

## Sanctions Compliance Policy

We comply with international sanctions regimes applicable in the jurisdictions in which we operate, Norway, the EU and the UN. We will not, directly or indirectly:

- Engage in transactions involving sanctioned persons, entities, vessels, or specifically designated territories;
- Engage in any transaction, project, contract, or engagement that would breach applicable sanctions laws or expose Westgass to sanctions enforcement; or
- Participate in any activity that could result in Westgass, its employees, or its officers being designated under applicable sanctions regulations.

To support this, we conduct mandatory sanctions screenings to ensure that:

- The goods, services, or activities in question are not prohibited under applicable sanctions regulations;
- The counterparties involved (including ultimate beneficial owners, directors, and key individuals) are not sanctioned or otherwise restricted; and
- The transaction structure, financial flows, logistics, or routing do not involve sanctioned persons, designated territories, or prohibited activities.

Sanctions compliance applies to all business activities, including trading, project development, procurement, advisory services, logistics, financing, and any interaction with third parties.

**Records:** We maintain records of all screening, approvals, and escalations in accordance with regulatory requirements.

**Reporting:** Employees must immediately escalate any sanctions “red flag,” uncertainty, or concern to the Compliance Officer. This includes situations where:

- Ownership or control structures are unclear;
- Routing or logistics appear unusual;
- Sensitive jurisdictions or public officials are involved; and
- Third parties request changes to beneficiaries, payment paths, or documentation that appear unusual.

No activity may proceed where sanctions concerns remain unresolved or where the Compliance Officer has not granted clearance.

**Compliance Officer Responsibility:** Upon receiving a sanctions concern or report, the Compliance Officer will:

- Acknowledge and record the report;
- Assess the risk and determine whether the activity can proceed, requires enhanced checks, or must be terminated;
- Escalate material or repeated issues to Executive Management; determine whether legal advice or external reporting is required; and
- Maintain appropriate records to demonstrate compliance with sanctions obligations.