



QMA02.16 Company Whistleblower Policy.docx

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QMA02.14 COMPANY WHISTLEBLOWER POLICY

Scope

The policy applies to all employees in Rederi AB Älvtank and shall secure fulfillment of the regulations in EU/2019/1937 which came in force 17 December 2023.

Purpose

Rederi AB Älvtank is committed to a high standard of openness, honesty and accountability. Our employees and business partners are the most important source of insight for revealing possible misconduct that needs to be addressed. The purpose of this Whistleblower Policy is to encourage employees and other stakeholders to report on suspected misconduct without any risk of retaliation, as well as to ensure an appropriate investigation process.

Responsibility

The Managing Director is responsible for this policy and that procedures is followed. For contact details to Managing Director, see [QMP09.01](#) Company Static Ship Interest Contact List.

Communication

Rederi AB Älvtank will ensure that:

- All employees take part of this policy during the induction process
- This policy is easily accessible by all members of the organisation
- Employees are informed when a particular activity or change to worksite environment or practice aligns with this policy
- Employees are empowered to actively contribute and provide feedback to this policy
- Employees are notified of all changes to this policy.

Monitoring and review

Rederi AB Älvtank review policies annually. This will be carried out by Managing Director

Effectiveness of the policy will be assessed through:

- Feedback from employees, the Health and Wellbeing Committee and management
- Review of the policy by management and committee to determine if all objectives have been met.

Whistleblowing

Employees are usually the first ones to realize potential discrepancies and wrongdoings. Whistleblowing is the opposite of turning a "blind eye" to these problems and can be described as



drawing the management's attention to potentially illegal and/or fraudulent practices or other wrongdoings.

You can use our internal reporting channel in IRIS, or whistleblowing function at the homepage, to report suspected misconduct and wrongdoings in our organisation. The aim of our whistleblowing function is to provide a better opportunity to disclose various forms of misconduct, as well as to provide enhanced protection for the reporting person. We guarantee that your case and your identity will be treated confidentially. You are also protected against retaliation.

What can you report?

When submitting a report, you must have valid reasons to believe that the information you submit is true at the time of reporting. The purpose of the reporting channel is to prevent and detect fraud and corruption, illegal activities, and non-compliance with rules in a range of areas. It can also be about illegal, unethical, or harmful activities that can negatively affect others. For example:

- Financial crime and fraud
- Corruption and bribery
- Environmental offences or health and safety risks
- Deliberate violations of the law

The misconduct does not have to be current or ongoing, it can also apply to the reporting of previous misconduct. The purpose of this service is not to voice dissatisfaction with working conditions, organisation or management, or conflicts in the workplace. Reports of misconduct that exclusively affect the whistleblower or his/her work situation are generally not considered to be a whistleblowing case.

Your Report

Your report should contain the following information:

- The type of misconduct you wish to report.
- Where it has taken place.
- When it happened. Provide time and date and if anything is recurring.
- Documentation in any form if you have access to it. If you don't have access but know documentation exists, include what type of documentation it is and where it can be found.
- Details of any other action that you have taken in relation to the misconduct.

Note! It is important that you read and understand to the content in the Data Privacy link at the homepage or in the Privacy notice below, before submitting your report. Any personal data that is clearly not relevant to your report should not be submitted. If you still submit such information, we may delete it without informing you.

External reporting

It is also possible to report misconduct externally to a competent authority who can receive, provide feedback, and follow up on whistleblowing cases and, where applicable, to EU institutions, bodies, or agencies. Further information can be found in the link External reporting at the homepage.

Anonymous or Confidential Reporting

You have the option to choose between anonymous reporting or providing your name and contact details when submitting a report.

If you choose anonymous reporting, your identity will remain completely hidden unless you voluntarily provide personal information. There is no obligation to disclose any personal details.



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If you choose confidential reporting, you can provide your name and contact information. This option may be required by some organisations and will facilitate investigation as well as any necessary follow-up actions. Appropriate measures will be taken to protect your identity and the information provided, in accordance with Whistleblower Protection Laws.

Privacy notice for Rederi AB Älvtank employees

Our whistleblowing system secures the right for individuals to report incidents, misconduct and other substantially incorrect behavior. As an employee, you are subject to be included in a report in our whistleblowing system. You may be reported as a person responsible for the reported incident, or as being part of the relevant surrounding circumstances describing the incident. This means that your personal data may be processed in our whistleblowing system during our handling of the report. The data we will process in such situation is any data reported to us, together with information we otherwise have about you, for example your role in our organisation and if the reported incident is serious also information in your work computer and work communications systems. The legal ground and purpose for this processing is our legitimate interest in, and legal obligation to, provide a secure workplace and investigating wrongdoing. We will only store the data for as long as the investigation and will not share it unless we are legally required to. Our external system provider for our whistleblowing system, Whistleblowing Solutions AB, will store the data but will not execute any further access to the data than is needed for the storage.

We, as a company, are the personal data controller for this processing, and if you wish to know more about this and other processing of your personal data, please read more in our general privacy notice, including contact details to request more information.

Please see also QMA02.06 COMPANY GENERAL DATA PROTECTION POLICY.

Managing Director Rederi AB Älvtank

Christian Nilsson 2023-09-22