

EIMSKIP GROUP

WHISTLEBLOWER POLICY



Eimskip is a leading transportation company in the North Atlantic providing container and reefer liner services with connections to international markets and is specialized in worldwide freight forwarding services with focus on frozen and chilled commodities.



OUR VALUES



ACHIEVEMENT

We simplify things for our customers.
That's how we achieve our goals.



COOPERATION

We offer outstanding solutions and
services. We do that through
cooperation.



TRUST

We show responsibility towards
customers, share- holders, society and
the environment. That's how we earn
trust.

INTRODUCTION

This policy sets out how Eimskipafélag Íslands hf. (Eimskip) will support you in expressing your concerns safely, knowing who to contact, how to make a report, and the protections available to you. This policy applies to all employees (current and former) and all companies within its group. It also applies to contractors, subcontractors, suppliers, and other third parties.

PURPOSE

Eimskip's values, embodied in the employee Code of Conduct, and other policies guide the Company toward conducting business with high ethics and integrity. Therefore, it is fundamental to the Company that any wrongdoing is reported.

The policy's purpose is to support these values and document procedures for handling reports of alleged misconduct concerning the Company's operations and the protection of whistleblowers. The aim is to have a secure platform to make suggestions that can lead to information about violations or reprehensible behavior that can cause damage to the Company and society and reduce such behavior.

The Company has several ways for individuals to raise concerns. If an individual is unable to use Speak Up procedures, a Whistleblower reporting channel is available for reportable conduct.



Atlantic Trucking



FAROE SHIP

GÁRA 
AGENTS & SHIPBROKERS



TROMSØTERMINALEN
EIMSKIP GROUP

TVG-ZIMSEN
FREIGHT FORWARDING

DEFINITION

WHISTLEBLOWER

A whistleblower is a person who comes forward and shares knowledge on any wrongdoing which is happening in the whole organization or in a specific department. A whistleblower could be an employee (current and former), contractor, subcontractor, supplier, and other third party who become aware of any illegal activities

VIOLATIONS OF LAW

Misconduct, or an improper state of affair or circumstances. Conduct that constitutes a contravention of laws specified in the Whistleblower Laws that are punishable by imprisonment. Concerns about possible violations of laws in the following areas: human rights, money laundering, corruption, foreign trade controls, retaliation, insider trading, competition law, IT security, data privacy, threats to health, environment, sexual harassment or discrimination.

WHISTLEBLOWER COMMITTEE

Includes the CEO, General Counsel and Compliance Officer, Executive Vice President Human Resources & Communication, Sustainability Manager and Manager of Finance and Administration International Operations. If reported misconduct involves members of the Whistleblower Committee, an alternative takes a seat in the Committee. The committee is responsible for all Whistleblower Reports. All Whistleblower Reports will be considered by the committee and assessed carefully to determine whether an investigation is required. Appropriate feedback will be provided to the Whistleblower on the process and expected timeframe of the investigation.

GOOD FAITH

Means anyone who makes a disclosure based upon beliefs that the information disclosed is correct and is evidence that it is in the interest of the public to disclose the information and that there are not have any other available options to prevent the violation of law or the conduct in question.

EMPLOYEE

An employee in this Policy is a person who has access to any information or data related to Eimskip's activities. That can be a permanent employee, temporary employee, external employee, contractor, intern or a board member etc. An employee is protected by this policy and applicable law after completion of employment.

INTERNAL DISCLOSURE

Information or documents that is discloses in good faith regarding violations of law or other misconduct in the company's operation to the whistleblower committee or to a designated body.

EXTERNAL DISCLOSURE

Information or documents that is discloses in good faith regarding violations of law in the company's operation to a party outside of the company. External disclosure is in general not permitted unless an internal disclosure has previously been exercised. If a disclosure is considered

WHISTLEBLOWER REPORTING PROCESS

HOW CAN I MAKE A WHISTLEBLOWER REPORT?

You can submit a report through a secure link on Eimskip's homepage. The form will be saved at a place only the Whistleblower Committee can access. As soon as the report has been submitted the Committee will be informed.

After submitting the report, the Whistleblower Committee will review whether the conduct is reportable conduct or not. Actions will be taken according to what the conclusions will be.

ALL WHISTLEBLOWER REPORTS WILL BE TAKEN SERIOUSLY BY EIMSKIP

The Whistleblower Committee will assess the Whistleblower Report carefully to determine whether an investigation is required. If the Whistleblower Committee finds the content to be a reportable conduct an investigation is required and appropriate actions will be determined.

While the circumstances of each Whistleblower Report may require different investigation, all investigations will:

- Follow a fair process
- Be conducted as quickly and efficiently as possible
- Determine whether there is enough evidence to report to authorities
- Be independent of the person(s) concerned with the allegations

The Whistleblower Committee will provide the Whistleblower with feedback on the process and expected timeframe of the investigation.

WHAT SHOULD BE INCLUDED IN THE REPORT?

Please provide as much detailed information as possible so that your report can be investigated.

Some useful details include:

- Date, time and location
- Names involved, roles and their business group
- Your relationship with the person(s) involved
- The general nature of your concern
- How you became aware of the issue
- Possible witnesses
- Other information that you think supports your report

CONFIDENTIALITY

All reports will be confidential and handled by the Whistleblower Committee. The whistleblower's identity will only be known by the Committee and will appear anonymous and confidential to others in case processing

ANONYMOUS?

You can choose to make your report anonymously. However, investigating the issue with complete anonymity may make it more difficult for the committee to investigate or take the needed actions. By letting us know who you are, we can contact you directly to discuss your concerns which will help us investigate the complaint more quickly and efficiently.

PROTECTION OF WHISTLEBLOWERS

Whistleblower who reports in good faith following our reporting procedures will be treated with confidentiality and respect. A Whistleblower has to make a Whistleblower Report through Eimskip's form on our website to qualify for protections under the Whistleblower Laws and this Policy. These protections include:

- Identity protection
- Protections from Detriment
- Civil, criminal, and administrative liability protection

The Whistleblower Committee is committed to taking all responsible steps to protect Whistleblower from detriment as a result of making a report under this Policy and Whistleblower Laws.

WHAT IS A REPORTABLE CONDUCT?

Conduct that constitutes a contravention of laws specified in the Whistleblower Laws or other laws that are punishable by imprisonment; or conduct that represents a danger to the public, environment, or the financial system.

Before making your Whistleblower Report you should ensure yourself that you have reasonable grounds to suspect Reportable Conduct. 'Reasonable grounds to suspect' is based on the objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard.

EXAMPLES OF REPORTABLE CONDUCT INCLUDE BUT ARE NOT LIMITED TO:

Fraud

- Accounting auditing
- Abuses of authority
- Abuse of fraud, falsification and improper modification of financial documents or theft and misuse of Eimskip's resources

Ethics

- Improper gifts and entertainment
- Trading and securities violation
- Embezzlement
- IT security or data privacy
- Competition and antitrust, conflict of interest, corruption and bribery
- Discrimination, sexual harassment, retaliation or harm relating to communities, livelihood, or property
- Damage or harm relating to the environment
- Human Rights Violations

Other breaches of laws, rules or Eimskip's values or policies

- Violations that could cause the Company financial and reputational loss

NOT A REPORTABLE WHISTLEBLOWER CONDUCT

Whistleblower Reports are not for questions regarding applications for employment, commercial inquiries or disputes, ordinary HR complaints (e.g. salary, performance, vacation) or general questions. Such matters should rather be directed to the relevant Business Unit, HR or relevant Manager as part of the Speak Up culture of the Company.

A personal work-related grievance is a report of behavior that has implications for the discloser personally and does not have significant implications for Eimskip. Examples include:

- An interpersonal conflict between you and another employee
- A decision relating to your employment or engagement, such as a transfer, promotion, or disciplinary action

DATA PROTECTION

The Company is committed to safeguarding the privacy and confidentiality of individuals who report concerns through our whistleblower form.

Personal data collected will be used only for investigation purposes, kept confidential, and protected with appropriate security measures. Data will be retained only as long as necessary and in compliance with applicable laws.

REVIEW

Legal & Compliance division is responsible for Eimskip's Whistleblower Policy and will initiate audits of it every two years or when necessary.

Approved by the Executive Board of Eimskipafélag Íslands hf. Reykjavík, Desember 22nd 2020, updated April 16, 2024.

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