



TRADE & ECONOMIC SANCTIONS

Our Commitment

We conduct our business in compliance with all applicable laws and regulations including those imposing trade and economic sanctions.

Our Safeguards

Sanctions consist of a range of political and economic measures which are put in place by international, regional and state bodies with the aim of influencing the behaviour or policies of a particular country, group, individual or economic sector. There are different types of sanctions that prohibit or restrict us and our managed vessels from dealing with designated persons, entities and/or countries, transporting certain goods, and calling to specified areas. We have implemented a compliance programme to manage the compliance risks arising from sanctions and to ensure that our business and activities do not violate sanctions or expose other parties to sanctions. This involves requiring our employees and seafarers to undergo compliance trainings, reviewing and assessing sanctions risks in transactions, issuing sanctions briefings and updates, screening counterparties and vessels to ensure that they are not designated under sanctions, and including protective trade and economic compliance clauses in contracts with counterparties. We only transact with counterparties that have been screened and approved in accordance with our counterparty screening procedures.

We require that imza MARINE' counterparties

- conduct their activities in a manner consistent with our Code of Business Conduct and all applicable legislation;
- have sufficient resources in place to ensure execution of and compliance with their own sanctions policies by their personnel;
- ensure that their subsidiaries and affiliates comply with the relevant policies and legislation;
- have relevant controls in place to monitor AIS;
- have controls in place to screen and assess onboarding or offloading cargo;
- have controls to assess authenticity of bills of lading and other cargo related documentation; and
- have controls in place consistent with the applicable legislation

Reporting Information

Please inform the Legal Department immediately if:

- you have any doubt as to whether a deal or transaction might violate sanctions;
- you become aware of certain circumstances which you think could result in imza MARINE violating or being exposed to sanctions.