

SANCTIONS STATEMENT

IM Group is committed to doing business in accordance with our company values and in accordance with the highest ethical standards. This includes complying with all applicable trade sanctions regulations in the countries in which we operate. The global nature of our business and because sanctions apply across borders means the transactions, we engage in may be subject to sanctions imposed by multiple government authorities. The nature and extent of restrictions may vary and we therefore encourage our employees to consult our Director of Compliance to raise any questions or concerns to seek clarity.

The statement summarises our policy concerning how we will ensure compliance

We will:

- Ensure appropriate sanctions processes are available for all employees and supply chain within IM Group and its subsidiary businesses to report issues in an appropriate & effective way.
- Communicate the Sanctions processes to all employees that are responsible for due diligence of new and ongoing business relationships, in particular those involved in legal, parts & services, compliance, finance, business development and senior management.
- Ensure all employees consider where we do business, who we do business with and how we do business so that they may raise concerns as set out in the Group Policy.
- Deal with any red flags or any other queries relating to sanctions, which should cause us to conduct further investigation in a prompt and timely manner.
- Communicate to the IM Group Board any reports or disclosures, the investigation and outcome.

This policy applies to IM Group and its subsidiary businesses, employees, and supply chain. It meets with legislation, is publicly available and supported by guidance, training, and awareness.

Signed



Gary Hutton

Executive Director

April 2023