

Compliance Procedure

1. Purpose

The purpose of this procedure is to ensure business ethics and transparency within Dynamic Energy Supply. We are committed to supporting and protecting business opportunities and relationships through the highest industry-leading compliance standards.

2. Policy and Core Commitment

In a global market vulnerable to high-risk transactions, Dynamic Energy Supply is consistently aligned with international regulations on sanctions, bribery, and corruption. We observe strict compliance when conducting enhanced due diligence on all vessels and counterparties.

3. Operational Screening Procedures

To mitigate risks, we follow a rigorous screening process:

- **3.1 Systematic Screening:** All counterparties and vessels are screened in our systems against international sanctions, adverse media, political exposure, and other risk factors.
- **3.2 Compliance Clearance:** Any identified concerns are addressed to the compliance team for further assessment. The trader requires formal compliance clearance before proceeding with any transaction.
- **3.3 Real-time Monitoring:** We implement effective tools that allow for real-time screening to respond swiftly to changes in the global sanctions landscape.

4. Key Compliance Policies

Dynamic Energy Supply operates under the following mandatory policies:

- **4.1 Anti-Bribery and Anti-Corruption:** We are committed to complying with ABAC laws, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and Danish Law. We actively combat bribes, facilitation payments, and other forms of corruption.
- **4.2 Sanctions Policy:** We adhere to applicable international sanctions regulations and restrictive measures issued by the United Nations, the United States, the European Union, and other national and supranational authorities.
- **4.3 Competition Policy:** We are committed to complying with the applicable legal framework for fair market competition, including the Treaty on the Functioning of the European Union.
- **4.4 Anti-Money Laundering and Counter-Terrorist Financing:** We implement and maintain adequate controls to prevent money laundering, terrorist financing, and financial crime in accordance with local and international regulations.

5. Global Cooperation and Standards

As part of our commitment to a corruption-free maritime industry:

- We support and promote ethical corporate practices within the maritime industry.
- We work towards a vision of a maritime industry that enables fair trade to the benefit of society at large.