



**EVO SUPPLY CHAIN PRIVATE LIMITED
INTERNATIONAL BUSINESS COMPLIANCE POLICY**

APRIL 1ST 2023

Evo Supply Chain Private Limited International Business Compliance Policy

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EVO Supply Chain Solutions

COMPANY DETAILS

EVO SUPPLY CHAIN INDIA PRIVATE LIMITED

Subsidiary company of *GLOBAL S.C VENTURES LLC, UNITED STATES OF AMERICA.*

CIN NUMBER : U50113HR2023PTC109880

GSTIN : 06AAHCE4587A1ZR

PAN NUMBER : AAHCE4587A

TAN NUMBER ; RTKE04092E

UDHYAM REGISTRATION NUMBER: UDHYAM-HR-05-0065936

BOARD OF DIRECTORS with holding positions

Manish Malik : Managing Director

Gunjan Malik : Advisory Board Member

Rakesh Jakhmola : Chief Financial officer

EVO Supply China Private limited - International Business Compliance Policy

Prepared For: Evo Supply Chain Pvt. Ltd. – India branches, subsidiaries, and employees.

Date: 1st April 2023

Purpose:

This policy sets forth Evo Supply Chain Private limited commitment to full compliance with the India international business laws and regulations and notifies employees to contact the Evo Supply Chain Pvt Ltd Compliance Department if they have any questions or concerns about compliance with India international business laws and regulations. The Compliance Department contacts are as follows:

1st Point of Contact: Rakesh Jakhmola : rakesh.jakhmola@evoscs.com

2nd Point of Contact: Manish Malik : manish.malik@evoscs.com

As Managing Director of Evo Supply China Private limited, I certify that I am familiar with the EVO SCS International Business Compliance Policy and the requirements summarized in this policy. I have read and understand this certification.

Manish Malik
Managing Director

Manish.malik@evoscs.com

EXECUTIVE SUMMARY

It is the policy of Evo Supply chain India Pvt. Ltd. (herein referred as EVO SCS in short form) to fully comply with India laws and regulations governing international trade. These laws and regulations cover the import, export, re-export, and facilitation of products, services, software, technology, and technical data. It is the responsibility of all EVO SCS employees to ensure that under no circumstance should a transaction occur contrary to EVO SCS policy of full compliance.

Being a subsidiary of Global SC Ventures LLC (US based company).

The U.S. imposes sanctions on a few countries in which U.S. persons and subsidiary companies may not do business. The Office of Foreign Assets Control of the United States Department of Treasury frequently modifies the list of countries and/or the degree of restrictions in place with respect to any such country. Employees engaged in international trade have responsibility for consulting the most current list, which is provided in the Embargoed Countries/Sanctions section of this policy.

Strict compliance with international trade controls is a top priority for EVO SC. Violations of the legal requirements could subject EVO SCS and its employees to criminal penalties, civil penalties (including fines), the loss of export privileges and debarment. Non-compliance with the applicable rules by EVO SCS employees could result in corporate discipline, including dismissal.

Each employee is required to understand and comply with the international business laws and regulations as they apply to his or her job activities. It is the responsibility of each Domain head at EVO SCS to distribute the corporate international business compliance policy to the employees, agents and business partners affiliated with their respective EVO SCS branches subsidiary or affiliate office(s).

BUSINESS CODE OF CONDUCT:

Introduction: Evo Supply China private limited is committed to conducting its business in an ethical and responsible manner. This Business Code of Conduct outlines the principles and standards that all employees and stakeholders are expected to adhere to in order to maintain the highest levels of integrity and professionalism. By following this code, we aim to foster a culture of trust, respect, and accountability within our organization and in our interactions with clients, partners, and the community.

1. **Compliance with Laws and Regulations:** All employees and stakeholders must comply with applicable laws, regulations, and legal requirements of the jurisdictions in which we operate. This includes, but is not limited to, laws related to labor, health and safety, environment, anti-corruption, and fair competition. Any illegal or unethical activities are strictly prohibited.
2. **Integrity and Ethical Behavior:** We expect all employees and stakeholders to act with integrity and uphold the highest ethical standards in their business dealings. This includes honesty, transparency, and fairness in all interactions, both internally and externally. Conflicts of interest must be disclosed promptly, and actions that compromise professional integrity or the reputation of the company are not tolerated.
3. **Respect for People:** We value diversity, inclusivity, and mutual respect among all individuals. Discrimination, harassment, or any form of inappropriate behavior based on race, color, gender, sexual orientation, religion, age, disability, or any other protected characteristic is strictly prohibited. Everyone is entitled to a safe, supportive, and inclusive work environment.
4. **Confidentiality and Data Protection:** All confidential information, including trade secrets, proprietary data, and personal information, must be handled with the utmost care and protected from unauthorized access or disclosure. Employees and stakeholders must comply with data protection laws and maintain confidentiality both during and after their employment or engagement with the company.
5. **Responsible Business Practices:** We are committed to conducting our business in an environmentally responsible manner. We strive to minimize our impact on the environment, conserve resources, and promote sustainable practices. Additionally, we expect our suppliers and partners to adhere to similar environmental and social responsibility standards.
6. **Fair and Transparent Business Practices:** We promote fair competition and do not engage in any form of anti-competitive behavior, such as price fixing, market manipulation, or collusion. Our business relationships and transactions are based on fairness, transparency, and compliance with applicable laws and regulations. Bribery, corruption, and kickbacks are strictly prohibited.
7. **Health and Safety:** The health and safety of our employees, customers, and the community are of paramount importance. We are committed to providing a safe and healthy work environment, complying with applicable health and safety regulations, and promoting a culture of accident prevention and employee well-being.
8. **Reporting Violations and Whistleblower Protection:** Any concerns or suspicions of code violations, illegal activities, or unethical behavior should be promptly reported through the designated reporting

channels. We provide protection for whistleblowers against retaliation and ensure that all reports are treated with strict confidentiality and investigated in a fair and impartial manner.

9. **Upholding the Code:** All employees and stakeholders are expected to read, understand, and comply with this Business Code of Conduct. Violations of the code may result in disciplinary action, up to and including termination of employment or business relationships.

Conclusion: By adhering to this Business Code of Conduct, we collectively commit to maintaining the highest standards of ethics, integrity, and professionalism in all aspects of our business. By doing so, we contribute to the success, reputation, and long-term sustainability of Evo Supply Chain private limited while building trust with our stakeholders.

Country Embargo and Sanctions for Evo Supply Chain Private Limited International Business

As a subsidiary Global SC Ventures LLC, a U.S. based company, EVO SCS is obliged to pursue and comply with certain trade restrictions in the global market. The restrictions mentioned hereafter apply to foreign companies which are owned/controlled by U.S. based corporation (such as EVO SCS), and/or to U.S. citizens or permanent residents wherever located. The following is a summary of the restrictions that apply to each and every of Global SC ventures LLC subsidiaries.

1. OFAC Embargoed countries

Office of Foreign Assets Control (“OFAC”) is an agency within the U.S. Department of Treasury. OFAC implements U.S. “Country Specific” embargoes and “Issue Specific” economic sanctions programs.

Country Specific Embargo programs:

These “Specific Embargo Programs” are subject to comprehensive trade embargoes, including an export and import ban, while the other regimes provide for “softer” sanctions that target only specific industries, such as the rough diamond trade in the Sierra Leone regime.

- a. **Cuba-** absolutely no importing/exporting or providing services to Cuba. This prohibition is part of the Cuban Assets Control Regulations that were issued by the U.S. Government under Trading with the Enemy Act. They are still in force today and affect any person subject to U.S. jurisdiction including:
 - i. U.S. citizen and permanent resident wherever located;
 - ii. All individuals and organizations physically in the U.S., and all branches and subsidiaries of U.S. organization throughout the world.

Criminal penalties for violating the regulations range up to 10 years in prison, \$1,000,000 fines, and \$250,000 in individuals fines. Civil Penalties up to \$65,000 per violation may also be imposed.

- b. **Iran-** No U.S. person may approve or facilitate the entry into or performance of transactions or contracts with Iran by a foreign subsidiary of a U.S. firm that the U.S. Person is precluded from performing directly. These transactions include: goods, technology or services (such as transportation).
- c. **Sudan**¹- the Sudanese regulations specifically prohibits “facilitation” and “brokering” activities by U.S. persons including foreign subsidiaries of U.S. firms.

¹ Regulations identify the Specified Areas of Sudan, which are exempt from the prohibitions of EO 13067, as Southern Sudan, Southern Kordofan/Nuba Mountains State, Blue Nile State, Abyei, Darfur and marginalized areas in and around Khartoum. Marginalized areas include the following official camps for internally displaced persons: Mayo, El Salaam, Wad El Bashir and Soba. Therefore, commercial imports and exports as well as humanitarian assistance are no longer prohibited in these Specified Areas of Sudan, provided that these activities do not involve Sudan’s petroleum or petrochemical industries, any property or

OFAC decrees that facilitation occurs when a U.S. person “assists” or “support” trading activities with Sudan by any other person.

Issue specific Embargoes²:

- d. **Syria** - all property and interest in property that are in the U.S., that hereafter come within the possession or control of U.S. person including any overseas branch, of persons determined by the Secretary of Treasury, after consultation with the secretary of state, are blocked.
- e. **North Korea** – goods of North Korea cannot be imported to the U.S. All property and interest in property of North Korea or a North Korean national that were blocked as of June 16, 2000, will remain block. Items subject to the Export Administration Regulations require a license for the export or reexport to North Korea (with the exception of food and medicine classified as EAR99).
- f. **Belarus, Balkans, Cote d’Ivoire (Ivory Coast), Democratic Republic of Congo, Somalia, Zimbabwe** – OFAC Sanctions Programs for these countries state that U.S. persons and all branches and subsidiaries of U.S. organizations throughout the world may not in any way approve, facilitate, broker, or be involved in any manner with transactions of individuals affiliated with these countries that are found on the OFAC Specially Designated Nationals List (SDN).

A link to the OFAC SDN List can be found here:

<http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>.

All consignees, exporters, forwarding agents and carriers must be screened on the SDN List prior to pursuing involvement with transactions with OFAC Sanctioned Program countries listed in subpart “f”. If a party appears on the SDN List, it is illegal to pursue with the transaction. If the result of the SDN List screen does not result in a match, the transaction may be pursued.

The full range of these restrictions applies under U.S. law to U.S. persons, wherever they are located and for whomever they work. The law provides that no U.S. person employed by, or associated with a foreign subsidiary may in any way approve, facilitate, broker, enable, or be involved in any manner with transaction with an embargoed country or party.

interest in property of the Government of Sudan, or involve transshipment of goods or financial services through non -Specified Areas of Sudan, as discussed below.

² You can run a search of designated nationals at www.ups.com. Select “Shipping Tab” and then select “Use International Tools” tab. Then utilize “Screen Denied Parties” tool in order to conduct denied parties screening.