

## NTG-Nordic Transport Group Foreign Trade Controls Compliance Key Points

The following key points summarize NTG's foreign trade controls compliance requirements in providing services to customers. More details are found in NTG's [Foreign Trade Controls Agreement](#) with customers and its [Annex 1](#), and NTG's [Foreign Trade Controls Policy](#).

These key requirements help ensure compliance with applicable trade sanctions, export controls laws and other legal restrictions governing NTG's global activities. They also protect our customers by helping them avoid legal violations.

- Customers must confirm
  - The identities of consignees and actual end-users of cargo shipped by NTG
  - That all applicable export and import licenses and permits are in place, e.g.,
    - Export licenses for Dual Use and Military items
  - Their cargo may legally be transported to the listed destinations and parties
  - Shipments to Highly Sanctioned Countries in Annex 1 will not involve US companies, US banks or US dollars, unless expressly agreed with NTG
  - That they will prevent reexport or reshipment of their cargo to parties on EU, UK or US sanctions lists, or to any Highly Sanctioned Country listed in the Foreign Trade Controls Agreement Annex 1, e.g.,
    - Belarus, Iran, North Korea, Russia, Russian-occupied areas in Ukraine

NTG screens transaction parties against official sanctions lists as needed, and always for shipments to or from Highly Sanctioned Countries and countries suspected of sanctions-evasion, and when shipping Dual Use and military items. NTG may reject a transaction if screening results raise significant compliance concerns, e.g., a party on, or controlled by a party, on a sanctions list, concerns raised by NTG banks.

NTG does not facilitate any cargo transit through Belarus or Russia except for food, humanitarian aid and medicine.

NTG requires customers to sign the **Foreign Trade Controls Agreement** for shipments to countries listed in its **Annex 1**, for dual use cargo shipments and in cases where NTG has reasonable concerns about sanctions or other legal risks. NTG may also require other information confirming a customer's compliance with foreign trade controls.

Customers should direct questions to their NTG contact persons, who will forward them to NTG's Compliance Team for review and response as quickly as possible.