

Ad Astra Group's Sanctions Policy

RESPECT and **APPRECIATION** for all high values.
Preventing cases of bribery and corruption in our business.

This policy, referred to as the Sanctions Policy, sets out the Ad Astra Group's principles and commitment in complying with the applicable international sanctions regulations and restrictive measures issued by the United Nations ("UN"), the United States ("US") the European Union ("EU") and other national and supranational authorities (the "Sanctions").

To ensure compliance with our responsibilities concerning sanctions and adherence to our principles, the Ad Astra Group has implemented following measures:

- Maintaining a Compliance Department that is independent, has and develops the necessary expertise, and is in close communication with all relevant departments, including the Ad Astra Group and its Board of Directors.
- Maintaining and updating a Risk Assessment to measure and manage sanctions risks in the Group.
- Maintaining and updating the Sanctions Policy and Procedure framework that establishes relevant jurisdictions, what is permissible and not, the consequence of non-complying with the Sanctions Policy, requirements on vessel tracking, sourcing document keeping, and all other relevant matters.
- Maintaining and updating appropriate controls, tools – including automated tools- and systems to monitor sourcing, ongoing customer and vendor activity and to screen all relevant counterparties and vessels against international sanctions lists.
- Maintaining and updating appropriate procedures for reporting potential breaches internally and externally to the relevant law enforcement authorities as appropriate.
- The maintenance of appropriate records for a minimum of 5 years; and
- Conducting regular training and updates to employees and keeping relevant training records.

This policy applies to the entire the Ad Astra Group and to any of its subsidiaries.

As a the Ad Astra Group employee, you should:

NEVER engage with entities, individuals, and/or vessels that are on the UN, US or EU sanctions lists.

NEVER engage in any business dealings that would constitute a breach of the Sanctions on Ad Astra Group's part and ALWAYS consult the compliance department if in doubt.

ESCALATE concerns of potential sanctions breaches to the Compliance Department or via the Whistleblowing System.