

NORDEN'S WHISTLEBLOWER SCHEME 2022
DAMPSKIBSELSKABET NORDEN

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Dampskibsselskabet NORDEN A/S ("NORDEN") are committed to providing an environment where the high NORDEN standards and best practices are encouraged and safeguarded.

NORDEN's whistleblower scheme provides safe access to reporting existing or potential violations of law and regulations, NORDEN policies and guidelines, or other serious irregularities. The reporting can be done anonymously, or by name.

Who can use the system?

The system can be used by any person related to NORDEN; NORDEN employees including the Executive Management and Board of Directors, auditors, lawyers, external consultants, suppliers, employees onboard NORDEN owned or operated vessels and other business partners and stakeholders.

NORDEN Employees that have a concern are encouraged to discuss such matters first with their immediate manager or other appropriate personnel in NORDEN. Where this is not possible the whistleblower scheme offers an alternative way of reporting.

What can be reported?

The whistleblower scheme is intended for the reporting of serious incidents or concerns.

Serious incidents or concerns may include:

- Illegal activities or activities which by law or agreement constitute serious improper conduct (such as human rights violations, discriminatory practices etc)
- Economical crime or financial fraud (such as accounts manipulation, fraudulent statements, or misappropriation of assets)
- Bribery and corruption
- Serious and material breaches of environmental laws (such as oil pollution)
- Violation of health and safety regulations
- Violence, sexual harassment, or any other kind of harassment.

If in doubt whether to report an incident or concern or not, it should be reported. All reports received will be addressed and investigated. If a reported matter is found to be outside the scope of the whistleblower scheme, the individual having reported the incidence will be advised via the whistleblower portal and the report will be deleted.

How are reports being processed?

The NORDEN whistleblower portal is hosted by the independent third-party, Got Ethics A/S, which guarantees anonymity, security, and a user-friendly system.

The whistleblower portal can be found at: <https://dsnorden.whistleblownetwork.net/>

Once a report has been made, users have the option to log in to the portal and any replies or follow-up questions from the investigator will be accessible to the user. All subsequent interaction via the Portal is fully anonymous and the system and investigator relies fully on the user being willing to log in to the Portal to see replies and receive feedback on the report.

If the report is deemed to be founded, further investigation will be undertaken, and appropriate remedial action taken. If the report is deemed unfounded (or outside the scope of the Scheme), it will be deleted from the portal and the reporter will be informed via the portal.

Who deals with the report?

To ensure confidential and unbiased handling of reports, NORDEN's Board of Directors has appointed Head of Legal as ombudsman. The Ombudsman is acting under the sole instruction of the Chair, and the Vice Chair of NORDEN's Board of Directors. Reports are investigated by the Board assisted by the Ombudsman.

Confidentiality

All communication is anonymous and confidential unless you as reporter chose otherwise. The portal gives you the option to stay anonymous.

You are encouraged, but not required, to identify yourself and explain your report and concern in sufficient detail to enable us to make a thorough investigation into the matter. Please provide as much information as possible. The identity of the reporting person will not be disclosed even if the person has chosen not to be anonymous.

Questions and review

All questions regarding the NORDEN whistleblower scheme can be addressed to the Head of Legal. The Board will review and assess the adequacy of NORDEN's whistleblowing scheme on a current basis.

The scheme was initially approved on behalf of the Board of Directors of NORDEN, 2011 and latest revised February 2022.

Klaus Nyborg, Chairman of the Board of Directors