

ODFJELL SE SUSTAINABILITY-LINKED FINANCE FRAMEWORK

VERIFICATION OF AER PERFORMANCE

Scope and objectives

DNV Business Assurance Norway AS (henceforth referred to as "DNV") has been commissioned by Odfjell SE (henceforth referred to as "ODFJELL") to verify ODFJELL's actual AER performance relative to the SPT trajectory described in ODFJELL's Sustainability-Linked Finance Framework (the "Framework"). Our objective has been to verify ODFJELL's methodology to calculate its Average Efficiency Ratio (AER) of the Controlled Fleet in gCO₂ per tonnenautical mile for 2020 and 2021, as well as to verify the underlying AER data. Our methodology to achieve this is described under 'Work Undertaken'.

Responsibilities of the Management of ODFJELL and DNV

The management of ODFJELL has provided the information and data used by DNV during the delivery of this review. Our statement represents an independent opinion and is intended to inform ODFJELL management and other interested stakeholders in the SECURITIES as to how ODFJELL's actual AER performance relates to the SPT trajectory, based on the information provided to us. In our work we have relied on the information and the facts presented to us by ODFJELL. DNV is not responsible for any aspect of the nominated assets referred to in this opinion and cannot be held liable if estimates, findings, opinions, or conclusions are incorrect. Thus, DNV shall not be held liable if any of the information or data provided by ODFJELL's management and used as a basis for this assessment were not correct or complete.

Work undertaken

Our work constituted a review of the available information, based on the understanding that this information was provided to us by ODFJELL in good faith. The work undertaken to form our opinion included:

- · Discussions with ODFJELL management and technology department
- Review of ODFJELL's 2020 AER data, which is externally verified by DNV under IMO DCS
- Review of ODFJELL's 2021 AER data. This data will be submitted to an external verifier under IMO DCS
- Review of implemented GHG reduction measures vs. planned measures to compare ODFJELL's 2021 AER data vs. its planned AER performance under its Fleet Transition Plan
- Review of ODFJELL's methodology to calculate its Average Efficiency Ratio (AER) of the Controlled Fleet in gCO₂ per tonne-nautical mile for 2021



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Based on the information provided by ODFJELL and the external review procedures conducted, nothing has come to our attention that causes us to believe that ODFJELL's actual AER performance is not in accordance with the emission reporting requirements under IMO-DCS. DNV opines that ODFJELL's methodology to calculate the average AER for its Controlled Fleet is consistent with the purpose of ODFJELL's KPI as defined in its Framework.

for DNV Business Assurance Norway AS

Oslo, 22nd of March 2022

Knut Ljungberg Principal Consultant DNV - Maritime Mark Robinson Senior Reviewer DNV – Business Assurance



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ODFJELL's actual AER performance relative to the SPT trajectory described in **ODFJELL's Framework**

Below graph visualises the data reviewed by DNV. It compares ODFJELL's planned AER performance of its Controlled Fleet against its actual performance. DNV's findings correspond with ODFJELL's representation of actual AER performance relative to its SPT trajectory.

