



Whistleblower Policy

Fonden Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

Link to our internal whistleblowing channel implemented as part of the Whistleblower Scheme:

<https://whistleblowersoftware.com/secure/zerocarbonshipping>

1 Purpose

- 1.1 Fonden Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping, Bredgade 6, 1260 Copenhagen K, Denmark, company reg. no. 41 80 50 56 (“Center”, “we”, “us”, “our”) has established a whistleblower scheme in order to allow reporting of potential violations of laws and serious violations of internal policies and procedures (“Whistleblower Scheme”). This policy governs the use and operation of the Whistleblower Scheme.
- 1.2 The Center will as data controller operate the Center’s Whistleblower Scheme to ensure:
- (i) that you know how to raise a compliance concern if you observe or suspect misconduct, and
 - (ii) provide a remediation framework for serious and sensitive compliance concerns that could have an adverse impact on our business.
- 1.3 Below in section 9 you will find a description of the personal data we will collect and process about you when you use the Whistleblower Scheme as well as the purpose on which basis we are processing the personal data.

2 Types of concerns that may be reported

- 2.1 You can raise a compliance concern if you reasonably suspect a breach of laws, policies, and/or other obligations of the Center. The nature of compliance concerns could include:
- (a) Illegal activity;
 - (b) Financial fraud (for example accounting manipulation, noncompliance with internal controls procedures, misappropriation of assets, fraudulent statements or money laundering);
 - (c) Bribery or corruption (for example conflicts of interest or facilitation payments);
 - (d) Violation of competition laws (for example price fixing or exchange of price sensitive information);
 - (e) Activities, which otherwise by law, treaty or agreement amount to serious improper conduct (for example discriminatory practices, sexual harassment, use of child labour, human rights violations); and/or
 - (f) Other serious compliance concerns (for example concerning transport safety, product safety and compliance, protection of the environment, protection of privacy and personal data, or security of network and information systems).
- 2.2 Reports on matters that are not a breach of law, policy and/or other obligations of the Center, such as dissatisfaction with wages or difficulties with cooperation between colleagues, should be made via the usual internal channels if you are an employee of the Center.



Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

3 Who can make disclosures

3.1 The following persons may report breaches in confidentiality and is protected against retaliation under this policy.

3.2 The persons who may report a breach under this policy are persons who have, or have terminated, an employment relationship with the Center, and who have intended to belong, belong, or have belonged to one of the following categories of persons:

- (a) worker (Center employees and secondees);
- (b) business representatives of the Center's suppliers, partners etc.;
- (c) persons belonging to the administrative, management or supervisory body of an undertaking, including non-executive members;
- (d) volunteers;
- (e) paid or unpaid trainees; and
- (f) persons working under the supervision and management of contractors, subcontractors and suppliers.

4 How to make a whistleblower disclosure

4.1 You can make a disclosure via:

- (a) the Center's internal whistleblowing channel implemented as part of the Whistleblower Scheme <https://whistleblowersoftware.com/secure/zerocarbonshipping> , or
- (b) a national authority or one of the EU bodies that have set up an external reporting channel. Examples of an authority in Denmark having set up an external channel is: Danish Data Protection Agency (<https://whistleblower.dk/>).

4.2 You are free to decide if you want to raise your concern via our internal channel or externally, however, the Center encourages you to make use of the internal solution for cases that effectively can be dealt with internally.

5 What happens after I have reported a concern

5.1 Your report will be screened by an external law firm. After screening, the external law firm will under strict confidentiality report to the Whistleblower Supervisor(s) within the Center, who is responsible for managing and investigating your concern. To the extent relevant to investigate your concern, the Whistleblower Supervisor(s) will rely on supporting information from the Center's Investigation Council, which represents different implied opinions within the Center. Both the Whistleblower Supervisor(s) and the Investigation Council are bound by secrecy.

5.2 After you have made a report of a concern via our internal channel you will within 7 days receive a confirmation that the report has been received. This is unless you have expressly requested otherwise or there are reasonable grounds to believe that a confirmation of the report will put the protection of your identity at risk.

5.3 Within a reasonable time that does not exceed 3 months from the confirmation of receipt or 6 months in duly justified cases, you will receive feedback on your report. Further, you will receive



Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

a notification of the result of the investigation triggered by your report if this was not given in connection with the feedback.

6 How will disclosures be treated

6.1 All reports made through our internal reporting channel are confidential. Only the external law firm, the Whistleblower Supervisor(s) and Investigation Council within the Center have access to the report in the whistleblower system through which the report is filed.

6.2 Information about your concern, including your personal data, will only be shared with a limited number of people internally in the Center on a strict need-to-know basis, or with the police or other public authorities if the Center is required to do so by law or it is necessary to fulfil an important public interest.

7 Rights of the person concerned in the report

7.1 The Center will ensure to protect the confidentiality of the identity of the person concerned in the report in the course of the investigation and ensure that the person concerned has access to an effective defense.

7.2 In addition, you have certain rights under the data protection legislation. Please see section 9 below.

8 Protection of whistleblowers

8.1 You are protected for speaking up in good faith in accordance with applicable legislation, i.e. protected from any kind of retaliation or discriminatory or disciplinary action as a result thereof, including discharge, demotion, suspension, threats or any other kind of harassment. However,



Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

such protection shall not apply if you maliciously or ill-intentioned makes a false allegation or makes an allegation that, bearing in mind all the circumstance, is unreasonable.

9 Processing of personal data

9.1 Data controller

9.1.1 The data controller for the processing of personal data in connection with whistleblower reports is the Center.

9.1.2 Below you will find a description of the personal data we will collect and process about you as well as the purpose on which basis we are processing the personal data when you use our Whistleblower Scheme.

9.2 The types of personal data that we collect and the legal basis

9.2.1 The Center collects and process your personal data, including name, phone number, email address, in order to receive, give feedback and follow-up on reports, in accordance with GDPR article 6(1)(c) and the Danish Whistleblowing Act section 22, or GDPR article 6(1)(f).

9.2.2 If the report contains special categories of personal data, the Center will process these data in accordance with GDPR article 9(2)(g) and the Danish Whistleblowing Act section 22, or GDPR article 9(2)(f).

9.2.3 The Center will process personal data relating to criminal convictions and offences in relation to the report in accordance with GDPR article 10, the Danish Data Protection Act section 8(3) and the Danish Whistleblowing Act section 22.

9.3 From which source the personal data originates

9.3.1 The above mentioned personal data that the Center processes about you derives from yourself or the whistleblower report. The personal data may also be generated and collected internally within the Center in order to investigate the specific case.

9.4 Recipients

9.5 In connection with processing the whistleblower report, the Center will transfer your personal data to the following categories of recipients:

- (a) third party IT service providers engaged by the Center on a need-to-know basis only,
- (b) external attorney or auditor in connection with the processing of the concern,
- (c) relevant authorities.

9.6 Transfers outside the EU/EEA

9.6.1 If the Center transfers personal data outside of the EU/EEA, and the country has not been deemed by the Commission of the European Union to have an adequate level of protection of personal data, such transfer of personal data will be subject to the European Commission's



Mærsk Mc-Kinney Møller Center for Zero Carbon Shipping

standard contractual clauses. You can request a copy of the measures applying to the transfer of personal data by contacting us via gdpr@zerocarbonshipping.com

9.7 Data retention

9.7.1 The Center will keep your personal data for as long as is needed to fulfil our purposes of investigating compliance concerns and documenting our compliance with applicable laws, unless the Center is required under applicable law to keep your personal data for a longer period.

9.7.2 Different retention periods apply if legal proceedings or disciplinary measures are initiated.

9.8 Your rights

9.8.1 **The right to information and access.** You have the right to ask us for information about or access to your personal data. There are some exemptions, which means you may not always receive all the personal data that we process.

9.8.2 **The right to object.** You have the right to object to the Center processing (using) your personal data. This effectively means that you can stop or prevent us from using your personal data. However, it only applies in certain circumstances, and we may not need to stop the processing of your personal data if we can give legitimate reasons to continue using your personal data.

9.8.3 **The right to erasure.** You have the right to ask us to erase your personal data in certain circumstances.

9.8.4 **The right to rectification.** You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.

9.8.5 **The right to restriction of processing.** You have the right to ask us to restrict the processing of your personal data in certain circumstances.

9.8.6 **The right to complaint.** If you have any complaints about the Center's processing of your personal data, you may contact the Danish Data Protection Agency.

10 **Contact information**

10.1 You may contact us by contacting our compliance manager via gdpr@zerocarbonshipping.com in regard to your personal data.

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