



# SANCTIONS POLICY STATEMENT



V3 DECEMBER 2022

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.



# Version control

## Document details

Detail	
<b>Title</b>	SANCTIONS POLICY STATEMENT
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