

ODFJELL SE

Whistleblowing Policy

General

Odfjell is committed to conducting its business safely and with honesty and integrity. All our staff are expected to maintain the highest possible standards in their work. One aspect of this is to have the courage to speak up if you are worried that things may be going wrong.

The aim of this policy is to encourage staff to report any suspected wrongdoing as soon as possible, to explain how to raise these concerns, and to ensure that staff are confident that their concerns will be taken seriously, and confidentiality will be respected. Whistleblowers play an essential role in exposing fraud, corruption, unauthorized use of funds, mismanagement, criminal offences, dangers to health and the environment and other wrongdoing that threatens our integrity, both financially and morally.

This policy does not replace Odfjell's regular information and reporting lines, but it provides an additional mechanism for the reporting of suspected serious wrongdoing, including breaches of any applicable Odfjell policy, through a dedicated channel, if regular reporting lines cannot be used or turn out to be inappropriate to use.

This Policy applies to:

1. all directors, officers, employees and any other person whose work is supervised by Odfjell as though that person were an Odfjell employee; and
2. all Odfjell operations, including all legal entities, and to our joint ventures over which we are able to exercise control with regard to policies and procedures. For those joint ventures over which Odfjell is unable to exercise control, we will endeavor to influence their policies and practice, so that they reflect the values described in this Policy.

Please also see our [Whistleblowing Procedure](#).

Introduction

Whistleblowing is the reporting of information that relates to suspected wrongdoing or dangers at work. This may include the following examples:

- danger to life, health, safety or environment
- fraud, corruption or bribery

- insider trading
- breach of human rights or labor rights
- harassment or discrimination
- breach of Odfjell's Code of Conduct
- non-compliance to any other policy or procedure (e.g. IT-security or data privacy policy)
- non-compliance to any other legal or regulatory requirement applicable to the company (e.g. environmental regulations)
- violations or crime (e.g. breach of competition law, money laundering)

A whistleblower is a person who, in good faith, raises a genuine concern relating to any of the above, or any other conduct likely to damage the interests or reputation of Odfjell.

Guiding Principle

Odfjell personnel have a responsibility to notify the appropriate persons if they become aware of wrongdoing or danger of potential wrongdoing in any area of our activities. Wherever possible, you are encouraged to report concerns relating to suspected wrongdoing or danger internally first. We hope that in most cases you will be able to raise any concerns with your line manager or your local terminal's General Manager or Human Resources Manager. This is normally the best way. However, if you feel that they have not addressed your concern, or if you prefer not to raise it with them for any reason, you could report to one of the Compliance Officers/Contact persons mentioned below, or via the Reporting Hotline through the following link: <https://www.odfjell.com/about/our-stories/report-a-concern/>

Reports may be filed anonymously unless this is prohibited by local law. Where anonymity is not allowed, we will handle any reports we receive as strictly confidential. Potential whistleblowers are, however, encouraged not to report anonymously, as this will complicate a potential audit or investigation. Should a whistleblower choose not to be identified, his/her identity may not be disclosed without the individual's explicit consent, unless otherwise required by law.

In some jurisdictions, there are legal obligations to report certain conduct and the failure to report could be perceived as approval of or involvement in such conduct. If you have any questions relating to the specific requirements in your local entity, please direct your query to your line manager or your Compliance Officer.

Any agreements, e.g. non-disclosure agreements and confidentiality agreements, will be invalid to the extent that they obstruct whistleblower protection and rights.

To ensure the effectiveness of this policy, Odfjell has nominated a Compliance Officer and other employees who:

- Investigate reports of serious wrongdoing or malpractice within Odfjell;
- Advise on reported serious wrongdoing or malpractice conducted in or on behalf of the company by any Employee or third party; and
- Safeguard – without limitation – against unjustified disciplinary action, dismissal, transfer or harassment directed at anyone who has made a disclosure of serious wrongdoing or malpractice in good faith and according to the set procedures.

The Designated Person (DP) is an ISM requirement applicable to those working on ships managed by Odfjell.

All employees shall have access to reliable channels for whistleblowing and protection from retaliations. Protection shall be granted for disclosures made on the basis of reasonable grounds to believe that the information is true at the time it is disclosed. Protection shall also extend to those who make inaccurate disclosures in honest error. Potential whistleblowers shall be protected from all forms of retaliation, disadvantage or discrimination at the workplace linked to or resulting from whistleblowing. Odfjell will consider non-compliance with this Policy, including false or malicious reporting, as a serious matter warranting disciplinary action, up to and including dismissal, where allowable by law.

Communication

Every department manager is required to communicate the policy and the established procedure effectively to all employees in his/her department and to organize and maintain the necessary conditions for this policy to be effective.

The policy shall be regularly brought to the attention of all employees, e.g. during all appraisals, and the relevant contact details of the Compliance Officer shall be updated and visible in publicly accessible places within the company.

Appendix 1: Reporting lines

COMPLIANCE REPORTING ODFJELL SE

Compliance Officer Corporate

Title: Chief Sustainability Officer
Name: Øistein Jensen
Mobile: +47 952 61 241
Email: oistein.jensen@odfjell.com

Regional Compliance Officer – USA Terminals

Title: CFO Odfjell Terminals Houston
Name: Morris J. White Jr.
Phone: +1 2812046021
Mobile: +1 2012818789
Email: MorrisJ.White.Jr@odfjell.com

Deputy Compliance Officer Corporate

Title: Senior Advisor Corporate QHSE
Name: Heike Beerbaum
Mobile: +47 905 14 317
Email: heike.beerbaum@odfjell.com

Designated Person Ashore

Name: Gunnar Moen
Mobile: +47 94850802
Email: gunnar.moen@odfjell.com

Designated Person Assistant

Title: Team Leader Crew and Family Affairs
Name: Olive de Vera
Phone: +632 8405 5020
Mobile: +63 91 75 79 72 03
Email: olive.devera@odfjell.com

Reporting Hotline Odfjell SE

The reporting hotline is a channel for confidential and anonymous reporting to Odfjell SE of issues that should be brought to Management's attention, and where other reporting procedures cannot be used.

The sender can remain anonymous, if he/she so chooses, and cannot be traced.

<https://www.odfjell.com/about/our-stories/report-a-concern/>

COMPLIANCE REPORTING SPECIAL CASES

Chair Odfjell SE Audit Committee

Title: Chair Audit Committee
Name: Åke Gregertsen
Mobile: +47 415 42 293
Email: ake.gregertsen@odfjell.com

For more information, please see [Whistleblowing Procedure](#) in Docmap



Harald Fotland
CEO
Bergen, September 2022