



TRADE COMPLIANCE

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Custodian:	Regulatory Compliance Manager
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Purpose

The purpose of this **procedure** is to define the responsibilities, process and required actions related to compliance with **economic sanctions** and **export controls**.

Revision Index

Version	Issuance Date	Revision Details
01	2017-02-27	Initial version
02	2018-01-12	Merge of International Trade Compliance Policy (No. 1006) and Export Control & Trade Compliance Standard Operating Procedure (No. 1756) as part of simplification initiative
2.1	2018-12-30	Minor changes including hyperlinks to documents

Version	Issuance Date	Revision Details
2.2	2020-01-21	Procedure review, but only minor changes (new references to the 360° Integrity Check Work Instruction, correction the Country Position Register hyperlink)
03	2022-01-20	Procedure full review
3.1	2023-06-05	Minor changes due to the removal of “contract” from the Global Glossary and template update
04	2023-12-08	Procedure full review. Issuance in new template with a new document number. Aligning with the implementation of the Vendor Management System as described in the Compliance Procedure
4.1	2024-06-28	Change in document number, from 2-IN-APR-002 to 2-DR-APR-002. Updated hyperlinks due to the change of AtkinsRéalis' domain.

1. Scope

The **scope** of this **procedure** is defined in the [Global Glossary](#).

2. Audience

This **procedure** applies to all **AtkinsRéalis personnel**.

3. Definitions

All terms in **bold and italics** are defined in the [Global Glossary](#).

4. Procedure

4.1 Introduction

Canada and other countries in which **AtkinsRéalis** operates have implemented **economic sanctions** against certain countries, individuals and entities and **export controls** on certain categories of **items**, technology, software and services. These laws and regulations, administered by different agencies, may require **AtkinsRéalis** to obtain an authorization in order to export certain **items** or restrict or ban all trade with a country, entity or person.

Economic sanctions and **export controls** laws and regulations are complex. Numerous elements such as the characteristics, the origin and destination of an **item** or even the overall nature of a **project** or **transaction** determine whether we can pursue an opportunity and whether an **export license** is required. Consequently, whenever proposals for international **projects** or business **transactions** are contemplated, it is essential that these risks are identified, reviewed and mitigated prior to submission of bid, signature of contract or any other form of commitment. The same process applies to the procurement of **items**.

This **procedure** is designed to provide basic requirements and relevant information to identify and recognize situations that generally require caution or legal or compliance advice before proceeding. **AtkinsRéalis personnel** must apply the following process to ensure compliance with the requirements of **economic sanctions** and **export controls**.

4.2 Sanctioned countries

Transactions in certain countries can be prohibited or severely restricted by law. Prior to undertaking any business activities in a foreign country, **AtkinsRéalis personnel** must ensure that the country in which the work would take place is not sanctioned or embargoed. The business development, proposal, commercial or any other team, as determined by the **business unit** or **sector** management, must verify if the said country is listed on the [Country Position Register](#), as per “Country Risk” and “Project Location” sections of the [Levels of Authority](#) Policy and have an [Integrity Officer](#) review and endorsement of any **project** involving work in a **controlled country** (regardless of the region).

4.3 Prohibited parties

Transactions with certain individuals or organizations can also be restricted or prohibited by law. To ensure compliance with these requirements, **AtkinsRéalis personnel** must review all **third parties** as follows:

- **Clients:** Complete a [360° Integrity Check Request Form](#) as per section “Client Integrity Risk” of the [Levels of Authority](#) Policy and the [360° Integrity Check Request](#) Work Instruction.
- **Business partners** and **suppliers:** Initiate an [Engagement Risk Assessment \(ERA\)](#) as per section “Business partners and suppliers” of the [Compliance](#) Procedure and [Business Partners](#) Work Instruction.

4.4 Proposed end-use and nature of the product/technology

Export controls are put in place in order to promote national security/foreign policies and apply not only to certain categories of **items** but also to the ultimate end-use of a product/**project**.

To verify whether the overall nature of the **project** could be subject to **export controls**, **AtkinsRéalis personnel** must proceed with the Integrity and Security Review in the [Proposal Approval System](#) (PAS). The respective [Integrity Officer](#) must be informed of any positive answer to ensure the appropriate actions/mitigation measures are undertaken.

To verify whether a product or technology is subject to **export controls**, **AtkinsRéalis personnel** responsible for procurement activities must obtain the following information from **suppliers** prior to finalizing purchase orders:

- Confirmation whether their **items** are subject to **export controls** (includes dual-use **items**):
- Any Export Control List Number (Canada), Export Control Classification Number (U.S.) or any other such reference number, if applicable.

4.5 Requirements of agreements or contracts with third parties

AtkinsRéalis personnel must ensure that all agreements (i.e., agreements, contracts, purchase orders, letters of engagement, etc.) or **transactions** with **third parties** comply with the applicable laws and **governance documents** with respect to trade compliance and **export controls**. **AtkinsRéalis personnel** can contact their [Integrity Officer](#) or **authorized procurement personnel** for guidance.

5. Exceptions and deviations

To request an exception or **deviation** from this **procedure**, please consult the [Deviation Process](#) Work Instruction and use the [Deviation Tool](#).

6. Guidance

For questions or further information with respect to this **procedure**, please contact your Integrity Officer or the Manager, Regulatory Compliance.

Controls and tasks related to this document

1. Risks related to **export controls** and **economic sanctions** must be identified, reviewed, and mitigated prior to submission of bid, signing a contract or any other form of commitment.
 2. When undertaking any business activity in a foreign country, **AtkinsRéalis personnel** must ensure that the country in which the work would take place is not sanctioned or embargoed as follows:
 - Verify if the said country is listed on the [Country Position Register](#) as per sections “Country Risk” and “Project Location” of the [Levels of Authority](#) Policy; and
 - Have an [Integrity Officer](#) review and endorsement for any **project** involving work in a **controlled country** (regardless of the region).
 3. **AtkinsRéalis personnel** must review all **third parties** as follows:
 - **Clients**: Complete a [360° Integrity Check Request Form](#) as per section “Client Integrity Risk” of the [Levels of Authority](#) Policy and the [360° Integrity Check Request](#) Work Instruction and
 - **Business partners** and **suppliers**: Initiate an [Engagement Risk Assessment \(ERA\)](#) as per section “Business Partners and suppliers” of the [Compliance](#) Procedure and [Business Partners](#) Work Instruction.
 4. When working in or exporting to a foreign country, **AtkinsRéalis personnel** must:
 - Proceed with the Integrity and Security Review in the [Proposal Approval System](#) (PAS) to verify whether the overall nature of the **project** could be subject to **export controls**;
 - Have an [Integrity Officer](#) review and endorse any identified risk; and
 - For procurement activities, obtain from **suppliers** (prior to finalizing purchase orders) a confirmation whether their **items** are subject to **export controls** (includes dual-use **items**) as well as any Export Control List Number (Canada) Export Control Classification Number (U.S.) or any other such reference number, if applicable
 5. **AtkinsRéalis personnel** must ensure that all agreements and **transactions** with **third parties**:
 - Comply with the applicable laws and **governance documents** with respect to **trade compliance** and **export controls**.
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Related documents & regulations

[Levels of Authority](#) Policy

[Compliance](#) Procedure

[Procurement of Goods and Services](#) Policy

[360° Integrity Check Request](#) Work Instruction

[Business Partners](#) Work Instruction
