

Hafnia Anti-Trust Policy

Policy:

Hafnia Limited and its' subsidiaries ("the **Company**") is committed to conducting its' business in a truly competitive market in a manner which ensures the consumer benefits from price competition, greater product development, improved product specifications and better quality of service.

Purpose:

The Company's Anti-Trust Policy articulates its' commitment to fair and competitive business practices and ensuring compliance with anti-trust laws and regulations. The Company strives to foster a culture of integrity, transparency, and ethical behaviour globally across all its' business operations. By adhering to this Policy, the Company aims to protect the interests of its' stakeholders, uphold the principles of fair competition, and educate its' employees, directors and officers on anti-trust and competition law so as to avoid any activities that may result in anti-trust violations.

Policy Scope:

This Anti-Trust Policy applies to all employees, directors and officers of the Company, as well as any third parties acting on the Company's behalf. It applies both to agreements and understandings between the Company's competitors and non-competitors (such as suppliers, industry associations and customers).

The Company considers it of the utmost importance that it conducts all its business in compliance with the highest degree of ethics throughout. It adheres to all applicable laws and corporate governance recommendations and other best practice guidelines at all times.

Main Objectives:

The Company will:

- Comply with all applicable anti-trust laws and regulations in those jurisdictions where it operates ("**Anti-Trust Laws**").
- Commit to fair and competitive business practices where it will not engage in any anti-competitive activities that restrain trade, monopolise markets, or restrict competition to the detriment of consumers.
- Make decisions that are transparent, market driven and independent of any collusion or anti-competitive agreements with competitors and suppliers.

Procedures:

In order to ensure that it conducts its' business in a truly competitive manner, the Company will adopt the following procedures and processes:

- **Prohibition of anti-competitive Conduct:** The Company will not engage in any conduct that restrains trade, monopolises markets, or restricts fair competition. Activities such as price-fixing, bid-rigging, tying, market allocation and group boycotts are strictly prohibited.
- **Fair and Transparent Pricing:** All pricing decisions and practices must be based on market dynamics and must not involve collusion or manipulation with competitors or suppliers. Pricing strategies must be transparent and independent.
- **Independent Dealings with Competitors:** Company employees, officers and directors must refrain from sharing sensitive competitive information with competitors (including its Pool Partners) and must not engage in discussions or agreements that may restrict competition or harm the consumers' interests.
- **Compliance Training:** The Company is committed to providing anti-trust compliance training to employees, officers and directors and key third-party partners to ensure they understand the Anti-Trust laws, the extent of its' coverage and their obligations under it.
- **Reporting and Escalation:** All Company employees, officers and directors and third-party partners are required to report any potential antitrust violations, suspicions of unlawful behaviour, or concerns about competitive practices through established reporting or whistleblowing channels.
- **Co-operation with Authorities:** In the event of an anti-trust investigation or inquiry, the Company commits to fully co-operate with relevant authorities whilst maintaining the confidentiality of legal advice and communications.

Non-compliance with the Company's anti-trust Policy can result in severe legal and financial consequences for both the Company and individuals involved. Employees, officers or directors found to be in violation of this Policy may face disciplinary action up to and including termination of employment.