



### **Sanctions and Export Control Compliance Policy**

Queensway Navigation Co. Ltd. is committed to full compliance with all applicable international sanctions, trade restrictions, and export control laws in the jurisdictions in which it operates. The Company recognizes the importance of adhering to these legal obligations to protect its reputation, maintain the trust of its stakeholders, and mitigate operational and financial risk.

This policy applies to all shipboard and shore-based personnel, as well as to agents, contractors, charterers, suppliers, and any third parties acting on behalf of the Company.

The Company shall not engage in any business activity, transaction, or commercial relationship that involves:

- Individuals, entities, vessels, or countries subject to economic or trade sanctions imposed by the United Nations, European Union, United States (OFAC), United Kingdom (OFSI), or any other applicable regulatory authority
- The transportation of cargo prohibited or restricted under applicable export control laws or international embargoes
- Knowingly facilitating or assisting others in activities that would violate sanctions or trade control regulations

To ensure compliance, the Company shall:

- Conduct due diligence, background checks, and sanctions screening on vessels, charterers, customers, suppliers, ports, and other third parties involved in commercial operations
- Maintain up-to-date awareness of applicable sanction regimes and export control measures
- Suspend or cancel any activity found to be in breach of sanctions, and report such incidents to the appropriate authorities if required
- Provide appropriate training and awareness to relevant personnel regarding sanctions compliance

All personnel have an obligation to report any actual or suspected violation of this policy to Top Management without delay. The Company will investigate any such reports with discretion and take corrective action as necessary.

Non-compliance with this policy may result in severe legal, financial, or reputational consequences for the Company, as well as disciplinary action for individuals involved.

Queensway Navigation Co. Ltd. expects all personnel and business partners to act with integrity and due diligence in all international commercial dealings and to uphold the principles of lawful, responsible, and transparent trade.

