



SANCTIONS POLICY STATEMENT



V4 APRIL 2026

The Clarkson group of companies (the Group) is the world's leading provider of shipping services with breadth of expertise in ship broking, finance, research, port services and other aspects of shipping.

The Group is committed to compliance with relevant economic and trade sanctions laws in all jurisdictions in which we operate, are registered and/or are licensed.

We may conduct business involving countries, entities, vessels and individuals subject to sanctions **only** where in strict compliance with applicable sanctions laws.

Policy

We do not:

- knowingly breach applicable sanctions laws;
- advise clients on how transactions should be structured or presented to avoid detection of a breach of applicable sanctions laws.

Procedure

To comply with our policy the Group maintains a sanctions compliance programme that includes:

- A Group sanctions risk assessment.
- Transaction screening including vessel and country checks.
- Counterparty due diligence.
- On-line and in person sanctions training to relevant employees.
- Resources dedicated to sanctions risk management including sanctions lawyers and KYC analysts.
- Internal controls including proprietary transaction monitoring software.
- Audit and oversight controls.
- A Group whistleblowing policy.



Version control

Document details

Detail	
Title	SANCTIONS POLICY STATEMENT
Classification	Public
Owner / Approver	Group General Counsel/Head of Compliance
Current version	V4 April 2026

