

UNION PETROCHEMICAL GROUP

Sanction Compliance and Anti-Money
Laundering Policy

Updated September, 2024

Sanction Compliance and Anti-Money Laundering Policy

Union Petrochemical Group (“Group”) is committed to adhering to all applicable laws and regulations, including sanctions and anti-money laundering laws as imposed by the U.S. OFAC, UK, UNSC, EU, Singapore, Hong Kong and the FATF.

Sanctions laws and regulations may take various forms, such as blanket embargoes, specific embargoes, or targeted sanctions against entities, organizations, vessels, or individuals. Given the complexities of our Group business environment, it is paramount that the Group screen and monitor to ensure our Business Partners are not designated as Restricted Parties.

Any violation of sanctions programs can result in severe and potentially irreparable damage to the company and the individuals involved. Consequences may include reputational harm, disruption of business relationships, suspension of transactions, asset and account freezes, inclusion on international trade blacklists, as well as civil or criminal penalties, including fines and imprisonment.

This Policy sets forth the standards expected of our employees and provides guidance for our Business Partners, encouraging them to acknowledge and adhere to these principles. Any potential breach or risk of breach is treated seriously, and we promote a transparent reporting environment to address potential issues on a timely basis.

Our Commitments are as follows:

- I. We develop a robust due diligence process, which includes conducting Know Your Customer (KYC) checks during onboarding and ongoing monitoring of our customers.
- II. We prohibit business relationships with any sanctioned entities and operations in any Sanctioned Country.
- III. We require that our Business Partners comply with international sanctions laws and regulations, as outlined in our agreements.
- IV. We continuously improve our compliance practices through monitoring developments in international sanctions laws and regulations to ensure compliance in a dynamic regulatory environment.

This Policy will be subject to periodic review to ensure it remains current and effective.