



Modern Freight Company  
Your Trusted Partner

# Sanctions Policy

January 2026





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MFC Group (**MFC**) is committed to conducting its business in full compliance with all laws and trade restrictions imposed by the United Nations, United States (**US**), European Union (**EU**), United Kingdom (**UK**) and other national and supranational authorities and legislators (**the Sanctions**).

Guided by an interest in protecting our employees and reputation, MFC may go beyond what is required by the Sanctions and decide not to provide services even where it is technically permitted by law.

# 1. What Type of Business is Prohibited?

A case-by-case approval is required from the Compliance Team who will scrutinise all business activity. The following restrictions apply for undertaking business or transactions:

<b>RED GROUP</b>	<p>MFC prohibits business and/or transactions involving any of the following countries:</p> <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; background-color: red; color: white; padding: 5px; width: 150px; text-align: center;"><b>IRAN</b></div> <div style="border: 1px solid black; background-color: red; color: white; padding: 5px; width: 150px; text-align: center;"><b>CUBA</b></div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="border: 1px solid black; background-color: red; color: white; padding: 5px; width: 150px; text-align: center;"><b>NORTH KOREA</b></div> <div style="border: 1px solid black; background-color: red; color: white; padding: 5px; width: 150px; text-align: center;"><b>VENEZUELA</b></div> </div>
<b>ORANGE GROUP</b>	<p>Any business and/or transactions involving the below listed countries must not be entered without first obtaining approval from the Compliance Team in writing.</p> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="border: 1px solid black; background-color: orange; padding: 5px; width: 150px; text-align: center;"><b>CRIMEA</b></div> <div style="border: 1px solid black; background-color: orange; padding: 5px; width: 150px; text-align: center;"><b>SYRIA</b></div> </div> <div style="border: 1px solid black; background-color: orange; padding: 10px;"> <p><b>RUSSIA</b> MFC is not permitted to engage in any business and/or transactions relating to the following activities in Russia:</p> <ul style="list-style-type: none"> <li>Arctic LNG 2 LLC</li> <li>Arctic offshore oil projects</li> <li>Deepwater projects/ exploration</li> <li>Nord Stream 2 AG</li> <li>Shale projects/ exploration</li> </ul> </div>
<b>YELLOW GROUP</b>	<p>MFC is permitted to engage in business and/or transactions with the countries listed below unless there is a reason to know or suspect that it might be to the benefit of a party listed on a sanction list. However, all freight forwarding requests relating to the countries listed below must first be forwarded to the compliance team for approval.</p> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 100px; text-align: center;"><b>BELARUS</b></div> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 100px; text-align: center;"><b>MYANMAR</b></div> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 150px; text-align: center;"><b>SOUTH SUDAN</b></div> </div> <div style="display: flex; justify-content: space-around; margin-bottom: 10px;"> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 100px; text-align: center;"><b>IRAQ</b></div> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 100px; text-align: center;"><b>SOMALIA</b></div> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 100px; text-align: center;"><b>YEMEN</b></div> </div> <div style="border: 1px solid black; background-color: yellow; padding: 10px; display: flex; justify-content: space-between;"> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 150px; text-align: center;"><b>DEMOCRATIC REPUBLIC OF CONGO</b></div> <div style="border: 1px solid black; background-color: yellow; padding: 5px; width: 200px;"> <p><b>SUDAN</b> Any nomination and/or transaction involving the Sudanese Government will require compliance approval prior to proceeding.</p> </div> </div>



MFC **cannot** engage in any business with any entity, individual, bank, vessel or aircraft listed on the US Department of Treasury's Office of Foreign Assets Control (**OFAC**) SDN List, EU Sanctions List, UK Sanctions List or any similar list.

Approval **must** be sought from the MFC Compliance Team if there is a reason to know or suspect that a transaction might be to the benefit of any such individual or entity.

### **Humanitarian Aid**

Certain humanitarian aid shipments may be undertaken for all countries listed in this policy. However, such shipments must have the prior written approval from the MFC Compliance Team.

## **2. What Could Happen if Sanctions are Ignored?**

Violation of Sanctions may impact MFC's reputation and could result in severe criminal and civil penalties being imposed on the MFC entity concerned or MFC as a whole, as well as individual directors and employees.

It is important to keep in mind that Sanctions imposed by one country may have an effect on individuals and companies both inside and outside its borders.

In addition, banks play a vital role in the enforcement of Sanctions. Any violation may severely damage MFC's banking relationships and ability to transact.

## **3. What are Your Responsibilities?**

- Become familiar with the Sanctions Guidelines (**the Guidelines**) which provide guidance on your responsibilities and due diligence processes including interrupted payments procedures which must be followed.
- Understand the Sanctions Policy (**the Policy**) and the Guidelines. It is the **responsibility** of all MFC employees involved in international transactions to fully understand and implement both the Policy and Guidelines. Company Managers are responsible for ensuring due diligence is fully implemented and adhered to.



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- Keep up to date with laws and regulations applicable to the countries in which you operate.
- Think carefully about the potential impact of Sanctions before accepting business.
- Know your customers: who they are, what they do, where they are based and how they will use MFC's services. This is important as you may become involved in a prohibited transaction without realizing it.
- Do not proceed with a transaction or conduct business if you have any doubt as to whether it is genuine.

MFC promotes an open culture. If you are unsure as to how this Policy applies to a particular transaction or there is any uncertainty as to the appropriateness of a transaction, either humanitarian or non-humanitarian, you should ask advice from the MFC Compliance Team.

The MFC Compliance Team can be contacted by email at [compliance@mfc@ae](mailto:compliance@mfc@ae).