

# Whistleblower Policy & System

#### **Purpose**

Ocean7's whistleblower system is providing a safe access for reporting exiting or potential violations of laws, regulations, Ocean7's policies and guidelines, or other serious irregularities, which could cause financial damage and/or loss of image to Ocean7.

#### Scope

The system is to be used by any person, directly or indirectly, related to Ocean7; Ocean7 employees including partners, external consultants, suppliers, crew on board vessels operated/managed by Ocean7 and other business partners and stakeholders.

## Reporting

The whistleblower system is intended for the reporting of serious incidents or concerns, which may include:

- Bribery & Corruption
- Money Laundering
- Financial Crime
- Fraud
- IT Security
- Breach of data Privacy
- Breach of law and regulations
- Environmental damage
- Harassment and discrimination
- Violation of Human rights

In the digital whistleblower system, the forms of reports are technically predefined.

If in doubt whether to report an incident/suspicion/concern or not, it should be reported. All reports will be confidential investigated, and if a report is found to be out of the scope of the whistleblower policy, the individual will be advised via the whistleblowers system's Secure inbox.

The whistleblower system is provided solely for the purpose of receiving and processing reports of any alleged or actual violations of laws, policies or regulations. It is not available for general complaints or inquiries.

The Whistleblower system may not be used to make false accusations against others, and altogether, deliberately untrue information may not be reported, and will be legally prosecuted.

#### **Processing**

Ocean7's digital whistleblower system is hosted by the independent third-party, EQS Group A/S (Integrityline), which guarantees anonymity, security, in a user-friendly system. The whistleblower portal can be found at: <a href="https://ocean7.whistleblower.integrityline.com">https://ocean7.whistleblower.integrityline.com</a>. Once a report has been made, users have the option to log in to the system's Secure inbox, where replies or follow-up questions in full anonymous form will be available to the user.

### **Receipt of reports**

All reports are being received and replied by the CEO and one partner only.



# Confidentiality

All communication is confidential, as well as anonymous unless the reporter chose otherwise, as the system gives the option to stay anonymous.

Reporters are encouraged to report their concern in sufficient detail enabling Ocean7 to make a thoroughly investigation of the matter. As much information as possible should be provided.

The identity of the reporting person will not be disclosed even if the person has chosen not to be anonymous, and no retaliation will not take place for any reported item.

# **Questions and review**

Any question regarding Ocean7's whistleblower System & Policy can be addressed to: hseq@ocean7project.com.

The management will review and assess the adequacy of Ocean7's Whistleblower Policy & System on a current basis.

Fredericia, 01 July 2023

Sign.

Stefan Nordby Petersen, CEO