



## **Sanctions Compliance Policy**

### **1. Purpose**

The purpose of this Sanctions Compliance Policy is to ensure that Strategic capital investments adheres to all applicable sanctions laws and regulations, thus avoiding any potential legal and reputational risks.

### **2. Scope**

This policy applies to all employees, contractors, and agents of Strategic capital investments, including its subsidiaries and affiliates.

### **3. Definitions**

Sanctions: Economic and trade restrictions imposed by governments or international organizations to achieve foreign policy and national security goals.

OFAC: Office of Foreign Assets Control, a U.S. government agency responsible for enforcing sanctions.

### **4. Policy Statement**

Strategic capital investments is committed to complying with all relevant sanctions laws and regulations. This includes those imposed by the U.S. Office of Foreign Assets Control (OFAC), the European Union, the United Nations, and other relevant authorities.

### **5. Responsibilities**

Compliance Officer: Responsible for overseeing sanctions compliance and ensuring that all relevant regulations are followed.

Employees: Required to be familiar with and adhere to the sanctions compliance policy. They must report any potential violations to the Compliance Officer.

### **6. Procedures**

Screening: All business partners, clients, and transactions must be screened against relevant sanctions lists.

Reporting: Any transactions or business relationships involving sanctioned individuals or entities must be reported immediately to the Compliance Officer.

Training: Regular training on sanctions compliance will be provided to all relevant employees.

### **7. Enforcement**

Violations of this policy may result in disciplinary action, including termination of employment or contractual relationships, and possible legal action.

### **8. Review**

This policy will be reviewed annually and updated as necessary to reflect changes in laws and regulations.

### **9. Contact**

For questions regarding this policy, contact us at [Compliance@scimarkets.co](mailto:Compliance@scimarkets.co).