

Sanctions Policy

1. Purpose and Commitment

Dynamic Energy Supply is committed to conducting business in compliance with relevant international sanctions regulations. Our purpose is aligned with our core value of respect. This policy sets out our commitment to complying with applicable international sanctions and restrictive measures issued by:

- **The United Nations**
- **The United States**
- **The European Union**
- Other national and supranational authorities.

2. Measures in Place

To ensure compliance, Dynamic Energy Supply has implemented the following:

- **Independent Compliance Department:** Specialized expertise in maritime law with a direct line to the Board of Directors.
- **Ongoing Risk Assessment:** Regular mapping of sanctions risks across our global trading activities.
- **Automated Screening Tools:** Real-time monitoring of all counterparties and vessels against global sanctions lists.
- **Vessel Tracking:** Monitoring of ship movements to prevent supply to vessels operating in sanctioned jurisdictions.
- **Record Keeping:** Maintenance of all compliance records for a minimum of 5 years.
- **Training:** Regular mandatory updates for all employees.

3. Employee Obligations

- **NEVER engage** with entities, individuals, or vessels listed on UN, US, or EU sanctions lists.
- **NEVER facilitate** business dealings that would constitute a breach of international law.
- **ALWAYS consult** the Compliance Department if in doubt regarding a counterparty or a specific transaction.
- **ESCALATE** concerns immediately to Compliance or via the Whistleblowing System.