

## SANCTIONS COMPLIANCE POLICY

1. Hafnia Limited and all its subsidiaries (the “**Company**”) conduct their business in accordance with good business ethics and principles, and applicable sanctions laws and regulations. The Company’s policy is based on a risk assessment and mitigation philosophy.
2. The Company approaches sanctions 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 sanctions law, the laws and regulations of the United Nations, United States of America, the European Union, United Kingdom, and Singapore all apply.
3. The Company requires its commercial counterparts to also conduct their business in accordance with good business ethics and principles, and applicable sanctions laws and regulations.
4. The Company does not call Russian ports. The Company does not carry Russian origin cargoes.
5. The Company’s Sanctions Policy is to be implemented and enacted via the Procedures and Protocols set out in its internal operational documentation.
6. It is the responsibility of the Sanctions Compliance Committee to ensure that the Company’s Sanctions Policy is observed and the Procedures and Protocols applied. All of employees of the Company are required to comply with this Sanctions Policy and to always follow the Procedures and Protocols.



We are Hafnia

Putting **people-first** and **challenging the industry of today** to deliver **a better tomorrow**