

BUSINESS INTEGRITY AND ETHICS

Sanctions, Anti-Money Laundering and Export Control Policy

Screened partners, clean money and lawful movement of goods across every border we cross.

Date 22 October 2026
Reference AC-CMP-POL-004 · Revision 00
To All employees, temporary personnel, contractors and subcontractors working for or on behalf of Accenti LLC

Issue of the Sanctions, Anti-Money Laundering and Export Control Policy, AC-CMP-POL-004, Revision 00

Dear colleagues,

I am pleased to issue the Accenti Sanctions, Anti-Money Laundering and Export Control Policy, effective 22 October 2026. It applies to everyone who deals with clients, suppliers, payments, freight or customs on Accenti's behalf.

We import equipment, move cargo by land, sea and air, and work with international clients, banks and suppliers. Every one of those transactions must be lawful, with partners we have checked and money we can account for.

Finance (Compliance) will screen counterparties against sanctions lists and keep the records, and every manager who brings in a new client, supplier or agent is responsible for making sure that screening happens first.

Please read this policy and refer any doubt to Compliance before you act. Compliance is mandatory.

Yours sincerely,



Ali Ahmed Dhadhaow
Chief Executive Officer
Accenti LLC



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DEFENSE INFRASTRUCTURE

MISSION SUPPORT

Sanctions, Anti-Money Laundering and Export Control Policy

DOCUMENT	REVISION	EFFECTIVE	STATUS
AC-CMP-POL-004	00	22 Oct 2026	Approved / Issued
APPROVAL AUTHORITY		POLICY OWNER	
Accenti LLC Management		Finance Department (Compliance)	
APPROVED BY		APPROVED ON	NEXT REVIEW
Ali Ahmed Dhadhaow, Chief Executive Officer		22 Oct 2026	22 Oct 2027

Controlled document. Approval is evidenced by the signed and sealed cover letter. The current revision is held by Finance (Compliance); printed copies are uncontrolled.

Accenti LLC shall comply with applicable sanctions, anti-money laundering and export control laws, and shall not deal with sanctioned parties or allow its business to be used for money laundering or terrorist financing.

1 Application

This policy applies to all Accenti employees and to agents, freight forwarders, customs brokers and partners acting on Accenti's behalf, for every client, supplier, payment and shipment.



— Every shipment and consignee checked before goods move.

2 Mandatory requirements

- 2.1 Sanctions screening. Clients, suppliers, agents, consignees and their owners shall be screened against UN, US, UK and EU sanctions lists before engagement and periodically after. Matches shall be referred to Compliance and no business shall proceed until cleared.

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- 2.2 Know your counterparty. The identity, ownership and legitimacy of counterparties shall be verified and recorded before engagement, with enhanced checks where risk is higher.
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- 2.3 Clean payments. Payments shall be made and received only through regulated banking channels, in the counterparty's own name. Cash shall be minimised and controlled. Third-party payments and unusual structures require Compliance approval.
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- 2.4 Red flags. Unexplained urgency, reluctance to give ownership information, payment from unrelated parties, over- or under-invoicing and unusual routing shall be reported to Compliance.
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- 2.5 Export and import controls. Goods, technology and equipment, including dual-use and controlled items, shall be classified, licensed where required and declared accurately to customs.
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- 2.6 Records. Screening results, due-diligence records, licences and customs documents shall be retained for at least five years.
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3 Responsibilities and enforcement

Finance (Compliance) shall perform screening, keep records and advise on red flags. Managers shall ensure screening is completed before engagement. Logistics shall ensure shipments are lawfully documented. Breaches shall result in disciplinary action and, where required, reporting to the competent authorities.

4 Reference framework

- 01 UN Security Council sanctions, including the Somalia and Al-Shabaab sanctions regime.
- 02 Applicable UAE and Somali anti-money laundering and counter-terrorist financing law.
- 03 Where they apply to Accenti's dealings, US, UK and EU sanctions and export control regulations.
- 04 The FATF Recommendations, as guidance.

Screen before you deal. Know who you are paying.

Questions about this policy?

Sanctions, money-laundering and export-control questions go to Finance (Compliance) or directly to the Chief Executive Officer.

Operations — Somalia

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Headquarters

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Policy owner

Finance Department (Compliance)
AC-CMP-POL-004 · Revision 00

■ On every site

Screen before you deal

No new client, supplier, agent or shipment proceeds until it has been screened. If a name matches a list, stop and refer it to Compliance.

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Zero harm to people, property and the environment.

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