

# EXPORT AND SANCTIONS CONTROL STANDARD



## PURPOSE

We recognize that PGS ASA and its subsidiaries (“PGS”) will from time-to-time Export certain Items that are subject to Export Control Laws. We also recognize that PGS is doing business worldwide and must understand with whom, how and where it is able to do business without violating Economic and Trade Sanctions and Anti-Boycott Laws. The purpose of this Standard is to ensure that PGS is complying with all applicable Export Control Laws, Economic and Trade Sanctions and Anti-Boycott Laws.

This Standard is mandated by the Legal & Compliance Policy. We shall:

## REQUIREMENTS

- Not Export any Item in violation of Export Control Laws
- Not enter any transaction or conduct any activities in violation of applicable Economic and Trade Sanctions or Anti-Boycott Laws
- Prior to Export of an Item, ensure that any required export license or government permission are in place, and that all restrictions, conditions and limitations in licenses or permissions are adhered to
- Prior to Export of an Item, entering a transaction or performing an activity, ensure that relevant Economic and Trade Sanctions and Anti-Boycott Laws are reviewed and cleared
- Not enter any transactions with companies, entities or individuals listed on the EU Sanctions lists, the US Consolidated Screening List, or sanctions lists of other countries or organizations deriving from Export Control Laws and/or Economic and Trade Sanctions applicable to PGS and its business

## PROCEDURES

Our *Export, Sanctions and Financial Crime Control Procedure* further details PGS’ requirements to comply with Export Control Laws, Economic and Trade Sanctions and Anti-Boycott Laws and PGS policy.

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## DEFINITIONS

**Anti-Boycott Laws** are laws that prohibit participation in certain foreign boycotts of other countries' boycotts, including those imposed by Norway, the United States, the United Kingdom, the European Union, and the United Nations.

**Economic and Trade Sanctions** are commercial and financial penalties and embargoes imposed by one or more countries and targeted against a country, organization, group, or individual, as adopted by the laws, regulations and orders of governmental authority applicable to PGS' activities, such as those of Norway, the United States and the European Union, as well as by the resolutions of the United Nations.

**Export** is a shipment or transmission of Items, including (i) sending or hand-carrying equipment and spare parts out from a country; (ii) sending seismic data out from the country of origin; (iii) sending or hand-carrying developed prototypes for testing out from a country; (iv) sending software or technical documents across a border (even to a PGS colleague in another country) by email, mail, orally (including via telephone or in-person), via hand-carry of physical documents or on a memory stick; (v) re-Exporting an Item from one foreign country to another foreign country; and (vi) transferring an Item within the same foreign country from one end user to another end user. Under United States law, an Export can also occur wholly within the boundaries of the United States when a non-U.S. national or any person representing a non-U.S. entity is provided access to a controlled Item.

**Export Control Laws** are all laws, regulations and orders of governmental authority applicable to PGS' activities concerning the Export, re-Export, and/or transfer of Items, such as those of Norway, the United States, the European Union, the United Kingdom, Malaysia and Indonesia.

**Items** are all equipment, software, technology, services and seismic data owned or managed by PGS that is subject to Export Control Laws and/or Economic and Trade Sanctions.