

# LANGUAGE REACH

## Sanctions Policy

### 1. Purpose

Language Reach Limited is committed to complying with all applicable sanctions laws and regulations. This policy is intended to ensure that the company does not engage in business with sanctioned individuals, entities, organisations, countries or regions where prohibited by law.

### 2. Scope

This policy applies to:

- all employees and directors
- freelancers, contractors and consultants
- agents and intermediaries acting on behalf of the company
- suppliers, clients and other counterparties where relevant

### 3. Policy Statement

Language Reach Limited will not knowingly:

- provide services to any person or entity subject to applicable sanctions
- make or receive payments involving sanctioned persons, entities or prohibited jurisdictions
- enter into transactions that would breach UK or other applicable sanctions laws
- assist others in evading sanctions restrictions

### 4. Due Diligence

The company will take reasonable and proportionate steps to identify sanctions risks, which may include:

- screening clients, suppliers and counterparties where appropriate
- checking whether services, payments or jurisdictions raise sanctions concerns
- escalating any unusual or high-risk matter before proceeding

### 5. Red Flags

Examples of warning signs include:

- a party appears on a sanctions list
- a payment route or counterparty is unclear or unusual
- a transaction involves a sanctioned country or restricted region

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- a client asks for services to be provided through another party without clear reason
- incomplete or inconsistent identifying information is provided

Any such concerns must be reported immediately.

## 6. Reporting Concerns

Any employee or associated person who becomes aware of a potential sanctions issue must report it promptly to management before any further action is taken.

No one will suffer detriment for raising a genuine concern in good faith.

## 7. Breaches

Any breach of this policy may result in disciplinary action, termination of contract, or other appropriate action. Serious breaches may also expose individuals and the company to civil or criminal penalties.

## 8. Responsibility and Review

Management is responsible for implementing and reviewing this policy and for ensuring that appropriate checks and controls are maintained.