

Counterparty Ethics Policy

All counterparties we engage with, including suppliers, customers, contractors, agents, intermediaries, business partners, and subcontractors that they use, must uphold strong governance, sustainability, and responsible business conduct. They are required to adhere to the following requirements:

Legal & regulatory compliance: Counterparties must comply with all applicable laws, regulations, and industry standards in the jurisdictions where they operate including those relating to business integrity, anti-bribery and corruption, anti-money laundering and financial crime, sanctions and export controls, labour standards, and health, safety, and the environment.

Ethical conduct & integrity: Counterparties must conduct business with honesty and integrity, and should act consistently with the principles in our Ethics Policy and related governance policies. They must:

- Avoid bribery, improper payments, or unethical behaviour;
- Not participate in money laundering or terrorist financing, and ensure transparent payment practices;
- Avoid conflicts of interest and disclose them promptly if they arise; and
- Treat confidential information appropriately.

Sanctions & financial crime: Counterparties must comply with all applicable sanctions regimes and must not participate—directly or indirectly—in transactions involving sanctioned persons, entities, vessels, or prohibited activities under Norwegian, EU, or UN sanctions.

Environmental Responsibility: Counterparties should manage their environmental impact responsibly and comply with applicable environmental laws. They are expected to adopt reasonable measures

to prevent pollution, reduce waste, and use resources efficiently where practical.

Supply chain expectations: Where relevant, counterparties should encourage their own key counterparties or subcontractors to follow similar standards and avoid practices that would place Westgass at legal, ethical, or reputational risk.

Reporting Concerns: Counterparties must inform Westgass promptly if:

- A breach of this Policy occurs or is suspected;
- Ownership or control changes materially; or
- Legal or regulatory investigations arise that may affect our relationship with them.

Monitoring & Assurance: We apply a risk-based approach to counterparty assurance. Westgass may rely on a counterparty's established policies and ethical standards where appropriate, however we reserve the right to request a signed declaration, additional information, or further due-diligence measures at any time. We may conduct further checks or follow-up where risks, concerns, or red flags are identified.