



SANCTIONS POLICY STATEMENT



Clarkson PLC and its subsidiaries (“We”) are committed to compliance with relevant economic and trade sanctions laws in all jurisdictions in which we operate, are registered and/or are licensed.

We may conduct business involving countries, entities, vessels and individuals subject to sanctions only where in strict compliance with applicable sanctions laws.

Policy

We do not:

- knowingly breach applicable sanctions laws;
- advise clients on how transactions should be structured or presented to avoid detection of a breach of applicable sanctions laws.

Procedure

To comply with our policy:

- We provide on-line, written and in-situ sanctions training to relevant employees.
- Employees screen for sanctioned entities, sanctioned vessels, sanctioned countries and potentially illicit behaviours using bespoke in-house checking tools in accordance with internal procedures.
- Any question about the ability to do business with a client, vessel or in a specific jurisdiction, is escalated to the legal department prior to transacting.
- Any employee who suspects a breach or potential breach of our obligations under this policy must report to their Managing Director and the legal department.
- We may terminate our relationship with employees and organisations if they breach this policy.
- We prohibit any retribution or retaliation against anyone who has in good faith:
 - i. sought advice regarding prohibited conduct
 - ii. reported a suspicion of prohibited conduct, or
 - iii. refused to participate in prohibited conduct.

