Report on Human Rights Due Diligence in Hansa Tankers AS

This report is based on the requirements in section 4 of the Norwegian Transparency Act (Lov om virksomheters åpenhet og arbeid med grunnleggende menneskerettigheter og anstendige arbeidsforhold (åpenhetsloven) 2022)

Description

The Transparency Act was enacted by the Norwegian Parliament on 10 June 2021 and establishes legal requirements for larger enterprises' duty to report on the work they do to ensure compliance with fundamental human rights and decent working conditions in the enterprises themselves, in their supply chains and with their business partners.

The Transparency Act's aim is to promote enterprises' respect for fundamental human rights and decent working conditions and ensuring that consumers, organizations, trade unions, journalists and the public have access to information. The Transparency Act is a Norwegian initiative, but we see similar initiatives in other European countries as well as at EU level.

The report requires a general description of:

- The enterprise's organization and area of operation.
- Guidelines and routines for handling actual and potentially negative consequences for fundamental human rights and decent working conditions.
- How the work with the due diligence assessment is organized.

and specific information on:

• Actual negative consequences and substantial risk for negative consequences which enterprises have identified through their due diligence assessments and measures the enterprises have taken or plan to take to stop actual negative consequences or to limit substantial risk.

The report shall be updated and published no later than 30 June each year and otherwise in case of significant changes to the enterprise's risk assessments. The report shall be published on the enterprise's website and may also be included in the enterprise's annual report or sustainability report. The report must be signed by the board and the general manager.

Hansa Tankers's organization and area of operation

Hansa Tankers AS is a pool manager with headquarters in Bergen, Norway. The company was founded in 2010 and operates ~ 30 chemical tankers on behalf of our partners ranging from around 20 000 to 35 000 dwt in size. Hansa Tankers is one of the major operators of vessels that transports chemicals and other bulk liquid cargoes world wide in this size brackets.

About 800 international seagoing personnel work onboard our partners vessels and the shore organization totals about 25 employees. We have strong focus on safety and quality and our safety and quality systems are certified by DNV. The company has in-house functions for chartering, operations, but all ship management and crewing is done by our partners technical managers.

It is the policy of the company to develop long term business with first class charterers with low contract coverage

How the work with the due diligence assessment is organized

The company CEO has the overall responsibility for human rights and has the role as compliance officer and the operational responsibility for human rights due diligence procedures, training, and programs. The Board of Directors are responsible for oversight and ensuring respect for human rights throughout Hansa Tankers's business activities.

Hansa Tankers shall employ necessary means of internal control, to monitor that the Code of Conduct is being fully complied with. Senior managers within the management group shall on an annual basis report compliance with the Code to the CEO. As part of the National Work Environment Laws - any employee that reports violations is protected from sanctions as in accordance with the Whistle-blower mandate.

Guidelines and routines for handling human rights due diligence

Hansa Tankers has developed and implemented a human and labor rights policy that is part of our company code of conduct. The policy clearly states that Hansa Tankers shall conduct its business in a manner that respects the right and dignity of all people. Hansa Tankers shall comply with all applicable laws and regulations and is committed to respecting the protection of internationally recognized human rights. In Hansa Tankers all people shall be treated with respect regardless of their background, gender, race, class, sexual orientation, political beliefs, age, or any other human right.

Further, a health, safety and working environment policy is incorporated stating that Hansa Tankers shall be a safe and healthy working place for all our employees. Any personnel injury is unacceptable, and our goal is zero harm to personnel. We continuously promote and maintain a strong safety culture onboard and ashore.

Hansa Tankers uses the EcoVadis sustainability rating for an independent and leading solution for monitoring our sustainability work were labor and human rights are included together with ethics, environment, and sustainable procurement. This rating is an annual exercise where our labor and human rights efforts are being evaluated.

Hansa Tankers adheres to United Nations Global Compact initiative and is committed to do business responsibly by aligning our strategies and operations with the ten principles on human rights, labor rights, environment, and anti-corruption.

The human rights due diligence process in Hansa Tankers includes risk assessments towards our impact on human rights. The impact assessment is risk-based meaning that the mitigating measures introduced shall correspond with the degree of severity of any negative impact and the probability that the negative impact will occur. When the probability and degree of severity both are high, the requirements for implementing mitigating measures will be correspondingly higher. The human rights impact risk assessments are reviewed annually during then corporate management review, and/or if significant changes to the organization or operations should occur.

Risk of negative consequences for human rights and labor conditions

Global shipping operations have an inherent risk of negative consequences for human rights and labor conditions. In Hansa Tankers's due diligence process the United Nations guiding principles on business and human rights have been used as reference document.

The following human rights have been identified where our operations might have a negative impact:

Human rights	Potential impact from Hansa Tankers's operations	Measures to stop potential negative consequences or to limit substantial risk
Right to access a clean, healthy, and sustainable environment	We continuously strive to reduce our impact on the environment, but emissions of GHG from our operations are significant.	Hansa Tankers is a Norwegian based company with employees only in Norway. Hansa tankers operates in accordance with local labor laws in Norway to maintain employees' health and safety.
		In addition to this, we constantly works to maintain a strong safety culture, through safety awareness and the right attitudes with our business partners.
		We believe that a positive and psychosocial working environment with measures for a proactive lifestyle, contributes to reducing and minimizing injuries, illness, disorders, sickness, and diseases.
		We aim to achieve continuous health improvement for our employees by providing support from healthcare and medical specialists.
Right to a healthy and safe work and living environment.	The global shipping industry has experienced a relative high number of personnel injuries and accidents through history.	We continuously promote and maintain a strong safety culture onboard and ashore.
		We supports IMO's goals for reducing emissions of greenhouse gases from the maritime industry, as well as ambitions to cut waste and improve biological diversity in our oceans.
		We see a good working environment is our priority and responsibility.
Right of freedom from forced labor and human trafficking.	The global shipping industry has been exposed to forced labor and contracts that are not in line with human rights.	Hansa Tankers employment contracts comply with industry standards such as MLC, STCW, ILO etc. We also ensure that are so of free will, and we expect the same from our suppliers
Right to non- discrimination in hiring, employment, and pay.	The global shipping industry, as other businesses, has been exposed to this risk.	All our employment contracts ensure fair pay and are in accordance with agreed tariffs.
		Diversity is encouraged in Hansa Tankers.
		Different backgrounds, skills and experience is recognized as a competitive advantage for the Company.

Human rights	Potential impact from Hansa Tankers's operations	Measures to stop potential negative consequences or to limit substantial risk
Right to a non- harassing work environment	Hansa Tankers has small organization were disputes and friction between employees might occur .	Hansa Tankers's code of conduct and policies clearly states that any harassment is unacceptable.
		Regular working climate surveys are being carried out ashore.

Potential impact from Hansa Tankers's operations

The potential human rights impact from our operations is risk evaluated against the countries and locations we operate. The result of these assessments show that the most significant risk of impact are those countries and regions that generally score low on human rights indexes.

Hansa Tankers's operation with most significant risk in these regions is the use of newbuilding-, maintenance/ repair- and recycling- yards, including the yards use of sub- contractors.

Consequently, Hansa Tankers implements a due diligence process before selecting shipyards in these regions. The due diligence process includes the use of Eksportfinans "Guideline for labor rights assessments at shipyards", contracts with human rights and labor condition requirements, audits and inspections of the yards and supervision by Hansa Tankers during the yard stay.

Information request

The following email shall be used to send an information request regarding how Hansa Tankers addresses actual and potential adverse impacts on human rights: <u>transparency@hansa-tankers.com</u>

Please clearly specify the information being requested, so that the request can be answered correctly and efficiently.

Please note that Hansa Tankers does not have an obligation to disclose information about an individual's personal affairs, or data regarding technical devices and procedures or other operational and business matters which must be kept secret for competitive reasons

Bergen, 18 June 2025

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Torfin Eide, CEO & Chairman Hansa Tanker AS