

J.A. Shipping A/S

WHISTLEBLOWER POLICY



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1. INTRODUCTION

At J.A. Shipping, we are committed to conducting our business with integrity, honesty, and transparency. We do this in compliance with applicable laws, guiding international principals and the J.A. Shipping Code of Conduct along with its underlying policies.

We strive to cultivate a working environment where employees, suppliers, business partners and stakeholders are empowered to embody the principles outlined in the J.A. Shipping Code of Conduct. Open and clear communication between J.A. Shipping and especially its employees is paramount in achieving this goal. We welcome suggestions, ideas, and criticism as opportunities for learning and growth.

The Whistleblower Policy is developed in line with applicable international and national laws – Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law, and the Danish law no. 1436/2021 about protection of whistleblowers (DK. Om beskyttelse af whistleblowere).

The Whistleblower Policy describes how J.A. Shipping offers its employees, suppliers, or business partners the possibility to report any (suspected) misconduct, breaches, concerns, incidents e.c. through the Whistleblower program. The main purpose of the whistleblowing channel is to provide employees support and guidelines to report severe misconduct which have occurred or very likely to occur within our organization in which an employee is or was in contact through their work, including breaches/ misconduct of the J.A. Shipping Code of Conduct, without a risk of being subject for retaliation.

2. TO WHOM DOES THIS POLICY APPLY

The Whistleblower Policy applies to J.A. Shipping, and all its employees performing work for J.A. Shipping, including trainees/ students; self-employees/ consultants; persons subject for recruitment; volunteers; shareholders and management who are active in the company, and other persons who are/ have been in a work-related context with us, under our control and management.

All employees have a duty to be aware of the contents of this Whistleblower Policy and any updates to same, and to comply therewith.

All reports made to the whistleblower channel in accordance with this Whistleblower Policy will be received and processed by the whistleblower team.

3. WHAT TO REPORT

This Whistleblower Policy describes how you can report any (suspected) misconduct within the J.A. Shipping organization without the risk of any retaliation. Such a report can be made anonymously and on a 24/7 basis.

If you know of or suspect any potential misconduct, J.A. Shipping urge you to make a report as soon as possible, so it may be addressed in a timely and appropriate manner.



A “**misconduct**” means an act or omission occurred (or most likely to occur) within the J.A. Shipping organization, which is considered as harmful to the public interest, which the employee has received knowledge of in a work-related context.

Examples of misconduct or (potential) misconduct considered as being of “public interest” are issues which are not in line with the J.A. Shipping Code of Conduct, the underlying policies, and applicable laws. These can be financial, operational, safety related, social or of employment nature, including violation of health and safety procedures, discrimination, racism, abuse, and criminal acts like but not limited to, fraud, bribery, theft, and environmental misdemeanors.

Please include in your report as many details as possible, such as the nature of the (suspected) misconduct, the persons involved, the time and place when and where it occurred, the discussions and actions which have already taken place regarding the (suspected) misconduct and all other information that might be relevant.

If an employee has concerns about their own employment, we ask that the employee discuss the matter directly with their supervisor. For more detailed guidance on handling employee complaints, J.A. Shipping’s MARAD MLC Complaint Guidelines provide specific policies and procedures.

4. WHERE AND HOW TO REPORT

If an employee has reasonable grounds to believe that a misconduct has been made, we encourage all employees to report the matter immediately through our whistleblowing channel.

You do not need to have proof of your suspicion, however you do need reasonable cause to assume that the information is true at the time of reporting, and you need to act in good faith. Allegations should not be made with the intent to cause harm.

A report can be made through email to: whistleblower@jashipping.com

You are allowed to choose between the following alternatives:

- written reporting, or
- reporting by requesting a physical meeting, which shall be enabled within a reasonable time.

It is possible to report anonymously.

PENALTIES FOR INTENTIONALLY INACCURATE REPORTING

If an employee misuses the reporting procedure by knowingly making inaccurate or malicious allegations, this could be seen as a serious violation, which may result in disciplinary actions.

5. HOW WILL YOU BE PROTECTED

PROHIBITION OF RETALIATION

J.A. Shipping is committed to a strict policy of non-retaliation, in accordance with applicable law.

The prohibition covers those who, in good faith, report suspected misconducts in accordance with this Whistleblower Policy, where such misconducts have occurred in a work-related context or participate



in investigations into a matter of misconduct, except where such investigation entails a criminal offence. The prohibition also includes indirect retaliation.

Retaliation; termination of employment; dismissal; other unfavorable treatment or other adverse consequences of a person who in good faith has reported a misconduct or suspected misconduct in accordance with the provisions of these guidelines shall be considered as a prohibited retaliation. It is also prohibited to hinder or attempt to hinder a reporting person from reporting information about a misconduct.

6. HOW YOUR REPORT IS TREATED

J.A. Shipping is committed to ensure that all reports of suspected misconducts are treated confidentially, efficiently and in accordance with our values and applicable law.

The whistleblower team has exclusive authority and responsibility for internal investigations and performs its duties impartially and independently. People outside the whistleblower team will be hindered from accessing the whistleblower data. However, during the investigation process, the whistleblower team may also request information and expertise from other individuals within or outside the company, in which case the obligation to maintain secrecy and confidentiality also applies to them.

THE INVESTIGATION

The reporting through the internal reporting channel is confidential. All information about the identity of the reporting person and the subject of the report and persons mentioned in the report and other personal data will be kept confidential.

The information in the report shall be processed as deemed necessary to complete the investigation. Appropriate remedial action, to the extent necessary, shall always be based on the results of a thorough investigation.

In certain circumstances, the whistleblower team may decide not to investigate the report. This can be the case for example in the following situations:

- the information obtained is insufficient in order to carry out an adequate investigation and no further information is available,
- classified information,
- the information is about the whistleblower's own employment,
- the report is made to the wrong channel, in which case the reporting person is directed to make the report to the correct party,
- the report is not provided in good faith, or
- if an investigation is already ongoing or has already been made.

If the provided information is not covered, cf. section 3, a notification will be given to the whistleblower, if possible.

If the report is made anonymously, the whistleblower team is prevented from further investigation of the identity of the reporting person. In case of an anonymous report, such report may risk being dismissed if, for example, the information obtained is deemed insufficient in order to initiate an investigation or if the veracity of the information provided cannot be reliably established.



A person who is the subject of a report shall not participate in the investigation or decision-making following the report. If a member of the whistleblower team is the subject of a report, they may not be involved in the investigation process and the decision-making.

The J.A. Shipping whistleblower team shall work in accordance with applicable laws and the J.A. Shipping Code of Conduct. All persons involved will be treated in fairness, with respect, with objectivity and impartiality. Persons are presumed innocent until proven otherwise.

ANONYMOUS REPORTING

You may make your report on an anonymous basis by sending an e-mail from an anonymous e-mail address. J.A. Shipping recognizes that an anonymous report may be the only alternative under extraordinary circumstances, although in general it will be more difficult to investigate the reported (suspected) misconduct and to protect the person who made the report. J.A. Shipping will not try to find out the identity of the person submitting an anonymous report.

DOCUMENTATION AND DATA PROCESSING

The whistleblower team is required to document all reports received through the whistleblower channel. J.A. Shipping will comply and process data in accordance with national and international legislation, cf. Section 1, and applicable data protection regulations (GDPR).

Personal data will not be kept longer than necessary, taking into consideration the purpose of handling in accordance with applicable legislation, cf. Section 1.

INFORMATION TO THE REPORTING PERSON AND THE PERSON SUBJECT TO THE REPORT

Information to the employee shall be provided as follows:

- Within seven (7) days following reporting, a confirmation will be sent by the whistleblower team in order to confirm that the report has been received, except where the employee has expressly requested not to receive any confirmation, or if the whistleblower team has reasons to believe that the identity would be revealed.
- The whistleblower team will, as far as possible, inform the reporting person, no later than within three (3) months upon confirmation, of the actions to be taken with regard to the report and the reasons why, and
- where applicable, the whistleblower team will inform if the identity of the reporting person needs to be provided to an authorized third party, except where such information would hinder the investigation.

The person subject to the report shall also receive information on the processing of their personal data with regard to the report, except where such information would hinder the investigation (if so, information shall instead be provided latest when measures are being taken).

If the whistleblower team is unable to meet the three (3)-month deadline, notification shall be provided to the reporting person, along with the reasons for the delay and the expected timeframe for further feedback.



7. ACCOUNTABILITY AND GOVERNANCE

Compliance with the Whistleblower Policy is overseen by the HSE Manager. Additionally, internal and external auditors conduct regular audits to ensure adherence to the J.A. Shipping policies and the J.A. Shipping Code of Conduct.

Furthermore, the Board of Management and our legal team conducts annual reviews of the J.A. Shipping policies in collaboration with the HSE Manager. This ensures that our commitment to upholding the highest standards of professionalism, integrity, and ethical behavior remains firm and aligned with evolving standards and best practices.