



Trade Compliance (HK)

APPLIES TO
UDB Logistics Limited

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OWNER
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GOVERNING LAW
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1. Purpose

This Trade Compliance framework describes how UDB Logistics applies sanctions screening, export control and strategic commodities controls, customs/cargo clearance support, and risk escalation procedures (including air cargo security escalation where applicable) for shipments handled under UDB Logistics Limited.

2. Scope (who/what is screened)

UDB Logistics screens, at a minimum, the following parties and shipment data (as applicable):

- Shipper / Consignor
- Consignee
- Notify party
- Payer (where available)
- Agents, intermediaries, and handling parties involved in the shipment (where applicable)
- Goods description, HS codes, origin/destination, routing, and supporting documents (invoice / packing list)
- Regulated Agent / air cargo security status where applicable
- SPX/UNK/security screening references where relevant
- Licence/permit information where required

3. Sanctions & restricted party screening

UDB Logistics performs sanctions screening against:

- UN sanctions lists
- Hong Kong applicable legal and regulatory requirements
- Additionally, where commercially required (e.g., banking, carrier, insurance, or customer requirements), screening may also include OFAC / UK / EU / other required lists.

Screening timing:

- Screening is performed at booking acceptance and/or during customer onboarding.
- Screening is repeated when there are material changes (parties, routing, goods, documents) and periodically to reflect list updates.

4. Match handling (hits) & escalation

If screening results indicate a potential match or unresolved compliance concern:

- The shipment and/or booking may be placed on hold pending review.
- UDB Logistics performs manual review using available attributes (name variants, address, country, identifiers, company registration details, and shipment documentation).
- UDB may request additional KYC/KYB, end-use/end-user, technical, licensing, or supporting documents where required.
- If a match is confirmed or concerns remain unresolved, UDB may reject, suspend, or terminate the shipment/service.

5. Prohibited / restricted goods & export control (strategic commodities)

UDB Logistics applies controls for prohibited/restricted goods and strategic commodities. In Hong Kong, strategic commodities controls may involve the Trade and Industry Department (TID), applicable Strategic Commodities Import/Export Licence requirements, Trade Single Window/TID e-service channels (where applicable), and Customs and Excise Department (C&ED) enforcement functions.

Process (high-level):

- Customer provides invoice/packing list, goods description, HS code, origin/destination/routing, and technical specifications where required, plus end-use/end-user information where applicable.
- UDB checks whether strategic commodities / controlled goods concerns may apply to the shipment.
- Where required, UDB supports the licence/permit/documentation workflow through relevant authority channels based on customer-provided information.
- Shipment is held until required approvals/licences and carrier/authority acceptance are confirmed.

6. Hong Kong customs / cargo clearance and aviation security interface

Certain shipments may require authority, customs, licensing, security screening, or carrier/terminal clearance before uplift/release. UDB supports applicable workflows where available and within the agreed service scope.

For air cargo security workflows, UDB follows applicable Regulated Agent / RAR requirements and relevant CAD, airline, and terminal procedures.

Where import/export declaration obligations apply, Customer remains responsible for accurate and complete data. UDB may support submission/coordination where agreed, noting that declarations are generally required within applicable statutory timelines.

7. Customer obligations & accuracy of declarations

Customers are responsible for providing complete and accurate shipment information including:

- Correct goods description, HS code, origin/destination, and routing
- Technical specifications / product datasheets where strategic commodity assessment is required
- End-user / end-use declarations where required



- Licence/permit information and supporting evidence where applicable
- Security status / RA/RAR information where applicable
- Accurate parties and transaction details

Failure to provide accurate information may result in hold, delay, rejection, cancellation, authority escalation, or additional screening/licensing requirements.

8. Recordkeeping

UDB Logistics retains relevant compliance records and screening evidence for operational and compliance purposes. General compliance records are typically retained for at least 5 years, unless longer retention is required due to legal, regulatory, or business needs.

Air cargo security / Regulated Agent records are retained in accordance with applicable CAD/RAR requirements. Customs/trade records may be retained in accordance with applicable law and operational needs.

9. No legal advice

UDB Logistics does not provide legal advice. Customers remain responsible for compliance with applicable laws and regulations, and for the accuracy of declarations and supporting documentation provided.

Commodity classification and licensing determination remain the Customer's responsibility unless UDB expressly agrees in writing to provide a specific advisory or submission service.