Vantage Corp

Trade Sanctions Policy

Vantage Shipbrokers strictly adheres to all applicable trade sanctions laws and

regulations prohibitions or restrictions under United Nations resolutions or the trade or

economic sanctions, laws or regulations of the European Union, United Kingdom or

United States of America.

All employees of the company are prohibited from engaging in any activities that would

violate these laws or regulations, or from conducting business with any individuals,

entities or countries that are subject to trade sanctions on the behalf of the company.

Clear expectations and processes pertaining to sanctions compliance will be provided to

all relevant employees to minimize known risks identified by the Company's risk assessment. As sanctions are responsive to the global geopolitical environment, policies

and procedures will be updated and communicated promptly. The designated person will

work with relevant Heads of Departments to ensure that the policies and processes are

workable and implemented at an operational level.

Vantage Shipbrokers employs a risk-based approach to manage our Sanctions risk

exposure. We require all employees to ensure that they are aware of all applicable

sanctions' laws and regulations, and to seek guidance from the Head of Governance before engaging in any activity that may be impacted by sanctions.

The Management of Vantage Shipbrokers is committed to ensuring that the Sanctions

Compliance Programme (SCP) receives adequate resources to foster a culture of

compliance and is a part of the Company's operations. A designated person has been assigned the role of overseeing the Programme, including anti-money laundering and

anti-bribery and corruption for Vantage Shipbrokers. All concerns on potential violations

of aforementioned policies should be made to the designated person for further

investigation and action.

Designated Person: Elaine Mak

Title: Head of Corporate Strategy / Governance

Email: elaine@vantageshipbrokers.com

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