



TWI Wine & Spirits Pte Ltd

Trade Compliance Policy Statement

PURPOSE

This trade compliance policy reflects our commitment to operate in accordance with TWI's Code of Ethics and Business Conduct. It also recognizes that failure to meet trade compliance requirements can have serious consequences for TWI, including damage to the company's reputation, monetary penalties, and suspension/revocation of the company's exporting and/or importing privileges with a resulting negative impact to our suppliers and customers. Thus, we are committed to the implementation, maintenance and continuous improvement of a robust global trade compliance program which integrates compliance activities into TWI's business processes.

SCOPE

This policy applies to all employees of TWI Wine & Spirits Pte Ltd.

POLICY STATEMENT

I. Export Compliance

- All exports are to be accurately declared to the relevant officials of the export country, if applicable, under the laws of the export country;
- Shipping documents shall accurately describe item(s) being shipped as well as the applicable export classification and authorization;
- TWI shall have proper authorization to export or re-export items or technology controlled by government regulations, including the International Trade in Arm Regulations (ITAR) and the Export Administration Regulations (the EAR) in the United States. Such exports or re-exports may include intra-company and/or intra-company technology transfers to foreign persons – even if they are TWI employees.

II. Import Compliance

- All imports are to be accurately described to the relevant officials of the import country, if applicable, under the laws of the import country;
- All Customs entries shall accurately state all required information, including the importer of record's name and address, importer number, quantity, value, classification, duty preference eligibility, and country of origin for the imported items;
- TWI shall have proper authorization to import items or technology controlled by government regulations.



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III. Sanctions Compliance

- TWI shall not participate in transactions in which the destination, end-use, or end-user is subject to a sanctions program, including, but not limited to, those programs maintained by United States' Office of Foreign Assets Control (OFAC).

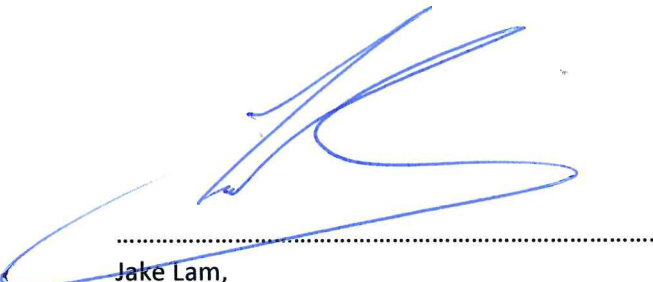
IV. Anti-Boycott Compliance

- Any requests received by a TWI employee to support a trade boycott of any country are to be reported to the Managing Director of TWI.
- The Managing Director shall assess whether any such requests to participate in a boycott could violate applicable anti-boycott regulations or otherwise could negatively impact the company.
- TWI shall not participate in any trade boycott without the prior written approval of the Managing Director.

COMPLIANCE RESPONSIBILITY

All employees are responsible to supporting the principles contained in this policy and working with fellow employees to continually monitor the Company's trade compliance.

Management serves as role model for supporting these principles and is responsible for monitoring the level of compliance with this policy within the area of their responsibility.



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Jake Lam,
Managing Director