



Sanctions & Trade Compliance Policy

Purpose

This Policy establishes the principles and controls implemented by Pulsar International Pty Limited and its controlled subsidiaries in North America, Latin America, Europe, Middle East and Asia ("Pulsar") to ensure compliance with applicable economic sanctions.

Scope

This Policy applies to all directors, employees, contractors, customers, suppliers, intermediaries, third parties, and transactions of Pulsar. It applies to all Pulsar operations, including:

- International sales and procurement.
- Cross-border financial transactions.
- Partnerships with foreign entities.
- Employee activities involving sanctioned regions or individuals.

Applicable Sanctions Regimes

The purpose of this Policy is to establish a framework for compliance with sanctions laws and regulations, including those issued by:

- U.S. Office of Foreign Assets Control (OFAC).
- European Union (EU).
- United Nations (UN).
- United Kingdom (UK) sanctions bodies.
- Other applicable local or international authorities.

Prohibited Activities

The Company shall not engage with sanctioned persons or entities or participate in transactions involving Russia or Belarus in breach of any sanctions.

Screening & Due Diligence

All counterparties must be screened prior to onboarding and periodically thereafter.

1. Counterparties and beneficial owners are screened prior to onboarding against applicable US, EU, UN, UK, and US sanctions lists.

2. Counterparties are classified as low, medium, or high risk based on geographic exposure, ownership structure, and transaction profile.
3. Enhanced due diligence measures are applied for higher-risk cases, including additional information requests and management approval.
4. Screening results, risk assessments, and approval decisions are documented and retained in accordance with applicable laws.
5. Counterparties are re-screened periodically and at least annually, or upon any material change.

Third-Party Payments

Payments are only permitted to and from bank accounts held in the name of the contracting counterparty. Third-party payments are strictly prohibited.

Export Controls & No Re-export to Sanctioned Jurisdictions

Relevant contracts include sanctions representations and a strict prohibition on re-export of goods to any sanctioned jurisdictions.

Enhanced Due Diligence Questionnaire

For medium- and high-risk counterparties, the Company requires the collection of enhanced due diligence information, which may include:

1. Legal name and registration details
2. Ownership structure and beneficial owners
3. Description of business activities
4. Intended end-use and final destination of goods or services
5. Confirmation that goods will not be re-exported to Russia or other sanctioned jurisdictions
6. Confirmation that no sanctioned persons or entities are involved
7. Bank account details and payment currency

Contractual Safeguards

Relevant contracts must include sanctions representations and no re-export clauses to sanctioned jurisdictions.

Escalation & Reporting

Potential sanctions compliance concerns must be escalated immediately and transactions suspended pending review.

Training & Record Keeping

Employees will receive periodic training and records of that training will be retained in accordance with law including:

- Identifying potential violations.
- Reporting suspicious activities.
- Understanding regional sanctions restrictions.

Policy Review and Updates

This Policy shall be reviewed annually or as required by changes in applicable sanctions laws and updated accordingly.

Approval & Signature

This Sanctions & Trade Compliance pack has been reviewed and approved by senior management of Pulsar.



Signature:

Name: Robert Sakker
Title: President & CEO
Date: January 20th, 2026