SANCTION POLICY

Version 2

General

This policy applies to all entities and employees, directors and other representatives of Odfjell SE, irrespective of their domicile. It must be read, signed and adhered to by all to which it applies.

Compliance

Odfjell will comply with all economic sanction laws and regulations, embargoes and other forms of trading restrictions to which it is subject in all countries where it operates. Sanctions are measures imposed by governments and international bodies (such as the United Nations, the United States and the European Union) to restrict dealings with certain countries, entities and individuals. Odfjell will maintain effective measures to ensure compliance with and awareness of its sanctions-related obligations. The responsibility for sanctions screening lays in the concerned unit's Commercial departments and Finance and Legal & Insurance.

Odfjell is prohibited from transacting with individuals, companies and countries that are on prescribed sanctions lists. Odfjell will therefore screen against sanctions lists in all jurisdictions in which we operate, including:

i. the United States Government,
ii. the United Nations Security Council,
iii. the European Union,
iv. the United Kingdom,
v. the Flag State,
vi. the People's Republic of China, and
vii. the respective governmental institutions and agencies of any of the foregoing, including without limitation, the Office of Foreign Assets Control (OFAC), the United States Department of State, and Her Majesty's Treasury (HMT).

Please note that Sanctions apply to individuals – not just companies – so EU and US nationals operating outside the EU/US must be aware of the specific Sanctions applicable to them in addition to those that apply to their employer company.

Odfjell and its subsidiaries must also be aware of their sanctions-related obligations in third-party agreements, such as lending and insurance agreements, and ensure that they do not breach the terms of such obligations, particularly where they extend beyond Odfjell's own legal obligations (e.g. agreements between US banks and EU Odfjell entities).

The process of sanctions screening and compliance is described in different corporate and business unit procedures as IDD process, KYC process, Trading in areas with sanctions and SM-Supplier management.

Non-compliance

Failure to comply with sanctions can lead to severe civil and criminal penalties, both for our business and individual employees, officers and directors, as well as significant reputational damage for Odfjell. Non-compliance with this policy is a serious matter that may lead to disciplinary action, up to and including dismissal. Violations of sanctions can also have legal consequences for individuals involved, including severe monetary fines and imprisonment. Employees shall report any suspected violations of this policy to their superior or the Compliance Officer according to Whistleblowing Policy PRI-0110.