



Anti-Money Laundering and Counter Terrorist Financing Policy

Expectations to all Grieg Group
companies



The Grieg Group is a family-owned business, which operates within seafood, shipping, shipbroking, maritime innovation, logistics, and investments. Across all industries, we shall create lasting value through competence, experience, and joint efforts.

Today the Grieg Group is owned and led by 4th and 5th generation Grieg, and we have three main priorities for our ownership:

1. We wish to develop the Group for a new future, where our common strategic foundation with vision, mission, and values remains.
2. We are active owners: We shall participate where needed, interact when it makes sense, and give freedom when necessary.
3. We aim to connect closely as a Group and focus on how the Group can create added value for each company.

The Grieg Maturitas board acts on behalf of all Grieg Group shareholders. We communicate our expectations to companies through our governance structure, the annual letter of ownership, and policies which describe our expectations to all Grieg Group companies.

Grieg Group Anti-Money Laundering and Counter Terrorist Financing Policy

Our Commitment

Respecting, promoting, and complying with applicable laws and regulations prohibiting activity involving money laundering and terrorist financing is fundamental to how all Grieg Group companies conduct their business within the Grieg Group. All Group companies are committed to apply high standards of business and personal ethics to detect the risks that we are exposed to with regards to money laundering and terrorist financing, and to take the proportionate measures required to deter and manage these risks. Concealing the origin of the funds through placing, obfuscating, and integrating is central to both money laundering and terrorist financing.

We are committed to not contributing to the illegal process of disguising the proceeds of crime to hide its illegal origins and give the appearance that they have originated from legitimate sources. This include not only money, but all forms of assets, real estate and intangible property that were derived from criminal activity, including collecting, storing, concealing, transporting, sending, transferring, converting, disposing of, pawning, or investing the proceeds of crime. In the Grieg Group we will not participate in association to commit, attempts to commit and facilitating and counselling any of the actions representing money laundering, or acting negligent in contravention of the requirement of due care in such circumstances.

We are committed to not participate in the process of providing funds to support or facilitate terrorist activities through providing, receiving, sending, procuring, or collecting money or other assets with the intention or knowledge that the funds will be used in whole or in part to carry out a terrorist act or be used by a terrorist organization or by an individual terrorist.

Therefore, all Grieg Group Companies will ensure that all Grieg Group officers, directors and employees:

1. are aware of and comply with the principles and standards of this Policy,
2. are familiar with all applicable anti-money laundering counter terrorist financing laws and regulations, and
3. refrain from engaging in any form of business or conduct whatsoever which involves money laundering or terrorist financing.

Our approach

The board of the respective Grieg Group companies is responsible for ensuring that compliance with fundamental anti-money laundering and counter terrorist financing laws and regulations.

This Policy applies to all Grieg Group companies and their subsidiaries, their officers, directors, and employees wherever located and in all countries. All third parties performing work on behalf of, or when engaged in a business relationship with a Grieg Group company, including but not limited to customers, suppliers, agents, stevedores, brokers, consultants, financial institutions, and other counterparties to which a Grieg Group company provides or receives services from, are expected to apply similar effective policies on anti-money laundering and counter terrorist financing.

This Anti-money Laundering and Counter Terrorist Financing Policy interlinks with other Grieg Group policy documents such as our Ethical Guidelines, Supplier Code of Conduct, Human Rights policy, Anti-Bribery and

Corruption Policy, and our grievance mechanisms. These policies outline our strong expectations to all Grieg Group companies, all Grieg Group employees, and requirements to suppliers to act in compliance with applicable laws and regulations prohibiting activity involving money laundering and terrorist financing.

Our responsibility

The Grieg Group is determined to work in an ethical and legal manner and opposes all forms of money laundering and terrorist financing. We will never participate in money laundering or terrorist financing wherever they are located, and we will also never contribute to, or allow others to do so when engaging with us.

Measures aimed at ensuring compliance with the requirements of this Policy will be described in procedures entailing amongst others:

1. the identification of risks of the occurrence of money laundering and terrorist financing in relation to the business operations and transactions,
2. the performance of adequate due diligence processes to prevent such risks of materializing, and
3. systems to ensure identification and reporting of activities that may pose such risks.

No Grieg Group officer, director or employee should suffer negative consequences for refusing to participate in behavior that will violate this Policy.

Routines to report suspicions of money laundering or terrorist financing, or other actual or potential violations of this Policy shall be implemented.

The management in each Grieg Group company is responsible for ensuring that this Policy is properly implemented and that all employees are acquainted with this Policy and procedures on Anti-Money Laundering and Counter Terrorist Financing. When necessary, updates will be made, and information and training shall be provided.

The Grieg Group will continuously assess and, if necessary, amend the content of this Policy and the measures applied to minimize the risk of any breach of the prohibitions against money laundering or terrorist financing.

