

Sanctions Exposure Questionnaire



This questionnaire will help us manage our regulatory obligations by understanding the nature and extent of your activities in sanctioned linked countries and with any sanctioned parties. The obligations stem from the financial sanctions imposed by a number of domestic and international authorities, including the United Nations (UN), European Union (EU), Office of Foreign Sanctions Implementation/HM Treasury (UK-OFSI/HMT) and Office of Foreign Assets Control (US-OFAC).

Legal Entity Name(s)

Please provide the name(s) of all legal entities, including sole trader names, which the questionnaire responses apply to.

Do you have a relationship with Santander in other jurisdictions?

The above applies to all the entities, including sole trader relationships where applicable.

Exposure to sanctioned countries and parties

1 Do you have any current or planned activities¹, directly or indirectly², involving any of the following jurisdictions? (Please tick all that apply, if none apply please leave blank)

¹ Please note that activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, goods/services provided, contracts, third party relationships, suppliers, connections, significant assets held, origin of goods handled/processed/shipped, receiving instructions from, interactions with/exposure to state owned or controlled entities or commercial exposure.

² Please note that indirect activities refer to expenditure or income (i) from sources other than the primary operations of your business or (ii) via a person or entity who/which provides a conduit for money to be transferred to or from persons/entities connected to the below sanctioned jurisdictions.

Iran	<input type="checkbox"/>	Sudan	<input type="checkbox"/>	Venezuela	<input type="checkbox"/>	Crimea/Sevastopol regions of Ukraine	<input type="checkbox"/>
North Korea	<input type="checkbox"/>	Syria	<input type="checkbox"/>	Russia	<input type="checkbox"/>	Ukraine (not Crimea/Sevastopol/Donetsk/Luhansk regions)	<input type="checkbox"/>
South Sudan	<input type="checkbox"/>	Cuba	<input type="checkbox"/>	Belarus	<input type="checkbox"/>	Kherson region of Ukraine	<input type="checkbox"/>
Donetsk region of Ukraine	<input type="checkbox"/>	Luhansk region of Ukraine	<input type="checkbox"/>	Afghanistan	<input type="checkbox"/>	Zaporizhzhia region of Ukraine	<input type="checkbox"/>

Please provide details of the activities in each sanctioned jurisdiction and the % of expenditure, profit and/or annual revenue, with supporting documentation e.g. invoices.

(Please use the supplemental page at the end of this questionnaire if you need more space)

2 Do you, or any group linked entities have any current or planned activities³ with an individual, entity, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

³ Please note that activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, goods/services provided, contracts, third party relationships, suppliers, connections, significant assets held, origin of goods handled/processed/shipped, receiving instructions from, interactions with/exposure to state owned or controlled entities or commercial exposure.

Yes No

If yes, provide details of the activities conducted with each sanctioned party, including name, location, relationship to the company and the sanctions imposing authority.

(Please use the supplemental page at the end of this questionnaire if you need more space)

3 Will Santander products or services be ring-fenced from activities in any of the above sanctioned jurisdictions, or with an individual, entity, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

Yes No

If yes, provide details of how Santander products or services will be ring-fenced from activities in the sanctioned jurisdictions, or with any parties named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC.

If the above-mentioned activities will be processed through Santander products or services, or you do not have exposure to the above-mentioned activities, please select "No" and confirm here.

(Please use the supplemental page at the end of this questionnaire if you need more space)

4 Do you have any current or planned activities⁴, directly or indirectly⁵, involving any of the following sanction targeted countries? (Please tick all that apply, if none apply please leave blank)

⁴ Please note that activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, goods/services provided, contracts, third party relationships, suppliers, connections, significant assets held, origin of goods handled/processed/shipped, receiving instructions from, interactions with/exposure to state owned or controlled entities or commercial exposure.

⁵ Please note that indirect activities refer to expenditure or income (i) from sources other than the primary operations of your business or (ii) via a person or entity who/which provides a conduit for money to be transferred to or from persons/entities connected to the below sanction targeted countries.

Bosnia and Herzegovina	<input type="checkbox"/>	Guinea	<input type="checkbox"/>	Montenegro	<input type="checkbox"/>	Turkey	<input type="checkbox"/>
Burundi	<input type="checkbox"/>	Guinea-Bissau	<input type="checkbox"/>	Myanmar (also known as Burma)	<input type="checkbox"/>	Yemen	<input type="checkbox"/>
Central African Republic	<input type="checkbox"/>	Iraq	<input type="checkbox"/>	Nicaragua	<input type="checkbox"/>	Zimbabwe	<input type="checkbox"/>
China	<input type="checkbox"/>	Lebanon	<input type="checkbox"/>	Republic of Serbia	<input type="checkbox"/>		
Democratic Republic of Congo	<input type="checkbox"/>	Libya	<input type="checkbox"/>	Somalia	<input type="checkbox"/>		
Ethiopia	<input type="checkbox"/>	Mali	<input type="checkbox"/>	Tunisia	<input type="checkbox"/>		

Please provide details of the activities in each sanction targeted country and the % of expenditure, profit and/or annual revenue, with supporting documentation e.g. invoices.

(Please use the supplemental page at the end of this questionnaire if you need more space)

5 Do you require any licences to undertake activity in any sanctioned jurisdiction, or to conduct activities with an individual, entity, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

Yes No

If yes, provide details and a copy of the licences.

(Please use the supplemental page at the end of this questionnaire if you need more space)

6 Do you conduct any activities⁶ with any Government of a sanctioned country (all categories of sanctions risk)?

⁶ Please note that activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, goods/services provided, contracts, third party relationships, suppliers, connections, significant assets held, origin of goods handled/processed/shipped, receiving instructions from, interactions with/exposure to state owned or controlled entities or commercial exposure.

Yes No

If yes, please provide details of the activities conducted with each Government of a sanctioned country.

(Please use the supplemental page at the end of this questionnaire if you need more space)

7 Do you operate or plan to operate in the airports, aviation, travel, art related, cryptoassets, insurance and reinsurance, importers and exporters, money service businesses, precious metals, petrochemical, oil or gas, petroleum, potash products, or tobacco industries, or charities, religious, state owned enterprises and public sector bodies, or the energy, soft commodities, telecommunications, aerospace and defence, arms, or military sectors?

Yes No

If yes, provide details.

(Please use the supplemental page at the end of this questionnaire if you need more space)

8 Do you require any licences to import/export goods, software or technologies?

Yes No

If yes, provide details and a copy of the licences.

(Please use the supplemental page at the end of this questionnaire if you need more space)

9 Do you produce, import, export or deal in any goods, software or technologies that are considered dual-use?⁷

⁷ Dual-Use Goods are goods, software, technology, documents, which can be used for both civil and military applications and are subject to export controls.

Yes No

If yes, provide details and a copy of the licences.

(Please use the supplemental page at the end of this questionnaire if you need more space)

10 Do you produce any goods, software or technologies that contain US origin counterparts/components? (US export/import controls have wide ranging controls and restrictions, this question helps Santander UK understand your overall risk exposure.)Yes No

If yes, provide details.

(Please use the supplemental page at the end of this questionnaire if you need more space)

11 Do you have any sanctions compliance controls? This will consist of, screening, which sanctions lists are screened, frequency of screening, a copy of the sanctions compliance policy etc.Yes No

If yes, provide details and supporting documentation.

(Please use the supplemental page at the end of this questionnaire if you need more space)

12 Is your company a US Person,⁸ or owned or controlled by a US Person?

⁸ The term US Person means any US citizen, permanent resident alien, entity organised under the laws of the United States or any jurisdiction within the United States (including their foreign branches), or any person physically present in the United States.

Yes No

If yes, how is the US revenue ring-fenced organisationally from the conduct of any such activity, where US Sanctions apply extra territorially to the client (outside the USA)?

(Please use the supplemental page at the end of this questionnaire if you need more space)

Supplemental Page

By signing the below you are confirming the information provided is correct, to the best of your knowledge, and you will not use Santander products and/or services in a way that would breach international sanctions UN, EU, UK-OFSI (HMT) or US-OFAC

Name

Position

Signature

Date

D	D	M	M	Y	Y	Y	Y
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