

Sanctions Compliance Policy and Protocol

INTRODUCTION

Ascon Tankercilik A.Ş. (“Ascon Tankercilik A.Ş.” or “The Company”) is committed to conducting business in accordance with the highest ethical standards and in full compliance with all laws and regulations applicable to our business operations. This includes a commitment to careful risk management with regard to all applicable sanctions.

Ascon Tankercilik A.Ş. provides high-quality shipbuilding, maintenance and repair services in Türkiye to a wide variety of international customers and vessels that engage in business around the world, including across international borders. It is critical for the Company to conduct business in a proper and legal manner in order to foster trust and to allow us to continue serving and supporting our customers around the world.

Ascon Tankercilik A.Ş. seeks to comply with all applicable laws and regulations related to trade compliance, including restrictions on imports, exports, and other dealings with certain countries, persons, or groups. Failure to address the risk of sanctions violations may undermine the Company’s reputation and lead to investigations, fines, and other penalties for Ascon Tankercilik A.Ş. and our employees.

This Sanctions Compliance Policy and Protocol (the “Sanctions Policy” or “Policy”) summarizes mandatory processes that Ascon Tankercilik A.Ş. has adopted and applies to all dealings in respect of the vessels it will repair or build. This Policy also provides internal guidance concerning measures that are designed to ensure the Company complies with applicable sanctions and does not engage in activities targeted for sanctions. This Policy is subject to regular update and revision. Violations of this Policy may lead to disciplinary actions, including termination of employment. This Policy is available in Turkish and English and will be provided to all Ascon Tankercilik A.Ş. employees and anyone acting on Ascon Tankercilik A.Ş. behalf.

SCOPE AND RESPONSIBILITIES

Emre Taş (DPA-CSO) (“Compliance Lead”) has overall responsibility for this Policy. He is responsible for ensuring that Ascon Tankercilik A.Ş., its employees, and all third parties acting on behalf of the Company adhere to this Policy. The Compliance Lead will receive support as needed from others within Ascon Tankercilik A.Ş. as well as from outside counsel to ensure compliance with this Policy and applicable laws and regulations, to mitigate risks associated with non-compliance, and maintain a robust framework for compliance.

EDUCATION AND TRAINING

All Ascon Tankercilik A.Ş. employees and third parties acting on behalf of the Company with responsibility for management, customer relations, contracting, finance, banking, procurement, vendor relations, risk management and legal shall be provided with copies of this Policy. Every employee and third party acting on behalf of the Company to whom this Policy applies must complete a signed certification attesting that he or she has read the Policy, understands the Policy, and is committed to compliance with the Policy and applicable laws and regulations.

The Compliance Lead, in coordination with outside counsel, will develop an appropriate training plan and program that covers all aspects of sanctions compliance relevant to Ascon Tankercilik A.Ş. business

operations. This will include information on relevant laws and regulations, company policies and procedures, and specific guidelines for identifying and avoiding sanctioned entities and activities. Completion of training is mandatory. Training materials will be updated to reflect changes in sanctions regulations and industry best practices.

SANCTIONS OVERVIEW

Ascon Tankercilik A.Ş. complies with all applicable sanctions administered by the following authorities:

Authority	Explanations
The United States (U.S)	<p>U.S. primary sanctions apply to U.S. persons and non-U.S. entities owned or controlled by a U.S. person. For purposes of U.S. primary sanctions, ‘U.S. persons’ include:</p> <ul style="list-style-type: none">(i) companies organized under U.S. law and their non-U.S. branches,(ii) individual U.S. citizens and lawful permanent residents (‘green-card holders’) (including U.S.- person employees of Ascon Tankercilik A.Ş.); and(iii) any person when physically present in or operating from the United States. <p>Transactions denominated in U.S. dollars presumptively involve U.S. persons in light of the clearing arrangements involving U.S. financial institutions.</p> <p>Importantly, non-U.S. persons such as Ascon Tankercilik A.Ş. can be subject to retaliatory U.S. sanctions measures known as ‘secondary sanctions’ if they engage in activities that the United States has targeted for such sanctions.</p>
The European Union (EU) and its Member States	<p>EU sanctions regulations apply to activity that:</p> <ul style="list-style-type: none">▪ (i) occurs (in whole or in part) within the EU, or on board any aircraft or vessel under the jurisdiction of a Member State,▪ (ii) involves a natural person who is a national of a Member State whether they are located inside or outside the EU; or▪ (iii) involves a legal entity established under the law of a Member State whether they are located inside or outside the EU.

Türkiye	<p>Under Turkish law, Targeted Financial Sanctions must be implemented in accordance with the relevant UN Security Council Resolutions.</p> <p>UN Security Council Resolutions are available online at the official United Nations website. UNSCR ratification decrees are available online in Turkish at the Turkish Official Gazette website (T.C. Resmî Gazete). In addition, domestic legislation governing AML/CFT regimes and Terrorist Financing and Proliferation Financing is available in Turkish on the Financial Intelligence Unit MASAK website at (Regulation On Measures Regarding Prevention Of Laundering Proceeds Of Crime And Financing Of Terrorism - Mali Suçları Araştırma Kurulu).</p>
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CUSTOMER ONBOARDING & SCREENING

Ascon Tankercilik A.Ş. will collect information from all customers and will conduct screening to identify risks related to sanctions and other applicable laws and regulations that pose a risk to the Company's operations and reputation. The Company must screen the information collected for each potential customer or third-party business partner against relevant databases and lists that identify sanctioned companies, vessels, and individuals

Customer Information

The Company shall require all customers to provide detailed information for all parties involved in a proposed project. The Company shall conduct due diligence and checks of any and all customers and other parties who will be involved in the project on an on-going basis, to assess sanctions risk.

For Customers, the following information shall be screened:

- Company name and country of domicile
- Nature of business activities
- Beneficial owners, executives, and directors
- Vessel name
 - Classification and flag information
 - Legal and Beneficial ownership
- Identity and domicile of any other interested parties involved in the vessel (e.g., technical managers, long-term charterers)

The beneficial ownership research should establish the company's ownership structure and identify its ultimate owners. This ownership research typically involves the review of a company's website; checking resources at P&I Clubs; obtaining diligence reports from proprietary business intelligence databases (e.g., Dow Jones Risk & Compliance); and conducting media searches as needed. If the ownership structure of a counterparty cannot be reasonably identified, please notify the Compliance

Lead so that he can decide whether to proceed with the transaction, taking into account the information that is known and the overall facts and circumstances. If the engagement is with a repeat counterparty, the beneficial ownership information can be updated every six months, unless there is a reason to believe that the ownership has changed since the previous screening.

All identified parties and vessels shall be screened against relevant sanctions lists to identify restricted parties. Additional due diligence shall be focused on identifying any other potential “red flags” indicating sanctions risk.

All parties and vessels must be screened, if applicable, against any lists of restricted or sanctioned parties, including, but not limited to the below listing databases:

Authority	Listing Database	Web Address	Searching Tool
US, OFAC	Specially Designated Nationals And Blocked Persons List (SDN) Human Readable Lists	http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx	https://sanctionssearch.ofac.treas.gov/
EU	Consolidated list of persons, groups and entities subject to EU financial sanctions	https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en	https://data.europa.eu/apps/eusanctionstracker/
United Nations	United Nations Security Council Consolidated List	United Nations Security Council Consolidated List Security Council	https://scsanctions.un.org/search/
Türkiye	MASAK TF Current List	TF Current List - TR Ministry of Treasury and Finance Official Portal	N/A

For the above screening the Company will utilize a subscription-based vessel and shipowner screening platform (e.g., Lloyds List Intelligence, Windward, Pole Star, etc.) which will flag indirect links to sanctions targets and sanctioned countries and regions. The Compliance Lead will determine which employees shall have access to the system, and those employees will receive training on how to use its screening platform and compliance features. If the screening platform is not available, Ascon Tankercilik A.Ş. will use publicly available sanctions lists and will seek assistance from outside counsel in conducting due diligence and sanctions screening for its customers.

You must consult the Compliance Lead if:

- Sanctions screening identifies a potential hit or red flag;
- The customer or vessel is (or could be) domiciled in, flagged by, or related to a Sanctioned Jurisdiction.
- Any other element of the screening or due diligence causes any sanctions concern.

At all times, the Company shall incorporate in all purchase orders and contracts the appropriate sanctions provisions/ clauses which, amongst others, give Ascon Tankercilik A.Ş. the right to terminate the respective agreement and refuse further performance, if: (i) the customer (or any other involved party) is in violation of any sanctions regime; (ii) the customer's representations with respect to ownership, business activities, or status as a sanctioned or otherwise targeted party are or become inaccurate; (iii) the customer or any other third party involved in the performance of the contract is or becomes subject to EU, U.S., Turkish, or UN comprehensive property-blocking, asset-freezing sanctions; or (iv) the customer or a third party acting on behalf of the customer is engaged in activities that could expose Ascon Tankercilik A.Ş. to sanctions. In the event that amendments to the sanctions clauses are required, the Compliance Lead should be consulted prior to responding to customers.

The Company will continuously monitor, as appropriate, all ongoing projects at the shipyard; any breaches of such policy will be reviewed by the Compliance Lead or outside counsel if necessary.

Banks to which the Company will make payments or from or through which the company will receive payment also should be screened against the relevant lists of designated parties. All records relating to due diligence and sanctions screening, the customers' and third parties' representations, and risk mitigation measures implemented by the company (if any) shall be maintained for a period of five years following the completion of the transaction.

Before receipt or transfer any funds to, from or on behalf of an individual or entity with whom we have NOT had any dealings for a period in excess of 6 months, screening should be conducted. Banks that will be involved in a funds transfer also must be screened.

Major vendors and suppliers of components, systems, raw materials (e.g., steel) software and technology also should be regularly screened against. Any reports that a vendor, supplier or contractor should be reported to the Compliance Lead immediately.

Under no circumstances shall the company engage in any transactions or dealings with a party subject to EU, U.S., Turkish, UN, or other applicable sanctions and no payment shall be made to or received from such a sanctioned party, or involve a sanctioned bank, in any currency, without first obtaining clearance from the Compliance Lead.

PROCESSES APPLICABLE TO OPERATIONS INVOLVING "HIGH RISK COUNTRIES"

THE HIGH-RISK COUNTRIES/TERRITORIES, WHICH ARE SANCTIONED JURISDICTIONS UNDER THIS PROTOCOL, PRESENTLY ARE: IRAN, NORTH KOREA, CUBA, SYRIA, VENEZUELA, RUSSIA AND CRIMEA

No new contract may be entered into involving services provided to, from or for the benefit of Venezuela, Cuba, Iran, North Korea, Syria, Crimea, or Russia.

No U.S. person may be involved in or facilitate any business with or involving any Sanctioned Jurisdiction or any party subject to U.S. sanctions, including any party on the SDN List or owned 50% or more, individually or in the aggregate, by one or more SDNs.

MONITORING AND REVIEW

Compliance with this Policy will be continually monitored by the Compliance Lead. The Compliance Lead shall review this policy at least annually as part of our overall risk management process and shall consult with outside counsel as necessary. The Compliance Lead shall monitor sanctions developments from the relevant sanctions authorities, and promptly update employees and all relevant third parties acting on behalf of the Company of any new sanctions programs or designations that would appear to have a direct impact on the Company's operations.

The Compliance Lead shall also review and revise this policy if:

- a) There are any significant changes in the law or practice;
- b) We identify or are alerted to a weakness in the protocol; or
- c) There are changes in the nature of our business, our clients, or other changes which impact on this protocol.