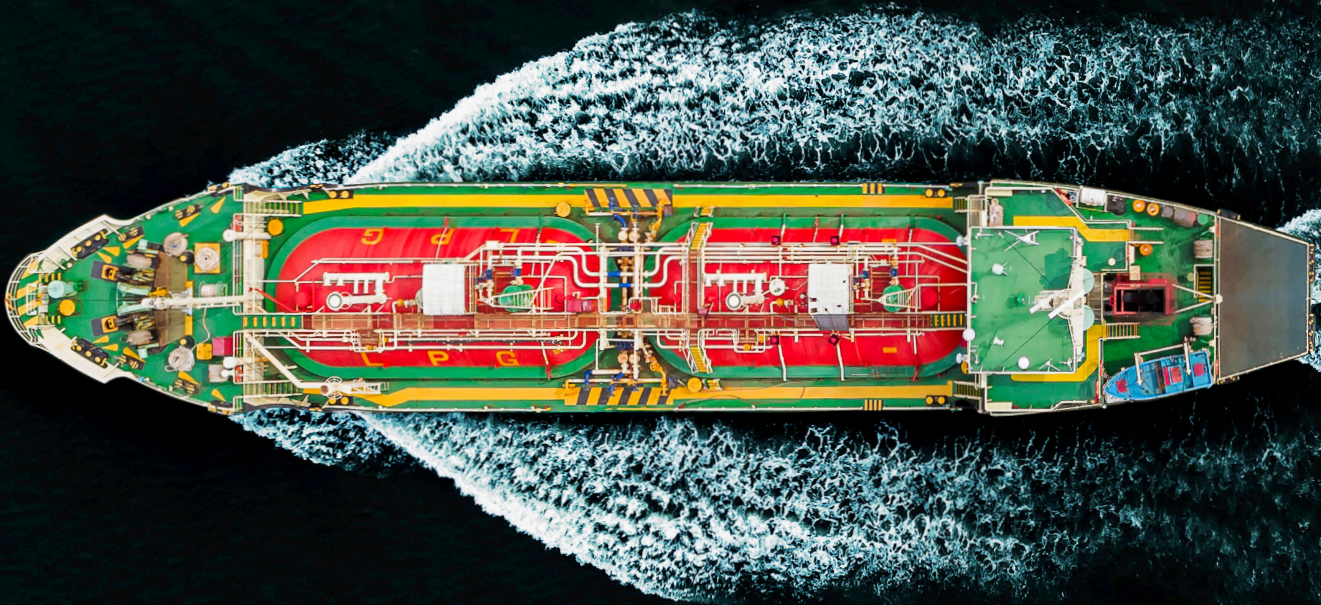




ANTI MONEY LAUNDERING (AML) POLICY STATEMENT



V1 APRIL 2026

The Clarkson group of companies (the Group) is the world’s leading provider of shipping services with breadth of expertise in ship broking, finance, research, port services and other aspects of shipping.

The Group is committed to preventing money laundering, proliferation financing and terrorist financing (“**Money Laundering**”) and takes reasonable care to establish and maintain effective systems and controls to counter all aspects of financial crime and conducting its business with integrity, transparency and in full compliance with all applicable laws and regulatory requirements.

The Group maintains an anti-Money Laundering framework that is risk based and reflects the nature, scale and complexity of the Group’s business, clients, transactions and geographic exposure.

The Group is committed to:

- identifying and assessing Money Laundering risks on an ongoing basis;
- conducting appropriate client, counterparty and transaction due diligence, including enhanced due diligence where higher risk is identified;
- maintaining effective systems and controls to monitor the business and identify suspicious activity;
- ensuring timely internal and, where required, external reporting of suspicious activity;
- maintaining accurate and complete records in accordance with legal and regulatory requirements;
- providing regular and targeted Money Laundering training to employees relevant to their roles and responsibilities;
- undertaking independent risk or audit assessments; and
- fostering a strong compliance culture through clear governance, senior management oversight and accountability.

The Group will not knowingly or willingly participate in any activity that facilitates Money Laundering or financial crime.

All Group employees, directors and officers are required to comply with the Group’s AML policy and with the Group’s AML procedures. Any concerns relating to actual or suspected Money Laundering or other types of financial crime are required to be escalated promptly in accordance with internal reporting procedures or in accordance with the Group’s Whistleblowing Policy.

Version control

Document details

Detail	
Title	ANTI MONEY LAUNDERING (AML) POLICY STATEMENT
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Owner / Approver	Group General Counsel/Head of Compliance
Current version	V1 April 2026

