

Sanctions policy

Ztrading Ltd (registration number HE 465830, Limassol, Cyprus), trading as Ztrade, does not take part in any transaction that involves a sanctioned person, company, vessel, port or origin, and screens every party, vessel and cargo before it becomes involved.

1. Purpose and scope

This policy sets out how Ztrading Ltd keeps every transaction it is involved in clear of sanctioned persons, companies, vessels, ports and origins. It applies to the company, its owner, its registered officers, anyone who works for it, and any partner company acting with it under a written agreement. It applies to every transaction, whether we represent the seller or the buyer, and whether or not we are a party to the contract.

Ztrading Ltd is a Cyprus company. EU sanctions bind it directly, wherever the transaction takes place and whatever the nationality of the parties. We also apply UN, UK and US sanctions, because the counterparties, banks, insurers and shipowners in our market apply them, and a transaction that one of them cannot complete is not a transaction we should introduce.

2. The sanctions regimes we follow

REGIME	AUTHORITY AND LISTS	WHY IT APPLIES TO US
EU restrictive measures	Council of the EU; the EU consolidated sanctions list; in Cyprus enforced under national sanctions legislation	Binding on Ztrading Ltd as a Cyprus company, wherever the transaction takes place. Includes the measures on Russian-origin crude oil and petroleum products under Regulation (EU) 833/2014 as amended, and the related price-cap rules.
UN Security Council	UN sanctions committees and consolidated list	Binding in Cyprus through EU implementation.
United Kingdom	OFSI; the UK sanctions list	Applied because UK banks, insurers, P&I clubs and brokers are involved in most cargoes.
United States	OFAC: the SDN list, other OFAC lists and secondary sanctions	Applied because US-dollar payment and US-linked counterparties are usual in our market.

Where the regimes differ, the strictest applicable rule is followed. The company screens against the current consolidated lists through a commercial sanctions-screening service and keeps the EU, UN, UK and US lists as its reference.

3. What we screen

Before we become involved, and again before each cargo, we screen:

- every party we represent or introduce, and every counterparty, by legal name, registration number and address;
- their owners up to natural persons, their directors, their signatories and the person who instructs us;
- the partner company and any agent acting with us;
- the vessel: name, IMO number, flag, registered owner, manager, operator and P&I club, and its recent movements;
- the cargo: product, declared origin, the refinery or terminal of origin, the load port, the discharge port and any transshipment;
- the banks and payment routes named in the transaction;
- any inspector, agent or other service provider the transaction depends on.

A party that will not give the information needed for screening is not screened. It is declined.

4. When and how we screen

- Before any introduction: full screening of the party we represent, its owners and its officers.
- Before a counterparty is approached: screening of the counterparty and its owners.
- Before each cargo: vessel, origin, ports, route and payment route.
- On any change: a new owner, vessel, port, bank or intermediary.
- Periodically: every party in an ongoing relationship is re-screened at least every twelve months.

Screening is run against the current consolidated EU, UN, UK and US lists through a commercial sanctions-screening service, and for vessels also against a vessel-tracking service. Each screening is recorded with the date, the lists checked, the result and the name of the person who ran it. A possible match is treated as a match until it has been resolved in writing.

5. Transactions we do not take part in

We do not take part in, introduce, coordinate or receive a fee from any transaction that involves:

- a person, company, vessel, port, bank or other entity on an EU, UN, UK or US sanctions list, or owned or controlled by one;
- crude oil, natural gas or petroleum products of Russian, Iranian, North Korean, Syrian or Venezuelan origin, or of any other origin subject to an import, purchase, transport or price-cap restriction that the transaction does not comply with;
- a vessel that has switched off or manipulated its AIS, changed flag or name recently without explanation, carried out ship-to-ship transfers in areas associated with sanctions evasion, or whose ownership cannot be established;

- documents that do not match: a certificate of origin, bill of lading, inspection certificate, cargo manifest or vessel data that conflict with each other or with the declared origin;
- payment through a bank, a third country or a third party without a commercial reason, or a request to split, restructure or re-route a payment;
- a party that refuses screening, provides documents that cannot be verified, or changes the supply chain after screening.

Any of these stops the transaction until the responsible person has decided in writing. Nobody acting for the company looks for a way around a restriction, and a counterparty's or partner's assurance never replaces our own screening.

6. Escalation and decisions

Anyone acting for the company who sees a possible match or a red flag stops work on that transaction and reports it the same day to the responsible person at compliance@ztrade.se. The responsible person decides in writing whether to decline, to continue, or to obtain external legal advice, and records the reasons. The transaction is not resumed until that decision is recorded.

Where the law requires a report to an authority, the responsible person makes it: in Cyprus to the Sanctions Implementation Unit of the Ministry of Finance and, where money laundering is suspected, to MOKAS under the anti-money-laundering policy. The company tells the counterparty that it has withdrawn, without disclosing more than the law allows.

7. Records, review and document control

Screening results, decisions and the documents relied on are kept for at least five years after the transaction, and are available to a counterparty's compliance function on request, under confidentiality terms. The responsible person reviews this policy every twelve months and whenever a sanctions regime changes materially. The regimes and lists in section 2 and the prohibited origins in section 5 are checked at each review.

Responsible person: Jimmy Karlsson, Founder and owner · compliance@ztrade.se

VERSION	DATE	STATUS	APPROVED BY	NEXT REVIEW
2026.1	27 October 2026	Adopted. External legal review in progress; the next version will incorporate its findings.	Jimmy Karlsson, Founder and owner	27 October 2027