GDT Sanctions Framework

June 2026 VERSION 2.0

1. This paper outlines GDT's sanctions framework, which was developed during 2013 following a review of its international trade sanctions compliance framework and has been subject to periodic review since.
2. Sanctions can be placed on an entire country, companies, organisations or individuals and the relevant rules applicable to a Participants (or GDT) can differ depending on the parties to a transaction and where they are located.
3. The transactional relationship formed through GDT sales is between the Seller and a bidder. Notwithstanding this, GDT maintains a policy of compliance with international sanctions regulations due to its role in matching buyers and Sellers and its operations involving US based entities. Accordingly, our sanctions framework is based on compliance with UN/US sanctions frameworks as they apply to US persons in addition to New Zealand sanctions laws.
4. As at June 2026, Participants from Iran, Cuba, North Korea, Myanmar (Burma), Iraq, Belarus, Cote d'Ivoire, DR Congo, Lebanon, Liberia, Libya, Yemen, Zimbabwe, Eritrea, Somalia, Guinea Bissau, Venezuela, the Darfur region of Sudan, Ukraine and The Russian Federation cannot be registered on Global Dairy Trade.
5. Registrations from countries other than those listed above may be accepted (subject to other applicable registration requirements).
6. Furthermore, GDT sellers cannot offer freight rates for shipping product to destinations in Iran, Cuba, North Korea, Venezuela, the Darfur region of Sudan, Ukraine and The Russian Federation.
7. This framework does not prevent GDT Participants from buying, selling and shipping dairy products in compliance with applicable sanctions outside of the GDT platforms.
8. The framework is subject to ongoing periodic review by GDT in conjunction with the GDT Events Trading Manager, and may be updated as the geopolitical environment changes.
9. For consistency's sake, this framework is applied to all GDT service lines.

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