

Sanctions and Export Controls Policy

GreenSpark will not knowingly participate in prohibited dealings with sanctioned persons or entities, make prohibited funds or economic resources available, or facilitate sanctions evasion or unlawful transfers of controlled goods, software, technology or services.

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Policy statement

GreenSpark will not knowingly participate in prohibited dealings with sanctioned persons or entities, make prohibited funds or economic resources available, or facilitate sanctions evasion or unlawful transfers of controlled goods, software, technology or services.

1. Scope and legal framework

This policy applies to clients, investors, banks, suppliers, agents, subcontractors, beneficial owners and other counterparties, as well as relevant payments, investments, equipment, software, technical information and services.

Obligations depend on the transaction, parties, goods, services and jurisdictions involved. Relevant legal requirements must be identified before commitment.

2. Screening and risk assessment

- Screen relevant parties at onboarding and again before material payments, investments, procurement commitments or project milestones. Ongoing monitoring must be proportionate to risk.
- Use the current official UK Sanctions List for UK designation screening. Check other lists where required by law, contract, financing arrangements or transaction exposure.
- Assess ownership and control, not only exact name matches; consider intermediaries and indirect benefits.

Screening tools can produce false positives and may not identify every risk. Resolve potential matches carefully and retain the rationale for decisions.

3. Export controls and end use

Before transferring equipment, software, technical data or services across borders, assess whether export controls, licensing requirements, end-use restrictions or other trade controls apply.

- Obtain appropriate licences or authorisations before proceeding where required. Do not assume that an exception applies without checking its conditions.
- Escalate opaque ownership, unusual payment routing, requests to conceal destination or end-user, or suspected circumvention.

4. Holds, escalation and reporting

- Do not proceed with a transaction that is prohibited or while a material sanctions concern remains unresolved.
- Pause the transaction and notify the designated compliance lead. Obtain specialist legal advice before releasing funds, goods, services or information.

Where required, freeze or refrain from dealing with relevant assets and report to the appropriate authority in accordance with applicable law. Do not tip off a counterparty where doing so may be unlawful.

- Document the decision, any licence or exception relied upon, and controls required for ongoing monitoring.

5. Responsibilities and review

Engagement leads must collect accurate counterparty, ownership, destination and end-use information.

Finance and procurement must not override a sanctions hold without documented legal clearance.

This policy will be reviewed at least annually and whenever relevant sanctions or export-control requirements change.

Related guidance

Sanctions and export-control obligations are fact-specific and can change rapidly. Seek specialist advice for potential matches, complex ownership, licences or cross-border transfers.

Approval and document control

This is the published version 1.0 of this policy, with approval and publication dates recorded as 1 July 2026. It forms part of the GreenSpark Consulting — Governance, Integrity & Responsible Business framework and should be read with other relevant policies and applicable law.

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