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## WHISTLEBLOWER POLICY FOR TERNTANK GROUP

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Terntank Group (consisting of Terntank Rederi A/S, CVR-no. 34 58 43 62, and Tern Skagen Management A/S, CVR-no. 32 43 84 66 – hereafter referred to as **Terntank Group**) has established this whistleblowing policy with the purpose to ensure openness and transparency in relation to any potential unlawfulness or serious irregularities – or the suspicion hereof – in the Group.

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**1. PURPOSE**

- 1.1 This policy gives the opportunity to perform anonymous or non-anonymous reports about unlawful conduct, including but not limited to money laundering, environmental damage or such other issues as set forth in EC Directive 2019/1937 of 23 October 2019.
- 1.2 The purpose is thus to ensure that the relevant individuals quickly and anonymously get informed about serious incidents – or the suspicion hereof – that can affect Terntank Group as a whole or individuals' life or health.
- 1.3 Terntank Group is a responsible corporation with an open culture, where employees are encouraged to speak freely. Especially, if you experience irregularities or unlawful behaviour. The preferred approach will normally be to address one's nearest superior.
- 1.4 If an employee believes that he/she cannot speak to anyone in Management, they can instead choose to report the incident – anonymously or not – by the approach described below.
- 1.5 The purpose of this policy is to explain how it works and hereby avoid a potential limitation regarding reports of important cases.

**2. WHO CAN REPORT?**

- 2.1 Reports can be submitted by anyone who should experience the described incidents in the "Which incidents can be reported about?" including employees in Terntank Group and its business partners.

**3. WHAT CAN I REPORT ABOUT?**

- 3.1 You can report about cases in which Terntank Group employees are involved. This applies to all types of employees.

**4. WHICH INCIDENTS CAN I REPORT ABOUT?**

- 4.1 The policy can only be used to report about serious cases or the suspicion hereof. There has to be violation of laws, rules, policies, guidelines or similar.
- 4.2 Less serious cases such as wage dissatisfaction, cooperation challenges, violation of dress code, smoking/alcohol or similar cannot be reported via the whistleblower policy.
- 4.3 Serious matters which can be reported includes, but is not limited to:

- 4.3.1 Economic criminality such as embezzlement, bribes, fraud, and forgery;
- 4.3.2 Submission of incorrect or misleading information to public authorities;
- 4.3.3 Accounting and auditing regularities;
- 4.3.4 Corruption;
- 4.3.5 Serious breaches of safety at work;
- 4.3.6 Serious matters aimed at an employee such as violence, sexual offenses, sexual harassment, or bullying;
- 4.3.7 Espionage or sabotage;
- 4.3.8 Conflicts of interests; and
- 4.3.9 Unauthorized publications of confidential information, including Terntank Group's intellectual property.
- 4.4 The list above is just examples. If an employee is in doubt whether an observation should be reported or not, we encourage to report the incident.

## **5. HOW DO YOU REPORT?**

- 5.1 Terntank Group has entered into an agreement with Mazanti-Andersen Law Firm. Therefore, reports of incidents happen by sending an email to attorney-at-law Rune Aagaard at the email address [raa@mazanti.dk](mailto:raa@mazanti.dk).
  - 5.1.1 The subject field of the email must state that the present email contains a whistleblower report. The email should further contain a description of the incident as well as possible appendixes. Mazanti-Andersen Law Firm will acknowledge the reception of the report within 7 days.

## **6. WHO PROCESSES AND HOW?**

- 6.1 As stated in item 5.1, Terntank Group has entered into an agreement with Mazanti-Andersen Law Firm to handle possible whistleblower cases. Therefore, the whistleblower unit consists solely of attorney-at-law Rune Aagaard.
- 6.2 The whistleblower unit will, based on the concrete report, assess whether there is a basis for further examination or if it should be rejected. If a report gets rejected, the whistleblower will

be notified hereof, and no further actions will be made. A rejection could for example happen if the reported incident is not governed by the purpose of the policy.

6.3 However, if the report is within the purpose of the policy, an investigation will start. During the investigation, there may be included individuals outside the whistleblower unit to enlighten the case sufficiently such as auditors. There will, however, always be involved as few people as possible.

6.4 If additional information or documentation is needed, the whistleblower will be contacted in order to provide this if possible. After the investigation has been concluded, a decision will be made by Terntank Group's management. Based on the content of the case, and who it involves, it can vary, who will be involved from management. It will always be someone unbiased.

6.5 If it is assessed that the case includes criminal offenses, the case will be handed over to the police or other relevant authorities.

## **7. ANONYMITY**

7.1 The individual who performs the report chooses whether they want to report anonymously or not. If the whistleblower wants to report anonymously, it must be stated clearly in the report sent to the whistleblower unit.

7.2 If a whistleblower chooses not to report anonymously, the report will be handles as classified as possible. If a not-anonymous reports leads to a trial against the reported person, the whistleblower can be called in as a witness during the trial.

7.3 The whistleblower unit has a duty of confidentiality regarding all information in received reports. Information about the whistleblower's identity, and other information from which the whistleblower's identity can be deduced, may not be shared without the whistleblower's explicit consent to others than authorized employees, who are competent to receive or follow-up on reports.

7.4 We encourage to report not-anonymously, since it increases the possibility to investigate the reported incident.

## **8. DATA STORAGE**

8.1 Reports will be registered and kept in an electronic folder externally by Mazanti-Andersen Law Firm with access control. If a report is rejected, the report and its contents will be deleted immediately. Reports that fall within the purpose of the policy will be destroyed within two months after the conclusion of the case, if it has not been handed over to the police or other

relevant authorities, assuming that the information has not been transferred to the individual's personnel file.

## **9. RIGHTS**

### **9.1 Protection against retaliation**

9.1.1 If a report has been made in good faith, you are protected against negative consequences. A report has been made in good faith, if a reporter had reason to believe that the reported information was correct at the time of the report, and that the incident was included in the purpose as set forward in item 1 and 4 of this whistleblower policy.

9.1.2 If a report has been submitted in bad faith, however, it can have negative consequences for the reporter. A report has been made in bad faith, if a reporter did not have reason to believe that the reported information was correct at the time of the report.

9.1.3 Whistleblowers, who have been the victim of retaliation as a result of a report, or attempted reporting, have the right to compensation.

### **9.2 By the Danish Data Protection Act**

9.2.1 The personal data evident in reports are governed by the laws regarding data protection. The rights according to the Act, applies to all registered in each case. This means both the whistleblower, the individual reported about as well as other individuals. The Danish Data Protection Act can be found [here](#).

9.2.2 As a registered, you have the following specific rights, unless it is an exceptional case and other rights apply according to the legislation:

#### 9.2.3 The right to insight

9.2.3.1 You have the right to request insight to the personal data that we process about you, and the right to a copy of your personal data as well as receive information about:

9.2.3.1.1 The purpose of the process;

9.2.3.1.2 The categories of personal data;

9.2.3.1.3 Receivers or categories of receivers;

9.2.3.1.4 The time of storage or the criteria for the determination of this;

- 9.2.3.1.5 The right to retraction, deletion, limitation and objection to the treatment of your personal data;
- 9.2.3.1.6 The right to make a complaint to the Danish Data Protection Agency;
- 9.2.3.1.7 Where your personal data origins from.
- 9.2.4 The right to retraction
  - 9.2.4.1 You have the right to request that incorrect personal data about yourself gets corrected as well as the right to request the completion of incomplete personal data.
- 9.2.5 The right to deletion
  - 9.2.5.1 You have the right to request that your personal data gets deleted under certain circumstances. For example, if they are no longer necessary for the purpose of the investigation in which they were collected.
- 9.2.6 The right to limitation
  - 9.2.6.1 You have the right to request limitation of the handling of your personal data. For example, if there is a dispute regarding the correctness of the personal data.
- 9.2.7 The right to data portability
  - 9.2.7.1 You have the right to request the receiving of the personal data that you have handed over to us, in a structured, commonly used and readable format as well as the right to request your personal data transmitted to another data controller, if certain conditions apply.
- 9.2.8 The right to objection
  - 9.2.8.1 You have the right to object against the treatment of your personal data as part of the processing of a reporting. If the report is legitimate, no further treatment of your personal data will occur.
- 9.2.9 The right to complain to the Danish Data Protection Agency
  - 9.2.9.1 If you disagree with the way that Terntank Group handles your personal data, you have the right to complain to the Danish Data Protection Agency. The Agency's contact information can be found [here](#). However, it is our hope that you will contact the whistleblower unit at [raa@mazanti.dk](mailto:raa@mazanti.dk), where you can also contact us if you wish to use any of your rights.

10. **DUTY OF DISCLOSURE**

10.1 If a report is made about a person mentioning personal data, and it is assessed that an investigation is to be initiated, the data controller will notify the data subject of the following:

10.1.1 The data controllers and its representative identity;

10.1.2 The purpose of the investigation for which the information has been determined; and

10.1.3 Where necessary, any further information which, having regard to the specific circumstances in which the data have been collected, are necessary for the registered to safeguard his or her interests.

11. **QUESTIONS AND ANSWERS**

11.1 If you have any questions of judicial nature, we refer to the current [legislation](#) within the field.

11.2 **General questions**

11.2.1 *Why does Terntank Group need a whistleblower policy?*

11.2.1.1 Terntank Group is a unique global corporation that operates on a market with intense competition. This means that there is a risk of inappropriate behaviour that violates our Code of Conduct.

11.2.1.2 It is important that there is a channel to report such incidents for our employees and business partners, if they don't feel comfortable with a traditional channel.

11.2.2 *Why do Terntank Group use an external attorney-at-law to handle reports according to their Whistleblower policy?*

11.2.2.1 By using an external attorney-at-law, Terntank Group ensures to handle possible reports unbiased and correctly. Furthermore, we assume that it will be more comfortable for the reporter to have the dialogue with external attorney-at-law, especially if the reporter wants to stay anonymous.

11.3 **Practical questions**

11.3.1 *What languages can I report in?*

11.3.1.1 You can report in Danish and English.



*11.3.2 Is it possible to conduct an oral report?*

11.3.2.1 No, it is only possible to report by email to Mazanti-Andersen Law Firm at [raa@mazanti.dk](mailto:raa@mazanti.dk).

*11.3.3 Can I be anonymous on my own computer?*

11.3.3.1 Yes. The email, which should be sent to [raa@mazanti.dk](mailto:raa@mazanti.dk), can be sent from any email address.

*11.3.4 Can I attach documents as proof?*

11.3.4.1 Yes, it is possible to attach files and appendixes as evidence in the email sent to [raa@mazanti.dk](mailto:raa@mazanti.dk).

**11.4 Further questions**

11.4.1 For further questions about the whistleblower policy, please contact our whistleblower unit consisting of attorney-at-law, Rune Aagaard, at email address [raa@mazanti.dk](mailto:raa@mazanti.dk).