



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). If you run out of space for any of your answers, please use the extra page at the end, indicating which question(s) your information is about.

Legal entity names Please provide the names of all legal entities in the group which the questionnaire responses apply to.	
Parent name Please provide the name of the ultimate parent company, where applicable.	
Group name Please provide the name of the group, where applicable.	
Do you have a relationship with Santander in other jurisdictions? The above applies to both the entity and the group, where applicable.	

Exposure to sanctioned countries and parties

1 Do you, or any group linked entities have any current or planned activities, directly or indirectly, involving any of the following jurisdictions? (Please tick all that apply, if none apply, please leave blank.)

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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.

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/ Kherson/Zaporizhzhia 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, income, and/or annual revenue, with supporting documentation e.g. contracts.

2 Do you, or any group linked entities import or export goods that originate from any of the above sanctioned jurisdictions?Yes ☐ No ☐

The origin of goods refers to goods grown, produced, manufactured, extracted, or processed in a jurisdiction, including where such products have been processed in a third country other than the UK or Isle of Man through alteration, transformation or any other type of operation or process.

If yes, provide details.

3 Are you, or any group linked entities owned or controlled by 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 the name, location, relationship to the company and the imposing authority.

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

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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.

5 Have you, or any group linked entities carried out any activities for an individual, entity, vessel, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC in the past 24 months?

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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 work conducted with each sanctioned party, including name, location, relationship to the company and the sanctions imposing authority. Please also confirm if Santander products or services have been used to support this activity.

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

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, goods/education/research 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.

A relative or close associate includes but isn't limited to family members, close business associates and beneficial owners.

Yes ☐ No ☐

If yes, provide details of the activities conducted with each relative or close associate, including name, location, relationship to the sanctioned party and the sanctions imposing authority. Please also confirm if Santander products or services have been used to support this activity.

7 Do you, or any group linked entities have any current or planned activities with an entity, vessel, or organisation which is directly or indirectly owned (regardless of %) or controlled by an individual or entity named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, goods/education/research 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 work conducted with each sanctioned owned/controlled party, including name, location, relationship to the company and the sanctions imposing authority. Please also confirm if Santander products or services have been used to support this activity.

8 Do you hold banking products or services with a bank other than Santander?

Yes ☐ No ☐

If yes, which other banks/financial institutions/payments service providers?

9 Will you carry out activities through another bank/financial institution/payment service provider, directly or indirectly, involving any of the above sanctioned jurisdictions (listed in question 1), or with an individual, entity, vessel, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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.

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 above sanctioned jurisdictions.

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, for example all sanctions exposure is processed through your bank account held at:

Insert name of bank

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

10 Do you have any current or planned activities, directly or indirectly, involving any of the following countries? Please tick all that apply, if none apply please leave blank.

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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.

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 countries.

Please provide details of the activities in each country and the % of expenditure, profit, income and/or annual revenue, with supporting documentation, for example, contracts.

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

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

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, goods/services provided, contracts, third-party relationships, suppliers, connections, significant assets held, 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 and a copy of the licences and confirm whether the activity will be processed through Santander products or services.

12 Do you conduct any activities with any government of a country listed in questions 1 and 10?

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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 government from the above countries.

13 Do you operate or plan to operate in any of the following sectors or industries? Air transportation (including airports); aviation; travel and tourism; yachts or superyachts; private jets; luxury or high value goods including art; insurance and reinsurance; professional and business services (including accounting, public relations, business and management consulting, advertising, architectural, auditing, engineering, IT consultancy and design); money service businesses; precious metals; aerospace and defence, military or arms; charities and religious bodies; crypto assets and digital currencies; maritime; metals (including iron and steel); diamonds; petroleum oil and gas; energy; soft commodities; tobacco; potash; state owned entities; public sector bodies; telecommunications.

Yes ☐ No ☐

If yes, provide details of your operations in each sector.

14 Do you require any licences to import/export goods, software or technologies?Yes ☐ No ☐

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

15 Do you produce, import, export or deal in any goods, software or technologies that are classified as military or dual-use?

Dual-use goods are goods, software, technology, documents, which can be used for both civil and military applications. Military items include physical goods, software and technology and specific technical information and data, specially designed or modified for military use.

Yes ☐ No ☐

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

16 Do you produce, import or export any goods, software or technologies that contain US origin parts/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.

17 Are you, or any group linked entities owned or controlled by an individual, entity, or organisation who is named on a US export/import control list?Yes ☐ No ☐

If yes, provide details of each listed party, including name, location, relationship to the company and the imposing authority such as Bureau of Industry and Security (BIS).

18 Do you, or any group linked entities have any current or planned activities with an individual, entity, vessel, or organisation who is named on a US export/import control list?

Activities include but are not limited to operations, presence (subsidiaries/branches/joint ventures), distributors, affiliates, sponsors, agents, 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 listed party, including name, location, relationship to the company and the imposing authority e.g. Bureau of Industry and Security (BIS).

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

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 from the conduct of any activity where US sanctions apply outside the USA?

20 Do you have any sanctions compliance controls in place to monitor activity:

- involving any sanctioned jurisdiction, or
- with an individual, relative or close associate of an individual, entity, or organisation who is named on a sanctions list issued by the UN, EU, UK-OFSI (HMT) or US-OFAC?

Sanctions compliance controls consist of, but are not limited to:

- manual screening
- third-party provider screening
- source of sanctions screening controls (name of screening provider/ websites)
- if screening is undertaken (manual/third-party), which sanctions lists do you screen against (UN/ EU/ UK-OFSI (HMT)/ US-OFAC/ US Export/ Import Controls Lists)
- frequency of screening
- a copy of the sanctions compliance policy
- staff sanctions training
- source of funds checks
- a link to your external website (if this information is available online).

A relative or close associate includes but isn't limited to family members, close business associates and beneficial owners.

Yes ☐ No ☐

If yes, provide details and supporting documentation.

Please use this page if you need more space

It's important that you understand your obligations to comply with international sanctions, and how they affect your business.

If any transaction is carried out through Santander Group products or services that Santander believes may violate applicable sanctions laws or Santander's financial crime controls, the transaction will be at risk of being rejected or, where required by law, frozen/blocked, and reported.

To help us assess any potential financial sanctions risk, please don't use Santander products or services for any activity involving countries listed in Question 1 without our pre-approval. Please also note that sanctioned jurisdictions could change over time.

If you've obtained a Sanctions Licence to carry out activity that would otherwise be in breach of financial sanctions prohibitions, please provide Santander with a copy of the licence and obtain pre-approval before involving Santander in such business.

If you'd like some more general information, we've set out below the current links to certain sanctioning authority websites:

UK Financial Sanctions Guidance -

gov.uk/guidance/uk-financial-sanctions-guidance

UK Government -

gov.uk/government/collections/financial-sanctions-regime-specific-consolidated-lists-and-releases

Office of Trade Sanctions Implementation -

gov.uk/government/organisations/office-of-trade-sanctions-implementation

U.S. Department of the Treasury Office of Foreign Assets Control -

home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information

United Nations Security Council -

un.org/securitycouncil/sanctions/information

European Commission -

ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en

By signing the below you're confirming your understanding of the above requirements and the information provided is correct, to the best of your knowledge, and you won't use Santander products and/or services in a way that would breach international sanctions UN, EU, UK-OFSI (HMT) or US-OFAC.

Name

Signature

Position

Date

D	D	M	M	Y	Y	Y	Y
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