



ESG Report Westfal-Larsen Group 2025

SKIBSAKTIESELSKAPET NAVIGATION CO LTD



Introduction



About Westfal-Larsen

With more than a century of experience in the shipping industry, Westfal-Larsen has acquired a strong, global position. Our core business is to provide high-quality maritime transportation services within the chemical tankers and open hatch dry cargo vessels segments. We take pride in having personal and long-lasting relationships with our clients across the world.

Westfal-Larsen with its subsidiaries ("Westfal-Larsen Group" or "Group") has more than a century of experience in maritime transportation. Westfal-Larsen was founded in 1905, and is headquartered in Bergen, Norway, and remains owned by the founder's direct descendants.

Skibsaktieselskapet Navigation Co. Ltd., Bergen, is the holding Group. Through its subsidiaries, the Group conducts activities primarily within maritime transportation, supplemented with investments in technology.

The Group's principal activities consist of chemical shipping and related maritime services. Ownership, commercial management and technical management of vessels are key elements of the Group's operations. The main operating companies include Westfal-Larsen & Co AS, Welco Eco Ship AS, Masterbulk AS, Westfal-Larsen Management AS, Westchart AS and Westfal-Larsen Group Resources.

In 2025, Armadora AS owned the Group's 16 dry bulk vessels through its subsidiary Masterbulk AS. These vessels are operated by Saga Welco AS under long-term contracts, primarily transporting pulp and paper products from South America to customers in China, the Middle East and Europe.*

The Group's fleet is managed through a combination of in-house and external technical management.

**By 2026, dry-bulk shipping will be phased out by sale of the whole bulk vessel fleet, and ownership and management of these vessels will no longer be part of the Group's activities.*

**ESG topics and metrics related to the vessels included in the Saga Welco Pool are covered in Saga Welco's ESG-report for 2025, and not included in this report.*

Group Overview



Basis for preparation

This year's report

This year's sustainability report has been prepared in accordance with the VSME Basic Module and covers the financial year 2025. The report is prepared on a voluntary basis and is intended to provide a transparent and proportionate overview of the Group's relevant sustainability-related matters.

The report has been prepared on a consolidated basis and covers the entire Westfal-Larsen Group of companies. The Group's core business is maritime transportation, which is also the area where the Group has its most significant environmental and social impacts. Consequently, the sustainability disclosures and metrics included in this report primarily relate to the Group's shipping activities.*

For the reporting year 2025, the scope of quantitative ESG disclosures is therefore limited to shipping activities. Other business areas within the Group are considered to have a more limited sustainability impact and are therefore not included in the detailed metrics in this year's reporting. This scope reflects a proportional approach aligned with the size, structure and risk profile of the Group, as envisaged under the VSME framework.

Where relevant, qualitative information has been included to provide context for the Group's operations, risks and sustainability-related priorities. This report does not replace statutory financial reporting and should be read in conjunction with the Group's annual accounts.

Chemical tanker activities

Background and status of chemical tankers

As a fully integrated shipping organization, the chemical tanker business consists of ownership of the vessels, as well as both technical and commercial management conducted from Westfal-Larsen's offices in Bergen.

The vessels are modern, uniform, zinc or Marineline coated ships, built between 2009 and 2016. All vessels are owned by Westfal-Larsen & Co AS and Welco Eco Ship AS. All our chemical tankers fly the Norwegian flag and are registered in the Norwegian International Ship Register (NIS).

By the end of 2025, Westfal-Larsen & Co AS and Welco Eco Ship AS owned and managed 8 chemical tankers.

The chemical tanker fleet includes two methanol **dual-fuel tankers**, owned by Welco Eco Ship AS. Westfal-Larsen is proud of being one of the first movers in this technology. These dual-fueled 50,000 dwt tankers are capable of running on methanol as well as fuel oil, marine diesel oil or gas oil. As a marine fuel, methanol is a promising option to enable owners to reduce the environmental impact of seaway transportation and to ensure compliance with applicable laws and regulations.

Technical Fleet Management

Vessel operations

Westfal-Larsen Management AS has long traditions of in-house technical management of our fleet. We are continuing this tradition by keeping the technical management for the chemical tankers in-house.

Westfal-Larsen Management AS is a fully integrated ship management Group providing all relevant services for the ship owners. These services include technical management, HSEQ-vetting, crewing, purchasing, insurance, finance, accounting and supervision in new-build projects.

Highly qualified, committed and skilled, the staff of Westfal-Larsen Management AS comprises approximately 15 employees in 2025 in Norway.

Practices, policies, and future initiatives for transitioning towards a more sustainable economy

Operational transition

As a shipping group with global operations, the Westfal-Larsen Group is exposed to operational, environmental and safety-related risks inherent to maritime activities. These include risks related to vessel operations, severe weather, collisions, groundings and other maritime incidents, which may impact people, the environment and property. Managing such risks forms an integral part of the Group's day-to-day operations and provides the context for its sustainability-related work and reporting.

Westfal-Larsen's operations are conducted within the international environmental requirements that apply to this kind of maritime activity. Ownership of vessels involves a risk of pollution of the external environment. American legislators have introduced stringent rules that may entail unlimited liability for oil spills in US waters. By using recognized quality assurance principles, the Group is seeking, via the services procured from Westfal-Larsen Management AS, to limit this risk by means of:

- Safe operating routines
- Adequate current maintenance
- Adequate insurance coverage
- Ensuring that operations are conducted by qualified personnel.

Shipping impacts the natural environment, climate, and ecosystems. Westfal-Larsen is committed to minimizing such impacts through responsible operations, in accordance with applicable environmental regulations, and continuous efforts to improve environmental performance.



Supporting UN Sustainable Development Goals

The Group has chosen to align its sustainability efforts with relevant United Nations Sustainable Development Goals, reflecting its commitment to responsible business conduct and long-term value creation. Through its maritime activities, the Group aims to contribute to a more sustainable shipping industry by reducing environmental impact, operating responsibly and creating lasting value for society, clients and stakeholders.

Environmental considerations are integrated into the Group's daily operations and decision-making processes. The Group's key environmental policies and practices include minimizing the environmental impact of operations, maintaining zero tolerance for environmental incidents or spills, and continuously improving onboard energy efficiency.

To support the transition towards a lower-carbon maritime industry, the Group has established clear objectives and targets. These include compliance with the IMO greenhouse gas reduction targets, currently aiming for a 40% reduction in carbon intensity by 2030 compared to 2008 levels and climate-neutral operations by 2050.

Further initiatives include the use of biofuels to reduce the overall greenhouse gas intensity of the fleet and ensuring that all newbuildings are dual-fuel ready.

Progress and implementation are followed up through internal monitoring and annual self-evaluations, supporting continuous improvement and transparency.





Environmental Metrics

Energy and greenhouse gas emissions

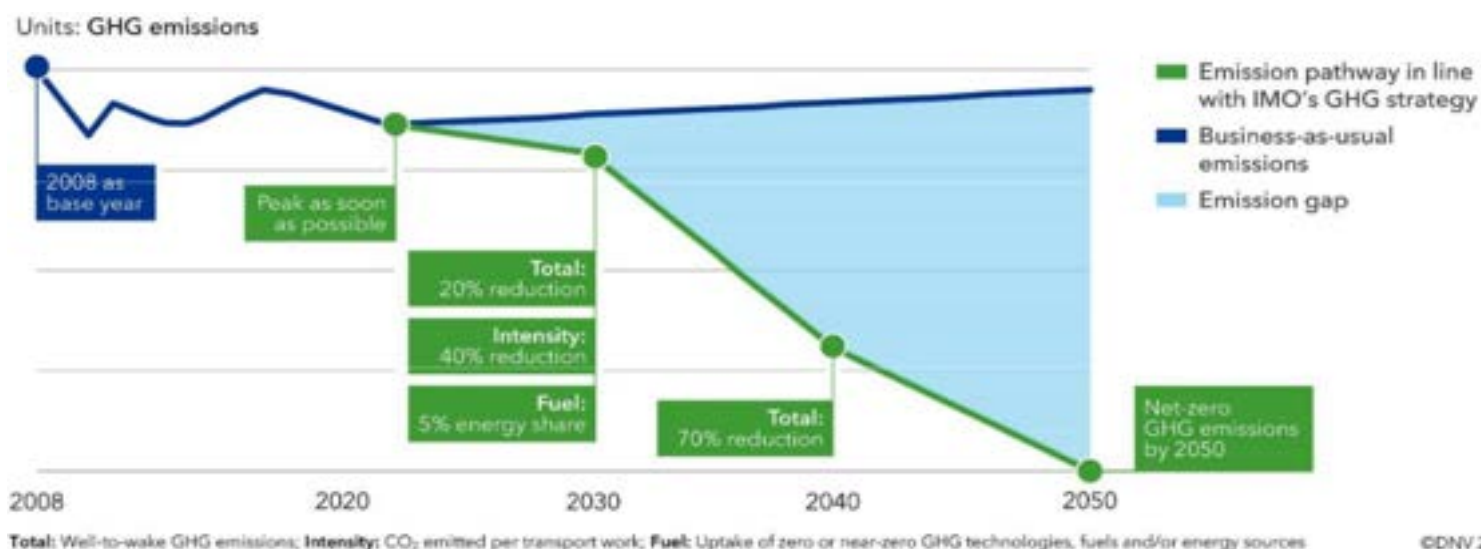
Energy Efficiency and Decarbonization Strategy

Westfal-Larsen is committed to operating a chemical tanker fleet that not only complies with, but surpasses, international environmental regulations. Energy efficiency is recognized as the most effective and immediately available measure for reducing environmental impact and is therefore a central element of the Group's operational and technical strategy.

Energy-efficiency measures are embedded into daily operations and supported by continuous performance monitoring at vessel and fleet level. These measures are designed to reduce fuel consumption per tonne-mile transported while maintaining high standards of safety and reliability. Performance is monitored using industry-standard indicators, including fuel consumption, carbon-intensity metrics aligned with the IMO Carbon Intensity Indicator (CII) framework, distance travelled and selected air-emission metrics, enabling targeted improvement actions where required.

Building on this foundation, Westfal-Larsen applies a pragmatic and phased approach to decarbonization that reflects the technical maturity and fuel-availability constraints of the chemical tanker segment. In the short to medium term, emissions-intensity reductions are achieved primarily through energy-efficiency improvements and selective technical upgrades. In parallel, the Group monitors developments in alternative fuels and propulsion technologies and has already integrated methanol and sustainable biofuels into its operations, supporting lower-carbon performance and compliance with emerging regulations.

The Group's approach is aligned with the IMO's greenhouse-gas reduction ambitions and is reviewed regularly to reflect regulatory developments, technological progress and market conditions.



CII Performance

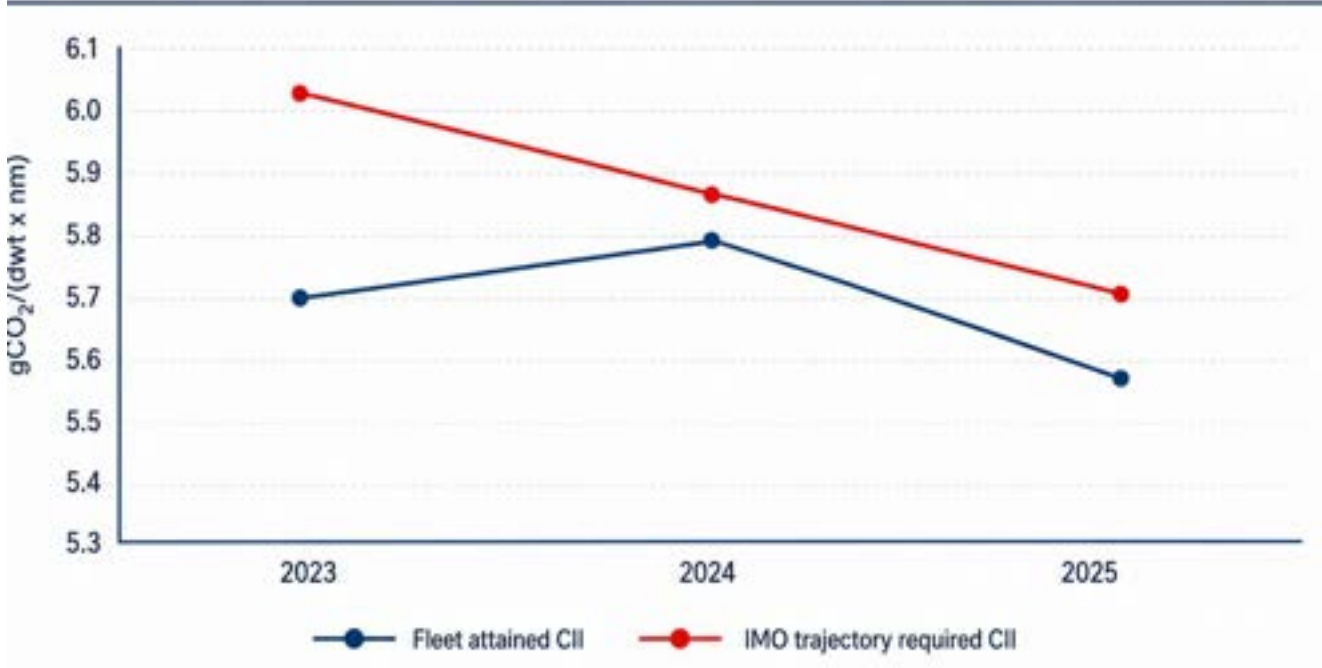
In 2025, the Westfal-Larsen chemical tanker fleet maintained strong compliance with the IMO Carbon Intensity Indicator (CII) requirements. All vessels achieved CII ratings of A or B, with no vessels rated C or below.

Attained annual operational CII values remained below the applicable required reference lines, reflecting the effectiveness of voyage optimization, speed management and continuous operational efficiency measures across the fleet.

Fleet-level carbon intensity is calculated using a DWT- and distance-weighted methodology in line with IMO guidance. Using this approach, the chemical tanker fleet achieved attained CII values of approximately 5.70 in 2023, 5.79 in 2024 and 5.58 in 2025. Despite a slight increase in 2024 and higher total sailing distance in 2025, the fleet-average CII improved, indicating that efficiency gains outpaced growth in transport work as low-carbon vessels accounted for a growing share of fleet activity.

Overall, the 2025 results confirm the fleet’s readiness for continued compliance with CII requirements and underscore the role of operational discipline and fuel flexibility in maintaining strong carbon-intensity performance within the chemical tanker segment.

Year	Fleet distance (nm)	Total CO2 emissions (t)	Fleet attained CII	IMO trajectory required CII
2023	524,495	154,824	5.70	6.03
2024	538,367	161,280	5.79	5.87
2025	565,368	163,503	5.58	5.71

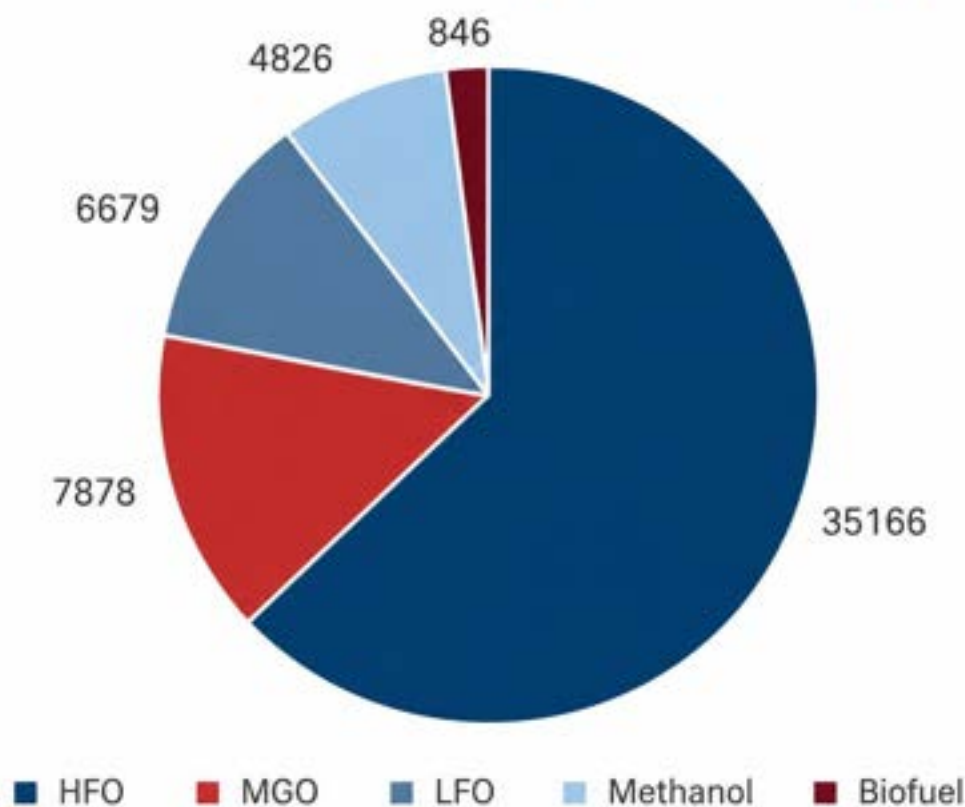


Fuel Consumption

Fuel consumption across the fleet continues to be dominated by conventional marine fuels; however, emissions intensity has been effectively managed through operational controls, selective technical measures and the targeted use of low-carbon fuels. The methanol dual-fuel vessels Leikanger and Lindanger played a central role in overall fleet performance, consuming a combined total of more than 4,800 tonnes of methanol in 2025 while sustaining high transport work and A-rated CII performance.

In addition, limited volumes of sustainable and certified biofuel blends were deployed on several vessels during 2025. These trials supported incremental reductions in emissions intensity while preserving operational flexibility and provided valuable experience for future fuel strategies. The annual fleet consumption of different fuel types in 2025 is shown below in tonnes.

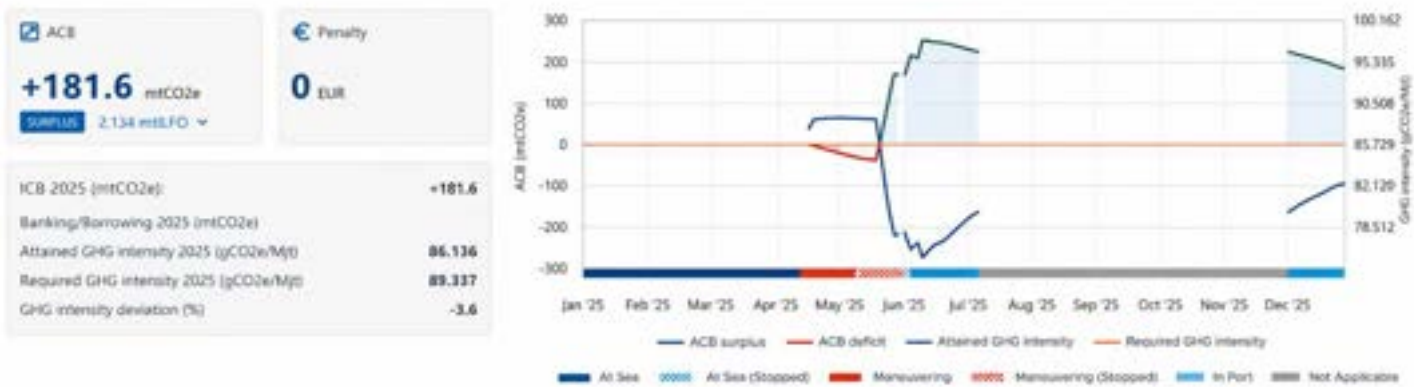
Total Fuel Consumption 2025 [mt]



Regional Emission Regulations

A strong focus on energy efficiency and emissions reduction supports Westfal-Larsen’s cost competitiveness by lowering fuel consumption and reducing exposure to regional emissions-related costs. Improved energy performance contributes to lower compliance costs under regulatory frameworks such as the EU Emissions Trading System (EU ETS) and FuelEU Maritime (FEM), strengthening the commercial resilience of the chemical tanker fleet. Simulation tools are applied during commercial planning to assess the financial implications of different trading alternatives and support informed decision-making.

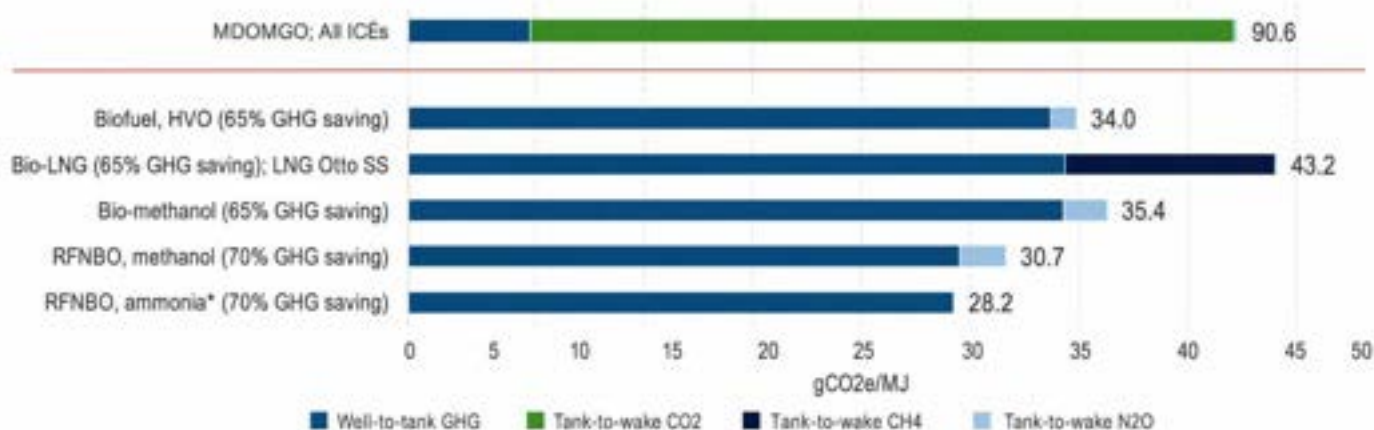
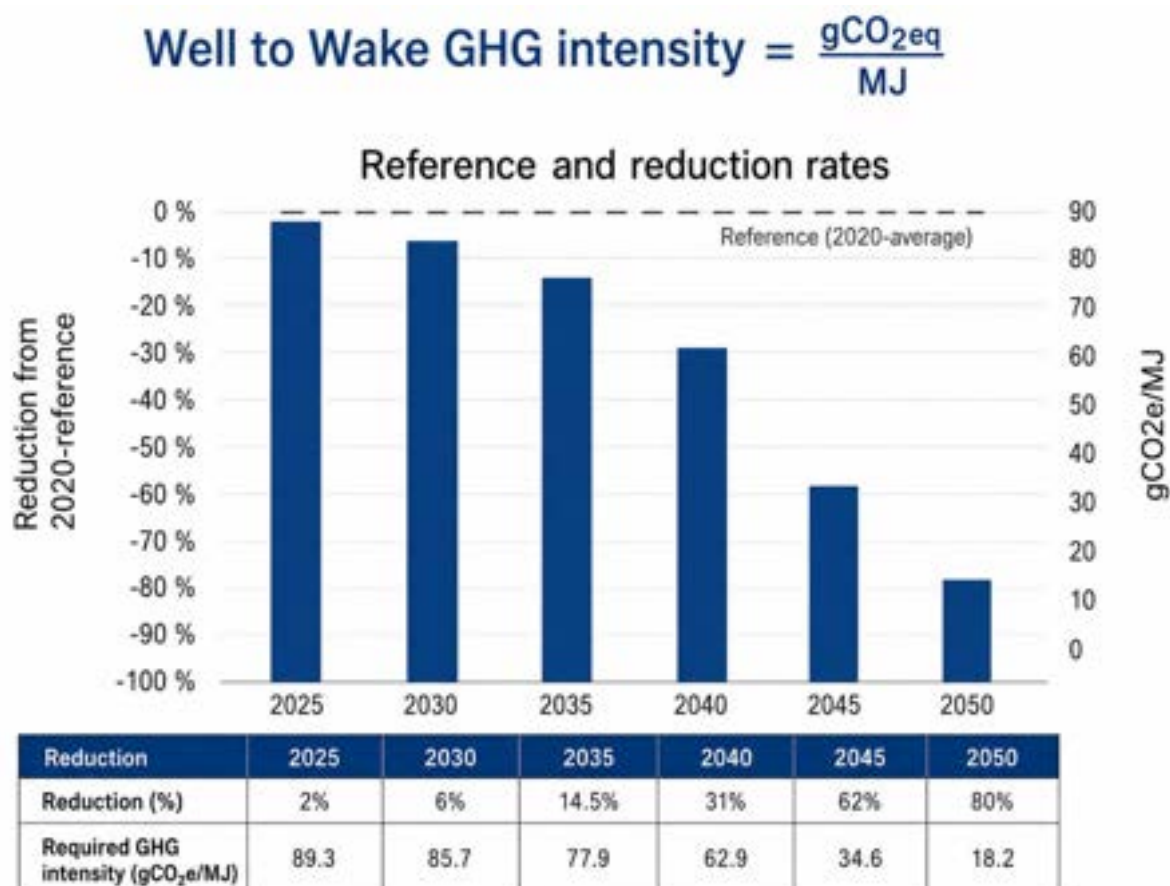
In 2025, five of the eight chemical tankers operated on EU-related trades and were therefore subject to both EU ETS and FEM requirements. Compliance with FEM is integrated into operational and technical planning, including fuel selection, voyage planning and evaluation of fuel flexibility. Performance is reviewed regularly to ensure ongoing adherence to applicable requirements, and the YTD compliance balance is updated daily in our software systems. Below is an example from our FEM performance dashboard, relevant for one of the vessels subject to EU trade:



FEM compliance in 2025 was achieved through a combination of sustainable, certified biofuel blends and external pooling arrangements with selected business partners. Prior to pooling, the fleet’s attained GHG intensity stood at 89.374 gCO₂-eq/MJ, marginally above the required level of 89.337 gCO₂-eq/MJ. Following the implementation of external pooling, the applicable GHG-intensity requirement was met, demonstrating the effectiveness of collaborative compliance mechanisms and the fleet’s ability to adapt to evolving regulatory frameworks.

EU ETS compliance is managed through a combination of active EUA trading and collaboration with trusted partners, providing flexibility in how allowances are sourced and allocated. Emissions data and financial exposure are monitored on a continuous basis, allowing the compliance strategy to be adjusted in response to market conditions and supporting cost-efficient compliance.

Looking ahead, the potential use of bio-methanol represents a significant opportunity to further strengthen FEM compliance. Depending on feedstock and production pathway, bio-methanol typically achieves well-to-wake GHG intensities in the range of approximately 15–30 gCO₂-eq/MJ, compared with around 89 gCO₂-eq/MJ for the 2025 FEM reference threshold. This corresponds to a lifecycle GHG reduction of roughly 65–85% relative to fossil fuels. The fleet’s dual-fuel methanol vessels are already technically capable of operating on bio-methanol without modification, providing flexibility and optionality as market availability of sustainable fuels increases.



Decarbonization Projects

In addition to fleet-wide operational and technical measures, Westfal-Larsen has throughout the years implemented and evaluated several targeted decarbonization projects across its fleet. These initiatives focus on practical, scalable solutions that improve energy efficiency to reduce the fuel consumption. Together, the projects drive measurable efficiency improvements and provide evidence-based input for decisions on which technologies can be scaled across the fleet. A quick introduction to some of our latest projects is given below.

Hull and Propeller Condition Management

The hull and propeller condition is managed through a structured hull cleaning and propeller polishing program aimed at maintaining optimal hydrodynamic performance. Decision-support tools are used to evaluate when and where cleaning or propeller polishing should be carried out, based on vessel performance trends, trading patterns and local regulatory considerations. By targeting interventions at the most effective point in time and location, biofouling-related resistance is minimized and the propulsion efficiency is improved.

This data-driven approach supports continuous energy-efficiency improvements while avoiding unnecessary underwater operations and associated costs.



In-transit hull cleaning

Westfal-Larsen is an early adopter of in-transit hull cleaning technology. Shipshave enables underwater hull cleaning during normal vessel operations, reducing biofouling build-up without the need for dry-docking or extended port stays. By maintaining a cleaner hull surface throughout the trading cycle, the system helps limit hydrodynamic resistance, supporting improved fuel efficiency and lower emissions over time. Early adoption of this solution reflects a proactive approach to operational energy efficiency and continuous performance optimization.

Ultrasound transducers

Ultrasound transducer technology has also been evaluated as part of broader biofouling and energy-efficiency initiatives. Based on operational experience from other vessel segments, ultrasound systems can help limit biofouling development by emitting high-frequency vibrations that discourage organism attachment to hull surfaces and sea chests. This experience provides valuable insight into the potential role of ultrasound technology as a complementary measure within a wider biofouling management and energy-efficiency strategy, supporting continuous improvement and informed technology assessment across the fleet.

Based on our operational experience, ultrasound transducers do not eliminate the need for periodic propeller polishing. However, when used as a complementary measure, they contribute to maintaining a cleaner propeller surface over time and help improve overall average propeller efficiency. This supports more stable propulsion performance and reinforces a holistic approach to biofouling management and energy efficiency.



Graphene based propeller coating

Graphene-based propeller coatings have been assessed as part of ongoing efficiency initiatives, offering potential benefits through reduced surface roughness and improved resistance to fouling. This can support more stable propeller performance over time and contribute to incremental gains in propulsion efficiency.

Condition-based maintenance

Condition-based maintenance of main and auxiliary engines is supported using the digital performance and diagnostics tools from Tekomar XPERT. This system enables continuous monitoring of engine condition, performance trends and key operational parameters, allowing potential deviations or inefficiencies to be identified at an early stage. By shifting from reactive or time-based maintenance to data-driven decision-making, the fleet improves engine reliability, optimizes maintenance intervals and supports more efficient fuel consumption. This approach contributes to reduced unplanned downtime, improved operational efficiency and lower emissions, while strengthening long-term asset integrity across the chemical tanker fleet.



EcoCam

Everllence's EcoCam system has been installed on selected vessels during scheduled dry-dockings in connection with special surveys. The system enables variable fuel injection timing to be optimized in line with actual operating conditions and is particularly effective during slow-steaming operations, where conventional cam settings may result in sub-optimal combustion. By optimizing injection timing at reduced engine loads, EcoCam supports improved combustion efficiency, lower specific fuel consumption and more stable engine performance. This targeted implementation during special surveys reflects a structured approach to technical upgrades, supporting energy efficiency improvements and emissions reduction across the chemical tanker fleet.

Advanced VFD systems

Variable-frequency drive (VFD) systems are used to optimize electrical load and energy consumption across key auxiliary systems, including seawater cooling, low-temperature fresh-water (LTFW) circuits and engine-room ventilation fans. By matching pump and fan speeds to actual operational demand rather than running at constant output, the system reduces unnecessary energy use while maintaining stable engine operating temperatures. This is particularly beneficial for the LTFW circuit, where precise temperature control helps avoid main-engine efficiency penalties and supports optimal specific fuel oil consumption (SFOC). The application of VFD technology therefore contributes to lower auxiliary power demand, improved main engine efficiency and reduced overall emissions.



FuelOpt Propulsion Control

Fuel consumption is further reduced by optimizing propulsion based on engine load rather than fixed revolutions. By using engine load as the primary control parameter, propulsion can be aligned more closely with the engine's most efficient operating range under varying conditions such as draft, weather and speed. This approach supports improved fuel efficiency, while promoting more consistent engine performance and contributing to lower emissions across the trading profile.

Environmental data overview

SCOPE 1 EMISSIONS

167,762.83

tCO₂e

TOTAL GHG EMISSIONS

167,762.83

tCO₂e

GHG INTENSITY

0.086

tCO₂eq/GJ

ENERGY CONSUMPTION

19,572,843.42

GJ

Fleet emissions

2025

CO ₂ emissions		164,503 mt
NOx		3,603,487 kg
SOx		728,232 kg
PM10		218,375 kg
CO		137,114 kg

Emissions and intensity

Indicator	Unit	2025
Scope 1 Emissions	tCO ₂ -e	167,762.83
Emissions to air - N ₂ O	kgN ₂ O	9,972.66
Emissions to air - CH ₄	kgCH ₄	2,770.19
Total Greenhouse Gas Emissions	tCO ₂ -e	167,762.83
Total Energy Consumption	GJ	19,572,843.42
GHG Intensity	tCO ₂ eq/GJ	0.086

Pollution of air, water and soil

Westfal-Larsen's chemical tanker operations are subject to international maritime environmental regulations under MARPOL, as implemented by Flag States and verified through classification societies.

Pollution of air

Emissions to air from Westfal-Larsen's chemical tanker operations arise primarily from fuel consumption during voyages and port operations. The management of air emissions is an integral part of the Group's environmental management practices and is governed by international maritime regulations.

Greenhouse gas emissions are tracked using verified fuel consumption data and standard emission factors, enabling the calculation of emissions-intensity metrics such as CO₂ per tonne-mile transported. These metrics support internal performance monitoring and compliance with applicable regulatory reporting requirements.

Emissions data are verified annually by DNV and continuously validated throughout the year in cooperation with the Group's long-standing partner StormGeo, supporting a high level of data quality and reliability across all datasets.

Compliance with MARPOL Annex VI forms the basis for controlling air emissions across the fleet. Sulphur oxides (SO_x) emissions are managed through the use of compliant marine fuels in accordance with IMO sulphur limits and the operation of exhaust gas cleaning systems. Nitrogen oxides (NO_x) emissions are addressed through the operation of engines certified to the applicable IMO NO_x standards, supported by planned maintenance and fuel-quality control to ensure stable and efficient engine performance.

In addition to CO₂, other air-emission components such as particulate matter (PM), methane (CH₄), nitrous oxide (N₂O) and carbon monoxide (CO) are monitored internally as part of the Group's broader environmental performance oversight. This monitoring supports early identification of deviations and contributes to continuous improvement of operational efficiency and emissions management.

Pollution of water

Operational discharges to water from chemical tankers are regulated under MARPOL Annex I (oil), Annex II (noxious liquid substances), Annex IV (sewage) and Annex V (garbage). The fleet operates under strict discharge prohibitions, cargo tank washing requirements, and reception facility obligations.

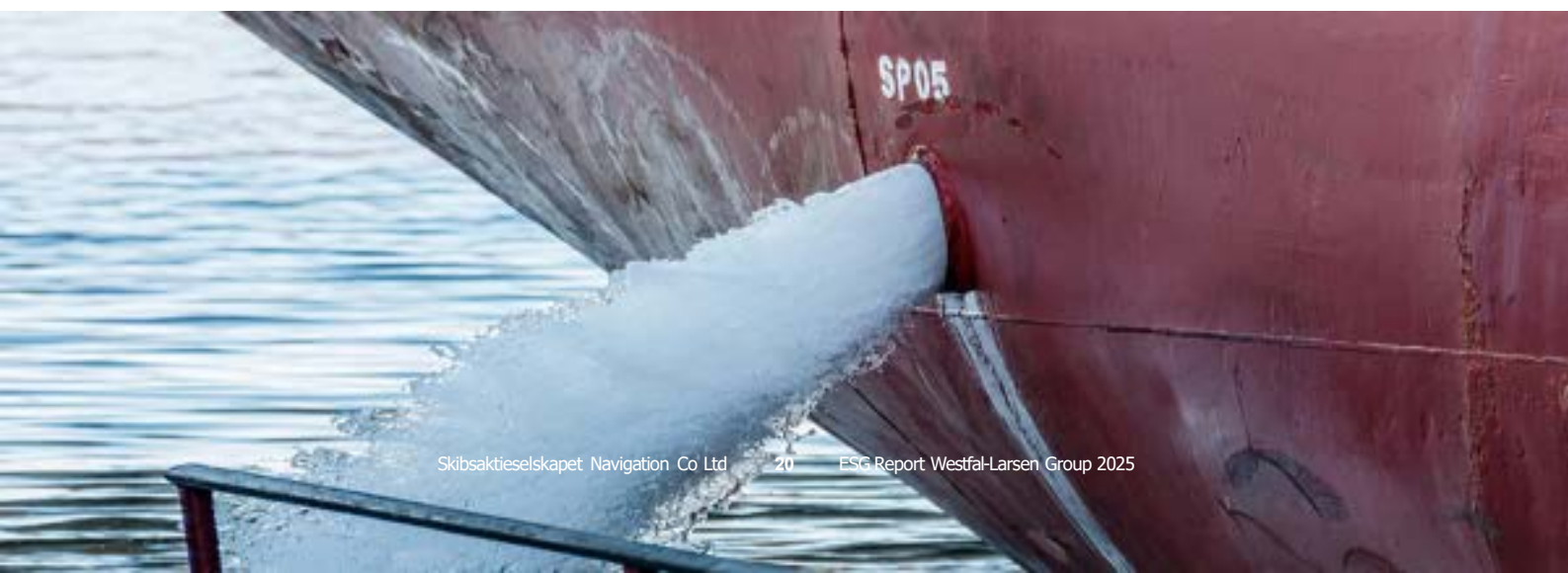
The tankers are equipped with approved pollution-prevention systems and operate in accordance with regulatory requirements. Any accidental releases or non-routine discharges are subject to mandatory reporting to Flag States and relevant authorities. There were zero reported spills in 2025.

Pollution of soil

The chemical tanker business does not involve land-based production facilities or activities that generate direct emissions to soil. As such, pollution of soil is not considered an impact of the Group's shipping operations.

Ballast Water Management

All vessels in the chemical tanker fleet are equipped with ultraviolet (UV) ballast water treatment systems (BWTS), ensuring full compliance with the IMO Ballast Water Management Convention. The installed systems are also approved by the United States Coast Guard (USCG), enabling unrestricted operation in US waters. The use of UV-based treatment effectively prevents the introduction and spread of invasive aquatic species by neutralizing organisms without the use of active substances. This solution supports robust environmental protection across all operating regions while minimizing chemical usage and operational complexity, reflecting the fleet's commitment to responsible marine protection and regulatory compliance.



Water

Westfal-Larsen's chemical tanker operations are conducted at sea and do not involve water abstraction from freshwater bodies, groundwater or municipal water systems for industrial production purposes. The Group does not operate land-based manufacturing or processing facilities where water withdrawal, consumption or discharge would typically be considered material under environmental reporting standards.

As per reporting standards, the Group assesses whether its tanker activities involve material water use, water stress exposure, or impacts on water bodies that require quantitative disclosure.

Water use in vessel operations

Water use onboard the tankers is limited to domestic use for crew welfare and accommodation needs, and technical use (engine cooling systems, cargo tank cleaning, and safety systems).

Seawater is used for technical purposes in closed or controlled systems, such as cooling circuits and cargo tank cleaning, in accordance with vessel design and international regulations. Freshwater used on board is typically generated by onboard freshwater generators or supplied through port services.

These uses are considered operationally necessary and non-consumptive in nature and do not constitute significant abstraction from freshwater resources at Group level.

Water stress and location-specific risks

The fleet operates internationally across multiple regions and does not depend on fixed water sources in water-stressed areas. As such, water stress is not identified as a material risk to operations or as a significant environmental impact driver for the chemical tanker business.



Resource use, circular economy and waste management

Westfal-Larsen's chemical tanker operations do not involve manufacturing or processing activities that consume raw materials as production inputs. Resource use is primarily related to operational consumables such as marine fuels, lubricants, spare parts, maintenance materials and onboard supplies. Fuel consumption and associated efficiency measures are addressed separately under B3 – Energy and greenhouse gas emissions.

Circular economy principles are applied mainly through maintenance, repair and reuse practices rather than material transformation. Planned maintenance strategies are used to extend equipment lifetime, reduce premature replacement and support reuse or refurbishment where technically and legally permitted. During dry-docking and repair activities, repair is prioritized over replacement, and recyclable materials such as metals are recovered through approved facilities. At end of vessel life, ships are recycled in accordance with applicable international conventions and requirements.

Waste generated during vessel operations includes operational waste, maintenance waste and hazardous waste. Waste handling, segregation and disposal are regulated under MARPOL, including Annex V on garbage, and are managed through onboard procedures and delivery to approved port reception facilities. Hazardous waste streams are handled in compliance with international and port-state requirements and documented where applicable.

Social Metrics



Sustainability Governance and Strategy

Workforce - General characteristics

The Group’s workforce consists of both land-based employees and seafarers, reflecting the nature of its shipping and support activities.

Land-based employees are employed by three Group companies: Westfal-Larsen Management AS, Westfal-Larsen Group Resources AS and Westchart AS. These employees perform management, technical, commercial and administrative functions supporting the Group’s operations.

Our seafarers are not directly employed by the Group companies but are engaged through established crewing agents in Latvia and the Philippines. The Group places strong emphasis on ensuring that seafarers are engaged under conditions consistent with applicable international standards, including requirements related to human rights, decent working conditions, health and safety.

Headcount of land-based employees by the end of 2025



Workforce - Health and safety

Ensuring safe and healthy working conditions is a core priority for the Group and an integral part of our operational and governance practices. Health and safety considerations are addressed through established policies, procedures and follow-up mechanisms adapted to the Group’s activities.

Occupational health and safety risks are managed in line with applicable regulatory requirements and operational standards relevant to both shore-based and maritime activities.

For 2025, the Group in total had 2 work-related accidents in 2025. The Group has had no fatalities as a result of work-related injuries and work-related ill health.

Workforce - Remuneration, collective bargaining and training

Westfal-Larsen employees' terms of employment, including remuneration, are determined in accordance with applicable laws, internal policies and individual employment arrangements. Where applicable, employees, both seafarers and land-based employees may be covered by collective bargaining agreements. The Group applies structured processes to ensure that remuneration is aligned with responsibilities, competence and market conditions.

Westfal-Larsen provides individual training of seafarers and office staff. Our training matrix clearly describes training requirements for each employee and the individual online training modules assigned for the specific ranks. We base our training programs on identified needs for training, rather than the minimum requirements.

Human Rights and Decent Working Conditions

The Group is committed to respecting internationally recognized human rights, and promoting decent working conditions across its operations and value chain. This commitment is formalized through Group-wide guidelines adopted by the Board of Directors, applicable to all employees, management, board members, as well as suppliers and business partners. The guidelines are aligned with the UN human rights conventions, the ILO core conventions, and the requirements of the Norwegian Transparency Act.

The Group works systematically with due diligence related to human rights and decent working conditions, applying a risk-based approach in line with the OECD Guidelines for Responsible Business Conduct. This includes annual overall risk assessments of suppliers and ongoing monitoring of risks in own operations, the supply chain and business relationships, with particular attention to health, safety and working conditions for seafarers and to risks in complex and global supply chains.

Clear expectations are set regarding fair working conditions, non-discrimination, reasonable working hours, safe and healthy workplaces, freedom of association and wages that enable a decent standard of living.

Identified risks or breaches are addressed through dialogue, corrective measures and follow-up, and may, where necessary, result in changes to contractual relationships. The work is supported by training, internal controls and accessible whistleblowing channels, with zero tolerance for retaliation.

Our Guidelines in full can be found in our website: www.wlco.no

Whistleblowing and Speak-Up Mechanisms

The Group has established whistleblowing procedures to ensure that concerns related to human rights, decent working conditions and other business ethical issues, can be raised and handled safely and responsibly.

Employees, suppliers and business partners are encouraged to report suspected breaches of the Group's guidelines, applicable laws or ethical standards through available whistleblowing channels.

All reported concerns are handled in accordance with established internal procedures and are followed up by relevant functions within the Group. The Group has zero tolerance for retaliation against any individual who raises concerns in good faith, regardless of whether the concern is ultimately substantiated.

The whistleblowing arrangements form an integrated part of the Group's overall governance, compliance and due diligence framework for human rights and decent working conditions, supporting transparency, accountability and continuous improvement.





Governance Metrics

Governance Performance

Business Conduct

The Group is committed to conducting its business in a responsible, ethical and transparent manner. This commitment is anchored in the Group's Code of Conduct, which sets out expectations for integrity, compliance with applicable laws and regulations, responsible business practices, and respect for human rights.

The Code of Conduct applies throughout the organization and provides guidance to employees, management and board members in their daily activities. It also establishes the Group's expectations towards suppliers and business partners, who are required to adhere to comparable standards of ethical conduct and legal compliance.

These principles are supported by internal policies, procedures and governance arrangements designed to promote compliance, prevent misconduct and ensure sound decision-making. This includes measures relating to sanctions compliance, anti-corruption and anti-bribery, anti-money laundering, respect for human rights, and the prevention of harassment and discrimination.

The Group expects suppliers to uphold the same high standards, including maintaining ethical business conduct, complying with applicable laws and sanctions regimes, and respecting human rights by ensuring safe and fair working conditions, and prohibiting child labor, forced labor and discrimination. Suppliers are also expected to minimize environmental impact and protect personal data and confidential information.



The Group is a member of the Maritime Anti-Corruption Network (MACN), a global industry initiative working to eliminate corruption in the maritime sector. Through this membership, the Group strengthens its anti-corruption practices and contributes to collective efforts to promote integrity and transparency across the maritime value chain.

Westfal-Larsen had no confirmed incidents of corruption or serious breaches of business conduct were identified during the reporting period.