

Policy on Training

Lack of mandatory awareness training has been a key component in many companies' compliance failures. Awareness and training are also mandatory components of many governments' compliance requirements.

Sanctions and export control non-compliance is a principal risk for the company. Non-compliance can result in reputational damage, financial penalties and loss of business.

Export controlled goods, software, technology and services exist throughout the Rolls-Royce supply chain, across the company, both military and commercial. It is therefore essential that all of us actually or potentially involved in export controlled activities possess a basic awareness of the issues, are able to raise questions and know where to seek advice.

In addition, there has been a dramatic increase in the imposition of sanctions by our governments' since the Russian invasion of Ukraine in February 2022. Sanctions apply to individuals, entities, goods, software, technology and services including items not covered by export controls and target the efforts of 3rd parties that have circumvented sanctions. This means that we all need to be aware of what to look out for to avoid unintentional non-compliance. In order to meet our obligations and to provide you with the tools to comply with the undertakings you have given under At Our Best: Our Code all office employees are required to complete the annual basic awareness training on sanctions and export controls.

Policy

1. That annual basic awareness training should be provided globally, be easy to understand, cost effective, relevant and available in local languages as well as English
2. Employees should complete their sanctions and export control training, that forms part of their Enterprise Mandatory Training package, by the specified deadline.
3. Sanctions and export control training should be given to all new starters within the company.
4. Completion of the training should be recorded on the company Learning Management Systems (Leatro/WDL).
5. The Head Office export control team and local export control managers will ensure that training material is updated in line with regulatory changes.