

Wan Hai Lines Sanctions Compliance Policy

Wan Hai Lines is firmly committed to complying with the applicable economic and trade sanctions laws and regulations in the jurisdiction in which it operates.

This Sanctions Policy applies to the director, manager, employee, agent, representative and any entities or persons who act on behalf of Wan Hai Lines and/or its subsidiaries and affiliates (WHL Group).

The implementation of this policy requires the maintenance of processes and controls to detect, investigate, and take appropriate actions for reasonable care to manage sanctions risks. Breaches of this policy may lead to significant reputational damage, legal and regulatory action and financial loss, criminal imprisonment and any serious consequences. Under this policy, the key obligations WHL Group will comply with include:

- i. Conducting a risk assessment for customers and commodities respectively against the applicable sanctions lists;
- ii. Prohibiting or rejecting any business activities, transportation of goods, customer relationships or facilitating transactions that may apparently and directly involve with economic sanction and embargo regimes under the applicable sanctions laws and export laws;
- iii. Prohibiting or restricting business activities, personal transactions, customer relationships or facilitating transactions that may apparently involve individuals, entities or vessels listed on an applicable and official sanctions list.

Wan Hai Lines is developing a rigorous compliance program regarding applicable regulations for economic sanctions and embargoes, in close cooperation with national and international authorities to implement effective sanction compliance. If you have any inquiries and/or concerns about the sanction implications of certain conduct, please contact the Legal Compliance Unit by addressing your questions at sanction@wanhai.com for guidance.