

 شركة الديار المتحدة للتجارة والمقاولات Diyar United Company for Trading & Contracting	Document No: TSECP-01			
	Issue No. 1	Revision No.	Review No.	Department: Sales & Procurement
Title: Trade Screening and Export Compliance Policy	Issue date 21.09.2026	Revision date	Review date	Page 1 of 2

Purpose

Diyar is committed to appropriate trade screening and compliance with applicable export-control and trade requirements to reduce the risk of prohibited or restricted transactions. This Policy provides a simple, function-based framework and does not replace applicable laws, regulations, licences, contractual requirements or Legal advice.

Diyar shall not knowingly engage in transactions prohibited under applicable sanctions, export-control or other applicable trade compliance requirements. Where required, transactions shall be subject to appropriate authorisation, licensing or regulatory approval before proceeding.

1. Scope & Responsibilities

<u>Function</u>	<u>Responsibility</u>
Pre-Sales – End Customer	Handle applicable customer, end-user, destination and transaction screening information within their process.
Sales, projects for Supplier Selection (TBC)	Address relevant supplier, project, end-use and transaction information within the business process before handover to Procurement. Escalate identified concerns to the Legal Department or the designated authorised function before making commitments or proceeding with the relevant transaction.
Procurement	From Purchase Requisition onward, conduct applicable supplier or third-party screening during onboarding and procurement processing, identify, hold and escalate concerns where required.
Legal / Authorized Function	Review potential details and determine applicable sanctions, export-control, licensing or other regulatory requirements and actions.

2. Screening & Export Compliance Controls

Relevant parties and transactions shall be screened at appropriate points based on risk and applicable requirements. Potential matches or red flags shall be referred to Legal or the designated authorized function and when required, the relevant transaction shall be placed on hold until clearance is provided. No employee shall knowingly circumvent applicable screening, sanctions or export-control requirements or proceed with a transaction that has been placed on hold pending review.

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Export-control considerations may include where applicable, destination, end-user/end-use, controlled goods, technology or software, classification and licensing. Where required, the relevant transaction shall be reviewed to determine whether an applicable licence, authorisation, exemption or other regulatory approval is necessary.

Diyar's existing supplier registration covers anti-bribery, fraud and related conduct remain applicable and supports this Policy.

3. Records & Review

Relevant screening evidence, decisions and approvals shall be retained in accordance with Diyar's document control and retention requirements. This Policy shall be reviewed annually and may be updated as necessary to reflect applicable legal or regulatory requirements, changes in business activities or relevant business processes.

4. Legal Review

The Legal department shall support the business in identifying the applicable jurisdictions, laws, screening sources or tools, escalation authority. Any concerns may be raised directly to the Legal department for further advice/review.

Where the applicability of sanctions, export controls or other trade compliance requirements is unclear, the relevant matter shall be referred to Legal or the designated authorised function before proceeding.

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