

The international scheme for competency validation and certification of personnel who work in explosive atmospheres.

CompEx Political Sanctions Compliance Statement



CompEx Certification Limited is committed to operating to the highest ethical and legal standards. This includes complying with all applicable trade and financial sanction legislation in the countries in which it operates.

CompEx not only considers the strict legal position relating to sanctions but is concerned that it does not operate in way that may cause political or reputational damage to itself or its owner JTL, a registered charity.

Definitions

Sanctions Legislation is defined as all applicable laws and regulations relating to economic or financial sanctions, export controls, trade embargoes or other restrictive measures from time to time imposed, administered, or enforced by a Sanctions Authority.

A *Sanctions Authority* includes government departments or similar official bodies in the UK, the United Nations, the European Union, the U.S.A or any other governmental authority with jurisdiction over CompEx or its Approved Training Providers.

For further information and definitions please see Appendix 1

Policy implementation

CompEx has introduced a number of measures to ensure that, as far as is reasonably practicable, it is complying with Sanctions Legislation.

CompEx will undertake the following:

- Due diligence checks of the ownership and registration details of all Approved Training Providers;
- Issue a revised Approved Training Provider Agreement to incorporate obligations relating to Sanctions Legislation.
- Specific ID verification checks for all candidates registering for CompEx qualifications, including checks for politically exposed persons;
- Periodic risk assessment and review of any legislation.

CompEx will also require that Approved Training Providers demonstrate that they:

- Comply with relevant sanctions legislation;
- Are not connected with any individual or legal entity that is subject to sanctions legislation;
- Are not operating in and have no dealings with a sanctioned territory;
- Shall not provide training, assessment or any other services relating to the CompEx Scheme to any individuals or companies that are the subject of Sanctions Legislation.

Consequences and implications

For Approved Training Providers this policy shall apply with immediate effect. Approved Training Providers who cannot demonstrate that they comply with these undertakings or whose actions may lead to reputational damage of the CompEx Scheme will have their Approval revoked.

Applications for approval from organisations that are operating in or near territories which are the subject of Sanctions Legislation or who cannot clearly demonstrate that they are compliant with Sanctions Legislation will not have their applications approved.

For candidates this policy will not be applied retrospectively but will apply to all new candidate registrations as of 1st August 2023. Any candidate who is directly subject to, connected with an organisation or lives in a country that are covered by Sanctions Legislation will not be registered by CompEx Certification Limited.

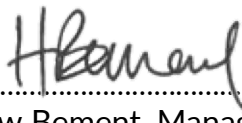
Any candidates registered and certified who are subsequently found to have done this based on false information shall have their certification withdrawn. Individuals who subsequently become the subject of Sanctions Legislation will not have their current certification withdrawn but will not be able to register for recertification.

Any decisions to withdraw approval of a training provider or to decline candidate registration is at the sole discretion of CompEx Certification Limited.

Please note that this statement should not be taken as a definitive legal interpretation or position, but is intended to summarise the policy position of CompEx Certification Limited.

For further information please contact info@compex-cert.com.

For and on behalf of CompEx Certification Limited



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Huw Bement, Managing Director

1st August 2023

Appendix 1

This appendix provides some additional context and definitions relevant to this Sanctions Policy Statement.

Trade Sanctions

The trade sanctions are imposed under the Russia (Sanctions) (EU Exit) Regulations 2019) (Regulations). Some pertinent definitions with relevance to CompEx are:

- 'A person connected with Russia' means (broadly) an individual or entity ordinarily resident, located, constituted or domiciled in Russia;
- 'Technical assistance' in relation to either goods or services means technical support relating to the repair, development, production, assembly, testing, use or maintenance of the goods or technology or any other technical service relating to the goods or technology;
- 'Energy related goods' means anything listed in Part 2 of Schedule 3 of the Regulations [here](#); and
- 'Oil-refining goods' means any of those listed in Schedule 2d of the Regulations [here](#).

Financial Sanctions

The Sanctions and Anti-Money Laundering Act 2018 and the Terrorist Asset-Freezing (etc) Act 2010 imposes financial and other sanctions on 'designated (or specified) persons' who may be individuals or corporate (or other) entities.

Different sanctions apply and range from prohibitions on doing any business with a designated person through freezing their assets to imposing an obligation to report them to the OFSI.

The [UK Sanctions List](#) lists people, entities and ships as designated or specified under regulations made under the Sanctions and Anti-Money Laundering Act 2018 and the [OFSI Consolidated List](#) is the Treasury (OFSI) list of all asset freeze targets.

Contact details

For further information regarding this policy, please contact CompEx at:

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