



Framework

F0.4 - Trade sanctions policy

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1. Introduction

- 1.1 The international community applies measures to countries, persons and organizations ("**Sanctioned Countries, Persons and Organizations**") against violations or threats to international peace and security. The aim is to achieve a change in conduct and prevent undesirable conduct in or by Sanctioned Countries, Persons and Organizations.
- 1.2 GMP+ International B.V. ("**GMP+**") pursues the business of deploying a certification scheme that facilitates companies all over the world by means of certification ("**GMP+ certification**") to contribute to safe feed. GMP+ is committed to ensure that it complies with the laws and trade restrictions imposed by the United Nations, the European Union, and the Office of Foreign Assets Controls of the United States ("**Sanction rules**").
- 1.3 In the case that GMP+'s suppliers and banks impose additional policies or restrictions, GMP+ will decide case by case what is included in the Sanction rules and mention it in the Appendix.
- 1.4 In order to comply with the Sanction Rules, GMP+ has this trade sanctions policy ("**Policy**").
- 1.5 GMP+ will apply a "zero tolerance" approach towards both GMP+ itself, towards its Personnel, as well as towards Third Parties regarding compliance. Any breach of this Policy will be regarded as a serious matter by GMP+ and is likely to result in disciplinary action.

2. Applicability

This Policy applies to all directors, officers and employees ("**Personnel**"), as well as agents, certification bodies, national representatives, registered consultants and other associated persons performing activities in relation to GMP+ certification ("**Third Parties**").

3. GMP+ Policy

GMP+, its Personnel and Third Parties are obliged to observe and comply with the Sanction Rules when it is about financial transactions with and GMP+ certification of companies in countries and persons as referred to in clause four below.



4. Sanction rules and sanctioned countries, persons and organizations

- 4.1 Sanctions Rules consist of different restrictions and prohibitions, including general or specific trade embargos (import and export restrictions) and financial restrictions.
- 4.2 GMP+ may encounter Sanction Rules when directly or indirectly dealing with Sanctioned Countries, Persons and Organizations. The Sanction Rules may prohibit GMP+ doing business related to GMP+ certification of companies with specific blacklisted Sanctioned Countries, Persons and Organizations.
- 4.3 The Sanction Rules and the Sanctioned Countries, Persons and Organizations may change in time. To ensure the use of up to date information, an overview of information sources that must be consulted prior to engaging into any business or transactions related to GMP+ certification is attached as an **Appendix** to this Policy.
- 4.4 The Appendix to this Policy will continuously be amended in order to remain updated in respect of applicable Sanction Rules, Sanctioned Countries, Persons and Organizations and Personnel must on a continuous basis review the Appendix.

5. Compliance officer

- 5.1 GMP+ has appointed a Compliance Officer within its organization who is in charge of supervision of Personnel's compliance with this Policy. The Compliance Officer can be reached via complianceofficer@gmpplus.org.
- 5.2 The Compliance Officer also functions as point of contact for Personnel in case there are any questions as to whether a certain transaction will fall within the ambit of this Policy.

6. Reporting and whistle-blower protection

- 6.1 If a member of personnel becomes aware of an existing or possible violation of this policy, he/she must directly report this to the compliance officer. Once a report is received, the compliance officer will investigate the allegations and will inform the managing director of GMP+.
- 6.2 Retaliation in any form against anyone who makes a report of wrongdoing or cooperates in an investigation is strictly prohibited.



Only where it has been clearly determined that someone has made a report of wrongdoing maliciously, frivolously, or in bad faith will disciplinary action be considered. The report is confidential and may only be shared with other people after a decision made by the management team of GMP+ (the "**Management Team**").

7. Non-compliance

- 7.1 In case of a breach of the Sanction Rules, the Compliance Officer will take all necessary steps to address such breach, including steps to suspend, cancel, freeze and terminate the relevant contract as to ensure that there is no contravention of applicable Sanction Rules, after approval of the Management Team.
- 7.2 Within 14 (fourteen) days of becoming aware of a contravention of the Sanction Rules, the Management Team must confirm to the Compliance Officer that the contravention no longer exists.

8. Adherence to the Policy

GMP+ has the following measures in place to ensure adherence to the Policy:

- a) The Management Team will ensure that all employees are familiar with the Policy and confirm their understanding and adherence to the Policy on an annual basis.
- b) When signing of quotations or contracts, a check on sticking to the Sanction Rules will be done;
- c) Third Parties will be made aware of the existence of this Policy and, where this is deemed necessary, Third Parties will be requested to confirm adherence to this Policy in writing;
- d) GMP+ Terms and Conditions of Employment will make a reference to this Policy; and
- e) Each license agreement with a certification body shall include a text referring to this Policy.

9. Communication

- 9.1 GMP+ will inform all employees about this Policy and any updates made, at least once a year.
- 9.2 This Policy will be posted on GMP+'s website to prevent offenses, as part of the comprehensive sanctions enforcement plan of GMP+.



10. Violations policy

GMP+ has no tolerance for violations of this Policy. Any violation will be sanctioned with disciplinary action. Disciplinary actions will reflect the severity of the non-compliance, up to and including termination of the (employment) relationship with GMP+.

11. Policy review

The compliance officer shall review and propose amendments to the Management Team of this policy on a regular basis to ensure the policy is up to date.

The Management Team.



Appendix – SOURCE OVERVIEW

Date: 12th November 2019

<https://data.europa.eu/euodp/nl/data/dataset/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions>

https://eeas.europa.eu/topics/sanctions-policy/423/sanctions-policy_en

<http://www.rijksoverheid.nl/onderwerpen/internationale-vrede-en-veiligheid/sancties>

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

<https://www.rabobank.nl/bedrijven/ondernemen/internationaal-zakendoen/wetgeving/sanctie/>

At GMP+ International, we believe everybody, no matter who they are or where they live, should have access to safe food.

GMP+ International

Braillelaan 9

2289 CL Rijswijk

The Netherlands

t. +31 (0)70 – 307 41 20 (Office)

+31 (0)70 – 307 41 44 (Help Desk)

e. info@gmpplus.org

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