



2.16 Financial Crime and Trade Compliance Policy

1 Purpose

The purpose of this policy is to ensure that Olympic is not misused for money laundering, terrorist financing or other financial crime, and that the company fully complies with applicable economic sanctions, export control and dual use regulations.

This policy supports Olympic's commitment to ethical business conduct, integrity, transparency and compliance with applicable laws and regulations in all jurisdictions where we operate.

2 Scope

This policy applies to everyone engaged in any Olympic activity. Including all business activities, transactions, payments, contracts, vessels, counterparties and geographic areas in which Olympic operates.

3 Statement, principles & commitments

Olympic applies a risk-based approach to identifying, assessing and managing risks related to financial crime, sanctions, export control and dual use restrictions.

Transactions are only conducted with verified and legitimate counterparties under valid contracts.

Anti-money laundering and terrorist financing

- We strictly prohibit any form of money laundering or terrorist financing.
- Identification, background and risk-based integrity due diligence (IDD) is conducted on relevant third parties.
- Payments are only made to or received from verified bank accounts held in the name of the contractual counterparty.
- Payments to or from third parties are not permitted unless explicitly approved by finance.
- Records of transactions and due diligence activities are maintained to ensure traceability and compliance.
- Relevant personnel receive AML training appropriate to their role.

Sanctions, export control and dual-use compliance

- We perform no business in or with countries, territories, entities or individuals subject to applicable sanctions, including parties listed on relevant UN, EU, UK, US, Norwegian or other applicable sanctions lists.
- Olympic recognises that sanctions and export control risks may arise indirectly through shipyards, sub-suppliers, materials, technologies or other parties involved in vessel construction and repair, and takes measures to prevent circumvention or indirect breaches.
- Compliance is ensured through continuous risk assessment, screening, and due diligence of counterparties and transactions.
- Export control, dual-use classifications, licences and end-use documentation are identified, verified and retained where required.

Any suspicion of financial crime, sanctions breach or export control violation must be reported without delay in accordance with Olympic's reporting and whistleblowing routines.

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Stig Remøy,
CEO