SANCTIONS POLICY

v. 2025-1, May 2025

INTRODUCTION AND PURPOSE

This Sanctions Policy (the Policy) outlines the principles and procedures adopted by Cool Carriers Ltd (the Company) to ensure compliance with all applicable sanctions laws, prohibitions and restrictions ("Sanctions Laws") imposed by the relevant authorities.

As a company operating globally, we recognize our responsibility to ensure involved vessels, cargoes, services, and operations are not used to facilitate any activity in breach of applicable Sanctions Laws.

The Company recognizes the importance of preventing any direct or indirect involvement in transactions or activities that may breach sanctions imposed by, including but not limited to the following Sanctions Laws and Regulations:

- United Nations Security Council (UNSC) Sanctions,
- the European Union (EU) sanctions regulations,
- The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctions programs,
- the United Kingdom sanctions regulations as administered by the Office of Financial Sanctions Implementation (OFSI).

The purpose of this Policy is to:

- establish a comprehensive framework for identification, assessment, and management of sanctions-related risks;
- prevent engagement with sanctioned individuals, entities, vessels, or jurisdiction;
- ensure that all employees, directors, agents, and third parties acting on behalf of the Company are fully aware of and adhere to their obligations regarding sanctions compliance;
- promote ethical business conduct and protect the Company from legal, financial, and reputational risks.

The Policy applies to all employees, directors, vessels owned, operated and chartered by the Company and to all third parties acting on behalf of the Company.

1. GENERAL PRINCIPLES

The Company is fully committed to strictly comply with all applicable Sanctions Laws. We take a zero-tolerance approach to sanctions violations and maintains effective controls and procedures to ensure ongoing compliance. This includes conducting appropriate due diligence (DD), enhanced due diligence (EDD), screening, training, and monitoring activities to identify and manage sanctions-related risks.

Cool Carriers

Our core principles are:

- Compliance with sanctions imposed by the U.S., U.N., UK and E.U., whenever applicable to our operations. We will not engage in business that violates these regimes.

- Adherence to directives and guidance from regulatory and other authorities relevant to sanctions.

- Assessing risks before entering into business relationship with clients, agents, vessels, or other third parties to identify potential red flags.

- Collecting accurate information when onboarding counterparties and monitoring ongoing relationships to ensure compliance.

- Verification of ultimate beneficial ownership (UBO) of clients and counterparties to ensure transparency and avoid indirect dealings with sanctioned persons or entities;

- Applying a risk-based approach with enhanced checks for higher-risk parties, locations, or transactions.

- Continuous monitoring of existing business relationships for any changes in sanctions status or risk.

The following activities are strictly outside the scope of our business and are not undertaken under any circumstances:

- transportation of cargo or entry into business relationships involving individuals or entities that are subject to applicable sanctions restrictions;

- facilitation of transactions, transportation, or services involving dual-use or restricted goods without the required governmental authorization.

2. ROLES AND RESPONSIBILITIES

The Directors, Senior Management and employees on all levels of the Company are responsible for the robust compliance with this Policy and should ensure they follow the procedures set out herein to disclose any suspected wrongdoing.

The Compliance Department has primary responsibility for implementing this Policy, monitoring its effectiveness and auditing internal systems and procedures to ensure their effectiveness.

It is the responsibility of all employees to ensure that no activities occur in violation of applicable sanctions laws and this policy.

Any employee or stakeholder who becomes aware of a suspected or actual sanctions breach must immediately report it to the Company's Compliance Department at compliance@cool-carriers.com.

Reports will be treated confidentially and investigated without retaliation.

3. MONITORING AND REVIEW

This Policy is maintained by the Compliance Department and approved by the Company's Board of Directors. This Policy will be reviewed and updated when significant changes in applicable sanctions regimes or the Company's sanctions policy occur to ensure its effectiveness.

4. TRAINING AND AWARENESS

Compliance Department of the Company provides appropriate training to all employees including the Board of Directors, to ensure that they understand the provision of the Policy.

Company's employees should be aware that restrictions may be related to:

- **Where** we do business: ensuring compliance with sanctions on restricted countries/territories;
- **Who** we do business with: ensuring compliance with sanctions on restricted persons/entities;
- **How** we do business: ensuring we do not circumvent, evade, or facilitate the contravention of sanctions rules; and
- **Red flags**: ensuring we report any suspicions which may raise sanctions concerns.

5. QUERIES

If you have any questions about how this Policy should be followed in a particular case, please contact the Compliance Department or the Managing Director of the Company in the first instance on compliance@cool-carriers.com.