



ANTITRUST/ COMPETITION COMPLIANCE POLICY

Version 2

This policy applies to all employees, directors and other representatives of Odfjell SE, irrespective of their domicile. It must be read, signed and adhered to by all to which it applies.

It is Odfjell's obligation to comply fully with the competition rules in all jurisdictions where Odfjell operates and that are applicable to Odfjell's business.

Odfjell prohibits any discussion or other communication the purpose or effect of which might be construed as an agreement or understanding, or an attempt to induce others to enter into such an agreement or understanding, to refrain from competing on the merits of Odfjell's products and services.

The following agreements between competitors are almost always violations of the competition laws and are often criminal violations. They are therefore strictly prohibited by the company:

- fixing prices at which the companies will buy inputs or sell outputs,
- reducing output,
- rigging bids,
- allocating markets or customers,
- boycotting third parties,
- fixing wages or agreeing not to poach each other's employees.

The following practices also raise competition concerns and may be illegal:

- Information sharing with competitors e.g. but not limited to freight rates, pricing strategies, margins, specified volumes, marketing strategies or capacities,
- Unilateral refusals to supply competitors or customers,
- artificially high or low rates,
- exclusive dealing,
- tying, bundling, or requirements of reciprocal dealing,
- discriminatory pricing or discounting,
- price gouging.

If in doubt employees shall consult the Chief Compliance Officer.

Odfjell has appointed a Chief Compliance Officer who is responsible for carrying out Odfjell's Compliance Policy and the training programme.

Contact with competitors as defined in the Company's principles and procedures, requires pre-approval by the Compliance Officer Corporate. Odfjell maintains records on contact with competitors.

Violations or suspected violations of the competition rules by Odfjell employees, directors or any other representative of Odfjell shall be reported to the superior or the Compliance Officer according to

[Whistleblowing Policy PRI-0110](#).

Any breach of competition law is likely to have serious consequences for Odfjell and those who work for Odfjell, and can result in criminal prosecution against individuals, severe financial penalties and damage to Odfjell's reputation. Odfjell will therefore take a very hard stance against violations of the competition rules

and the Compliance Policy, and penalties may include pay reduction, demotion, termination of employment and dismissal.

For more information please see [Competition Law Compliance Principles PRI-0010](#).