

NTG FTC Agreement, Annex 1: List of countries subject to: trade or financial sanctions, other trade or financial restrictions and/or due diligence. September 2025

This List of countries subject to: trade or financial sanctions, other trade or financial restrictions, and/or due diligence is incorporated by reference into the **NTG Foreign Trade Controls Compliance Agreement (FTC Agreement)** and into any related written, electronic or oral transport or other service agreement between NTG and any NTG customer or supplier, e.g., signed agreement, e-mail exchanges, telephone agreement.

This List is updated at NTG’s discretion and incorporates countries or other areas subject to trade or financial sanctions and other trade and financial restrictions imposed by the European Union (EU), United Kingdom (UK), United Nations (UN), or United States of America (US), as well as restrictions required by NTG to protect its legal interests.

NTG transactions involving the countries/regions listed below require varying levels of due diligence, based on the level of risks involved. NTG’s Sanctions Screening team performs such due diligence, which can take time – **therefore it is essential that transactions involving those countries are sent as early as possible to the team.** Adequate due diligence must be performed to avoid NTG being at risk of sanctions or other legal violations, even if that means having to delay or cancel a transaction.

Highly Sanctioned Countries (HSCs) subject to comprehensive sanctions:

- **Belarus**¹
- Cuba (only US sanctions – no exports from US or of US goods)
- Iran
- North Korea
- **Russia**²
- Ukrainian regions under Russian control, e.g.
 - o Crimea
 - o Donetsk
 - o Kherson
 - o Kursk
 - o Luhansk
 - o Zaporizhzhia

Countries subject to targeted sanctions, e.g., specific parties, transactions or goods:

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|-------------|--------------|
| Afghanistan | Arms embargo |
| Armenia | Arms embargo |
| Azerbaijan | Arms embargo |

¹ In addition to restrictions on transport to/from destinations in Belarus, no transit through Belarus may occur except for food, humanitarian aid and medicines that do not violation applicable sanctions.

² Same transit restrictions as for Belarus.

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| Burma/Myanmar | Arms embargo Restrictions on <ul style="list-style-type: none"> - Dual use goods and technology - Equipment for internal repression - Equipment/technology/software for telecommunications, monitoring, surveillance, interception |
| Central African Republic | Arms embargo |
| Democratic Republic of Congo | Arms embargo Exports of gemstones or tin, tantalum, tungsten, gold |
| Guinea | Arms embargo |
| Haiti | Arms embargo |
| Iraq | Arms embargo except to Iraq government |
| Lebanon | Arms embargo |
| Libya | Arms embargo |
| Somalia | Arms embargo |
| South Sudan | Arms embargo |
| Venezuela | Due diligence on transaction parties due to many sanctioned parties |
| Yemen | Arms embargo |
| Zimbabwe | Arms embargo |

Countries/regions subject to other restrictions on trade or financial dealings imposed by the EU, UK, UN or US, or by NTG to protect its interests, e.g., concern of sanctions evasion:

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|----------------------|---|
| Georgia | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Hong Kong | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Kazakhstan | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Kyrgyzstan | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Moldova | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Singapore | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Syria | Due diligence on transaction parties due to many sanctioned parties |
| Tajikistan | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Turkmenistan | Due diligence of transaction parties: Russia sanctions evasion concerns |
| United Arab Emirates | Due diligence of transaction parties: Russia sanctions evasion concerns |
| Uzbekistan | Due diligence of transaction parties: Russia sanctions evasion concerns |