

# **MGP.144.1.0 Monjasa Sanctions Policy**

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### **1. Introduction**

Monjasa, a company with worldwide presence and operations, is committed to complying with applicable Sanctions Laws and Regulations (“SLRs”) across its business and the Monjasa Group Entities.

The global nature of Monjasa’s business means that many of our transactions and operations are subject to SLRs.

Monjasa Sanctions Policy, hereinafter referred to as Policy, sets out the measures which Monjasa follows to identify, manage and mitigate SLRs risks in the jurisdiction(s) it operates in.

Our Policy is guided by applicable SLRs, including but not limited to those issued by the United Nations, the European Union, the United States, and the United Kingdom.

### **2. Scope**

This Policy applies to all Monjasa Group Entities, Monjasa Employees, contractors, consultants, and Third Parties acting on behalf of Monjasa. It covers all counterparties whom Monjasa does business with, including but not limited to customers, vessels, and suppliers.

### 3. Definitions

Term	Definition
<b>Country Guide(s)</b>	Internal guidance documents, providing a set of rules applicable when engaging, transacting and/or dealing with Highly Sanctioned Countries.
<b>Employee(s)</b>	Monjasa Group Entities' officers, directors, personnel whether fixed term, permanent or probationary, trainees, volunteers, and interns.
<b>Group Compliance</b>	Monjasa Group's global internal compliance department.
<b>Highly Sanctioned Countries</b>	Countries against which the EU and the US impose comprehensive sanctions – see Annex A (under continued monitoring of Group Compliance and updated when required). Trade with these countries is mostly prohibited or restricted.
<b>Monjasa Group Entities</b>	Monjasa Holding A/S and all its subsidiaries, including Montec and C-Bed.
<b>OFAC</b>	Office of Foreign Assets Control of the US Department of Treasury.
<b>Restricted Party/Parties</b>	Organisations, entities, individuals or companies which are listed on a Sanction List.
<b>Sanctions Laws and Regulations ("SLRs")</b>	SLRs are understood as national and international laws regulating: Business transactions with certain countries, governments, organisations, companies and individuals ("sanctions"); and transfer of certain goods, technologies and software between countries ("export controls").
<b>Sanction List(s)</b>	Includes lists published and maintained by the EU, the UN, the US and the UK, identifying countries, individuals, entities, vessels, or other parties that are subject to sanctions.
<b>Third Party</b>	Any individual not employed by Monjasa acting on behalf of Monjasa, including agents, brokers, consultants, or contractors.
<b>US Person(s)</b>	Any entity organised under the laws of the US, including foreign branch offices and subsidiaries of a US entity. Any individual who is a US citizen or permanent resident, wherever located or employed. Any person or entity physically present in the US. US Flagged vessels and non-US-flagged vessels owned/operated by a US company or companies.

### 4. Policy

SLRs are complex and govern international trade, covering two principal areas: sanctions and export controls.

**4.1** SLRs are imposed against specific countries, governments, persons and/or companies (as well as companies owned or controlled by any of the foregoing), whereby business dealings with those countries, governments, persons and/or companies are restricted or prohibited. SLRs also restrict some goods and services from being exported or re-exported.

#### **4.2** *EU SLRs*

EU SLRs apply within the jurisdiction of the EU, that is:

- within the EU territory;
- to EU nationals, whether or not they are located in the EU;
- companies incorporated under the laws of an EU Member State, including branches, whether or not they are in the EU;
- to any business done in whole or in part within the territory of the EU; or
- on board of aircrafts or vessels under the jurisdiction of an EU Member State.

Monjasa Group Entities and its Employees are not permitted to have commercial or financial dealings with parties subject to EU SLRs prohibiting such dealings.

#### **4.3** *US SLRs*

The US imposes SLRs on several countries in which US Persons may not do business. The OFAC frequently modifies the list of countries and/or the degree of restrictions in place with respect to any such country. US SLRs are generally broader in scope than the EU SLRs and apply to activities:

- performed within, or undertaken from, the US (activity undertaken by persons of any nationality while in the US);
- involving US Persons wherever located (including but not limited to approval or facilitation by such US Persons);
- involving US Persons organised under US law and/or their foreign branches (foreign companies that are owned or controlled by US Persons or US companies also are fully subject to US SLRs);
- involving US flagged vessels;
- involving goods, services, software or technology subject to US law (i.e. US-origin items as well as foreign-made items containing more than the de minimis amount of controlled US content), even if no US Person is involved in the transaction; and
- involving US currency (even if the sender and the recipient are non-US Persons).

Monjasa US Persons, including Employees, are not permitted to have commercial or financial dealings with parties listed on a Sanction List by the US authorities, or that are known to be owned

or controlled by a Restricted Party. Other Monjasa Group Entities may have such dealings only with the preapproval from Group Compliance.

## **5. Highly Sanctioned Countries**

Any new, planned or actual dealing with Highly Sanctioned Countries requires the approval of Group Compliance. Reference is made to the Highly Sanctioned Countries list in [Annex A](#) to this Policy.

For each Highly Sanctioned Country, an individual Country Guide is available, setting out specific internal rules and clear “do’s and don’ts”.

Activities that are permitted under the Country Guides, remain prohibited if they involve any entity, individual or vessel listed on a Sanction List.

### **5.1 Highly Sanctioned Countries & US Persons employed by Monjasa**

US SLRs prohibit US Persons from engaging, facilitating, approving or otherwise participating in commercial dealings with a Highly Sanctioned Country or a Restricted Party. This includes parties based in those countries and their affiliates, even if Monjasa itself may not be prohibited from engaging in the transaction.

US Persons must inform their managers and consult with Group Compliance if their work may involve a Restricted Party or a Highly Sanctioned Country and immediately withdraw themselves from any discussions or decisions relating to such transactions.

US Persons, who are Employees, may only travel to Highly Sanctioned Countries on business with the prior approval of Group Compliance.

## **6. Sanctions screening & due diligence**

Monjasa screens and applies due diligence on counterparties and vessels with whom in conducts transactions. This includes screening of counterparties (customers & suppliers of marine fuels), vessels, and Third Parties.

### **6.1 Automated screening tools**

Monjasa employs automated screening tools which are fully integrated with its internal databases and systems. In the event of hits against Sanction Lists, Restricted Parties and/or Highly Sanctioned Countries, Group Compliance receives an alert which ensures that the transaction is reviewed, and if needed mitigated based on the risk involved. In the event of an elevated risk, enhanced due diligence measures may be applied.

### **6.2 Counterparty screening**

Screening and due diligence activities are applied during the onboarding of a new counterparty and throughout the lifecycle of the relationship with the counterparty.

The due diligence and (re)approval process on counterparties is risk based. Below table provides an overview of due diligence documents and required approvals.

	<b>Suppliers of marine fuels</b>	<b>Customers</b>
KYC/ Onboarding	Mandatory	Depending on the risk
Applicable Document	Monjasa Counterparty Questionnaire	Know Your Counterparty form
Approval Process	Final approval from Group Compliance	Risk based approval matrix

Group Compliance performs its counterparty due diligence based on the below risk factors:

- counterparty country of incorporation;
- counterparty ownership;
- origin of the marine fuels;
- adverse media findings;
- counterparty compliance programme.

### 6.3 Vessels

Monjasa conducts due diligence on vessels receiving bunker services or otherwise involved in Monjasa's operations, e.g. for chartering operations and/or cargo operations.

The purpose of these due diligence activities is ensuring that Monjasa is not supplying or otherwise supporting Restricted Parties, facilitating the transportation of cargo subject to export controls, and/or cargo owned or controlled by Restricted Parties.

Group Compliance performs its vessel due diligence based on below risk factors:

- vessel ownership;
- vessel movements;
- high risk port calls;
- movements in Highly Sanctioned Countries;
- vessel behaviour (ship to ship operations in high-risk locations, potential Automated Information System gaps, trading patterns etc.);
- transported cargo, including the type, origin, destination, loading and discharging ports and involved parties;
- frequent change of flag in a short time interval (flag hopping).

## **7. Regulatory updates**

Group Compliance is responsible for monitoring regulatory developments and updating this Policy.

In the event regulatory changes impact Monjasa's business activities, Group Compliance assesses the impact, updates the internal framework, including systems, controls, and procedures and communicates relevant updates to internal stakeholders.

## **8. Learning & awareness**

Monjasa provides sanctions compliance learning (both e-learning and in-person learning) to Employees, to:

- promote awareness around sanctions risks;
- explain internal processes and responsibilities;
- provide updates on sanctions developments;
- support effective implementation of this Policy.

## **9. Consequences of violation**

Violations of SLRs may result in severe consequences for the involved Employees and the Monjasa Group Entities. Such consequences may include penalties and/or fines, imposed audits, blacklisting, or sanctioning of Monjasa Group Entities. In addition, involved Employees may risk imprisonment for intentional violations.

## **10. Reporting and disciplinary actions**

Any violation of the provisions of this Policy may result in disciplinary action, including termination of employment or contract.

Any violation or suspected violation of SLRs or this Policy must be escalated and reported immediately to any of the following:

- Monjasa Group Compliance; or
- Monjasa Whistleblower System; or
- Any member of the Monjasa Management

Failure to report a suspected violation constitutes a violation of the Policy.

## **11. Policy review and updates**

This Policy is reviewed and updated on a regular basis to ensure ongoing compliance with the applicable SLRs.

**ANNEX A:**

## List of Highly Sanctioned Countries

- A. Russia
- B. Iran
- C. North Korea
- D. Sudan
- E. Cuba
- F. Venezuela