

PBS

Sanctions Policy

Purpose

The purpose of this policy is to ensure that PBS complies with all applicable sanctions laws and regulations administered or enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), the U.S. Departments of State or Commerce, the United Nations Security Council (UNSC), the European Union (EU), Switzerland, Poland, and any other applicable sanctions authorities (collectively, "Sanctions").

Scope

This policy applies to all PBS subsidiaries, directors, senior executives, officers, employees, and any person or entity acting on behalf of PBS in connection with its operations, agreements, and business activities.

Policy Statement

1. Prohibition Against Sanctioned Persons and Sanctioned Countries

PBS, including its subsidiaries, directors, executives, officers, and representatives, shall not:

- Engage in business with, or provide any benefit to, any person or entity that is subject to Sanctions ("Sanctioned Person"), or any person or entity owned or controlled (50% or more) by a Sanctioned Person.
- Conduct business with entities or individuals based, organized, or residing in countries or territories subject to comprehensive Sanctions, including, but not limited to, Crimea, Cuba, Donetsk, Iran, Luhansk, North Korea, Syria, Russia, and Belarus (collectively, "Sanctioned Countries").

2. Ownership and Participation

PBS shall ensure that no Sanctioned Person holds any beneficial ownership or other property interest in PBS agreements, nor participates in or derives financial or economic benefits from PBS business activities.

3. Restricted Use of Resources

PBS shall not use or provide materials, services, or funds:

- To facilitate activities or businesses with or related to Sanctioned Countries or Sanctioned Persons.
- In a manner that would result in a violation of Sanctions.
- For activities or businesses that could result in PBS being designated as a Sanctioned Person or expose PBS to sanctions-related risks.

4. Sectoral Sanctions

Where applicable Sanctions are sectoral in nature, restricting specific activities (e.g., financing, export, or import of certain goods, technologies, or services), PBS shall ensure compliance with the requirements of such Sectoral Sanctions.

Compliance Measures

1. Due Diligence

PBS shall conduct thorough due diligence on its counterparties, including their ownership structure, to ensure compliance with applicable Sanctions.

2. Monitoring and Reporting

PBS will continuously monitor business activities to identify and address potential violations of this policy. Any suspected violations must be reported to the Compliance Officer immediately.

3. Training and Awareness

PBS shall provide regular training to employees on the requirements and implications of Sanctions laws and this policy.

4. Third-Party Compliance

PBS will require all third-party partners, suppliers, and contractors to adhere to Sanctions laws and cooperate in compliance efforts.

Breach of Policy

1. Termination Rights

PBS reserves the right to terminate or suspend any agreement or business activity if:

- A counterparty becomes a Sanctioned Person.
- PBS reasonably believes a counterparty has breached or is likely to breach this policy.

2. Liability for Non-Compliance

Any costs, liabilities, or expenses incurred by PBS due to non-compliance with this policy shall be the responsibility of the breaching party.

Force Majeure and Non-Performance

PBS shall not be obligated to perform any contractual obligations if such performance would result in a violation of applicable Sanctions or expose PBS to sanctions-related risks, including the risk of being designated as a Sanctioned Person.

Review and Amendments

This policy shall be reviewed regularly to ensure its effectiveness and compliance with evolving Sanctions laws and regulations. Amendments to this policy shall be communicated to all relevant stakeholders.

Approved by: Vitali Kantsevich, President of the Board

Effective Date: 08 January 2025