

Peninsula prides itself on its approach to international sanctions compliance and we are often at the forefront of these matters. It is a subject that we take seriously.

When Russia invaded Ukraine in March 2022, Peninsula took a very clear stance in support of Ukraine. We stated: *"In light of the recent escalation of armed conflict by Russia in Ukraine, Peninsula is going beyond the currently imposed sanctions and is not doing any business with Russian vessels, ports, companies (owned or majority-owned), suppliers and financial institutions."*

This remains our position. Peninsula continues to go beyond current EU sanctions as follows:

- We don't do any business in Russian ports;
- We don't do any business with Russian companies, sanctioned or otherwise;
- We don't provide products or services to Russian-flagged vessels or those which are owned by Russian individuals or entities;
- We don't procure cargoes of Russian oil to supply in our physical ports; and
- We closed down all presence in Russia shortly after the outset of the conflict.

Peninsula has best-in-class sanctions compliance processes and controls which have been reviewed and audited by major external stakeholders and expert professional advisers. The US, EU and UK guidance published in respect of the maritime transport and services bans relating to Russian-origin oil and oil products very clearly provides that the provision of bunkering services to vessels carrying Russian oil or oil products is not prohibited. Nonetheless, we continue to maintain scrutiny via vessel tracking, enhanced due diligence and contractual protections.

The EU has made a clear statement on this matter, *"The price cap on Russian oil limits price surges driven by extraordinary market conditions and drastically reduce the revenues Russia has earned from oil after it unleashed its illegal war of aggression against Ukraine. It serves to stabilise global energy prices while mitigating adverse consequences on energy supply to third countries."* OFAC bolster this guidance from the American perspective stating that this *"is part of an ongoing effort by the U.S. and an international coalition to maintain a steady oil supply to the global oil market without further enriching the Russian Federation"*.

In summary therefore, the EU, UK and US have implemented a regulatory and legal framework which is intended to enable Russian oil to continue to flow. As part of this framework, the provision of bunkering services to vessels carrying Russian oil or oil products is permitted.

Considering the above framework, we do not prohibit the bunkering of non-Russian flagged vessels legitimately carrying Russian oil and oil products. These vessels, often owned or operated by global shipping companies and commodity trading houses, continue to lawfully transport Russian oil and oil products around the globe. Both the EU and the US (as well as all G7 nations) have implemented a very deliberate and legal process to help protect the global economy and safety at sea, whilst balancing its efforts to weaken revenues destined for the Russian war effort.

Peninsula supports the Ukrainian people in their war against Russia and we support the EU, UK and US's methodology in ensuring that maximum pressure is exerted on Russia, whilst limiting the negative impact of ceasing to lawfully supply compliant ships.