctions Laws. In the screening process a thorough check is made whether Sanctions Laws are applicable.

This includes a check on the country or territory where your business is planned to take place, whether there are any restrictions to work with the entity or individuals DUTCH HEALTH plans to do business with and that the activities we plan to perform in that country or territory are permitted under the relevant Sanctions Laws. Following this screening process, the Compliance Officer will inform you whether it is permitted to conduct your business in the specific restricted country or territory. Where applicable periodic screening process are carried out on a regular basis by the Compliance Officer.

Both the targets of Sanctions Laws and the nature of the restrictions imposed by Sanctions Laws are subject to change on a regular basis. For each new case you shall request the Compliance Officer to perform a new screening process.

#### **b. Export control for military and dual-use goods and services**

Sanctions Laws also include special rules for the export of dual-use goods. Dual use goods are products which may be deployed in medical projects on our vessels or in our operations but which may also be used for military purposes. Countries have introduced specific Sanctions Laws to control where, when and under what conditions these dual-use goods may be used. Often a license is necessary to transport, import or export these dual-use goods, such as Ambulance boats

DUTCH HEALTH does apply the laws concerning export control for military and dual-use goods and services.

## **WHAT IS EXPECTED FROM YOU**

Compliance with the applicable Sanctions Laws is essential in the day-to-day business of DUTCH HEALTH. DUTCH HEALTH therefore expects you not to engage in any business transaction or activity that could violate applicable Sanctions Laws and this Sanctions Policy. Violations of Sanctions Laws can lead to substantial criminal and civil penalties, for both DUTCH HEALTH, directors and you as an employee. This may include the imprisonment of individuals, blacklisting of DUTCH HEALTH, bans on entry into specific countries, the freeze of assets and the use of certain currencies. Clients, investors, banks, insurers and other stakeholders expect strict compliance of Sanctions Laws, whereby non-compliance may lead to the exclusion of tender procedures or termination of (financial) contracts.

## **HOW TO DEAL WITH BUSINESS PARTNERS**

At DUTCH HEALTH we are committed to conduct business with integrity, honesty and fairness in compliance with the applicable laws, the Sanction Laws as well as the DUTCH HEALTH Code of Conduct. We expect our business partners, like joint venture partners, suppliers and agents to do the same.

The main principles of the Sanctions Policy are also incorporated in the Code of Conduct. Suppliers (including but not limited to agents) will seek to select their own suppliers in accordance with the Code of Conduct. You should ensure that the Code of Conduct forms part of the contractual relationship between DUTCH HEALTH and the supplier.

## ACCOUNTABILITY AND GOVERNANCE

The responsibility for the Sanctions Policy and the management of sanctions risks sits ultimately with the Board of Management.

Compliance of the Sanctions Policy is monitored by management and the Compliance Officer and through audits performed by the external and internal auditors.

The Board of Management and the Compliance Officer review the content of this policy on a yearly basis.

## HOW TO REPORT (SUSPECTED) MISCONDUCT

If you are an employee of DUTCH HEALTH and you believe that anyone who is involved in the business of DUTCH HEALTH is attempting to breach or has breached the Sanctions Policy or you become aware that DUTCH HEALTH or one of its employees has (inadvertently) become involved in any business activity or a transaction with a sanctioned person or entity contrary to applicable Sanctions Laws, you are expected to report this immediately to the Compliance Officer and your (direct) manager.

## WHERE DO YOU FIND THE SANCTIONS POLICY

The Sanctions Policy is available on [www.dutch-health.com](http://www.dutch-health.com) On the DUTCH HEALTH website you can also find the list of restricted territories where Sanctions Laws apply for activities and designated persons on internet, where the basic guidelines are published: <https://www.sanctionsmap.eu/#/main>

## COUNTRIES WHERE DUTCH HEALTH DOESN'T PERFORM ANY BUSINESS OR PROJECTS

Iran, North Korea, Russia, Sudan

Signature:



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In the capacity of: Managing Director For & on behalf of Dutch Health B.V.

Nederhorst Den Berg: 28 January 2025

