



# Impact Report 2024





**PEOPLE**

**ENVIRONMENT**

**GOVERNANCE**



# Contents

## PEOPLE 10

## ENVIRONMENT 31

## GOVERNANCE 40

### GENERAL INFORMATION

- 2 About Us
- 3 About the Report
- 4 Sustainability Governance
- 7 Material Sustainability Matters

- 11 People Overview
- 12 Human Rights
- 14 Own Workforce: Demographics
- 15 Own Workforce: Occupational Health and Safety
- 20 Own Workforce: Equality, Diversity and Inclusion
- 26 Workers in our Value Chain
- 30 Local Communities

- 32 Environment Overview
- 33 Climate Risk Assessment
- 34 Climate Change
- 38 Biodiversity and Ecosystems
- 39 EU Taxonomy

- 41 Governance Overview
- 42 Business Conduct
- 44 Cyber Security

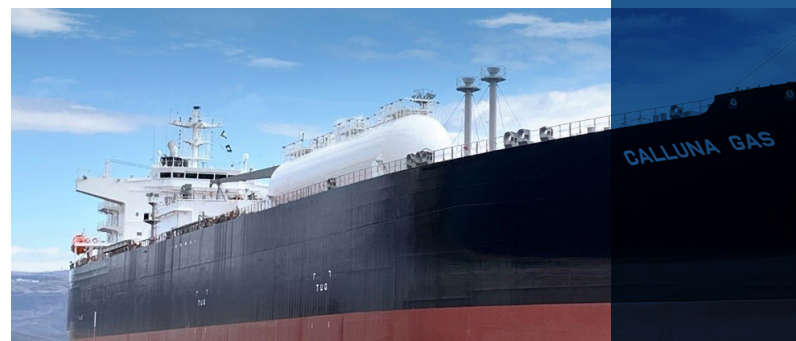


# About Us

Wilhelmsen Ship Management is a part of Wilhelmsen Maritime Services, a Wilh. Wilhelmsen Group company. We are one of the world's largest third-party ship managers with a portfolio of more than 450 vessels and 13,000 active seafarers. We provide technical and crew management services for various vessel segments: LNG/LPG; Ro-Ro and PCC/PCTC vessels; FPSO/FSO; Container; Cruise; Bulk; Seismic; and Offshore. Wilhelmsen manages vessels from eight offices worldwide alongside a crewing network of 11 manning offices. Other key services include dry-docking services, layup services and newbuilding supervision.

We provide a diverse range of ship management services, including:

- **Technical management:**  
Operational flawlessness is our hallmark, achieved through a robust safety culture. This culture is cultivated by capable professionals, established processes, and supported by technology.
- **Crewing management:**  
With an expansive network of manning offices and training centres, we assure you of our ability to seamlessly cater to your crewing requirements.
- **OPEX management:**  
Through proactive monitoring of operational expenditure (OPEX), we optimize your vessel operations for cost-effectiveness, efficiency, and strategic alignment. These factors significantly enhance your financial performance.
- **Auxiliary ship services:**  
Leveraging our expertise, we assist you in your fleet development plans. Our comprehensive services encompass ship inspections, new building supervision, and lay-up management.
- **Emission Management:**  
Involving the continuous monitoring of vessel emissions and the optimization of operations to minimize emissions





# About the Report

The content of this report is defined by the double materiality assessment conducted in 2024 and covers activities in the calendar year 2024.

As a consolidated entity in the Wilhelmsen Group, our ESG performance is reported as part of the Wilhelmsen Group's Annual Report 2024. The Wilhelmsen Group's Annual Report 2024 is prepared in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS), and is subject to an external assurance with limited assurance. The Independent Practitioner's Report on a Limited Assurance Engagement can be found in Wilhelmsen Group Annual Report 2024.

The contents of this report apply solely to Wilhelmsen Ship Management, and are developed in parallel with the Wilhelmsen Group's Annual Report 2024. The aim of the report is to inform our key stakeholders on ESG progress which is specific to Wilhelmsen Ship Management.

## Scope of this report

Entities not wholly owned, or in transition to becoming a joint venture, are not included in this report:

- Diana Wilhelmsen Management
- Hecla Emissions Management
- Wilhelmsen Ahrenkiel Ship Management
- Barber Ship Management
- BestShip

For a complete list of entities under Wilhelmsen Ship Management, please refer to the **Wilhelmsen Group Annual Report 2024**.





# Sustainability Governance

## Sustainability-related goals

Our sustainability goals stem from our vision to shape the maritime industry. They are comprised of strategic ambitions and targets, and apply to our activities, geographies, and business relationships.

The ambitions are included in our business strategy, with relevant metrics and targets monitored in our internal ESG index. Every quarter, the ESG index results are presented to our Board of Directors, and included in executive remuneration.

The goals also support the focus from customers on sustainability practices due to regulatory requirements and corporate commitments.

Health and safety and compliance have been and continue to be minimum requirements, whereas supplier management is developing further in importance. This is mainly related to both due diligence and compliance requirements, in addition to data requirements for reporting disclosures. The main challenge related to this is the extensive number of suppliers in the maritime value chain, particularly small and medium enterprises. Having suppliers agree to the Supplier Code of Conduct provides the foundation for cooperation and meeting stricter requirements over time.

For GHG emissions, the focus varies by impact on the customer's emissions. For example, base operations can have a measurable effect for offshore energy customers in their Scope 1 and Scope 3 emissions, whilst the use of products sold, or energy efficiency decisions made by competent technical managers and crew onboard vessels can have a more measurable effect for Scope 1 emissions for maritime customers.

## Data collection process

We collect ESG data through our systems, measurements, calculations and information. Estimates and judgment may be used for selected data points if the data is not readily available or as part of the methodology of calculating the required data point.

The estimated value chain data is prepared using operational data, supplier information, and industry benchmarks. Assumptions and extrapolations are used when primary data is unavailable. Data accuracy depends on the quality and availability of information. While direct operations have high accuracy, upstream and downstream estimations are less certain. If verified data is missing, estimates rely on public reports or past data. These estimates provide an overview of our sustainability performance, which will improve as more reliable information becomes available.

While all efforts are made to control the completeness and accuracy of the data, we are in the preliminary stages of implementing an ICSR policy. As a result, there may be uncertainties in the reported information due to the extensive scope of the sustainability disclosures and the lack of established guidance and practices for certain types of data.

Use of estimations and judgment are likely to have a potential impact on the following reported datapoints:

- Estimates for decarbonization levers
- Estimates for Scope 3 GHG emissions categories 1, 5 and 6
- Estimates for shore-based exposure hours used when calculating the recordable work-related accidents and lost-time injury frequency rate

We aim to improve data accuracy by refining categories and emissions factors, investing in data management systems, and applying internal controls for consistent reporting. We aim to collaborate more with suppliers for better upstream and downstream data collection and stay aligned with industry best practices and new sustainability standards. Estimation methods will be regularly updated.

## Internal Controls for Sustainability Reporting (ICSR)

In 2024, we implemented the ICSR policy, based on a new requirement from the Wilhelmsen Group. The Wilhelmsen ICSR policy is based on the COSO Internal Control over Sustainability Reporting framework.

A risk assessment according to the ICSR policy was conducted at the Wilhelmsen Group level in 2024, where risks of material misstatements were identified related to specific datapoints and functions based on consequence and probability. The implementation of the ICSR policy is in the early stages of maturity, and we plan to fully implement the ICSR policy over the next three years, and to continuously improve our processes to identify and manage risks related to sustainability disclosures.

In 2025, we plan to take the following actions to operationalize the ICSR policy:

- Conduct key controls for the 2025 ESG Index reporting with deviations to be followed up, explained, and documented.
- Implement additional application controls in the ESG reporting system.
- Standardize reporting processes and implement centralized tools.
- Participate in ICSR training organized by the Wilhelmsen Group.
- Comply with the Wilhelmsen Group's annual wheel for internal control monitoring and oversight by our Board of Directors.



# ESG at a Glance in 2024

	STRATEGIC AMBITION	STRATEGIC TARGET	2024 RESULTS
PEOPLE	Build a culture where each employee is valued for their contribution and feels motivated and safe to voice their opinion.	<ul style="list-style-type: none"> <li>Employee engagement score greater than 8 (out of 10)</li> <li>40% gender balance in top 3 management levels by 2030</li> </ul>	Females in top three management positions: 44% Engagement survey score: 7.8 out of 10 Average registered training hours per employee: 9.91
	Have an engaging and safe workplace with no harm to people.	Zero work related fatalities	Onshore LTIF: 0.00 Onshore TRCF: 2.08 Number of work-related fatalities: 0 Onboard LTIF: 0.34 Onboard TRCF: 3.28 Number of work-related fatalities: 2
	Have responsible supply chain partners.	100% suppliers agreeing to the Supplier Code of Conduct	Number of suppliers audits or assessments with ESG criteria: 23 Percentage of new suppliers screened with ESG criteria: 100% Percentage of suppliers in defined tiers agreeing to our Supplier Code of Conduct: 100%
ENVIRONMENT	Reduce GHG emissions in own operations, and support the maritime industry's decarbonization and energy infrastructure transformation.	100% electricity consumption from renewable sources by 2030	Scope 1 emissions: not material Scope 2 emissions (location based): 287.05 tCO <sub>2</sub> e Scope 2 emissions (market-based): 206.76 tCO <sub>2</sub> e Scope 3 emissions <ul style="list-style-type: none"> <li>Category 1 Purchased Goods and Services: 4,042.69 tCO<sub>2</sub>e</li> <li>Category 5 Waste: 5.76 tCO<sub>2</sub>e</li> <li>Category 6 Business Travel: 23,712.85 tCO<sub>2</sub>e</li> </ul>
GOVERNANCE	Be a responsible, trusted and compliant business partner.	100% employee completion of business standards training	Percentage completion rate for business standards training: 100% Percentage click rate on simulated phishing tests: 19% Status of implementation of Cyber Security Standard: 4-step program fully implemented



# Sustainability Governance

## Sustainability governance across the Wilhelmsen Group

Responsibility for sustainability is anchored with the Wilhelmsen Group's independent Board of Directors. For more details on sustainability governance at the Wilhelmsen Group level, please refer to the **Wilhelmsen Group Annual Report 2024**.

## Sustainability governance at Wilhelmsen Ship Management

Wilhelmsen Ship Management's Board of Directors is responsible for implementing the Owner's Statement requirements set by the Wilhelmsen Group. This means executing the Wilhelmsen Group's agreed strategy, including financial, operational and ESG targets.

The ESG team is responsible for implementing and continuously improving the following:

- ESG-related due diligence, risk assessments and materiality assessments
- Internal controls for sustainability reporting (ICSR),
- ESG index, reporting, and disclosures,
- ESG network with related companies in the Wilhelmsen Group, and
- ESG positions and campaigns.

Our ESG results are submitted to the Wilhelmsen Group on a quarterly basis for consolidation and review. The results are also reviewed by Wilhelmsen Ship Management's board and management team on a quarterly basis.

### Wilhelmsen Group

- Sets Owner's Statement requirements and expectations for the Wilhelmsen Group.
- Sets the Wilhelmsen Group's ESG direction and makes group-wide decisions.



### Wilhelmsen Ship Management

- Makes decisions and sets Wilhelmsen Ship Management's ESG direction in line with Owner's Statement.
- Implements the Wilhelmsen Group's Owner's Statement requirements.





# Material Sustainability Matters

In 2024, we carried out a double materiality assessment in order to identify, assess and prioritize our material impacts, risks and opportunities. The results of the assessment were consolidated at the Wilhelmsen Group level, and used to determine the material sustainability matters for Wilhelmsen Group.

## Working with stakeholders

The process incorporated input primarily from internal sources with deep knowledge of operations, geographies, stakeholder views, and impacts, supplemented by desktop research, including internal assessments and reports, industry reports, findings from non-governmental organizations (NGOs), and other external resources. The viewpoints and interests of affected stakeholders, including customers, the natural environment, employees,

workers in the value chain, and local communities were taken into account, though we did not directly consult affected communities, but instead used available feedback from local stakeholders, authorities and bodies, to align with community expectations and regulatory requirements. The purpose of engaging with stakeholders was to understand their expectations, and to integrate their interests and concerns into our assessments and activities.

Stakeholders	Employees	Seafarers	Customers in the maritime sector	Suppliers of products and services globally	Authorities (local, regional and global)	Financial institutions, including investors and banking section	Local community, individuals and groups	Non-governmental organizations (local, regional, global)
<b>Types of engagement</b>	Directly with management through individual interactions or forums, town halls, working environment committees, works councils, or union representatives.	Individual interactions with crewing office, engagement through pre-joining briefings, vessel visits, vessel inspections, internal and external audits, safety campaigns, and officer and cadet conferences.	Direct interaction and participation in multi-stakeholder meetings and industry associations.	Engagement through direct interaction including business reviews and audits, and industry associations.	Participation in national and international multi-stakeholder meetings.	Engagement through direct interaction such as investor meetings, reports, and investor relations	Participation in multi-stakeholder meetings and direct interaction.	Engagement through industry associations and multi-stakeholder meetings.
<b>Purpose</b>	To understand employee expectations and integrate them into our strategy and activities.	To ensure seafarers' well-being, safety, and performance.	To gather customer feedback and ensure customer needs are met.	To ensure our expectations and requirements are clear and address supplier concerns.	To comply with regulations and collaborate on industry standards.	To communicate financial performance and sustainability initiatives.	To address community concerns and contribute to local development.	To collaborate on sustainability initiatives and address societal issues.
<b>Outcome</b>	Improved employee engagement and alignment with the group's strategic goals.	Enhanced safety awareness, improved working conditions, and support for seafarers' needs.	Enhanced customer satisfaction and engagement.	Strengthened supplier relationships and sustainable supply chain practices.	Compliance with regulatory requirements and contribution to industry standards.	Increased investor confidence and support.	Positive community relations and support for local initiatives.	Effective partnerships and progress on sustainability goals.
<b>Topics addressed</b>	Working conditions, career development, health and safety, well-being, equality diversity and inclusion.	Health and safety, working conditions, career development, mental health support, discrimination, harassment, and bullying.	Service delivery, customer support, and sustainability practices.	Supplier Code of Conduct, supply chain transparency, and environmental impact.	Regulatory compliance, industry standards, and environmental regulations.	Financial performance, ESG criteria, remuneration, risk management, and governance.	Community development, environmental impact, and social responsibility.	Human rights, environmental protection, and business conduct.

# Material Sustainability Matters

Based on stakeholder input, we analyzed potential impacts, risks and opportunities to determine the most material ESRS topics for our business. We also analyzed which stakeholders in our value chain (upstream, own operations or downstream) would be affected; and used ESRS time horizons to determine when these impacts, risks and opportunities were likely to occur. Emphasis was placed on activities, business relationships, and geographies with heightened risks, such as emissions or resource-intensive operations, supply chains with potential human rights concerns, and regions vulnerable to environmental degradation or social challenges. Scenario analysis from the Network for Greening the Financial System (NGFS) Current Policies scenario was also used to explore a range of plausible future outcomes, with an understanding of the inherent uncertainties in predicting long-term sustainability impacts.

## Impact, risk and opportunity assessment and prioritization

In the assessment, impacts were classified as actual or potential, positive or negative, and direct or indirect. Negative impacts were scored on a five-point scale, considering severity (combining scale, scope, and remediability) and likelihood, with

severity prioritized, particularly for human rights-related impacts. Positive impacts, such as decarbonization opportunities or working conditions improvements, were assessed based on scale, scope, and likelihood.

Specific risks and opportunities were identified and analyzed, determining direct or indirect ownership and whether the financial effects were negative or positive. Risks and opportunities were scored based on the likelihood and magnitude of financial effects.

If an impact, risk or opportunity exceeded a predetermined threshold, the associated sustainability matter would be deemed material.

The scope of operations covered included both direct operations, as well as value chain activities covering supply chains, partnerships and third-party suppliers. The geographic scope included all countries in which we have operations.

The findings of the double materiality assessment were then presented to our Board of Directors, who are responsible for overseeing compliance with sustainability-related requirements. The findings were also consolidated at the Wilhelmsen Group level, and used to inform group-level decision-making and operational adjustments. The Wilhelmsen Group defines our ESG strategic objectives, and

we develop targeted action plans to address material IROs, supported by tools and frameworks provided by Wilhelmsen Group. Our progress is tracked through key performance indicators (KPIs) in the ESG Index.

Our impacts, risks and opportunities are monitored and reviewed at least annually to address emerging risks and adaptation of risk management strategies. Results from internal reviews and controls are used to refine this process.

## Changes to material impacts, risks and opportunities

After consolidating the double materiality assessment results at the Wilhelmsen Group level, several changes in material impacts, risks and opportunities have been identified compared to the previous double materiality assessment conducted in 2023. While climate impacts are material, climate risks and opportunities have been assessed as not material based on a thorough and strict financial materiality assessment. Biodiversity and ecosystems were also not assessed as material. These changes reflect continuous improvement of the Wilhelmsen Group's approach to the double materiality assessment.

For a complete overview of the Wilhelmsen Group's double materiality assessment methodology and outcomes, please refer to the **Wilhelmsen Group Annual Report 2024**.





# Material Sustainability Matters for Wilhelmsen Ship Management

	Material topic	ESRS Sustainability matter	Position in value chain	Positive / negative	Actual / potential	Time horizon	Interaction with business model
PEOPLE	Occupational health and safety	<b>S1 – Own workforce</b> <ul style="list-style-type: none"> <li>Health and safety – impacts on people related to health and safety incidents in own operations</li> </ul>	Own operations	Negative	Actual	Short and medium term	We prioritize health and safety through comprehensive management systems, training, risk assessments, and safety protocols to protect our workforce.
	Equality, diversity and inclusion	<b>S1 – Own workforce</b> <ul style="list-style-type: none"> <li>Equal treatment and opportunities for all – impacts on people related to discrimination, harassment, or bullying in own operations</li> </ul>	Own operations	Negative	Potential	Short and medium term	We promote a diverse and inclusive workplace, with policies and training to prevent discrimination and support affected employees.
	Supply-chain management	<b>S2 – Value chain workers</b> <ul style="list-style-type: none"> <li>Equal treatment and opportunities for all – impacts related to discrimination, harassment or bullying</li> <li>Forced labour or child labour</li> <li>Working conditions and health and safety</li> </ul>	Value chain	Negative	Potential	Short and medium term	We require suppliers to ensure fair treatment of workers and adherence to human rights standards. We set requirements for suppliers to improve working conditions and ensure fair wages and safety standards and prevent forced labour or child labour. We enforce our Supplier Code of Conduct through regular screening, assessment, and audits.
ENVIRONMENT	Climate change and decarbonization	<b>E1 – Climate change</b> <ul style="list-style-type: none"> <li>Climate change mitigation – impacts on climate change caused by the burning of fossil fuels</li> </ul>	Own operations and value chain	Negative	Actual	Short, medium and long term	We are actively working to mitigate climate change through energy efficiency and renewable energy use. The Wilhelmsen Group has plans to adopt a formal climate transition plan within the next three years to achieve long-term reductions across the value chain and enable avoided emissions for customers.
GOVERNANCE	Compliance	<b>G1 – Business conduct</b> <ul style="list-style-type: none"> <li>Compliant and ethical business conduct – impacts on people subject to corruption and bribery demands from undesirable actors</li> <li>Risks from incidents of fraud, corruption or bribery</li> </ul>	Own operations and value chain	Both negative and positive impact. Financial risk	Potential	Short, medium and long term	We are committed to ethical operations and eliminating corruption in the value chain. We enforce clear policies, support management, maintain a whistleblowing channel at the Wilhelmsen Group level, and conduct training and reporting.  Anti-corruption measures include regular audits, employee training, and support for affected employees. The strategy also involves strict anti-bribery measures and collaboration with industry bodies.
	Information and cyber security	<b>Cyber security and personal data protection</b> <ul style="list-style-type: none"> <li>Impacts on people from cyber security and personal data breaches</li> </ul>	Own operations	Negative	Potential	Short, medium and long term	We invest in robust cyber security measures and data protection protocols including employee training to safeguard personal information and ensure the integrity of our systems.



## PEOPLE

- People Overview
- Human Rights
- Own Workforce: Demographics
- Own Workforce: Occupational Health and Safety
- Own Workforce: Equality, Diversity and Inclusion
- Workers in our Value Chain
- Local Communities

Material topic	ESRS Sustainability matter	Interaction with business model
Occupational health and safety	<b>S1 – Own workforce</b> <ul style="list-style-type: none"> <li>• Health and safety – impacts on people related to health and safety incidents in own operations</li> </ul>	We prioritize health and safety through comprehensive management systems, training, risk assessments, and safety protocols to protect our workforce.
Equality, diversity and inclusion	<b>S1 – Own workforce</b> <ul style="list-style-type: none"> <li>• Equal treatment and opportunities for all – impacts on people related to discrimination, harassment, or bullying in own operations</li> </ul>	We promote a diverse and inclusive workplace, with policies and training to prevent discrimination and support affected employees.
Supply-chain management	<b>S2 – Value chain workers</b> <ul style="list-style-type: none"> <li>• Equal treatment and opportunities for all – impacts related to discrimination, harassment or bullying</li> <li>• Forced labour or child labour</li> <li>• Working conditions and health and safety</li> </ul>	We require suppliers to ensure fair treatment of workers and adherence to human rights standards. We set requirements for suppliers to improve working conditions and ensure fair wages and safety standards and prevent forced labour or child labour. We enforce our Supplier Code of Conduct through regular screening, assessment, and audits.



# People Overview

Our strategic ambition is to have an engaging and safe workplace with no harm to people and a culture where each employee is valued for their contribution and feels motivated and safe to voice their opinion.

We are committed to safeguarding human rights across all our operations, irrespective of the countries in which we operate.

Our corporate values – customer centred, empowerment, learning and innovation, stewardship, and teaming and collaboration – govern behaviour and are acted upon consistently to deliver the right results the right way.

Material topic	2024 target	2024 performance	2025 target
<b>HEALTH AND SAFETY</b>	Lost Time Injury Frequency (LTIF) • Onshore: not to exceed 2.00* • Onboard: not to exceed 0.40*	• Onshore: 0.00 • Onboard: 0.34	• Onshore: not to exceed 2.00 • Onboard: not to exceed 0.35
	Total Recordable Case Frequency (TRCF) Onshore: not to exceed 7.00* Onboard: not to exceed 2.80*	• Onshore: 2.08 • Onboard: 3.28	• Onshore: not to exceed 4.00 • Onboard: not to exceed 2.80
<b>EQUALITY, DIVERSITY AND INCLUSION</b>	Percentage of women in top three management levels and internal boards • 40%	• 44%	• 30%
	Employee voluntary turnover rate • less than 16%	• 14%	• maintain at less than 16%
	Engagement survey score • 7.7 out of 10	• 7.8 out of 10	• 7.7 out of 10
<b>SUPPLY CHAIN MANAGEMENT</b>	Supplier assessments and audits with ESG criteria • 12 assessments and audits	• 23 assessments and audits	• 24 assessments and audits
	Percentage of new suppliers in defined tiers screened with ESG criteria • 100% of new suppliers	• 100% of new suppliers	• 100% of new suppliers
	Percentage of suppliers in defined tiers agreeing to our Supplier Code of Conduct • 100% of suppliers in defined tiers	• 100% of suppliers in defined tiers	• 100% of suppliers in defined tiers

\* In 2024, the Lost Time Injury Frequency (LTIF) rate calculation and Total Recordable Case Frequency (TRCF) rate calculation for both onshore and onboard were based on a multiplier of 1,000,000 manhours. The same will apply to the LTIF and TRCF calculation in 2025.

# Human Rights

## Human Rights Commitment

We are committed to respecting human and labour rights across all our operations. Our policies prohibit modern slavery, human trafficking, forced labour, exploitative practices, slavery and child labour, in accordance with the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.



- 1 Human rights commitment and governance structure**
  - Human rights requirements set by Owner's Statement, in line with commitments to human rights due diligence and transparency.
  - Establish policies and practices to ensure all stakeholders are aware of and comply with human rights requirements.
- 2 Human rights impact and risk assessments**
  - Periodically assess the risk of adverse impacts on human rights in operations, supply chains, and business relationships.
- 3 Measures**
  - Implement measures to cease, prevent, or mitigate adverse impacts.
- 4 Result monitoring**
  - Periodically monitor implementation and results of mitigation measures and any grievance handling.
  - Report to Board of Directors.
- 5 Stakeholder engagement and disclosure**
  - Disclose our activities and how impacts are addressed at least annually.
  - Respond to requests for information from stakeholders in compliance with Norwegian Transparency Act regulation.
- 6 Grievance handling and remediation**
  - Address grievances and provide for or cooperate in securing remediation when appropriate.



# Our Human Rights Approach

## Human Rights Due Diligence (HRDD) assessment

We conduct a Human Rights Due Diligence (HRDD) assessment in coordination with the Wilhelmsen Group. The HRDD process is guided by the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD Guidelines). The HRDD is a live document; it is reviewed at least once a year, with updates occurring if there are new developments which may have an impact on human rights.

The purpose of the HRDD is to identify any actual and potential adverse impacts where we or our suppliers may be directly or indirectly involved. The size of each impact is assessed by rating them based on their severity and likelihood, allowing us to determine an appropriate response. The findings of the HRDD are integrated into our policies and actions – we set targets, monitor our progress, and communicate our responses to stakeholders where relevant.

Stakeholders with human rights concerns may raise their concerns via the Wilhelmsen Group whistleblowing channel, or request for information via email.

Salient human rights relevant to our operations include providing safe, healthy, and decent working conditions free from bullying and harassment, ensuring fair treatment without discrimination, and supporting employees' career development. Discrimination specifically refers to race, colour, religion, gender, age, nationality, sexual orientation, disability, or any status protected by law. Compliance with these commitments is required from all employees and suppliers, with a preference for third parties who share these standards.

Based on our HRDD assessment in 2024, we have identified the following as the most salient human rights topics:



### Employees and seafarers

- Ensuring that seafarers receive sufficient leisure time, and are able to sign-off on schedule
- Ensuring that seafarers are not subject to recruitment fees, placement fees, or other illegal kickbacks during the recruitment fees
- Protecting the physical and mental-well being of our employees and seafarers
- Protecting employees and seafarers from discrimination and harassment in the workplace
- Protecting the privacy and data of our employees, seafarers, customers and other stakeholders

### Value chain and affected communities

- Ensuring that our suppliers are sub-suppliers comply with international human rights standards
- Upholding high health and safety standards at the ports and shipyards where our managed vessels may operate

# Own Workforce: Demographics

In 2024, our workforce comprised of 802 shore employees and 12,231 seafarers.

29 nationalities were represented in our global onshore operations, with Malaysia, India and the Philippines representing the top three populations in size.

The annual voluntary turnover rate for our onshore employees was 14%. Our goal for 2025 is to maintain a voluntary turnover rate of less than 16%.

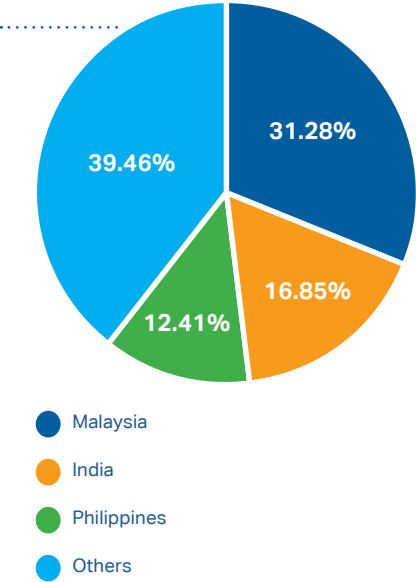
58 nationalities were represented in our global seafarer pool, with Philippines and India representing the two largest seafarer populations. Ukraine, Brazil and Korea tied for third place, with approximately 400 seafarers each.

In 2025, we plan to expand our operations into Kenya by setting up our first manning centre in Nairobi. The ground-work to establish our Kenya office was started in 2024 and will continue into 2025.

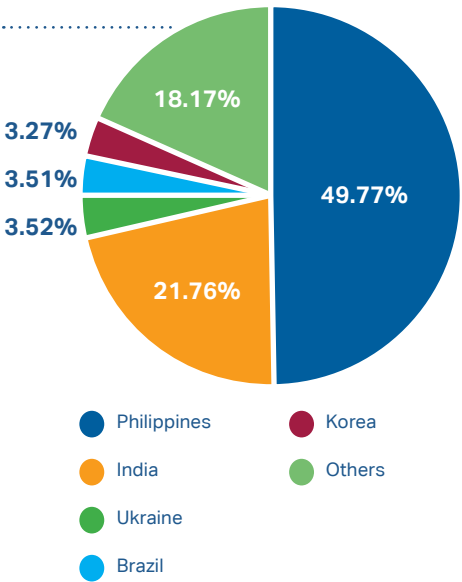
Material topic	2024	2023	2022
Number of employees onshore	802	646	588
Nationalities onshore	29	26	28
Number of seafarers	12,231	11,340	10,868
Nationalities onboard	58	60	–
Turnover rate onshore*	14%	17%	21%

\* In 2022 and 2023, the turnover rate was calculated based on both voluntary and involuntary terminations. Beginning in 2024, we have revised the calculation method to include only voluntary terminations, in line with European Sustainability Reporting Standards (ESRS) definitions.

Onshore employees  
by nationality



Seafarers  
by nationality





# Own Workforce: Occupational Health and Safety

The physical and mental well-being of our workforce is a top priority for our business. Our value proposition, which includes providing 24/7 services, can increase the workload of our workforce and create pressure on labour rights.

Onboard vessels, seafarers face higher risks of physical and psychosocial harm due to operational hazards, exposure to weather conditions, or working conditions. These conditions can lead to negative outcomes for affected individuals, including physical and/or emotional trauma, loss of earning power for families, and reduced well-being.

## Policies and approach

Building a strong safety culture in the workplace is fundamental to mitigating the risks to our workforce and delivering a safe and engaging workplace with zero harm to people.

Our health and safety management systems comply with internationally recognized standards. Onshore, our operations were certified according to ISO 9001 health and safety standards in 2024, and we intend to obtain ISO 45001 certification in 2025. Onboard, we are certified to operate ships as per the International Safety Management (ISM) Code, and all our operations comply with the Maritime Labour Convention (MLC) requirements. Our Safety and Quality Policy establishes procedures and guidelines to ensure safety and quality excellence.

All our seafarers are covered by either a collective bargaining agreement (CBA) or a special agreement approved by the International Transport Workers' Federation (ITF). The ITF, along with its country affiliates, represents the interests of seafarers, providing us with insights into the perspectives of its workforce.

Compliance is verified through management reviews, and internal and external audits conducted by trained and qualified auditors covering both ship and shore processes. Regular risk assessments, including safety, operational, and cyber security risks, are conducted to further safeguard the workforce.

If there is an undesired incident, our vessel managers and HSEQ managers are responsible for following up with vessels to ensure that preventive actions have been implemented.

## Factors influencing safety culture onboard

Taking a data driven approach towards safety, we collect and analyze data from our operations onboard in order to improve our safety performance. Based on seven years of data, we have found that safety performance is influenced by the following factors:

- **Safety mindset:**  
Individual seafarers have differing risk appetites and attitudes towards safety culture.
- **Service tenure with company:**  
Seafarers with a longer tenure in Wilhelmsen experience fewer incidents onboard compared to newly recruited seafarers who are equally experienced.
- **Crew profile mix:**  
Our crew coordination teams aim to deploy the ideal crew profile mix that complements the vessel's type and age.



# Own Workforce: Occupational Health and Safety

## Key actions

### *Encouraging responsible behaviour onboard*

We strive to implement the principles of Just Culture within our workplace. Just Culture provides assurance to our employees and seafarers that we have a workplace that is built on trust and responsible behaviour – we seek to ensure that all of our workforce is encouraged to speak up about challenges that could affect safety and performance, and to stop work if working conditions are unsafe. When mistakes do occur, we will conduct a fair investigation, attempt to mitigate impacts, and put in place measures to ensure that the same mistakes do not occur again.

In 2024, as part of our efforts to strengthen safety culture in the workplace, we launched WLearn, a training platform for seafarers to develop their skills and knowledge, thereby contributing to safer and more efficient maritime operations.

A professional safety consultancy was engaged to assess our current culture using scientific and psychometric methodologies. The insights from this assessment were used to identify key areas for improvement. Based on the findings, we introduced a 24-month training program focused on driving cultural change through leadership. The program emphasizes mistake management and the development of leadership behaviours that foster a proactive and accountable safety environment.

Our CEO and President, **Haakon Lenz** spending quality time with our seafarers. Management visits are a crucial part of demonstrating felt leadership and building a strong safety culture.

We carry out the following activities as part of the process of building a strong safety culture in our workplace:

- Regular safety trainings.
- Safety shares, whereby employees or seafarers share a lesson learned from a health and safety incident.
- Safety stand down hours are carried out onboard whenever an undesired incident is reported.
- Our vessel managers conduct vessel manager inspections onboard twice or more a year for each vessel.
- Our internal auditors conduct audits at least once a year, focusing on health, safety and working conditions as per Maritime Labour Convention (MLC) requirements. Additional audits may be carried out if necessary.
- Our management team conducts vessel visits to demonstrate felt leadership.
- We carry out vessel profiling based on their operational and safety performance. Vessels which require improvement will undergo an performance improvement process.





# Own Workforce: Occupational Health and Safety

## *Taking collective action to advance seafarer rights*

Each year, all of our Document of Compliance (DOC) holders complete the RightShip Code of Conduct self-assessment. The purpose of the self-assessment is to continue to lift the industry standards for the treatment of seafarers beyond the minimum requirements of the Maritime Labour Convention (MLC), and place emphasis on rights and issues which are important to seafarers but not currently addressed by the MLC.

In 2024, we participated in the SEAFARER Roundtable co-hosted in Singapore by the Institute of Human Rights and Business (IHRB), Sustainable Shipping Initiative (SSI), RightShip, Mission to Seafarers and Rafto Foundation for Human Rights. We discussed some of the most pressing challenges to seafarer welfare, including mental health, recruitment fees, seafarer abandonment, and quality of life onboard.

Our efforts to combat recruitment fees are ongoing. We uphold the principle that no seafarer should be required to pay for a job, and we make this principle clear to potential recruits and other industry stakeholders. All our manning agents are guided by our Code of Conduct and subject to audits and risk assessments. External manning agents are further required to complete a thorough self-assessment before they are accepted as manning agents. The whistleblowing channel is made available for seafarers to report requests for recruitment fees.

In 2025, we will participate in a newly established Action Group on Seafarer Recruitment Fees organized by IHRB and TURTLE, a maritime recruitment platform which abides by the Employer Pays Principle. The aim of the group is to raise awareness on recruitment fees among charterers and ship owners, with the collective aim of eradicating this practice within the maritime industry.

The issue of recruitment fees is difficult to address as it is deeply entrenched within the maritime industry. We acknowledge that there is always room for improvement, and we are committed to tracking our progress throughout 2025.

## *Promoting healthy lifestyles*

In 2024, we took steps to promote active and healthy lifestyles among both internal and external stakeholders. We hosted golf tournaments for our customers, encouraging customers and employees to take work outdoors. Health campaigns and sports activities after work such as badminton and bowling has been a focal point for employees. These activities align with the new European Sustainability Reporting Standards' requirement for us to track and report the number of days lost to work-related ill-health.



RIGHTSHIP



CREW WELFARE

Self-Assessed, Wilhelmsen Ship Management Sdn Bhd

Seafarers enjoying a game of badminton onboard. Ensuring that seafarers have adequate access to leisure, such as well-equipped sports facilities, is a critical part of building a strong health and safety system onboard.



# Own Workforce: Occupational Health and Safety

### Key targets

Our aim is to have a safe and engaging workplace with zero work-related fatalities or other work-related harm to people. We track three metrics in pursuit of this goal:

- The number of work-related fatalities for onshore employees and for seafarers under technical management contracts
- The Lost Time Injury Frequency (LTIF) rate, which tracks the frequency of work-related injuries that result in time away from work
- The Total Recordable Case Frequency (TRCF) rate, which tracks the frequency of work-related injuries, including those that may require medical treatment

These metrics serve as a reflection of the overall safety culture and incident prevention measures. We monitor these metrics and present them to our senior executives and Board of Directors each quarter. This ensures that incidents are promptly addressed and deviations from the target are identified.

The definitions and methodologies of the LTIF rate and TRCF rate are reviewed annually to ensure consistency and comparability over time. The target is based on our historical performance and is benchmarked against comparable results in the maritime sector.

### Onshore

In 2024, the LTIF rate onshore was 0.00, which was within target of 2.00 incidents per million manhours; and the TRCF rate was 2.08, which was within target of 7.00 cases per million manhours.

Health and Safety metrics		2024	2023	2022
	<i>Onshore</i>			
	Exposure hours*	1,439,677	1,275,353	1,162,903
	Lost Time Injury Frequency (LTIF)	0.00	0.16	0.17
	Total Recordable Case Frequency (TRCF)**	2.08	0.31	0.17



\* For onshore employees, exposure hours are calculated based on an assumption of 8 hours a day, 5 days a week.

For seafarers, exposure hours are calculated based on the nature of exposure being 24 hours a day, 7 days a week while onboard. At the end of each week, each vessel will submit a report of its headcount onboard. The total headcount figure is then used to calculate exposure hours.

\*\* The increased TRCF onshore is due to changes made to the calculation methodology. In 2022 and 2023, the LTIF and TRCF calculation for employees onshore were based on a multiplier of 200,000 manhours. In 2024, the multiplier was changed to 1,000,000 manhours to comply with the European Sustainability Reporting Standards (ESRS) requirements.

# Own Workforce: Occupational Health and Safety

## Onboard

In 2024, the LTIF rate onboard was within the target of 0.40 incidents per million manhours; in 2025, the LTIF target will be reduced to 0.35 incidents per million manhours, reflecting our commitment to continuously improving our safety standards.

Unfortunately, the TRCF rate onboard was not within target. This requires continued attention and actions, including following up the results of the safety survey, ongoing campaigns and trainings to strengthen safety awareness. This includes conducting safety drills, holding safety talks, providing training, arranging visits from shore management personnel, and running continuous awareness campaigns to ensure everyone can apply the safety protocols.

At the same time, a higher TRCF rate can indicate improved incident reporting, ensuring that more incidents are being recorded and addressed, which is essential for enhancing overall safety culture and safety measures. The target will remain the same for 2025 at 2.80 incidents per million manhours.

Health and Safety metrics	2024	2023	2022
Onboard			
Exposure hours*	41,166,720	37,461,192	36,070,904
Lost Time Injury Frequency (LTIF)	0.34	0.35	0.25
Total Recordable Case Frequency (TRCF)	3.28	2.27	1.86

\* For seafarers, exposure hours are calculated based on the nature of exposure being 24 hours a day, 7 days a week while onboard. At the end of each week, each vessel will submit a report of its headcount onboard. The total headcount figure is then used to calculate exposure hours.



Regrettably in the reporting period, there were two work-related fatalities among seafarers. One case involved a crew member who was trapped under a forklift during cargo operations, and the second case involved a crew member who fell from height during maintenance work in the engine room. Corrective and preventive actions included a safety stand down to pause all work in the affected area and reinforce safety awareness, risk assessments specific to the key controls identified, and learnings shared through safety briefings, crew conferences and during ship visits. These incidents highlight the critical need for continuous improvement in safety measures and protocols, emphasizing the importance of ongoing efforts to enhance safety practices which will be the focus in 2025.

# Own Workforce: Equality, Diversity and Inclusion

Protecting our workforce from discrimination and harassment has been identified as one of the key priorities of our business. Our employees and seafarers may be exposed to discrimination, harassment, or bullying in their interactions with colleagues, value chain workers, or business partners. The risk is higher for employees and seafarers from minority communities, and for certain roles, such as junior positions. Factors such as the operational environment, location, and size of the operation can influence the risk. Incidents of discrimination and harassment can cause physical and/or emotional trauma for affected individuals, loss of earning power, and reduced well-being for co-workers, affecting the overall work environment.

## Policies and approach

### *Combatting discrimination and harassment in the workplace*

We enforce a zero-tolerance policy for bullying, harassment, and discrimination on any grounds – discrimination based on race, colour, religion, gender, age, nationality, sexual orientation, disability, or any status protected by law is specifically prohibited by the Wilhelmsen Human Rights Commitment, and the Code of Conduct which applies to all employees and those working on our behalf. We also comply with the Maritime Labour Convention, which prohibits discrimination against those working onboard our vessels.

The Wilhelmsen Group complies with the requirements of the Norwegian Equality and Anti-discrimination Act is made each year, and a statement of compliance can be found in the **Wilhelmsen Group Annual Report 2024**.

## *Workplace engagement*

We are dedicated to creating an engaging and safe work environment which offers professional management and growth opportunities for all employees. Our aim is to foster a culture which enables all employees to contribute and create value, grow and excel in the workplace.

### *Competence building*

We work consistently to stay relevant and ensure employees have the skills and competencies necessary to create business value today and in the future. A learning organization with motivated employees contributes to the efficiency of operations and has a positive effect on culture.

Our policies are set based on the feedback received from employees, working environment committees and human resources personnel; and our management team is responsible for implementing these policies.





# Own Workforce: Equality, Diversity and Inclusion

## Key actions

### *Combatting discrimination and harassment in the workplace*

In 2024, we focused on diversity management and unconscious bias training for HR, leaders, and employees; and implemented awareness campaigns to improve the understanding of what an equal and inclusive workplace and business partner should be experienced as.

### *Increasing the number of women in our seafarer pool*

Increasing the number of women in our seafarer pool is a significant priority for our business. Doing so allows us to advance gender equality in a traditionally male-dominated field; it also helps us to remain competitive in the face of increasing seafarer shortages which are likely to intensify over the next five years.

Our approach to advancing gender equality onboard starts with our cadet program, where we strive to increase the intake of female cadets. In 2024, the first sponsorships from Tom Wilhelmssen Foundation were awarded to four promising female cadets at Maharashtra Academy of Naval Engineering and Training (MANET) in Pune. Upon graduation, these four cadets will join our pool as qualified junior officers. Once onboard, we ensure that all female cadets are assigned to vessels in pairs, thus providing a system of mutual support.

### *Engaging with employees onshore*

Engagement activities are ongoing throughout the year, with specific events conducted as part of our annual process. The annual performance review between employees and their direct managers is used to recognize achievements, discuss development areas, and agree on targets for

the upcoming period. Working environment, values-based behaviour and relations with the manager are a part of the discussion. The review is documented and followed up mid-year.

Outside annual performance reviews, employees have the opportunity to engage with senior management via structured town halls which are held on a quarterly basis.

Additionally, we conduct employee engagement surveys at least once a year to gather feedback on workplace matters. The survey uses a standardized questionnaire based on industry best practices for employee engagement, and encompasses various aspects of the work environment, including workload, environment, management support, strategy, meaningful work, accomplishment, growth, and reward. All employees in our global operations are included in the survey.



We build partnerships with maritime colleges and provide sponsorships for promising new cadets, ensuring a robust pipeline of skilled seafarers going forward. In 2024, four female cadets received sponsorships from the Tom Wilhelmssen Foundation.



# Own Workforce: Equality, Diversity and Inclusion

## *Engaging with seafarers*

Because seafarers operate on fixed-term contracts, the engagement process differs substantially from employees onshore.

Before seafarers board our vessels, they undergo a pre-joining briefing where they receive important information about our systems, their rights and their duties while onboard.

Once onboard, we conduct internal audits and vessel inspections, and vessel operational excellence visits as required. External parties, such as external auditors and regulatory body inspectors, may engage directly with seafarers, focusing on health, safety, and working conditions as per Maritime Labour Convention (MLC) requirements. If undesired events are reported onboard, safety campaigns are carried out.

At the end of a seafarer's contract, we conduct a debriefing session where seafarers may provide feedback on the working conditions onboard.

Outside contract periods we engage with seafarers via officer and cadet conferences held in key locations where our largest seafaring populations come from. Our officer conferences focused on health and safety, technological advancements, regulatory compliance, and environmental initiatives. Our cadet conferences catered specifically to the needs of young seafarers who are just starting out on their careers. Cadets learned about the unique challenges of life at sea, and the importance of mental and emotional balance.

## *Addressing workplace grievances*

We have adopted both formal and informal channels for employees onshore to raise concerns or needs directly. Structured channels, such as working environment committees and quarterly town halls, aim to foster open communication between employees and management. Informal mechanisms allow employees to discuss issues with supervisors or human resources representatives in settings such as one-on-one meetings or casual conversations. We also rely on employee feedback mechanisms, such as engagement surveys, to gather insights and address workplace concerns.

Seafarers have several different avenues to raise grievances: if a seafarer reports grievances while onboard, the Designated Person Ashore (DPA) is the initial point of contact, and is responsible for receiving and working with the technical management centre in resolving the seafarer's grievances. If a seafarer has already signed off a vessel, the seafarer can approach the manning centre to report grievances. If grievances remain unresolved, we engage in discussions and arbitration. Should the issue persist, a complaint can be lodged with the relevant authorities. Seafarers are informed of all available grievance mechanisms during the pre-joining briefing and post-contract debriefing.

Mental health support is offered through our health and safety management systems (SMS), health campaigns, and consultations with qualified health professionals during officer conferences. Contact details for external health experts, such as ISWAN, are also provided, and seafarers have access to Mission to Seafarers chaplains when possible.

The whistleblowing channel available on the Wilhelmsen Group's website allows both shore employees and seafarers to raise concerns anonymously.

We proactively assess the material negative impacts that we may have on our workforce through our Human Rights Due Diligence assessment. Based on the results of the assessment, we implement measures, including revising or creating new policies and conducting audits and campaigns to cease, prevent, or mitigate adverse impacts. The results of these mitigation activities are reported to our Board of Directors at least annually, while grievance handling and information requests are reported quarterly.

The effectiveness of our grievance channels is ensured through monitoring the type and volume of cases received, reports from the human resource function, and results from engagement surveys and Code of Conduct training. Management reviews the results of these processes to assess the understanding, awareness and trust in the grievance channels and identify improvement areas.

If we directly cause or contribute to harmful human rights impacts, we promote access to fair remediation. The effectiveness of remediation efforts would be monitored and regularly reviewed to ensure that the intended outcomes are achieved and any new issues are promptly addressed.



# Own Workforce: Equality, Diversity and Inclusion

## *Building the competence of our workforce*

We work consistently to stay relevant and ensure employees have the skills and competencies necessary to create business value today and in the future. A learning organization with motivated employees contributes to the efficiency of operations and has a positive effect on culture.

All shore employees have access to training opportunities, and personal development plans are integrated in performance appraisal and review processes. Our target is for shore employees to receive at least eight hours of training per year, and this target is monitored and reviewed through regular tracking of internal training records. In 2024, the average training hours per employee was 9.91 hours, which points to consistent and positive dedication to professional development by employees. The target will remain the same for 2025.

Onboard, our seafarers receive extensive, ongoing training throughout the year to comply with rules, regulations and best practices. Our Competence Development and Training team's goal is to establish a robust training framework which ensures that our seafarers possess the knowledge, skills, abilities and behavioural attributes to undertake assigned tasks onboard.

Our first virtual reality training hub was launched in 2023 at the International Maritime Training Centre (IMTC), our in-house training centre in Mumbai. In 2024, we have made continuous improvements to the IMTC training hub, such as adding a new virtual-reality welding simulator, and commissioning new digital ship models, ensuring that our seafarers are familiarized with all types of vessels.

In 2025, we plan to launch our in-house training academy in Manila that will offer classroom and workshop training. The academy will offer the same curriculum as IMTC and will cater to the needs of our Filipino seafarers.

In 2024, we launched WLearn, our learning management system which is intended to improve how seafarers access and complete their training. WLearn provides supplemental training and refresher courses to seafarers on important topics such as cyber security and health and safety. It also provides seafarers with the opportunity to share insights, suggest new topics and offer their feedback directly into the system.

In 2025, we plan to expand the course offerings on WLearn. We intend to make WLearn mandatory for all seafarers, with the recorded training hours counting towards official training records.





# Own Workforce: Equality, Diversity and Inclusion

### Key targets

#### Targets to combat discrimination and harassment in the workplace

Our Code of Conduct prohibits bullying, harassment, and discrimination on any grounds and applies to our entire workforce. We aim to inculcate the values of our Code of Conduct through annual training. In 2024, we achieved a 100% completion rate for our annual Code of Conduct training.

#### Targeted number of women in the workforce

We strive to have access to the broadest talent pool possible, while enabling more diverse competences and decision-making.

In 2024, our target was to maintain 40% gender balance in our top three management levels in 2024. The top three management levels refer to the CEO (level 1), Central Management Team (CMT) (level 2), and direct reports to the CMT (level 3). Our target is in line with the Wilhelmsen Group’s strategic target is to achieve a 40% gender balance in the top three management levels and internal boards by 2030, and is based on an analysis of current gender representation, benchmarked against industry standards and international policy goals on gender equality.

	2024	2023	2022
<i>Women in the workforce</i>			
Females – % of employees	46%	49%	49%
Females – % in top three management levels	44%	49%	30%
Number of seafarers	12,231	11,340	10,868
Females – % of seafarers in our pool	2%	1.5%	1%
Females – number of active cadets on rotation onboard	30	-	-

In 2024, women represented 46% of our employees onshore. At the top three management levels, women represented 44% of positions, which was on target.

Onboard, we aim to diversify our seafarer pool and mitigate the ongoing officer shortage by increasing the number of female seafarers in our pool.

As a result of our efforts, in 2024, we had 60 female cadets in our pool and 30 active cadets onboard. In 2025, our target is to have 40 active female cadets on rotation onboard.



# Own Workforce: Equality, Diversity and Inclusion

### Engagement targets

For employees onshore, we conduct an employee engagement survey to get feedback on our work environment. In 2024, the participation rate in the survey was 95%, and the result was 7.8 out of 10. This demonstrates consistent and positive high engagement among our employees.

Continuous improvement is made based on the results of the survey. Senior management and individual managers in all locations hold follow-up discussions with their teams to implement relevant actions, ensuring employee feedback is addressed and used to improve the working environment and people strategies. Our senior management and Board of Directors are kept updated on the results, incorporating employee feedback into decision-making processes.

For seafarers, we carry out an annual engagement survey, which will allow us to measure seafarer satisfaction with their working environments onboard.

### Learning and development targets

Our target is for shore employees to receive at least eight hours of training per year, and this target is monitored and reviewed through regular tracking of internal training records. In 2024, the average training hours per employee was 9.91 hours, which points to consistent and positive dedication to professional development by employees. The target will remain the same for 2025.

	2024	2023	2022
<i>Learning and development</i>			
Average training hours per shore employee	9.91	11.69	5
Female shore employees – average training hours	10.39	-	-
Male shore employees – average training hours	9.45	-	-
<i>Employee engagement</i>			
Engagement survey score*	7.8	7.7	75%
Engagement survey completion rate	95%	96%	96%

\* In 2023, we implemented a new system where scoring is out of 10.



## Workers in our Value Chain

With more than 6,000 suppliers, there is potential for negative human rights impacts in our value chain. These risks are higher for specific groups in certain locations, industries, job types, and among minorities. Each of these issues can lead to physical and emotional trauma, loss of earning power, and reduced well-being for the affected value chain workers.

We adopt a zero-tolerance position for all forms of corruption, modern slavery, and child labour. Our strategic ambition is to work with responsible supply chain partners.

We have identified the following risk groups in our value chain:

Specific groups	Involvement in our value chain	Potential impacts
Seafarers on crew-management contracts	Seafarers on crew management contracts are classified as value chain workers as we do not have control over the safety management systems of vessels outside our technical management.	Crew-management seafarers may be exposed to hazardous conditions; discrimination, harassment, bullying; corruption and bribery demand; labour rights violations; and data privacy breaches.
Upstream value chain workers	Upstream value chain workers may be engaged in extraction, refining, manufacturing or processing of raw materials and production of components.	<p>Our strategy of providing cost-effective and timely services can create pressure on labour rights within the value chain, potentially leading to cost-cutting measures affecting wages and working conditions. Workers may be exposed to poor or unsafe working conditions, long working hours, low wages, or hazardous materials.</p> <p>Shipyard activities specifically, including newbuilding and dry-docking services, are at higher risk of forced labour due to shipbuilding activities involving complex supply chains and subcontracting.</p>
Downstream value chain workers	Ports and shipyards employ workers who may be engaged in providing services to vessels, or in vessel construction, maintenance and repair.	<p>Generally, there is a higher risk of forced or compulsory labour in the production facilities of countries where:</p> <ul style="list-style-type: none"> <li>• Labour laws are weakly enforced</li> <li>• There is high economic disparity</li> <li>• Migrant labour is highly prevalent.</li> </ul>



# Workers in our Value Chain

## Policies and approach

### *Workers in our value chain*

To mitigate potential negative impacts, we consistently monitor and evaluate the impact of our strategy on value chain workers. Our Human Rights Commitment and Supplier Code of Conduct are the policies implemented to ensure that all our suppliers commit to responsible business practices, treat their workers fairly, and adhere to human rights standards.

Our Human Rights Commitment sets expectations for safeguarding human rights across the group and in the value chain. We identify actual and potential adverse impacts through our ongoing Human Rights Due Diligence process, integrate the findings and monitor our progress on established targets.

Our Supplier Code of Conduct applies to all suppliers, and includes provisions for suppliers to apply the same principles within their own supply chain. Suppliers are required to provide safe and healthy working environments free from harassment, bullying or discrimination. The Supplier Code of Conduct also prohibits human trafficking, forced labour and child labour, ensuring adherence to international labour standards. Compliance with our Supplier Code of Conduct is enforced through initial screenings, periodic audits, and inspections of suppliers. Non-compliance results in mandatory corrective actions, and failure to comply may lead to termination of business activities or civil action.

### *Seafarers on crew-management contracts*

All our contracts for seafarers on crewing-management vessels comply with the requirements of the Maritime Labour Convention (MLC).



# Workers in our Value Chain

## Key actions

### *Mitigating risks in our upstream and downstream value chain*

Upstream of our value chain, our procurement solutions consultancy, RightProc, works to ensure potential or new suppliers or those with contract renewal meet stringent ESG criteria before engagement. RightProc adopts a risk-based approach, using criteria such as spend, criticality and ESG-related risks, to assess both new and existing suppliers.

RightProc works to have suppliers commit to and comply with the ESG standards set out in the Supplier Code of Conduct. Where a supplier has its own Code of Conduct which is equivalent to or better than Wilhelmsen's, then an agreement can be made on that basis.

Downstream of our value chain, we acknowledge that there is a high risk of forced labour in shipyard activities due to the complex supply chains and subcontracting involved. We provide supervision services aimed at supporting shipowners in mitigating the risks of forced labour by upholding human rights standards. All our contracted shipyards are required to commit to our Supplier Code of Conduct, and are subject to our supplier vetting processes. Continuous due diligence and monitoring are essential to ensure compliance with human rights standards and mitigate risks of child labour, forced labour, or compulsory labour in these value chain activities.

Supply chain management	2024	2023	2022
Number of new suppliers screened with ESG criteria	852	834	-
Percentage of new suppliers screened with ESG criteria	100%	100%	-
Number of risk-based supplier assessments*	1,889	391	58
Percentage of suppliers in defined scope agreeing to our Supplier Code of Conduct	100%	-	-
Number of supplier audits or assessments with ESG criteria*	23	-	-

\* Supplier audits or assessments with ESG criteria are structured audits carried out by qualified auditors, whereas risk-based supplier assessments are



The "Strengthening Public-Private Relations for Effective Shipyard Labour Advocacy" panel at the SEAFARER Roundtable in Singapore. Issues discussed included the challenges faced by shipyard workers, and the collaboration needed between the public and private sectors to uncover poor labour practices at shipyards.



# Workers in our Value Chain

To further mitigate the risks in our value chain, we have increased awareness and management attention and focus on country risk / outsourcing risks. In addition, we conducted supplier workshops, information sessions, performance assessments, and business reviews. Any findings following these assessments were addressed to the suppliers with expected corrective actions.

These actions are part of a continuous effort over the short and medium term intended to prevent child labour and forced labour, improve employment conditions, and enhance health and safety standards in our value chain.

No material impacts requiring remedy were identified in the reporting period. If our operations have caused or contributed to material impacts on stakeholders in our value chain, we are committed to promoting access to effective remedies. External stakeholders with concerns may raise these concerns via the Wilhelmsen Group whistleblowing channel. Whistles received through the whistleblowing channel are investigated promptly, the findings are documented, and feedback is provided to the whistleblower. Stakeholders may also request for information via email, at [humanrights@wilhelmsen.com](mailto:humanrights@wilhelmsen.com).

## ***Mitigating risks to seafarers on crew-management contracts***

We conduct background checks on our customers, and require our customers to accept our Code of Conduct. All seafarers on crew-management contracts are protected by a Collective Bargaining Agreement (CBA) or ITF Special Agreement.

## **Key targets**

We have set targets to mitigate potential negative impacts on upstream and downstream value chain workers.

**Percentage of new suppliers screened with ESG criteria:** In 2024, the target was for 100% of new suppliers to be screened with ESG criteria, and the result was 100% which is considered positive engagement with suppliers. The target will remain the same for 2025.

**Percentage of suppliers agreeing to our Supplier Code of Conduct:** In 2024, we implemented a rolling assessment to roll out our Supplier Code of Conduct to both new suppliers, as well as existing suppliers in our database who were registered earliest, who have not completed a self-assessment in the last 3 years,

or who do not have a supply agreement. The target was for 100% of all suppliers in the rolling assessment to agree to our Supplier Code of Conduct, and the result was 100%. This is considered positive and provides a foundation to work with suppliers to maintain ESG standards. The target will remain the same for 2025.

**Number of supplier audits or assessments with ESG criteria:** our internal auditors conduct ongoing desktop due diligence to identify and determine suppliers at high human rights related risk. In 2024, we scaled up the criteria of our supplier audits, and arranged for structured audits to be carried out by certified auditors. The target was for 12 audits to be carried out, and we conducted 23 supplier audits or assessments with ESG criteria, which was above target.





# Local Communities

## Policies and approach

We strive to create a positive impact in the local communities in which we operate. We rely on input from both employees and seafarers in finding marginalized and vulnerable communities where our financial support may have the largest positive impact.



Employees working together with our customer, Golden Ocean to cultivate a vegetable garden at Our Lady of Divine Providence Home in Cebu, Philippines.

## Key actions

In 2024, we carried out the following philanthropic activities:

### INDIA

Vacha Charitable Trust – We have sponsored 2 new computers centres in the learning centres located at slums in Mumbai. The new computers centres will help the girls living in slums acquire basic technological competencies.

Snehasadan Welfare Home – We have funded the renovation cost for one of the homes in 2022. In 2024, we have organized a learning session at our in-house training centre, International Maritime Training Centre (IMTC) for the children to gain early exposure to the maritime industry and a career at sea

### KOREA

In Busan, we conducted our annual kimchi making event. In 2024, we prepared 840kg of kimchi, which was distributed to the elderly community.

### MALAYSIA

Rumah Kasih Harmoni – We sponsored upgrades to the living facilities at Rumah Kasih Harmoni, a home for underprivileged children in Sungei Buloh. Our employees also organized a food donation drive

and a shopping trip for the children to purchase new clothes for Eid al-Fitr.

Spastic Children Association of Johor – In 2024, three of our employees won the Wilhelmsen Group's annual Do Good Locally Program, a bottom-up initiative where employees nominate a not-for-profit organization in their local communities for financial support. Our employees delivered and set up medical equipment for the Spastic Children Association of Johor which provides support to children with cerebral palsy and other physical disabilities.

### PHILIPPINES

Bahay at Yaman ni San Martin de Porres – in 2022, we had funded a culinary room at this orphanage. The culinary room is now actively used for cooking lessons for the children. In 2024, we held a cooking class conducted by our chief cook to impart professional culinary skills to the children.

Our Lady of Divine Providence Home – Together with our customer, Golden Ocean we have converted a neglected piece of land next to the children home and cultivate it into a vegetable garden in Cebu. We also provided training to ensure proper maintenance of the garden. Our long-term aim is to provide a sustainable food source for the home.



ENVIRONMENT

- Environment Overview
- Climate Risk Assessment
- Climate Change
- Biodiversity and Ecosystems
- EU Taxonomy

Material topic

Climate change and decarbonization

ESRS Sustainability matter

- E1 – Climate change**
- Climate change mitigation – impacts on climate change caused by the burning of fossil fuels.

Interaction with business model

We are actively working to mitigate climate change through energy efficiency and renewable energy use. The Wilhelmsen Group has plans to adopt a formal climate transition plan within the next three years to achieve long-term reductions across the value chain and enable avoided emissions for customers.

# Environment Overview

Our strategic ambition for tackling climate change is to support the maritime industry’s decarbonization and energy infrastructure transformation. Within our own operations, the activities at large office locations are the main sources of emissions. Purchased goods and services, and business travel also contribute to emissions in the upstream value chain.

We are actively working to mitigate climate change through energy efficiency and renewable energy use. We are building a comprehensive GHG emissions

inventory and improving data collection methods to achieve long-term reductions across the value chain and enable avoided emissions for customers.

The Wilhelmsen Group plans to adopt a transition plan for climate change mitigation within the next three years. Key considerations in the transition plan development will be the size of emissions within our own operations relative to our Scope 3 emissions, as well as our ability to contribute to avoided emissions for customers will be evaluated.

Material topic	2024 target	2024 performance	2025 target
CLIMATE CHANGE AND DECARBONIZATION	Scope 1 and Scope 2 emissions <ul style="list-style-type: none"><li>Continued reduction based on targets set by Wilhelmsen Group</li></ul>	<ul style="list-style-type: none"><li>Scope 1 emissions deemed immaterial</li><li>Decrease in Scope 2 market-based emissions: 18% decrease</li><li>Percentage of energy consumed classified as renewable: 43%</li></ul>	<ul style="list-style-type: none"><li>Percentage of energy consumed classified as renewable: at least 20%</li></ul>
	Scope 3 emissions <ul style="list-style-type: none"><li>Establish 2024 as base year</li></ul>	<ul style="list-style-type: none"><li>Scope 3 reporting completed for 2024.</li></ul>	<ul style="list-style-type: none"><li>Continuous improvement for Scope 3 reporting</li></ul>
	Internal controls <ul style="list-style-type: none"><li>Establish internal controls related to GHG emissions reporting</li></ul>	<ul style="list-style-type: none"><li>Implemented internal controls for Scope 1 and Scope 2 reporting</li></ul>	<ul style="list-style-type: none"><li>Continuous improvement of internal control procedures</li></ul>
	Climate transition plan (new) <ul style="list-style-type: none"><li>No target</li></ul>	<ul style="list-style-type: none"><li>Implemented internal controls for Scope 1 and Scope 2 reporting</li></ul>	<ul style="list-style-type: none"><li>Adopt a climate transition plan over the next three years, in line with the Wilhelmsen Group.</li></ul>



# Climate Risk Assessment

We conduct annual climate risk assessments to understand and raise awareness of the potential consequences of climate-related physical and transition risks. These assessments are integrated into our operational plans to monitor and mitigate

potential exposure with countermeasures, and are presented to our Board of Directors for oversight.

In 2024, we identified the following risks to our operations:

Risk type	Risk category	Risk description	Exposure	Mitigation measures
Physical risks	Acute risks	Temperature increases: heatwaves can affect worker health and safety	<ul style="list-style-type: none"><li>• Heat stress</li><li>• Reduced productivity</li></ul>	<ul style="list-style-type: none"><li>• Employee health and safety training</li><li>• Efficient cooling measures</li></ul>
	Chronic risks	<ul style="list-style-type: none"><li>• Extreme weather events: storms, cyclones, and hurricanes can damage assets and disrupt operations</li><li>• Flooding: increased precipitation can disrupt operations and damage infrastructure</li></ul>	<ul style="list-style-type: none"><li>• Safety of personnel</li><li>• Damage to infrastructure</li><li>• Supply chain disruption</li><li>• Crew-change disruption</li><li>• Operational delays</li><li>• Increased maintenance costs</li></ul>	<ul style="list-style-type: none"><li>• Business Continuity Plans (BCPs) and regular office inspections for emergency preparedness</li><li>• Diversification of supply chain</li><li>• Diversification of seafarer pool</li><li>• Property and infrastructure management.</li></ul>
Transition risks	Policy and legal	Enhanced emissions reporting obligations: increased reporting requirements can lead to higher administrative costs	<ul style="list-style-type: none"><li>• Additional administrative burden and potential penalties for non-compliance</li><li>• Investment in new reporting systems</li></ul>	<ul style="list-style-type: none"><li>• New competencies</li><li>• Adequate compliance systems</li></ul>
	Technology	Technology shifts: adoption of low-carbon technologies by vessels and vessel owners	<ul style="list-style-type: none"><li>• Lack of competencies to manage low-carbon technology vessels</li></ul>	<ul style="list-style-type: none"><li>• New competencies</li><li>• Diversification of seafarer pool</li></ul>
	Market	Market shifts: demand for alternative fuels can impact operations	<ul style="list-style-type: none"><li>• Shifts in supply chains</li><li>• Shortage of qualified crew</li></ul>	<ul style="list-style-type: none"><li>• Diversification of supply chain</li><li>• Diversification of seafarer pool</li></ul>
	Reputation	Reputational impact: failure to meet sustainability expectations can damage reputation	Negative publicity and loss of stakeholder trust	<ul style="list-style-type: none"><li>• Code of Conduct</li><li>• Transparent disclosures</li><li>• Internal controls</li></ul>

In 2024, the Wilhelmsen Group carried out an evaluation of the resilience of our strategy and business model in relation to climate risks.

In the medium-term, our services are considered well-positioned in relation to transition, with the ability to adapt and invest where assessed to be needed.

From a technology development and disruption standpoint, the medium-term risk is assessed to be limited, and we are well-positioned with the opportunity to adapt and invest where assessed to be needed.

# Climate Change

## Policies and approach

We have established policies to manage our material impacts related to climate change. We have set targets to reduce our GHG emissions, implemented environmental management systems which address climate mitigation impacts, proactively managed climate risks and opportunities, and reported on our progress to our Board of Directors. Besides, we have environmental-related opportunities and growth as a goal in our business strategy. These actions are in line with the requirements set by the Wilhelmsen Group's Owner's Statement and Environment Standard.

## Key actions

Our main GHG emissions reduction actions have been to procure renewable electricity and improve energy efficiency. These actions are based on the decarbonization levers for targeted Scope 2 emissions reductions by 2030. In 2024, we purchased unbundled Energy Attribute Certificates (EACs) in Malaysia, Norway and Singapore.

Our remaining sites have started the assessment for purchasing electricity from renewable sources. However, the procurement potential for renewable electricity will be impacted by lease agreements, local energy infrastructure, regulation, and incentive programs. In geographic locations where the marketplace for EACs is not yet mature, we rely on contracts with electricity suppliers to secure renewable electricity where feasible.

In 2024, we established reporting procedures for Scope 3 emissions and began reporting in its ESG reporting system. In 2025, we will improve

data accuracy by refining categories and emissions factors, investing in data management systems, and applying internal controls for consistent reporting. The main actions related to Scope 3 emissions over the next three years will concentrate on reporting and analysis to be incorporated into the Wilhelmsen Group's transition plan development. These activities mark our progress towards our near term 2030 reduction targets.

The reporting of indirect Scope 3 emissions is based on the Greenhouse Gas Protocol, which divides the Scope 3 inventory into 15 categories. Based on our materiality assessment and Scope 3 screening, there are three significant categories of Scope 3 emissions: Category 1 (purchased goods and services), Category 5 (waste), and Category 6 (business travel). Category 7 (employee commuting), which accounted for emissions from seafarers travelling to and from their vessels, was previously assessed to be a significant category. However, we have since reassessed that emissions from seafarer travel should be categorized under Category 6 because seafarers are not "employees" within the definition of the European Sustainability Reporting Standards (ESRS).

99.9% of emissions for Category 6 are calculated using primary data that is available from our travel agents. Where primary data from travel agents is not available, emissions are calculated using the distance-based method by multiplying the distance travelled by emissions factors from NTM. Category 6 emissions amount to approximately 85% of our total Scope 3 emissions.

Primary data is not available for Category 1 emissions. Instead, Category 1 emissions are estimated using the spend-based method by multiplying the total spend in the reporting period with relevant global calculated average emissions factors from Exiobase 3.9 (2019) for each purchased good or service category.



# Climate Change

## Key targets

### *Wilhelmsen Group decarbonization targets*

In order to achieve its net-zero goals, the Wilhelmsen Group has set near-term absolute GHG emission reduction targets for direct Scope 1 and 2 market-based emissions following the guidance provided by the Science Based Targets Initiative (SBTi), using the absolute contraction approach. This method aligns emissions reduction targets with the global, annual reduction rate required to meet 1.5°C or well below 2°C, ensuring they are science-based and in line with the Paris agreement.

The Wilhelmsen Group targets to reduce Scope 1 emissions by 42% by 2030 compared to base year 2022, and for Scope 2 market-based emissions, procure 80% renewable electricity by 2025 and 100% by 2030. These targets are directly related to climate change mitigation actions. The Wilhelmsen Group plans to adopt Scope 3 emission targets as part of its climate transition plan development within the next three years.

### *Our targets*

Our targets to address impacts related to direct GHG emissions are established in line with the Wilhelmsen Group's near-term absolute GHG emissions reduction targets for Scope 1 and 2 emissions.

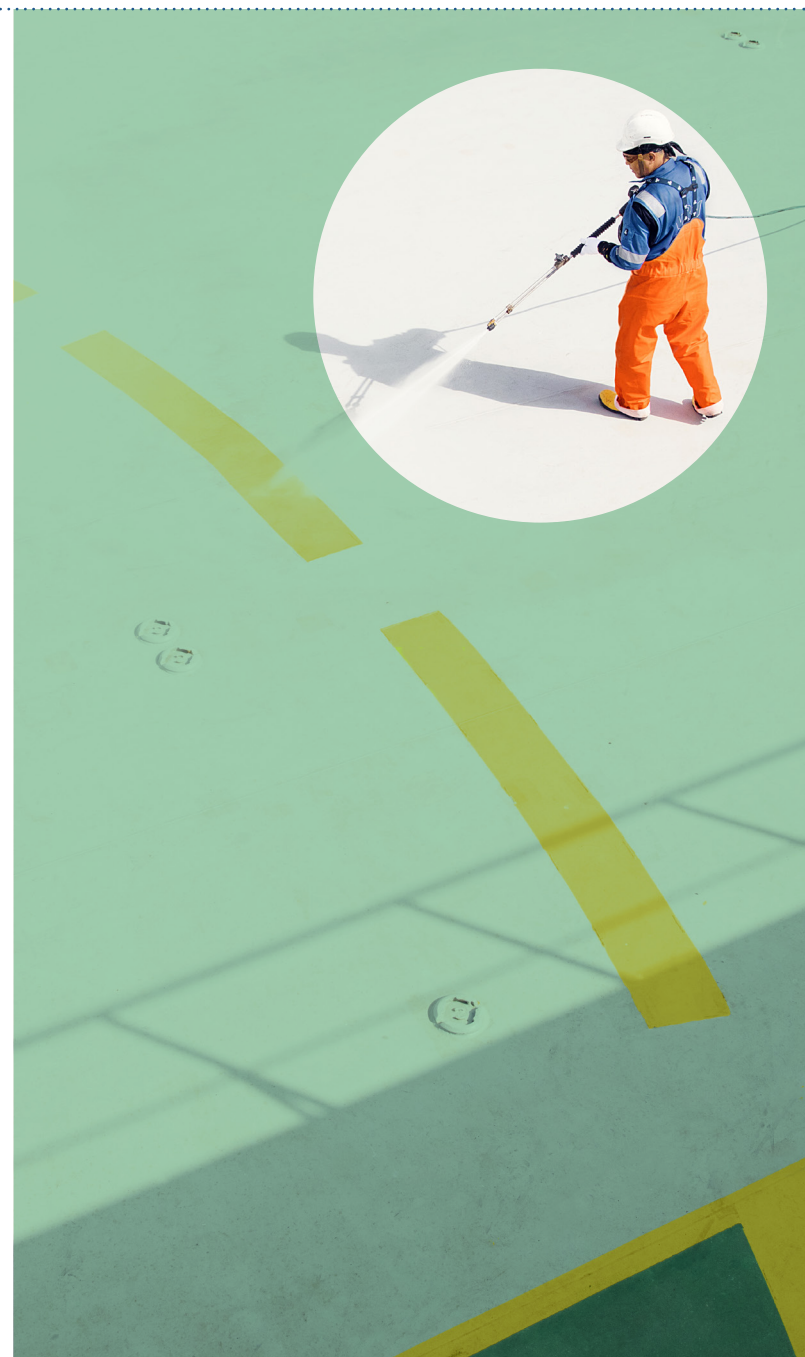
In 2023, based on a reassessment of our emissions profile, we had deemed that Scope 1 emissions are immaterial for the purposes of reducing emissions since they are relatively small and are estimated to amount to less than 1% of our total emissions.

In order to reduce our Scope 2 emissions, our target in 2024 was to procure at least 20% renewable electricity. Procurement included green power agreements with bundled energy attribute certificates (EACs), and purchasing of unbundled EACs. This target is based on the availability of EACs in the jurisdictions in which we operate.

In 2024, the targets were achieved as planned. Electricity from renewable sources accounted for 43% of our total electricity consumed, and the related reduction in Scope 2 market-based emissions was 18% compared to the base year. The target will remain the same in 2025 at 20% renewable electricity procured, as we plan to integrate three new offices into our emissions scope.

2024 was also the first year in which we established reporting procedures for Scope 3 emissions. No base year was established due to a need to increase the maturity of our reporting, and instead we will use 2025 to improve data accuracy.

We plan to adopt Scope 3 emission targets as part of the Wilhelmsen Group's climate transition plan development within the next three years. As part of this transition plan, we will adopt measures to reskill or upskill employees and seafarers whose job roles and responsibilities may be impacted. This could include skills related to emissions reduction technologies, alternative fuels management, environmental compliance, digital technologies, and renewable energy integration.





# Climate Change: 2024 Emissions

Emissions category	2024 (tCO <sub>2</sub> e)	2023 (tCO <sub>2</sub> e)	2022 (tCO <sub>2</sub> e)
<b>Scope 1***</b>			
Mobile combustion	Immaterial	Immaterial	Immaterial
<b>Scope 2***</b>			
Electricity (location-based)	287	281	194
Electricity (market-based)	207	280	236
<b>Scope 3</b>			
Category 1: Purchased goods & services	4,043	N/A	N/A
Category 5: Waste generated in operations	6	11	5
Category 6: Business travel (restated)*	23,713	21,506**	18,041**
<b>Total Emissions (location-based)</b>	<b>28,048</b>	<b>28,223</b>	<b>27,786</b>
<b>Total Emissions (marked-based)</b>	<b>27,968</b>	<b>28,222</b>	<b>27,828</b>



\* In 2022 and 2023, we reported emissions from seafarers travelling to and from their assigned vessels under Category 7: Employee commuting. In 2024, we have reclassified emissions from seafarer travel to Category 6: Business travel because seafarers are not "employees" within the definition of the European Sustainability Reporting Standards (ESRS).

In the **Wilhelmsen Group Annual Report 2024**, no emissions have been reported under Category 6: Business travel because it has been determined that emissions in this category do not significantly contribute to the Group's emissions profile or risk exposure, and would account for less than 1% of the Wilhelmsen Group's total Scope 3 emissions. Because Category 6: Business travel emissions are Wilhelmsen Ship Management's largest Scope 3 category and account for 85% of our Scope 3 emissions, we have decided to disclose the figures in this report.

\*\* Category 6: Business travel emissions for 2022 and 2023 have been restated due to changes made to the measurement methodology. We are only reporting emissions from seafarer travel to vessels under our technical management because we have operational control over such travel.

\*\*\*The methodology for collecting Scope 1 and Scope 2 data has been verified by DNV in February 2024.

# Climate Change: embedding transition risks into our business strategy

We are forging partnerships and pursuing new business models related to decarbonization and energy infrastructure in an effort to mitigate the transition risks identified through our Climate Risk Assessment.

## *Meeting regulatory requirements*

Hecla Emissions Management, our joint venture with Affinity Shipping LLP provides compliance services and carbon allowance procurement in order to support customers in complying with the EU Emissions Trading System (ETS). Its services centralize the ETS value chain within one workflow, enabling customer oversight through its digital platform.

In 2024, Hecla launched the FuelEU Maritime Exchange (FME), the industry's first platform dedicated to the secure trading of FuelEU Maritime compliance balances. The platform leverages digital ledger technology to tokenize compliance balances, making them tradeable per voyage.

## *Improving energy efficiency onboard*

We work with our customers to optimize vessel operations and reduce their environmental impact.

We assist customers in implementing Ship Energy Efficiency Management Plans (SEEMP) onboard their vessels, including reporting of fuel oil consumption data, and ensuring that measures are in place to meet the vessel's carbon intensity targets.

In 2024, we introduced our vessel energy optimization guide, which provides guidance to internal stakeholders on measures which will reduce a vessel's energy demand.

Through our acquisition of Zeaborn Ship Management, we also gained ownership of BestShip, an optimization and performance management consultancy. BestShip aims to improve the commercial performance of its vessels by optimizing their technical performance, reducing fuel consumption and carbon emissions in the process. BestShip is set up as a joint venture with MPC Capital, and shall be our designated performance management platform throughout our operations.

## *Preparing for a multi-fuel future*

Our newbuilding services support our customers in transitioning to alternative fuels. We are constantly enhancing our competencies in this area, and in 2024, we supervised the newbuilding of two methanol dual-fuel vessels on our customer's behalf.

We are committed to preparing our seafarers for an alternative fuel future. Successfully integrating these technologies requires adaptation of human behaviours and processes to address any potential safety concerns related to handling the new bunker.

Our in-house training centre, International Maritime Training Centre (IMTC) in Mumbai is certified by the Directorate General to provide IGF basic and advanced training courses. We also plan to deliver new courses regarding alternative fuels, ranging from simpler familiarization courses designed for all ranks, to operation and maintenance related courses designed for our engine room teams.

## *Establishing green corridors*

We are one of the partners in the Silk Alliance, an alliance lead by Lloyd's Register Decarbonization Hub and backed by both governments and industry stakeholders.

In 2024, we hosted the sixth Silk Alliance workshop in Singapore, facilitating dialogue between regulators, financial institutions, fuel suppliers, ship owners and other key stakeholders. Subject matter experts shared their perspectives for green transition; we also gained insight into future government-driven projects that aim to support the maritime industry's transition towards low emission fuels.



Participants at the sixth Silk Alliance workshop in Singapore. Members discussed ways of bridging the financial viability gap of alternative fuels, and shared case studies on transitioning to alternative fuels.

# Biodiversity and Ecosystems



**Eliminating unnecessary plastics onboard. Drinking water should be provided through advanced onboard systems and seafarers should be provided with reusable bottles**

**Substituting unnecessary plastics with innovative alternatives**

**Improving collection and waste management systems by properly segregating waste and selecting waste discharge locations which can properly recycle or reuse waste.**

**Cleaning up existing plastic pollution, with a focus on waterways, sewage plants and coastlines.**

Biodiversity and ecosystems is an emerging area of concern for the maritime industry. Our vessel operations may have a negative impact on biodiversity and local ecosystems, especially if vessels travel or trade in regions deemed to be ecologically sensitive. Because of these concerns, we have incorporated biodiversity into this report.

## Policies and approach

In order to mitigate the impact that our operations have on biodiversity and ecosystems, we include relevant biodiversity and ecosystem aspects in our impact assessments, planning and strategy. All of our operations comply with international regulations, including the Convention for Prevention of Marine Pollution (MARPOL), Ballast Water Management Convention (BWMC) and the International Convention on Oil Pollution Preparedness (OPRC). We implement an Environmental Protection Policy on vessels managed by us which seeks to reduce the risk of environmental damage, in line with the requirements of the International Safety Management (ISM) Code. For vessels trading in polar water regions, the requirements of the Polar Water Operation Manual are applied.

## Key actions

Certain areas of the ocean which have been deemed to be ecologically sensitive require a heightened degree of care. When travelling at or near marine protected areas (MPAs), our vessels comply with

local regulations, including reporting on our passage through the area, and using piloting services as required. We implement measures, such as voluntary speed reductions and travelling within recommended shipping lanes, in order to avoid whale strikes.

We are mindful of the fact that compliance with regulatory requirements alone is not always sufficient. Accordingly, we strive to promote measures which go beyond existing regulations.

In 2024, we participated in the Sargasso Sea Project. The project aims to produce a series of practicable voluntary measures aimed at preserving the Sargasso Sea and beyond. We, as industry stakeholders, provide our perspective on ship operations when trading in ecologically sensitive areas.

We also promote responsible consumption and recycling programs onshore and onboard. As one of the industry pioneers in reducing single-use plastics onboard vessels, we have shared our experience and best practices in eliminating single-use plastics from vessels. This contributed to BIMCO's guide on practical measures that vessel owners could adopt to eliminate single-use plastics from their ships, which was published in 2024.

As a provider of complete technical management, crewing, and related services for all major vessel types, we are in a good position to influence compliant, sensible, safe, and environmentally sound operations for vessel owners.

Source:  
BIMCO, "The Art and Science  
of Removing Single-Use Plastic  
Bottles from Ships" (2024).



# EU Taxonomy



The EU Taxonomy is a classification system that establishes a list of 'environmentally sustainable' economic activities. The purpose of the EU Taxonomy is to scale up environmentally sustainable investments and help in reaching the EU's climate and environmental targets for 2030 and the objectives of the European Green Deal.

In 2023, which was the first year in which Wilhelmsen Group submitted its EU Taxonomy report, the EU Taxonomy Regulation required us to assess our economic activities against two climate and environmental objectives: climate change mitigation, and climate change adaptation. In 2024, the EU's climate and environmental objectives expanded to encompass water, circular economy, pollution prevention, and biodiversity.

Economic activities which are covered by the EU Taxonomy Regulation are classified as "taxonomy-eligible" activities. In order for these activities to meet the higher threshold of being "taxonomy-aligned" and therefore environmentally sustainable, three criteria need to be met:

1. The activity makes a substantial contribution to at least of the climate and environmental objectives;
2. The activity does not significantly harm other climate and environmental objectives;
3. The Wilhelmsen Group's policies meet the EU Taxonomy Regulation's minimum safeguards criteria.

In 2024, our data-monitoring and performance management platform, has been classified as taxonomy-eligible because it is a data-driven solution that can be used to optimize operations, increase efficiency, reduce energy consumption, and reduce respective GHG emissions.

However, we did not have any taxonomy-aligned turnover, CapEx and OpEx in 2024. Our performance management platforms did not meet the Substantial Contribution and Do No Significant Harm criteria. In the same vein, the Wilhelmsen Group will not report any taxonomy-aligned turnover, CapEx, or OpEx in 2024.

The rest of our core business (revenue generating activities) are not taxonomy-eligible because, even though they are within maritime services, shipping, logistics, and related infrastructure, they are:

- not yet defined in the scope of the EU Taxonomy, and/or
- within the value chain of the current list of eligible economic activities, and/or
- related to management and administration

For more details about Wilhelmsen Groups' EU Taxonomy reporting, please refer to the **Wilhelmsen Group Annual Report 2024**.

## GOVERNANCE

- Governance Overview
- Business Conduct
- Cyber Security



Material topic	ESRS Sustainability matter	Interaction with business model
Compliance	<b>G1 – Business conduct</b> <ul style="list-style-type: none"><li>• Compliant and ethical business conduct – impacts on people subject to corruption and bribery demands from undesirable actors</li><li>• Risks from incidents of fraud, corruption or bribery</li></ul>	<p>We are committed to ethical operations and eliminating corruption in the value chain. We enforce clear policies, support management, maintain a whistleblowing channel at the Wilhelmsen Group level, and conduct training and reporting.</p> <p>Anti-corruption measures include regular audits, employee training, and support for affected employees. The strategy also involves strict anti-bribery measures and collaboration with industry bodies.</p>
Information and cyber security	<b>Cyber security and personal data protection</b> <ul style="list-style-type: none"><li>• Impacts on people from cyber security and personal data breaches</li></ul>	<p>We invest in robust cyber security measures and data protection protocols including employee training to safeguard personal information and ensure the integrity of our systems.</p>

# Governance Overview

Our ambition is to be a responsible, trusted, and compliant value chain partner. We have a robust management system in place to ensure sound governance of our business.

In the global maritime industry, there is potential for incidents of fraud, corruption, and bribery. Individuals or groups within our workforce may be subject to fraud, corruption and bribery demands, particularly those involved in awarding contracts or engaged in ship/shore interface operations. Seafarers applying

for roles may face illegal demands for recruitment fees from undesirable actors. At the individual level, such incidents can lead to trauma, financial loss, loss of reputation, and legal consequences; at the company level, such incidents can result in financial loss, reputational damage, and compliance violations.

Our systems may be exposed to privacy breaches, unauthorised use of information, or cyber-attacks from undesirable actors. Personal data privacy breaches can lead to unlawful use of data, cyberbullying, exposure to harmful content, identity theft, fraud attempts, and ransom demands.

Addressing these risks is essential to maintain our integrity and operational stability, protecting stakeholders including employees, customers, and investors. Accordingly, we are dedicated to maintaining compliant and ethical operations, including the elimination of corruption in the value chain. We also invest in robust cyber security measures and data protection protocols to safeguard personal information and ensure the integrity of its systems.

Material topic	2024 target	2024 performance	2025 target
COMPLIANCE	100% completion of Code of Conduct training	<ul style="list-style-type: none"><li>100% completion</li></ul>	<ul style="list-style-type: none"><li>100% completion</li></ul>
	Internal Controls for Sustainability Reporting (ICSR) <ul style="list-style-type: none"><li>Implementation of ICSR policy</li><li>Integration of CSRD/ESRS modules in ESG reporting tools</li></ul>	<ul style="list-style-type: none"><li>ICSR policy implemented for high risk ESG metrics</li><li>CSRD/ESRS module implemented in ESG reporting systems</li></ul>	<ul style="list-style-type: none"><li>Continuous improvement of internal controls</li></ul>
INFORMATION AND CYBER SECURITY	IT and Cyber Security Standard <ul style="list-style-type: none"><li>Implement the Wilhelmsen Group IT and Cyber Security Standard</li></ul>	<ul style="list-style-type: none"><li>Completed four-step program to implement IT and Cyber Security Standard</li></ul>	<ul style="list-style-type: none"><li>Number of cyber risk assessments conducted: 4</li></ul>
	Simulated phishing campaigns <ul style="list-style-type: none"><li>Measure percentage click rate on simulated phishing tests</li></ul>	<ul style="list-style-type: none"><li>Percentage click rate on simulated phishing tests: 19%</li></ul>	<ul style="list-style-type: none"><li>Percentage click rate on simulated phishing tests: 15%</li></ul>
	100% completion of cyber security training	<ul style="list-style-type: none"><li>100% completion</li></ul>	<ul style="list-style-type: none"><li>100% completion</li></ul>



# Business Conduct

## Policies and approach

### Code of Conduct

Our Code of Conduct is the main policy that outlines the business ethics standards applicable to our own workforce. It emphasizes compliance with laws and regulations, fair and ethical competition, and a zero-tolerance policy towards corruption, bribery, theft, and fraud. The Code of Conduct highlights the importance of a respectful and safe working environment, responsible handling of drugs and alcohol, and avoiding conflicts of interest. It requires approval for external commercial engagements, promotes environmental responsibility, and mandates secure handling of cyber security. Additionally, it commits to safeguarding human rights, careful handling of confidential information, and encourages whistleblowing with guaranteed confidentiality and protection. Suppliers are also expected to comply with and promote these principles, as outlined in our Supplier Code of Conduct.

### Corruption and bribery

We adopt a zero-tolerance stand on corruption and bribery, and have established comprehensive procedures to prevent, detect, and address allegations or incidents of corruption and bribery. This policy is communicated through the annual Code of Conduct training which is rolled out to all shore employees.

Completion rate for business training	2024	2023	2022
Code of Conduct training	100%	100%	100%



### Whistleblowing

The whistleblowing channel, established and managed by Wilhelmsen Group, is accessible on the Wilhelmsen intranet and website and is specifically designed for receiving and processing grievances or allegations related to human rights. It is written in plain English, available in multiple languages, offers appropriate protection for stakeholders, and operates through a third-party vendor, which guarantees that the sender's identity remains confidential. The system includes a chat function for anonymous communication. Retaliation against whistleblowers is explicitly prohibited by the Code of Conduct.

# Business Conduct

## Key actions

### *Code of Conduct training*

To ensure that all employees are aware of their rights and obligations under the Code of Conduct, all employees must undergo mandatory annual training on key components of the Code of Conduct, delivered through a 45-minute e-learning.

### *Sanctions compliance*

We have comprehensive sanctions risk management procedures to ensure that we only work with external entities or individuals who comply with sanctions regimes. Before engaging with third parties, a risk assessment must be performed.

We monitor the movements and locations of our fleets to ensure that they are not involved in high-risk movements to sanctioned countries or ports.

In 2025, we plan to conduct a gap analysis on our current sanctions compliance processes to identify further improvement.

### *Addressing corruption and bribery*

The Wilhelmsen whistleblowing channel is our primary method for preventing, detecting, and investigating allegations of breaches is the Wilhelmsen whistleblowing channel. Additionally, internal control measures are implemented to prevent such incidents. However, if there are allegations of corruption and bribery, investigations into the allegations are separated from the

operational chain of management. Any serious allegations and outcomes of investigations are reported by our compliance functions to the Board of Directors.

In 2024, the Wilhelmsen Group formalized an investigation procedure, outlining principles for conducting investigations into corruption and bribery. This investigation procedure will be implemented in 2025.

### *Addressing whistleblowing cases*

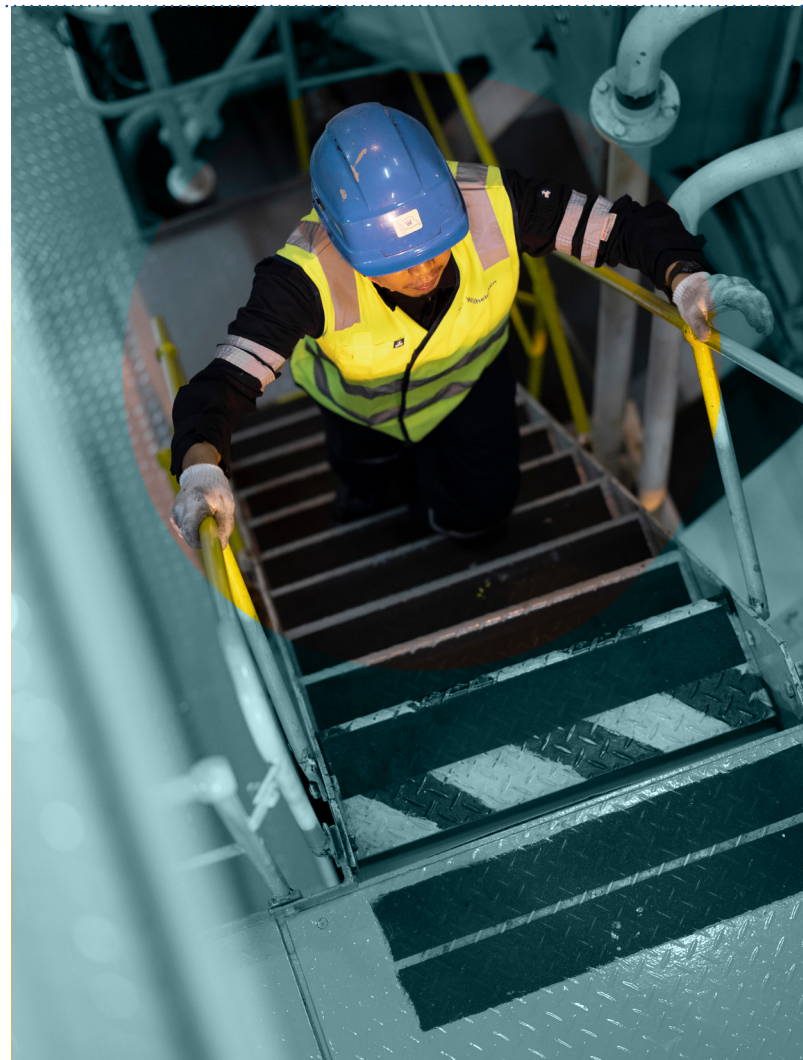
The Wilhelmsen Group's grievance and complaints handling mechanism is structured to systematically address whistleblowing cases. The group's compliance officer initially reviews grievances or allegations from whistles and assigns a case handler from the relevant entity and function. The case handler follows a four-step process: confirmation, evaluation, investigation and information collection, and conclusion.

Reports of misconduct are identified through the whistleblowing channel, alerts, and internal audits. Investigations are conducted by compliance, internal audit, and human resources functions.

## Key targets

The target for Code of Conduct training is for 100% of shore employees to complete the training. In 2024, the completion rate was 100%.

We do not have targets for addressing corruption and bribery or handling whistleblowing cases.



# Cyber Security

## Policies and approach

In 2024, we completed a 4-step program to implement the Wilhelmsen IT and Cyber Security Standard. The IT and Cyber Security Standard is aligned with ISO/IEC 27001, and defines a mandatory minimum set of security requirements, establishes a security direction and ambition, and outlines levels of accountability and responsibility for cyber security. The Standard addresses material impacts related to information security, including data breaches, unauthorised access, and cyber threats. We also focused on compliance with EU General Data Protection Regulation (GDPR), with relevant procedures and practices in place relating to the processing of personal data.

The views and interests of key stakeholders, including employees, suppliers and business partners, have been taken into account in crafting the Standard. Employees are made aware of their responsibilities under the Standard via cyber security awareness and training programs – in 2024, the completion rate for cyber security training was 100%, and the same target will apply for 2025. The Standard also extends to suppliers, who are expected to comply with and promote these principles within their own supply chains.

Regular assessments, audits, and reviews are conducted to ensure compliance with and the effectiveness of the Standard.

## Key actions

In 2024, in addition to implementing the IT and Cyber Security Standard, we completed a targeted uplift for the EU directive NIS2 and established a Governance, Risk, and Compliance (GRC) platform. A cyber compass program was launched to support 2024 targets, involving gap assessments and planning for gap closure in the short to medium-term.

We carried out phishing campaigns to enhance security awareness. Reducing the click-rate in phishing campaigns aligns with our policy objective of enhancing cyber security awareness and reducing vulnerability to cyber threats. The intended goal is to improve employees' ability to recognize and respond to phishing attempts and enhance overall cyber security awareness.

Data protection enquiries from stakeholders were addressed with no significant breaches reported.

In 2025, we will focus on closing identified gaps, implementing robust cyber risk assessments related to our own operations and our value chain, and continued cyber security training and awareness for employees. These actions aim to strengthen our overall cyber security and protect against potential threats.

## Key targets

We have set targets and metrics related to cyber security and the impact of personal data breaches and cyber security aligned with the IT and Cyber Security Standard.

2024 was the first year in which we started tracking phishing campaign click rates. In 2024, the click rate was 19%.

Given the rapidly evolving nature of phishing attempts, which are becoming more sophisticated, we will use both 2024 and 2025 to establish a relevant baseline for further target setting.



Completion rate for business training	2024	2023	2022
Cyber security training	100%	100%	100%
Phishing campaign click rate	19%	-	-



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