

2.15 SANCTIONS POLICY

This policy shall apply to everyone engaged in any of Olympics' activities.

We are committed to the following principles:

- **Compliance:** We will comply with and take reasonable steps to ensure adherence to economic sanctions, restrictive measures applicable to our business activities, and import and export regulations.
- **Prohibited Activities:** We will not conduct business in:
 - Countries or territories subject to comprehensive sanctions or with counterparties located or established under the laws of such countries or territories including but not limited to country-based sanctions imposed by Norway, the EU, UK or the U.S¹.
 - With counterparties designated on any sanctions lists, including but not limited to list of Specially Designated Nationals and Blocked Persons or otherwise subject to US blocking sanctions under Executive Orders or OFAC regulations, or sanctions administered by the UN, the UK, the EU, the Ministry of Foreign Affairs of Norway, and any other applicable authority (whether designated by name or by reason of being included in a class of person).
 - In any other manner that could result in Olympic violating sanctions.
- **Risk Management:** To ensure compliance and awareness of sanctions and export control:
 - We regularly perform risk assessments to identify potential risks related to sanctions or trade control violations in Olympics' business and implement mitigating measures to reduce risk.
 - We implement controls and processes, including due diligence and screening of our counterparties and vessels involved in transactions, as well as monitoring and relevant follow-up measures, using a risk-based approach.
 - We conduct regular training and raise awareness related to sanctions and trade controls.
- **Employee Responsibility:** We require employees to remain vigilant to sanctions risks and to report any suspicious activities, transactions, and/or business relationships to the CFO.
- **Transparency:** We maintain transparency with lenders and counterparties in relation to our business activities.

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¹ Further information is available at: EU Sanctions Map and U.S. Department of the Treasury Office of Foreign Assets Control's overview of "Sanctions Programs and Country Information".