

ANTI MONEY LAUNDERING POLICY

Policy:

Hafnia Limited and all of its subsidiaries (the “Company”) is committed to preventing Money Laundering. The Company conducts its business in accordance with good business ethics and principles and applicable Anti Money Laundering laws and regulations (“**AML Laws**”).

Policy Scope:

Each employee, officer and director of the Company has a personal responsibility and obligation to conduct the Company’s business activities in compliance with Anti-Money Laundering Policy (“**AML Policy**”) and related procedures and protocols. The AML Policy and related procedures and protocols aim to prevent the receipt, concealing, disguising, conversion and transfer of property that the Company and its’ officers, directors or employees know or suspect represent the benefit of criminal conduct (**Criminal Property**), hereinafter referred to as money laundering (“**Money Laundering**”).

The Company requires its commercial counterparts to also conduct their business in accordance with good business ethics and principles and applicable AML laws.

Policy Statement:

The Company approaches AML compliance on an ‘assumed applicability’ basis. This approach requires the Company and its employees and officers to start from the assumption that in addition to any local jurisdiction AML laws, the laws and regulations of the United States of America, the European Union, United Kingdom and Singapore all apply (“**Applicable AML Laws**”).

The Company requires its commercial counterparts to also conduct their business in accordance with good business ethics and principles, and Applicable AML laws. The Company conducts thorough Corporate Due Diligence (CDD) and Know Your Customer (KYC) screening on its counterparties whilst maintaining and periodically reviewing its list of approved counterparties pursuant to the Company’s screening procedures.

All employees of the Company shall comply with the counterparty onboarding procedures and;

- Implement adequate procedures, controls and resources to manage AML risks; and
- Require relevant employees, officers and directors to meet all basic training requirements to manage AML risks, including training in the engagement of third parties.

No Hafnia employee, officer or director shall engage in a transaction that they know, or should reasonably suspect:

- Involves Money Laundering, Criminal Property or the receipt, concealing, disguising, conversion and transfer of any money or other property (including crypto currency) derived from or intended to promote criminal activity or terrorism;
- Is designed to conceal, convert or disguise the nature, location, source, disposition, movement, or ownership of money or other property;
- Is otherwise an attempt by a third party to engage in Money Laundering;

if such a transaction would be prohibited by applicable AML laws.

When faced with suspicions of potential Money Laundering activities, Company officers, directors and employees must promptly report such suspicions to their immediate manager and/or an AML Contact within the organisation and/or via the Company whistleblowing procedure.