



Gram Car Carriers Group

Procedure for Reporting Concerns

(adopted by the board of directors on 31 October 2021, updated 7 February 2024)

1 INTRODUCTION

Gram Car Carriers Group (the "**Group**") encourages all employees, including non-permanent/temporary staff, and everyone employed or operating on board Group vessels (the "**Employees**"), to report their concerns of any misconduct related to our business operations that should be prevented or corrected.

This Procedure for Reporting Concerns (the "**Procedure**") informs how the Employees can report their concerns and how the Group receives, and follow-up reported concerns.

The Procedure is in accordance with applicable whistle-blower protection and data protection laws.

2 REPORTING OF CONCERNS

2.1 The Right To Report Concerns

All Employees have the right to report suspicions of misconduct related to the Group's business. They may report concerns relating to a violation of law or other reprehensible conduct; conduct contrary to the Group's Code of Conduct or other internal policies or procedures; and/or conduct contrary to ethical norms that are widely accepted in society, for example:

- dangers to life and health,
- climate or environmental hazards,
- bribery, corruption, other financial crimes or criminal activity,
- unsafe working environment, or
- personal data breach

(together "**Reportable Conduct**").

An Employee who reports a concern does not need to have firm evidence for expressing a suspicion.

It should be noted that an Employee may express himself or herself professionally, politically or critically about for example salary, workload, distribution of work tasks and general work-related interaction challenges, without this being considered as Reportable Conduct.

2.2 Duty to report concerns

All Employees have a duty to report concerns regarding the following:

- dangers to life or health that the Employee(s) cannot correct themselves
- harassment or discrimination in the workplace
- injury or illness from work or conditions in the workplace

2.3 Protection against retaliation

An Employee who reports concerns according to this Procedure will not, as a result of the reported concern, be subject to unfair treatment or other retaliatory conduct or sanctions, including but not limited to the deprivation of rights, change of responsibilities in a burdensome manner or termination of a contract.

Anyone involved in retaliatory conduct against a reporter of a concern may themselves be subject to disciplinary action.

3 HOW TO REPORT A CONCERN

Concerns may be reported to the following persons within the Group:

- *Your manager.* If the suspicion concerns your immediate manager, you should contact the manager on the level above that individual or use one of the two alternatives below.
- *The Chief Executive Officer ("CEO").* If the suspicion concerns the CEO, you should contact the Chairman of the Board.

WhistleB (<https://report.whistleb.com/en/gramcar>) a 3rd party digital whistleblowing system, operated by a response team from the law firm Simonsen Vogt Wiig AS A concern may be reported both orally and in writing. However, you should make sure that the person you are reporting to perceives that you are making a report of concern regarding a Reportable Conduct.

To ensure that a reported concern can be followed-up properly, the report should as a minimum contain the following information:

- Name and contact data of the reporter, unless he/she wants to be anonymous
- A brief description of the concern, including time and place of the suspected misconduct and any observations made.
- Further details of the case, including names of involved individuals and information about relevant documents, potential witnesses, or other evidence.

4 RECEPTION, FOLLOW-UP AND INVESTIGATION OF REPORTED CONCERNS

4.1 Receipt of a report of concern and initial assessment

Upon receiving a report of concern, the Group shall ensure that the report is adequately assessed and also ensure that the reporter is given a confirmation that the report of has been received.

The Group may decide not to follow up or investigate the reported concern if:

- the alleged conduct is not considered Reportable Conduct (c.f. section 2.1);
- the report is obviously unfounded;
- there is insufficient information to allow for further investigation; or
- the subject matter of the report has already been solved.

The Group shall provide information to the reporting person regarding whether the report of concern will be followed-up or not.

4.2 Follow-up and/or investigation of a report of concern

Reports of concern will be taken seriously, followed up appropriately and handled within a reasonable time. For how long and how thoroughly the report will be examined/followed-up, depends on the nature, severity and/or complexity of the reported concern.

All reports shall be handled according to principles of fairness and objectivity. In particular the following principles shall apply:

- *Confidentiality.* The identity of the reporter and information related to the report of concerns will only be shared with those who need the information to follow up or investigate the case; with relevant management to the extent, it is relevant; and for reporting purposes
- *Objectivity and impartiality.* The person(s) handling the reported concern shall e.g. not have their own interests in the case
- *Contradiction.* The person(s) accused of a Reportable Conduct/the subject(s) of concern has the right to know what he/she is accused of and shall be given the opportunity to give their version of the case.

4.3 Communication

1.1.1 The subject(s) of the report of concern or other affected parties

If the follow-up/investigation concludes that there has been a breach of laws or regulations, the Group's Code of Conduct or other internal policies or procedures, or that other unacceptable behaviour has taken place, the subject(s) of the report or other affected parties shall normally receive information about the relevant criticism and the factual circumstances on which the criticism is based. Such person(s) shall also be given the possibility to express their view before the case is closed.

1.1.2 The reporter

The reporter shall be notified when the case is closed. Such notification shall be sent within a reasonable time. If practical, and not restricted by applicable legislation or internal guidelines, the reporter may be informed about the outcome of the investigation. Any complaints about the outcome may be directed to the CEO.

1.1.3 The Board of Directors

The CEO shall report on a regular basis to the Board on reports of concern received and the outcome of any follow-up or investigations.

5 DATA PROTECTION

5.1 Storage and deletion of personal data

Personal data included in a report of concern and any follow-up/investigation documentation will not be kept for longer than what is necessary for the purpose of the follow-up/investigation, the establishment, exercise or defence of legal claims or as otherwise provided for or required by applicable law.

REVIEW AND UPDATES

This Procedure will be reviewed at least annually and may be updated or changed accordingly.

Signed

CEO of Company: Georg A. Whist

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Board approval date: 7 February 2024

Version	Date	Summary of changes
1	31 October 2021	Original approved by the Board of Directors of Gram Car Carriers ASA
2	7 April 2023	Approved by the Board of Directors of Gram Car Carriers ASA
3	7 February 2024	Approved by the Board of Directors of Gram Car Carriers ASA