

ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING POLICY

1. Purpose

This Policy on Anti-Money Laundering and Counter Terrorist Financing sets out the principles and standards of G2 Ocean to ensure defences against money laundering and terrorist financing risks. G2 Ocean is committed to apply high standards of business and personal ethics to detect the risks that it is exposed to with regards to money laundering and terrorist financing and to take the proportionate measures required to deter and manage these risks. It is the policy of G2 Ocean to always comply with any applicable laws and regulations prohibiting activity involving money laundering and terrorist financing.

1.1 Definition of money laundering and terrorist financing.

Money laundering is the illegal process of disguising the proceeds of crime to hide its illegal origins and give the appearance that they have originated from legitimate sources. Criminal proceeds include not only money, but all forms of assets, real estate and intangible property that were derived from criminal activity. Money Laundering can be committed by collecting, storing, concealing, transporting, sending, transferring, converting, disposing of, pawning or investing the proceeds of crime. Participation in association to commit, attempts to commit and facilitating and counselling any of the actions representing money laundering, or acting negligent in contravention of the requirement of due care in such circumstances, is also prohibited.

Terrorist financing is the process of providing funds to support or facilitate terrorist activities through providing, receiving, sending, procuring or collecting money or other assets with the intention or knowledge that the funds will be used in whole or in part to carry out a terrorist act or be used by a terrorist organisation or by an individual terrorist. Terrorist financing may involve both legitimate and illegitimate funds. Concealing the origin of the funds through placing, obfuscating, and integrating is central to both money laundering and terrorist financing.

2. Scope

This Policy applies to G2 Ocean and all its subsidiaries, their officers, directors and employees wherever located and in all countries. All third parties performing work on behalf of, or when engaged in a business relationship with G2 Ocean, including but not limited to customers, suppliers, agents, stevedores, brokers, consultants, financial institutions and other counterparties to which G2 Ocean provides or receives services from, all which collectively is

referred to as «G2 Ocean and G2 Ocean Personnel», are expected to apply similar effective policies to counter money-laundering and terrorist financing.

G2 Ocean require that G2 Ocean and all G2 Ocean Personnel at all times keep themselves aware of and comply with the principles and standards of this Policy and all applicable laws and regulations, and refrain from engaging in any form of business or conduct whatsoever which involves money laundering or terrorist financing.

3. Policy Statement

G2 Ocean is determined to work in an ethical and legal manner and opposes all forms of money laundering and terrorist financing. G2 Ocean shall never participate in money laundering or terrorist financing wherever we are located and shall also not contribute to or allow others to. Adequate measures shall be implemented to avoid G2 Ocean being misused by others for purposes of money laundering or terrorist financing.

No G2 Ocean Personnel should suffer negative consequences for refusing to participate in behaviour that violates this Policy.

G2 Ocean will continuously assess and, if necessary, amend the content of this Policy and the measures applied to minimize the risk of any breach of the prohibitions against money laundering or terrorist financing.

3.1 Measures

G2 Ocean has implemented measures aimed at ensuring compliance with the requirements of this Policy. These measures are described in procedures and entail as a minimum (a) the identification of risks of the occurrence of money laundering and terrorist financing in relation to G2 Ocean's business operations and transactions, (b) the performance of adequate due diligence processes to prevent such risks of materializing, and (c) systems to ensure identification and reporting of activities that may pose such risks.

4. Responsibilities

The Director Compliance, Risk and Business Process is responsible for the implementation and updates of the policy.

All G2 Ocean Personnel shall report suspicions of money laundering or terrorist financing, or other actual or potential violations of this Policy.

G2 Ocean management shall ensure that this Policy is properly implemented and that all employees are acquainted with G2 Ocean's Policy and procedures on Anti-Money Laundering and Counter Terrorist Financing. When necessary, updates and information and training shall be provided.