

SIGLAR CARBON

GLOBAL SANCTIONS POLICY

1. Introduction

- 1.1 Siglar Carbon AS (hereinafter referred to as the "Company") is committed to conducting its business in accordance with the highest ethical standards and in compliance with the standards set out herein this Global Sanctions Policy (hereinafter referred to as the "Policy").
- 1.2 The Company expects its employees, subsidiaries, subcontractors, clients, suppliers, joint ventures controlled by the Company, and any other business partners (collectively referred to as "Partners") to comply with this Policy and all relavant applicable laws and regulations.
- 1.3 The Company is committed to implementing robust controls to prevent, detect, and respond to potential breaches of Sanctions Laws.

2. Policy Statement

- 2.1 It is the Company's policy to comply fully with all applicable Sanctions Laws in its operations globally.
- 2.2 Siglar Carbon will not engage in or facilitate any business activities that violate the Sanctions Law and regulations and will actively monitor compliance within its operations and business relationships.

3. Definition

3.1 Sanctions are regulatory restrictions that apply to dealings with certain countries, territories, governments, groups, entities, individuals, or controlled goods and services. The nature and extent of these restrictions can vary and may include limitations on imports and exports, controls on specific goods and services, or restrictions on financial operations, among others. It is essential that all Partners consult with the Company to understand the business implications of these sanctions.

4. Due Diligence and Compliance

- 4.1 The Company conducts sanctions due diligence on its Partners to mitigate risks associated with sanctioned entities and individuals.
- 4.2 Siglar Carbon may suspend, terminate, or decline business engagements if any party is found to be in violation of any Sanctions Laws or this Policy.

5. Consequences of Non-Compliance

- 5.1 Violations of this Policy may lead to the disciplinary actions, termination of contracts, business relationships, and any other legal remedies available.
- 5.2 Individuals or entities found to be in breach of Sanctions Laws may be subject to civil or criminal prosecution under applicable regulations, including potential fines, asset seizures, and imprisonment.

6. Monitoring and Review

- 6.1 This Policy will be periodically reviewed and updated as necessary to ensure continued compliance with applicable laws and regulations. The Company will also revise this Policy to reflect changes in business operations, international standards, or new sanction regimes that may arise.
- 6.2 All Partners, including but not limited to employees, clients, customers, and any third parties involved with Siglar Carbon are advised to consult this Policy regularly for updates and amendments. Continued access to or use of the Company's website, products, and/or services after any modifications to this Policy shall constitute acceptance of the revised terms.

7. Applicable Law

- 7.1 This Policy shall be governed by and construed in accordance with the laws of Norway.
- 7.2 Any disputes arising out of or in connection with this Policy shall be subject to the exclusive jurisdiction of the courts in Stavanger, Norway.

8. Contact

8.1 For any questions or concerns regarding this Policy, or to report a potential breach, please contact Siglar Carbon AS at legal@siglarcarbon.com.

CEO

Sigmund Kyvik

25 April 2025

