



The Seatrans group (referred to as “Seatrans” or “the Company” in the Policy) wants everyone to have the courage to speak up if they are worried that things may go wrong.

Whistleblowers play an essential role in exposing any wrongdoing that threatens our integrity, both financially and morally. Whistleblowers shall be confident that their concerns will be taken seriously, and confidentiality respected.

Traditional reporting lines should always prevail, but the whistleblower mechanism provides an additional option for reporting wrongdoing to either the Compliance Officer or the Designated Person.

This Policy applies to:

- All employees working for and on behalf of Seatrans.

Whistleblowing applies to the following (but not exhaustive) examples:

- Danger to life, health, safety or the environment
- Fraud, corruption or bribery
- Insider trading
- Breach of human rights or labor rights
- Harassment or discrimination
- Breach of Seatrans Group Code of Conduct
- Recurring non-compliance to any other policy or procedure
- Recurring non-compliance to any other legal or regulatory requirement applicable to the company (e.g. environmental regulations)
- Violation of law

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

Whistleblowing Principle

All personnel have a responsibility to notify the appropriate persons through internal and regular reporting lines when they become aware of wrongdoing or danger or potential wrongdoing in any area of our activities. If this seems inappropriate or you feel that they have not addressed your concern, you could report to the Compliance Officer.

The Designated Person (DP) is an ISM requirement applicable to those working on ships managed by Stödig Ship Management AS.

Your report will be treated anonymously and confidentially (if desired) unless otherwise provided by local laws.

The Company will consider non-compliance to this Policy as a serious matter.

Abuse of the whistleblowing mechanism will be a serious breach of the Code of Conduct.