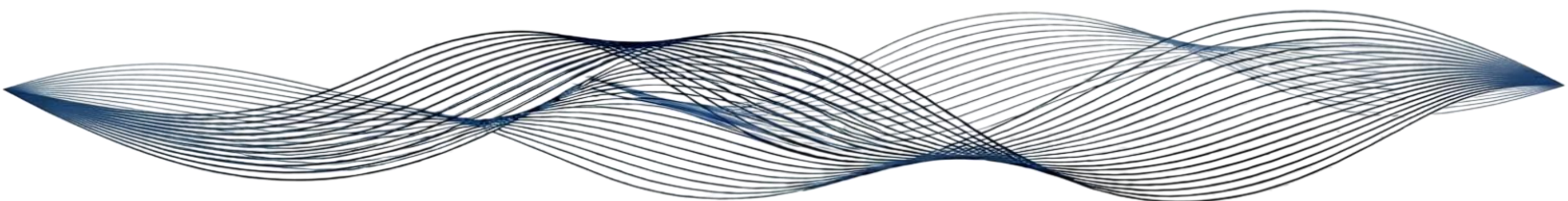




AXION FUEL MARINE TRADING FZE

FUELING JOURNEYS | POWERING OCEANS

COMPLIANCE & RISK POLICIES



Axion Fuel Marine Trading FZE

Address: Office - C1 - 1F - SF14536, Ajman Free Zone C1 Building

License No: 54206

I. Compliance Policy

- **Policy Statement**

The Company is committed to full compliance with all applicable laws, rules, and regulations governing its operations in all jurisdictions where it conducts business. Given the Company's global operations, this commitment is crucial as legal and regulatory requirements can be extensive and change frequently.

- **Prohibition**

The Company **prohibits** engaging in any activity, transaction, or business practice that directly or indirectly violates any applicable law, regulation, or ethical standard. This includes, but is not limited to, activities related to fraud, bribery, corruption, money laundering, and antitrust violations.

- **Compliance Procedures**

All **business activities, transactions, and employee conduct** must be routinely reviewed and conducted in a manner that adheres to all relevant internal policies and external legal requirements. Any potential or actual breach of this policy or any law must be immediately reported to the Compliance Department for verification and investigation.

- **Due Diligence Requirements**

It is prohibited for any employee to enter into a contractual relationship or sign any binding document until the required **Vetting and Due Diligence (DD)** has been completed, and the counterparty has been duly onboarded according to the Company's DD procedures.

- **Compliance Responsibilities**

The Company maintains strict policies and procedures to ensure overall compliance and expects all personnel to act in full compliance with its policies, including completing all mandatory compliance training.

- **Record Keeping**

Records relating to the Company's Compliance efforts, including due diligence documentation, training records, and internal reviews, must be retained for the period required by relevant regulatory authorities.

II. Sanctions Compliance Policy

- **Policy Statement**

The Company is committed to full compliance with all applicable **Sanctions** and restrictive measures imposed by jurisdictions including the United Nations, European Union, and relevant national authorities. Given the Company's global operations, this commitment is crucial as Sanctions can change frequently and quickly.

- **Prohibition**

The Company **prohibits** engaging in any activity, transaction, or business relationship that directly or indirectly breaches international sanctions laws. This includes transacting with, or benefiting, any country, entity, or individual designated on a Sanctions List.

- **Screening Procedures**

All **customers, suppliers, counterparties, and transactions** must be routinely screened against applicable Sanctions Lists prior to engagement and throughout the business relationship. Any potential match generated during the screening process must be immediately reported to the Compliance Department for verification and investigation.

- **Due Diligence Requirements**

It is prohibited for any employee to enter into a contractual relationship or sign any binding document until the required **Vetting and Due Diligence** (DD) has been completed, and the counterparty has been duly onboarded according to the Company's DD procedures.

- **Compliance Responsibilities**

The Company maintains strict policies and procedures to ensure compliance and expects all personnel to act in full compliance with its sanctions-related policies.

- **Record Keeping**

Records relating to the Company's Sanctions Compliance efforts, including due diligence documentation and screening results, must be retained for the period required by relevant regulatory authorities.

III. Counterparty Due Diligence Policy

- **Policy Purpose**

This policy establishes the requirement for conducting **risk-based due diligence (DD)** on all high-risk business counterparties (including suppliers, agents, distributors, and joint venture partners) to prevent the Company from being associated with fraud, corruption, sanctions violations, money laundering, or other illegal activities.

- **Scope and Application**

This policy applies to all business units that engage third parties, recognizing the unique risks associated with global trading and the marine supply chain. **Due Diligence** is a continuous process, required both at the inception of a new relationship and on an ongoing basis.

- **Due Diligence Components**

The due diligence process will include: (a) **Identity Verification**: Confirming the legal existence and ownership structure of the counterparty. (b) **Sanctions and Watch List Screening**: Screening principals and beneficial owners against applicable sanctions, politically exposed persons (PEPs), and government watch lists. (c) **Integrity and Reputation Check**: Assessing the counterparty's business reputation and history related to ethics, corruption, and legal compliance. (d) **KYC Processes**: Performing thorough Know Your Customer (KYC) processes and supplier audits to ensure supply chains adhere to ethical, sustainable standards.

- **Contractual Requirement**

It is **prohibited** for any employee to enter into a contractual relationship or sign any binding document until the DD has been completed, and the counterparty has been duly onboarded according to Company procedures. Counterparties must contractually commit to adhering to the Company's policies.

- **Failure to Pass Due Diligence**

The Company reserves the right to terminate negotiations or existing contracts with any counterparty that fails to meet the Company's due diligence standards or refuses to provide the requested information.