

Frontline Ltd

Financial Crime Policy

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1 Introduction

Frontline Ltd (“the Company”) operates in jurisdictions world wide where financial crime is a criminal offence.

In the context of our operations at the Company, financial crime is any kind of criminal conduct relating to money including any offence involving:

- Fraud or dishonestly; or
- Handling the proceeds of crime; or
- The financing of terrorism.

2 Purpose

This policy expands on the Company’s Code of Conduct and further details our requirements in relation to financial crime, specifically relating to:

- Anti-bribery and anti-corruption (“ABAC”)
- Anti-money laundering (“AML”)
- Sanctions

3 Scope and applicability

This policy applies to all entities controlled by the Company and officers, directors, employees as well as workers and third party consultants of the Company, wherever they are located (together “Employees”).

It also applies to representatives, vendors, agents, consultants and other individuals or companies that provide services for or on behalf of the Company (together “Business Partners”).

4 Our commitment and responsibilities

The Company will not tolerate any form of financial crime by its employees or Business Partners acting on its behalf and this policy demonstrates our zero-tolerance approach.

The Chief Compliance Officer (“CCO”) will regularly review and update this policy where necessary as our business environment changes and new threats appear.

5 What's the legislation?

As a global business, there is a growing number of, and changes to, laws which apply to jurisdictions in which we operate. The regulatory landscape has become more dynamic and complex. This policy makes reference to some of the key global legislative requirements, however is not intended to be an exhaustive list of all relevant legislation.

Instead, this policy aims to communicate the spirit of the relevant laws and regulations with particular reference to the following:

- Foreign Corrupt Practices Act (FCPA) 1997 (as amended)
- UK Bribery Act 2010
- Norwegian Penal Code
- Office of Foreign Assets Control (OFAC) sanctions
- US Economic Sanctions Laws
- European Union (EU) sanctions
- United Nations (UN) Security Council sanctions
- EU 4th Directive on anti-money laundering (AML) and counter terrorist financing (CTF)
- HM Treasury (UK) sanctions

6 Bribery and Corruption

6.1 What is Bribery?

Bribery is an inducement or reward offered, promised or provided, in order to influence a business outcome.

Bribery may involve government officials, companies or private individuals and may occur directly or indirectly through third parties.

6.2 What are your responsibilities?

The company prohibits the following acts being undertaken by any Employee or Business Partner acting on the company's behalf:

- Offering, promising or giving a bribe;
- Requesting, agreeing to receive or receiving a bribe;
- Bribing a Public Official in order to obtain or retain a business advantage

6.3 Public Officials

The term “Public Official” includes elected or appointed officials at all levels of government as well as anyone who is employed by a national, regional or local government or a government-owned or controlled entity, employees of public international organisations, political parties, officials of political parties and candidates for public office.

6.4 Facilitation Payments

The Company prohibits facilitation payments. A facilitation payment is a payment made to a public official to expedite or secure performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due.

The only exception to this is where an employee or Business Partner has reasonable belief that their personal safety is at risk. In such situations the employee must report the details of the payment to CCO within 48 hours of making such a payment.

6.5 Gifts, entertainment and hospitality

Employees or Business Partners should not provide gifts to or receive them from any Public Official (or their close families and business associates).

Only gifts, entertainment and hospitality that are reasonable and proportionate, that do not influence business decisions and are not prohibited by law or otherwise may be offered or accepted.

6.6 Political and Charitable donations

The company does not make contributions of any kind to political parties.

No charitable donations will be made by the company with the intent to gain a commercial advantage.

6.7 Conflicts of interest

A conflict of interest exists if actions by an employee are, or could reasonably appear to be influenced directly or indirectly by personal considerations, duties owed to persons or entities other than the Company, or by actual or potential personal benefit or gain. Conflicts of interest do not necessarily have to result in unethical or illegal acts.

Employees and Business Partners must avoid conflicts of interests, including potential conflicts of interest that could create the perception that they may be improperly influenced in their decision making.

If an employee or Business Partner acting on the company's behalf have an actual, perceived or potential conflict of interest they should notify this immediately to their manager and the CCO and adhere to any instructions provided on how to address such conflict of interest.

7 Anti-Money Laundering

7.1 What is money laundering?

Money laundering is a term used to describe the process of hiding the criminal origins of money or property which are proceeds of crime within legitimate business activities.

It can also be the use of money of a legitimate origin that supports terrorism.

7.2 What are your responsibilities?

The company prohibits the following acts being undertaken by an employee or Business Partner:

- concealing, disguising, converting, transferring criminal money or property;
- entering into or becoming concerned in an arrangement that a person knows or suspects facilitates, by whatever means, the acquisition, retention, use or control of criminal money or property by or on behalf of another person; and
- acquiring, using or possessing criminal money or property

Employees of the Company should undertake appropriate due diligence to assess the integrity and identity of third parties.

Should any employee of the Company have any knowledge or suspicion of money laundering they should report this to the CCO.

8 Sanctions and Export control laws

8.1 What is a sanction or Export control?

Sanctions are economic or trade penalties which governments may impose against foreign countries, entities, organisations, or individuals who engage in acts contrary to international law or against the government's national security interests.

The purpose of sanctions is to change conduct related to activities such as:

- Terrorism
- Money laundering
- Human rights abuses
- Narcotics trafficking
- Proliferation of nuclear or chemical weapons

As well as restrictions in activities with certain individuals, groups and/or countries, there are also sanction requirements relating to interacting/using some Ships, appropriate checks should be carried out to make sure these requirements are not being breached.

Export controls are restrictions on importing or exporting "controlled items", including certain goods, raw materials, services, or technologies.

These restrictions and prohibitions may depend on the nature of the items, the country of origin, the end-use, or on the identity and activities of the counterparty.

8.2 What are your responsibilities?

Employees and Business Partners must observe and comply with applicable local and extraterritorial sanctions and export controls requirements.

Any third party, including but not limited to, agents, suppliers, service providers, distributors, vendors, consultants, banks or other financial service providers should have appropriate due diligence carried out to make sure they are not under any sanction and/or trade controls restrictions.

Should any Employee or Business Partner suspect a violation of trade controls they must inform the CCO.

9 Managing incidents and reporting a concern

Should any employee or Business Partner acting on behalf of the Company have a concern or know or suspect a violation of this Financial Crime Policy they can either report the matter:

- Directly to your line manager or CCO as appropriate.
- Via the third party compliance hotline on the numbers attached at Appendix A or via the online link <https://wrs.expolink.co.uk/frontline>

Any reports will be handled confidentially, impartially and in a timely manner and in accordance with the Company complaints procedure.

10 Disciplinary action

Financial crime such as bribery, money laundering and breaching international sanctions are offences which can lead to criminal penalties for you as an individual as well as the Company.

In addition to this, breaches to this policy will result in prompt disciplinary actions, which may include dismissal / termination of contract.

11 Training

Appropriate risk based communication and training will be provided to employees and Business Partners as part of their on-boarding and ongoing development programme. If you have any questions regarding your training please contact your line manager or the CCO.

12 Further Detailed Guidance

Specific guidance and procedures with regards to the following areas are incorporated into our guidance manuals. If you feel uncertain at any time regarding these guidance manuals, please refer to the policy owner or the CCO.

- Code of Conduct
- Gifts and Entertainment
- Third party engagement
- Complaints Procedure

International Freephone Numbers

Mobile access to any of the supplied telephone numbers cannot be guaranteed.

Country	Freephone number	Alternative Number (If applicable)
Albania	2-stage dial, first 00 800 0010 wait for recorded message, and then dial 8666812836.	
Argentina	0800 6662603	
Armenia (Yerevan)	60462 2655 (Local Rate Number)	
Australia	1800 121 889	
Austria	0800 281700	
Bahrain	80004475	
Bangladesh	000800091031	2-stage dial, first 157-0011, wait for the operator or recorded message then dial 8779167615.
Barbados	1844 854 1994	
Belarus	882000 730028	
Belgium	0800 71025	
Bermuda	1844 649 2904	
Brazil	0800 891 8807	
Bulgaria	00800 110 44 74	
Cambodia	00855 23962548 (Local Rate Number)	
Canada	1888 268 5816	
Cayman Isles.	1844 649 2905	
Chile	123 002 004 12	
China (North - China Netcom)	10800 852 2112	00800 3838 3000
China (South - China Telecom)	10800 152 2112	
China (Whole)	400 120 3148 (Local Rate Number)	
Colombia	01800-944 4796	
Congo (Democratic Republic)	064 000 005 (Local Rate Number)	
Costa Rica	8000440101	
Croatia	0 800 222 845	
Cyprus	800 95207	
Czech Republic	800 142 428	
Dominican Republic	1800 148 5275	
Denmark	8088 4368	
Egypt	0800 000 00 23	
Eire	1800 567 014	
Estonia	800 00 44 265	
Finland	0800 116773	
France	0800 900240	
Georgia	0706 777 469 (Local Rate Number)	
Germany	0800 182 3246	
Ghana	54 431 5494 (Local Rate Number)	
Greece	00800 4414 5735	00800 441 31422
Hawaii	1866 293 2604	
Hong Kong	800 930770	
Hungary	06800 14863	
Iceland	800 82 79	
India	000 800 440 1286	
Indonesia	007 8030 114626	001 803 0441 1201
Israel	1809446487	
Italy	800 783776	
Japan	00531 78 0023	0081 368 908 675 (Local Rate Number)
Jordan	0800 22984	
Kazakhstan	88003333524	
Kenya	0800 723 132	
Korea (South)	00308 442 0074	
Kuwait	22274590 (Local Rate Number)	
Kyrgyzstan	00800 30022 016	

Latvia	8000 26 70	
Lithuania	8800 30 444	
Luxembourg	8002 4450	
Macedonia	0800 953 86	
Malaysia	1800 885 530	1800 805 597
Malta	800 62404	
Mexico	01800 123 0193	
Monaco	800 936 90	
Morocco	0800 092 326	
Namibia	8333 000 85 (Local Rate Number)	
Netherlands	0800 022 9026	
New Zealand	0800 443 816	
Nigeria	7080601033	
Norway	800 14870	
Oman	80077686	
Pakistan	00800 900 44181	
Panama	001 800 507 3321	
Paraguay	0098 0044 10168.	
Peru	0800 53611	
Philippines	1800 1441 0948 (PLDT & SMART Networks)	1800 1442 0076
Philippines	1800 8739 5278 (GLOBE Network)	
Poland	00800 442 1245	00800 441 2392
Portugal	800 880 374	
Puerto Rico	1866 293 1804	
Qatar	800 0019	
Romania	08008 94440	
Russia	810 800 260 81044	810 800 2058 2044
Saudi Arabia	800 844 0172	
Serbia	0800 190 603	
Singapore	800 4411 140	
Slovakia	0800 004461	
Slovenia	0800 80886	
South Africa	0800 990520	
Spain	900 944401	
Sri Lanka	011 244 5413 (dialling from Colombo omit 011)	
Sweden	0200 285415	
Switzerland	0800 563823	
Taiwan	0080 10 44202	
Tajikistan (Dushanbe)	42781 5394 (Local Rate Number)	
Tanzania	0411200059 (Local Rate Number TTCL Landlines Only)	
Thailand	001 800 442 078	
Trinidad/Tobago	18002037122	
Turkey	00800 4488 29578	00800 4463 2066
UAE (United Arab Emirates)	8000 44 138 73	
Uganda	206300056 (Local Rate Number UTL Landlines Only)	
Ukraine	0800 609 172	
United Kingdom	0800 374199	
Uruguay	40190882	
USA	1877 533 5310	
Uzbekistan	00800 120 1049	
Venezuela	0800 100 3199	
Vietnam	120 11527	
Zimbabwe	86 4404 1044 (Local Rate Number)	

Where there is no Freephone number please communicate the following:

Collect call/reverse charge number steps as follows:

- 1. Caller dials their country operator**
- 2. Asks for an international collect call or reverse charge to: 0044 1249 661 808**
- 3. Operator will dial the number and speak to an Expolink Operator who will accept the call and charges**
- 4. Country operator connects caller to Expolink, leaves the call and then the call takes place as normal**

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