

ESG report 2021



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Our new look ESG report provides a transparent view into the Wilhelmsen group and how we approach environment, social and governance aspects. The content of this report is defined by a materiality assessment conducted in 2021.

1

ESG report

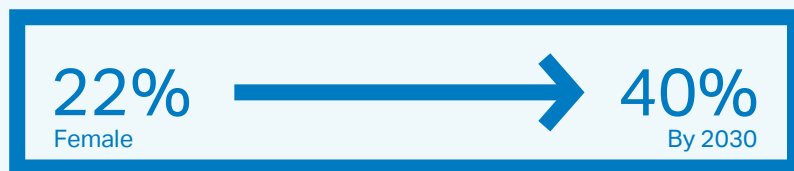


Highlights for 2021

Net zero GHG emissions ambition



40%

 Gender diversity ambition

40% of each gender in top three levels of management

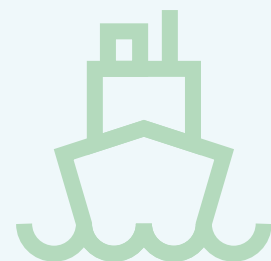


Increase in whistles through the whistle blowing channel

On target LTIF result (not to exceed 0.40)
0.35 on vessels and 0.36 on shore



0.36



0.35

ESG Report

CEO MESSAGE

Our commitment to the ten principles of the UN Global Compact and to actively contribute towards the UN Sustainable Development Goals has never been stronger.

2021 was a year where we continued to make great strides towards a greener future. We redesigned our company structure to fit and accelerate our green ambitions, most notably establishing the New Energy segment with an USD 500 million investment ambition for renewable energy and decarbonisation projects. We have also set a commitment to have a net zero carbon footprint from own operations before 2030.

Unfortunately, the maritime industry has not traditionally been at the forefront of attracting an equal share of males and females. This is a challenge we have decided to take on, and we have decided that before 2030, we will have 40% of each gender among our top three management levels and on internal boards.

We believe our ability to realise our ambitions is unique. First, we have the will. Secondly, we have extensive maritime and offshore experience. And finally, we have one of the largest networks in the industry and our customer base spans more than 50% of the merchant fleet. Through our 160 years, we have been fortunate to develop a reputation and a brand that gives us a voice. This enables us to capitalise on our network by facilitating innovative partnerships, influencing regulatory development and governing bodies, and last but not least, we can set requirements to our supply chain. We believe the combination of our reach and our ability to influence our value chain will result in significant improvements for the industry at large.

This year we have reframed our annual sustainability report as an ESG report. We hope this makes it clearer to our stakeholders how we address environmental, social, and governance issues in our work to enable sustainable global trade.

— Thomas Wilhelmsen, group CEO



During 2021, the group actively contributed to collective action on ocean health, climate, decarbonisation of shipping, the crew change crisis, anti-corruption, and marine pollution.

Group structure

Wilh. Wilhelmsen Holding ASA		
Maritime Services	New Energy	Strategic Holdings and Investments
Ships Service	NorSea Group 75%	Wallenius Wilhelmsen 37.8%
Ship Management	NorSea Wind 87.6% (owned 50% by NorSea Group and 50% by Wilhelmsen Ship Management)	Treasure ASA (74.8%) which has an 11% interest in Hyundai Glovis
Insurance Services	Edda Wind 25.7%	Financial investments
<i>(all Maritime Services companies are 100% owned)</i>	Topeka 100%	WilNor Governmental Services 87.8% (owned 51% by Wilhelmsen and 49% by NorSea Group)
	Massterly 50%	
	Raa Labs 100%	
	Dolittle 46%	
	Loke 18%	
	Ivaldi 10%	

ABOUT THE REPORT

The content of this report is defined by a materiality assessment conducted in 2021 and covers activities in the calendar year 2021. Consolidated companies which Wilh. Wilhelmsen Holding ASA (Wilhelmsen) owns more than 50% are included in the scope of this report.

This report is in accordance with the GRI Standard: Core option. No external assurance has been undertaken. The GRI disclosure table is available in appendix 1.

This report serves as our communication of progress and our continued commitment to the [ten principles of the UN Global Compact](#).

SCOPE OF THIS REPORT

In 2021, the corporate structure was reorganised into three distinct business segments: Maritime Services, New Energy, and Strategic Holdings and Investments. However, there have been no significant changes to the operating entities included in the scope of this report for 2021 compared with 2020.

Entities included in the report

Wholly owned entities in the Maritime Services and New Energy segments where Wilhelmsen has majority ownership are included in the report:

- Ship Management, which provides full technical management, crewing and related services for all major vessel types.

- Ships Service, supplying products and services including marine products, marine chemicals, maritime logistics, and ships agency.
- Insurance Services, which provides marine and non-marine insurance solutions.
- NorSea Group, which provides logistic support to offshore activities anywhere in the North Sea basin and beyond.
- Raa Labs, which delivers infrastructure and services to digitalize vessels and operations.
- WilNor Governmental Services, which provides military logistics services in Norway and internationally.
- Corporate services are also included in this report.

Entities not included in the report

Entities not wholly or majority owned are not included in this report:

- Wallenius Wilhelmsen ASA (37.8%)
- Hyundai Glovis (11% through Treasure ASA)
- Massterly (50%)
- Dolittle (46%)
- NorSea Wind (owned 50% by NorSea Group and 50% by Wilhelmsen Ship Management)
- Edda Wind (25%)

MANAGEMENT APPROACH

We use a materiality assessment to identify the aspects of our business that we believe have the most impact on the environment and the societies in which we operate. In the

assessment, the importance of different topics is ranked by us and our stakeholders, such as our board, group and company management teams, employees, customers, suppliers, competitors, industry players, and shareholders.

In 2021, we conducted a materiality assessment to account for changes to the internal and external context since 2020. Based on the assessment, the group management team prioritised four strategic topics that were approved by the board:

- Decarbonisation and green growth
- Health and safety
- Equality, diversity and inclusion
- Compliance and supply chain management

These strategic topics are integrated in the group’s long-term strategy and aligned with our intentions to contribute actively and positively to the targets of the Sustainable Development Goals (SDGs). Companies are accountable for integrating these topics into their strategies and annual plans. Metrics and the status of activities related to these topics are reviewed on a quarterly basis by the group management team and the board.

WORKING WITH OUR STAKEHOLDERS






We are regularly in dialogue with key stakeholders who engage in issues relating to the maritime industry and the activities of the group. The dialogue contributes to understanding the expectations of stakeholders and transferring them to the group. It also enables us to communicate decisions to stakeholders and provide them with explanations for our underlying motives.

Wilhelmsen engages in dialogues with governments, investors, non-governmental organisations and other stakeholders on topics related to the group or industry at large. We utilise external partners, shareholder meetings and stakeholder engagement for advice and to identify ways to improve and remain in the forefront of developments. We meet evolving stakeholder demands by:

- partnering with other serious actors, our customers, and value chain for broader impact
- working through local and international associations to contribute to improved ESG practices
- implementing recognised and transparent international standards and proactively demonstrating our ESG work.

During 2021, stakeholders’ interests were related to the ongoing COVID-19 response, financial issues, compliance, innovation, decarbonisation of shipping, renewable energy, and ESG in general. We continued our active and collaborative stakeholder engagement through our memberships at a group level, as well as at individual company levels with the Green Shipping Program Norway, UN Global Compact, Maritime Anti-corruption Network (MACN), and Sustainable Shipping Initiative (SSI) amongst others.

During 2021, the group actively contributed to collective action on ocean health, climate, decarbonisation of shipping, crew change crisis, anti-corruption, and marine pollution. We will continue to actively engage with stakeholders directly and through our membership platforms (see appendix 2 for a list of memberships and associations).

Stakeholders					
	 Employees	 Investors	 Customers	 Suppliers	 Community
Key topics	<ul style="list-style-type: none"> • Engagement, commitment, leadership, culture • Climate, environmental impact • Business ethics, working conditions, QHSSE, training • KPI results and targets 	<ul style="list-style-type: none"> • ESG risks, opportunities and governance • Results, prospects • Knowledge sharing • Main business drivers 	<ul style="list-style-type: none"> • Climate, environmental protection, human rights, child labour • Campaigns, plans • Satisfaction, feedback • Innovation, proper use, expertise advise 	<ul style="list-style-type: none"> • Human rights, child labour, environmental protection • Sustainability governance, transparency, values • Working conditions, QHSSE, regulations 	<ul style="list-style-type: none"> • Climate, environmental impact • Anti-corruption, rules and regulations, labour regulations and standards • Education
Channels and activities	<ul style="list-style-type: none"> • Intranet, management communication • Engagement survey • Performance appraisal • Industrial democracy • Code of conduct 	<ul style="list-style-type: none"> • Annual and quarterly reports and presentations, capital markets day • Press releases • Investor meetings 	<ul style="list-style-type: none"> • Customer meetings, regular dialogue • Customer surveys • Road-shows and fairs 	<ul style="list-style-type: none"> • Supply chain code of conduct • Procurement policies • Supplier assessments and audits 	<ul style="list-style-type: none"> • Meetings and discussions with NGOs • Membership organisations and associations • Sponsorships • Presentations and guest lectures

Materiality assessment overview

ESG	Strategic topics	Strategic ambition	Alignment with SDGs	Material topics
Environment	Decarbonisation and green growth	Shape the maritime industry's transition towards net zero emissions and capitalise on green growth.	<p>13. Climate action – Strengthen resilience and adaptive capacity to climate-related hazards, and integrate climate change measures into policy, strategy, and planning (Targets 13.1, 13.2).</p> <p>7. Affordable and clean energy – By 2030, increase substantially the share of renewable energy in the global energy mix (target 7.2). By 2030, double the global rate of improvement in energy efficiency (Target 7.3)</p> <p>14. Life below water – Prevent and significantly reduce marine pollution, sustainably manage and protect marine and coastal ecosystems and minimize and address the impacts of ocean acidification (Targets 14.1, 14.2, 14.3)</p>	GHG Emissions
				Biodiversity and ecosystems
				Circular economy
				Green growth and decarbonisation
Social	Health and safety	Have an engaging and safe workplace with no harm to people.	<p>8. Decent work and economic growth – Achieve higher levels of economic productivity, improve global resource efficiency and decouple economic growth from environmental degradation (Targets 8.2, 8.4). Achieve full and productive employment and decent work, eradicate forced labour, modern slavery, human trafficking and child labour, protect labour rights and promote safe working environments (Targets 8.5, 8.7, 8.8)</p>	Occupational health and safety
				Competence development
	Equality and diversity	Have a culture where each employee is valued for their contribution.		Human rights and employment conditions
				Equality, diversity, and inclusion
Governance	Compliance and supply chain management	Be a responsible, trusted and compliant value chain partner.	<p>16. Peace, justice and strong institutions – Substantially reduce corruption and bribery (Target 16.5). Develop effective, accountable and transparent institutions at all levels (Target 16.6)</p>	Compliance
				Supply chain management
				Responsible ownership

What the topic covers	Why the topic is material	Topic boundary
GHG emissions from own operations.	Addressing climate change and associated physical and transition risks requires operations, products and solutions with lower or no GHG emissions.	Wilhelmsen group, customers, suppliers and partners
Impact of our activities and products on air, soil, and water.	Overuse or mismanaged use of ecosystem services can lead to contamination, ecological devastation, economic disruption and impacts on human health.	Wilhelmsen group, customers, suppliers and partners
Reduce, reuse and recycle to minimise resource use.	Pollution, stronger environmental focus, full asset / product lifecycle accountability, as well as regulatory requirements requires new product and service offerings for the maritime industry.	Wilhelmsen group, customers, suppliers and partners
Low-carbon / circular (i.e. taxonomy) products and services.	We pursue investments and new business models aimed at decarbonising the maritime industry, enabling the energy transition and renewable energy, and sustainable product and service offerings.	Wilhelmsen group, customers, suppliers and partners
Accidents, injuries and absence.	An engaging and safe working environment at sea and on shore is a prerequisite for an efficient, sustainable and profitable business. High health, safety and wellness standards prevent accidents and dangerous situations for our employees. We need to have in place standards and practices addressing physical and psychosocial health of employees; operational and process safety including accident prevention; and wellbeing of employees and contractors.	Wilhelmsen group, customers, suppliers and partners
Investing in human capital.	To meet current and future demands, we need to continually renew ourselves, to work smarter and improve our fields of expertise. Particular attention towards renewables, technological and digital capabilities.	Wilhelmsen group
Respect and protection of fundamental human rights.	We conduct business with respect for human rights with sound, safe working conditions free from discrimination. This includes respect and protection of working conditions, equal treatment and non-discrimination practices, labour standards, and labour relations including freedom of association, collective bargaining, working hours, rest, minimum age, fair wages, and adherence to the ILO Maritime Labour Convention.	Wilhelmsen group, customers, suppliers and partners
Respect and protection of equal opportunities.	To do business and access the best local talent, we need to provide an engaging and safe work environment where equal opportunities are available for all. We also need to retain and attract a diverse and talented workforce with the right competence, experience, skills, and motivation.	Wilhelmsen group, customers, suppliers and partners
Responsible relations with local communities.	We have employees in 60+ countries around the world. To do business and access the best local talent, we need to ensure a positive contribution to the development in these communities. This includes engagement and partnership activities with the public sector, communities, other bodies and associations with the purpose of promoting, implementing and demonstrating sustainable ways of working.	Wilhelmsen group, local communities
Business ethics and anti-corruption.	Compliant and ethical operations, and the elimination of corruption in the value chain supports fair trade and a level playing field. Our various stakeholders depend on us being a transparent, accountable and compliant partner. We expect the same of our partners and suppliers in order to do business. This includes standards and practices addressing business ethics and anti-corruption, data privacy, and channels for raising anonymous concerns from internal or external stakeholders (whistleblowing).	Wilhelmsen group, customers, suppliers and partners
Responsible procurement and supplier monitoring	We need to ensure our ESG expectations are clear for our suppliers and that products and services are compliant with our standards. This includes standards and practices addressing human rights, employment conditions, compliance, business ethics and anti-corruption, health and safety, diversity and inclusion, emissions, waste and recycling.	Wilhelmsen group, customers, suppliers and partners
Sustainable investments and active (ESG) ownership.	We engage and actively exercise investor influence on ESG issues. ESG matters in the company's sourcing, investing and management of investments sets clear expectations to portfolio companies and better management of ESG risk and exposure.	Wilhelmsen group

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Environment



Environment

Our ambition is to shape the maritime industry’s transition towards net zero emissions and capitalise on green growth. In practice, we focus on greenhouse gas (GHG) emissions, biodiversity and ecosystems, circular economy, and green growth and decarbonisation.

CLIMATE CHANGE AND GREENHOUSE GAS (GHG) EMISSIONS

Addressing climate change and associated physical and transition risks for the group requires investments, operations, products and solutions with lower or no GHG emissions. We continue to develop and mature a systematic approach to climate risk identification, including firm estimates of future costs and income prospects for new opportunities. Our management of climate risk and GHG emissions is described in appendix 3 based on the Task Force on Climate-related Financial Disclosures (TCFD) framework.

GHG emissions ambition

In 2021, the group’s long term GHG emissions ambition was defined and embedded in the long-term strategy process:

1. Net zero emissions in own operations before 2030
2. Net zero emissions in the value chain before 2040
3. Net zero emissions in portfolio (equity investments) before 2050

The ambition has been set by the group management team and endorsed by the Wilhelmsen board of directors.

In 2022, consolidated companies will set science-based targets and their emissions reductions programs towards this ambition.

For equity investments, the group monitors and actively engages in discussions related to climate risk and emissions reductions achievements with the relevant companies, specifically:

1. Progress on GHG emissions reductions against stated targets
2. Progress on green growth investments / activities contributing to energy transition.

Scope 1 and 2 emissions for consolidated companies

In 2021, we established an initial GHG emissions inventory based on the GHG Protocol standard for scope 1 and 2 emissions for consolidated entities where the company has operational control. We will build on the scope of this inventory as data integrity is improved and will seek verification of the inventory data for the 2022 ESG report.

The scope 1 and 2 emissions in tonne of CO₂ equivalent (tCO₂e) from consolidated entities are described below.




Year	tCO ₂ e		
	Scope 1	Scope 2	Total
2020	1 891	2 669	4 562
2021	1 855	2 824	4 679

Several data collection and reporting improvement actions have been identified to continue to build a robust reporting framework over time. Office sites are particularly challenging to account for as the vast majority of our employees work in multi-user leased spaces where there is limited or no operational control of facilities. In 2022, consolidated companies will set science-based targets and their emissions reductions program.

Scope 3 emissions – category 7 and 15

The group included two categories of scope 3 emissions in

Contribution to the SDG targets

		
<p>13. Climate action – Strengthen resilience and adaptive capacity to climate-related hazards, and integrate climate change measures into policy, strategy and planning (Targets 13.1, 13.2).</p>	<p>14. Life below water – Prevent and significantly reduce marine pollution, sustainably manage and protect marine and coastal ecosystems and minimize and address the impacts of ocean acidification (Targets 14.1, 14.2, 14.3)</p>	<p>7. Affordable and clean energy – By 2030, increase substantially the share of renewable energy in the global energy mix (target 7.2). By 2030, double the global rate of improvement in energy efficiency (Target 7.3)</p>

Key risks and opportunities

Key opportunities	Key risks
<ul style="list-style-type: none"> • Green growth in new arenas. • New partnerships with other serious actors. • Access to capital from environmentally conscious actors, both public and private. 	<ul style="list-style-type: none"> • Physical risks from extreme weather, rising water levels, and resource scarcity/cost. • Transition risks related to regulations, potential liability, technology shift, market shifts and reputational impact.

the initial inventory work – category 7 employee commuting for seafarers; and category 15 investments. This was based on accessibility of data and further categories will be included in the inventory over time.

The scope 3 emissions related to seafarer’s air travel commuting to/from vessels are described below based on calculations from third party travel providers. Travel plan optimization is key to secure seafarers join vessels and return home in a safe, secure, and efficient manner.

Year	tCO ₂ e
2020	15 391
2021	21 260

The scope 3 emissions related to the group’s equity investments are described below. This is based on the proportion of the group’s equity investments in Wallenius Wilhelmsen ASA (37.8%), Hyundai Glovis (11% through Treasure ASA), and Qube (1.8%). It is calculated based on the GHG Protocol’s investment-specific method using publicly available data from the operating companies.

The group has neither financial control nor significant direct influence over the operating entities in this portfolio.

Year	tCO ₂ e
2018	2 270 616
2019	2 127 101
2020	1 687 632
2021	*data not available at time of this report

**The operating companies publish their emissions report after the group’s ESG report is produced. The emissions data for 2021 will therefore be reported in the group’s 2022 ESG report.*

The main source of the emissions are the operating companies’ scope 1 emissions related to energy consumption from shipping activities. The companies have established systems in place for managing climate risk and implementing emissions reduction activities. The companies have established targets to reduce the intensity and absolute greenhouse gas emissions of their operations.

Progress on targets

Target 2021	Result 2021	Target 2022
Implement a common greenhouse gas (GHG) emissions reporting framework and system for all entities where we have more than 50% ownership.	GHG emission reporting channel in place for entities and to be continuously improved.	GHG Inventory verified for 2022 report.
Establish appropriate GHG emission reduction targets to direct activities across entities.	Wilhelmsen group ambition for net zero emissions embedded in long term strategy: Net zero emissions in own operations before 2030; in value chain before 2040; and in portfolio before 2050.	Consolidated companies establish science-based targets and reduction program.
Implement a common waste reporting framework and system for all entities where we have more than 50% ownership.	Waste emission reporting channel established, however there are data integrity challenges. For example, accounting for leased office sites with no operational control of facilities is particularly challenging, as is the identification of waste disposal streams.	Improve visibility and integrity of data with vendors.
Establish appropriate targets to direct activities across our entities, guided by circularity principles.	Product lines have several circular initiatives ongoing.	Progress circular initiatives.

GREEN GROWTH AND DECARBONISATION

We pursue investments and new business models aimed at decarbonising the maritime industry, enabling energy transition and the growth of renewable energy, and sustainable product and service offerings.

In 2021, the group established a New Energy segment, a continuation of several years of exploring renewable opportunities and to capitalise on the opportunities which will arise from global energy transition. The group committed up to USD 500 million in new business investments related to renewable segments over the next five years, investing in own ventures, together with partners, and/or utilising the capital market.

Across our entities, we continued to work with other industry leaders in partnership to develop value chains for new and renewable fuels for marine applications in Norway and internationally.

In addition, our joint venture company Massterly, continues to partner with industry leaders to move cargo transport from road to sea, and towards zero emissions autonomous logistics chains. 2021 saw the delivery of Yara Birkeland to Norway to take on the task of hauling Yara fertilizer products and reducing 40 000 truckloads each year. Massterly will be responsible for the operation of this vessel which will eventually run autonomously. Massterly will also handle two new battery powered vessels for Norwegian food wholesaler ASKO that will be delivered in 2022, carrying shipping containers across the Oslo fjord.

Other entities continued to develop innovative and more sustainable products and services. RaaLabs continued their work to offer vessel data as a service, streaming performance data to onshore digital dashboards to track engine performance, improving efficiency and reducing emissions. Marine Products in partnership with thyssenkrupp successfully digitised, printed, tested, and delivered a spare part on behalf of an OEM. This was an important and significant milestone in their aim to re-examine and optimize the production and delivery process of 3D printed spare parts for the unique demands of the maritime market.

Entities have also continued to work actively in the offshore wind value chain. NorSea Wind provides integrated service packages to the offshore wind sector. NorSea Group continues to increase its footprint in the sector. In 2021, the company established an alliance with Parkwind, with the intention of becoming an operator of offshore wind parks in the North Sea. The company is also working with other partners to establish a new, pioneering industrial plant at Jelsa in Ryfylke, Norway, for assembling wind turbines. To future proof its base facilities, the company has also developed its 2030 vision of maritime industrial parks bringing together services for the offshore energy sector, hydrogen hubs, cargo operations, and aquaculture including fish farming and algae operations.

In 2020, Wilhelmsen acquired 25% of Østensjø Group's offshore wind company, Edda Wind, with an option to buy another 25%. The option was exercised in the first quarter of 2021, increasing the Wilhelmsen ownership to 50%. In the fourth quarter, Edda Wind ASA launched an initial public offering (IPO). Following completion of the IPO, Wilhelmsen owns 16.5 million shares in Edda Wind ASA, representing 25.7% of total shares. The company operates service vessels supporting the maintenance work conducted during the commissioning and operation of offshore wind parks and the vessels are constructed to be able to accommodate future zero-emission technology.

The group is also exploring new areas. Norway is one of the only countries to have formalised marine mineral legislation with the Seabed Mineral Act in 2019. Following a detailed public consultation in 2021, the Norwegian government is now preparing an in-depth environmental impact assessment, ahead of its final decision on licensing approval for exploration and production. The decision is expected in the second quarter of 2023. Wilhelmsen and NorSea Group have together acquired a 18% stake in innovative Norwegian deep-sea mining company Loke Marine Minerals.

In 2022, we will continue to progress our investments, projects and other innovations in line with our strategy. We will also continue the work to prepare for the EU taxonomy regulations. In 2021, awareness sessions about the EU taxonomy were held internally and with the Board, and an initial screening of activities was conducted. The regulations are expected to enter into force in Norway in 2022, and will require listed companies with more than 500 employees to include information in their annual reports on the extent to which their activities can be classified as sustainable according to the taxonomy.

BIODIVERSITY, ECOSYSTEMS AND CIRCULAR ECONOMY

Overuse or mismanaged use of ecosystem services can lead to contamination, ecological devastation, economic disruption and impacts on human health. In addition, full asset and product lifecycle accountability, as well as growing regulatory requirements require new product and service offerings for the maritime industry. The group aims to minimise resource use and the impact of our activities and products on air, soil, and water.

Ship Management provides full technical management, crewing and related services for all major vessel types, and as such is in a good position to influence compliant, sensible, safe and environmentally sound operations for vessel owners.

To provide value to customers and reduce environmental impact, ship management works with customers to optimize vessel and voyage operations to reduce operational costs and emissions, offering purpose-built digital solutions such as Spark to enable this. Ship management's environmental management practices onboard are in compliance to Convention for Prevention of Marine Pollution (MARPOL), Ballast Water Management Convention (BWMC) and The International Convention on Oil Pollution Preparedness (OPRC). The company promotes responsible consumption and recycling programs onboard and onshore. The company is also proactive in reducing plastics in vessel operations by introducing requirements towards suppliers and facilitating industry initiatives to reduce single use plastics in the maritime industry. The company is committed to the first milestone of the [IMPA SAVE](#) program to reach zero plastic drinking water bottles by 2025, a resolution that branched from roundtable discussions facilitated by the company in 2019.

The company also supports customers adapting to stricter emissions regulations, such as the Energy Efficiency Design Index for existing ships (EEXI) and Carbon Intensity indicator (CII) which come into effect on 1 January 2023. Ship management's ongoing goal is to collaborate with relevant partners towards the decarbonisation of shipping, particularly in the development and transition to alternative fuels including hydrogen, ammonia and methanol.

Wilhelmsen Chemicals is located in Norway, a 12 000m² production facility with chemical tanks, storage facilities

and a deep-water quay. The site does not produce chemicals, but rather brings in different components and mixes them to become products distributed nationally in Norway and globally through the Ships Service network. The operation is certified according to the ISO14001 standard and has focus on utilising chemical components that are less harmful to the environment, employees and customers, and addressing the plastic packaging and packing materials used for chemical distribution. The company has products that meet the high standards of the [Nordic Eco-labelling scheme](#). The company is also an active member of [Grønt Punkt Norway](#) and has committed to increase the use of recycled plastics in own packaging; cut unnecessary use of plastics and design for recycling.

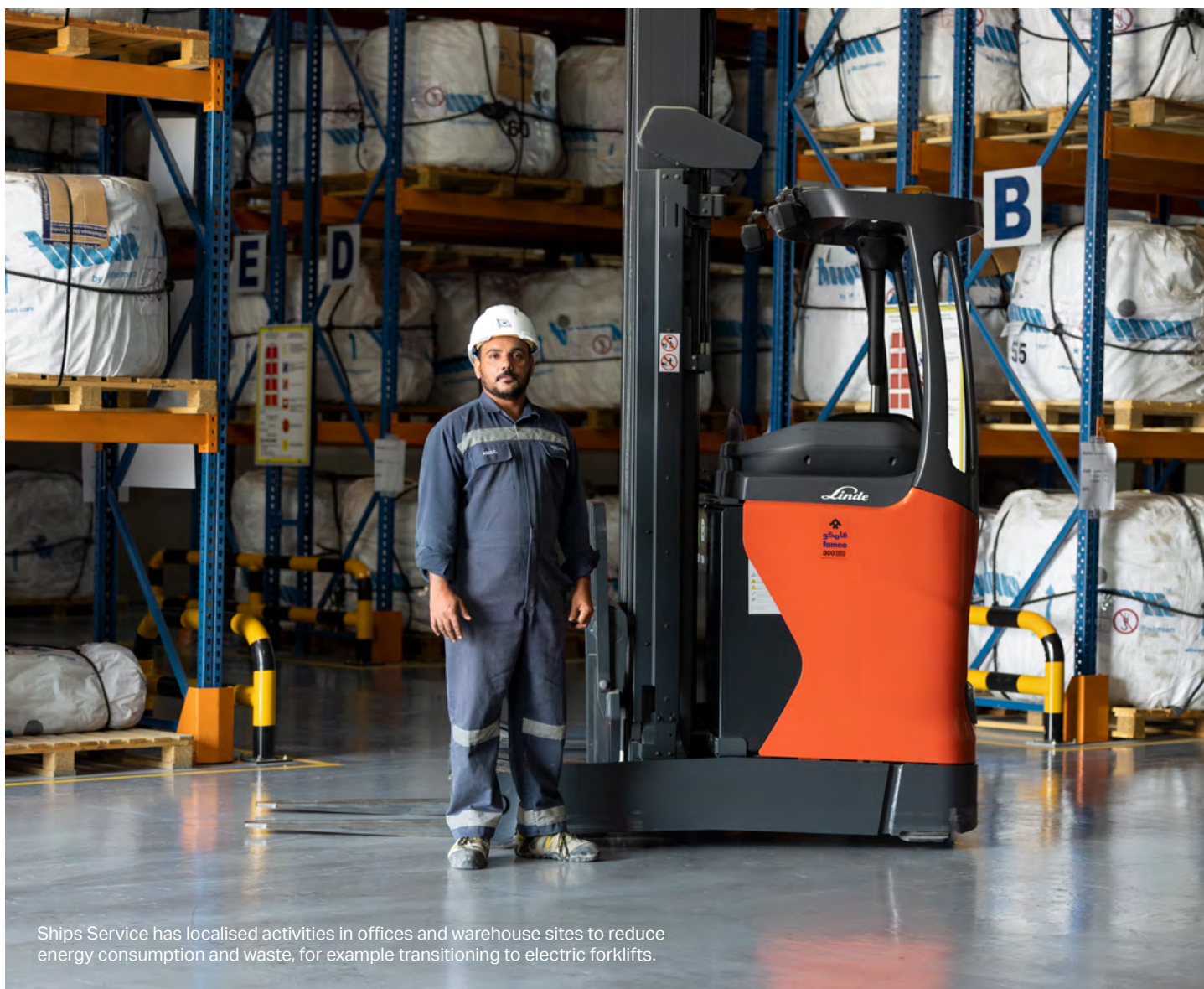
NorSea Group has nine bases covering 2 471 000m². When investing, developing and operating bases, environmental aspects and impacts are addressed in five key areas – infrastructure, machines and equipment, buildings, digitalization and improvement, and collaboration and new business concepts.

Bases set environmental targets and improvement projects based on their individual site risk assessments. The operations are certified according to the ISO 14001 standard and focus areas include energy and emissions, waste and recycling, oil separators, tanks and chemical handling.

Activities related to energy transition and emissions reductions include the installation of shore power, gradual electrification of the machine park, efficient terminal management system, and supporting infrastructure development to contribute to the offshore wind, hydrogen and carbon capture value chains.

Ships Service has localised activities in offices and warehouse sites to reduce energy consumption and waste, for example transitioning to electric forklifts, finetuning / replacement of heating and lighting, reuse of packaging and pallets and appropriate waste segregation. The company delivers a range of marine products, chemicals and technology solutions to customers that support compliance, efficiency and reduced environmental impact. For example:

- Highly concentrated cargo hold cleaning product solutions to get more done with less chemicals that are classified as not harmful to the marine environment.
- Responsible refrigerant solutions to support customers comply with the gradual phasing out of refrigerants with high global warming potential (GWP) and achieve better energy efficiency and safety outcomes.
- Supporting customers to extend the service life of vessel's ropes, and innovations such as the snap back arrestor to secure safer and more efficient vessel mooring. End of life rope recycling is also in focus to reduce waste to landfill and marine pollution.



Ships Service has localised activities in offices and warehouse sites to reduce energy consumption and waste, for example transitioning to electric forklifts.

3



Social



Social

People make our strategy come alive. Simply put. People are our most valuable asset. That is why we take pride in creating an attractive, engaging, and safe workplace, and nourishing a culture where employees around the world deliver the right results, the right way. Since our strategic ambitions require us to change and transform the businesses we are in, we need to ensure we have engaging and inspiring leaders and offer employees the possibility to grow and excel.

We conduct our businesses with respect for human rights and labour standards, including conventions and guidelines related to the prevention of child or forced labour, minimum wage and salary, working conditions, and freedom of association. Employees and external stakeholders are encouraged to report on non-compliant behaviour through the group’s global whistleblowing system.

DEMOGRAPHICS

At the end of 2021, the group employed 15 464 people, 4 476 onshore and 10 988 seafarers. 85 nationalities are represented in Wilhelmsen’s global onshore operations, with Norway, Malaysia, and India representing the top three populations in size. Females represent 36% of the onshore population, and 1% of the seafarer population.

The Wilhelmsen group consists of a diverse portfolio of maritime related companies operating on six continents. We have the world’s largest maritime network with 239 offices in 60 countries on call 24/7 and deliver products and services to more than 50% of the world’s merchant fleet.

70% of the senior management team members at the head office locations in Norway, Singapore and Kuala Lumpur were from the local communities. 22% of these senior management team positions were held by females. Senior management teams are defined as the top three levels in each company included in the scope of this report. One of the five members of

the company’s group management is female and two of the five directors on the board of directors of Wilhelmsen.

The annual turnover rate for employees in the group was 12.74% in 2021, in line with previous years.

Demographics	2021	2020	2019
Offices	239	229	241
Countries	60	62	62
Total employees	15 464	15 452	15 065
Land based employees (FTE)	4 476	4 813	4 835
Seafarers	10 988	10 639	10 230
Nationalities	85	84	89
Turnover rate onshore	12.74%	11.25%	12.71%

OCCUPATIONAL HEALTH AND SAFETY

We take pride in offering an engaging and safe workplace. In addition to continuously improving our health and safety management systems and employee behaviours, our aim is to have zero work related fatalities or other work-related harm to our people.

Through our different entities, we conduct our businesses in compliance with local labour standards and internally accepted human rights as described in the UN Global Compact, which the group subscribes to. Through our ship management organisation, we are Maritime Labour Convention (MLC)-compliant. All seafarers’ contracts are in accordance with local Collective Bargaining Agreement (CBA)s and International Transport Workers’ Federation (ITF) standards.

Contribution to the SDG targets

8 DECENT WORK AND ECONOMIC GROWTH



5 GENDER EQUALITY



8. Decent work and economic growth – Achieve higher levels of economic productivity, improve global resource efficiency and decouple economic growth from environmental degradation (Targets 8.2, 8.4). Achieve full and productive employment and decent work, eradicate forced labour, modern slavery, human trafficking and child labour, protect labour rights and promote safe working environments (Targets 8.5, 8.7, 8.8)

5. Gender equality – End all forms of discrimination against all females and girls everywhere (5.1). Ensure full participation in leadership and decision-making (5.5).

Key risks and opportunities

Key opportunities	Key risks
<ul style="list-style-type: none"> • High engagement score • Strengthen learning and development culture • Diversify the workforce • Build sustainable brand reputation 	<ul style="list-style-type: none"> • Fight for talent • Lack of engaging and inspiring leaders navigating through changing business environment • Lack of competence development

The group's variety of ongoing initiatives to maintain employee wellbeing and a healthy and safe work environment were particularly critical during the year. The focus was on physical and mental health and safety, working conditions (including working from home), employee assistance program, safe social activities, employee engagement surveys and opportunities for personal development.

Entities in the group have also developed comprehensive health, safety, security, environment, and quality management systems, supporting a safe working environment. Ship Management are certified to operate ships as per the ISM Code. Ships Service and NorSea Group are certified according to the ISO45001 occupational health and safety standard.

In 2021, there were around 42.5 million exposure hours (work hours) in the group. Vessel based operations accounted for 80% of total exposure hours and onshore operations accounted for 20%.

Regrettably in 2021, there was one work related fatality of a seafarer re-enforcing the need to continuously apply and improve measures that secure a safe work environment and a robust safety culture for all employees.

The lost-time injury frequency (LTIF) rate for sailing personnel was 0.35, within the target not to exceed 0.40. The total

recordable case frequency (TRCF) rate was 1.26, within the target not to exceed 2.80. Sickness absence was 0.02% and no occupational disease cases were recorded. The targets will remain the same for 2022.

During the year, safety campaigns focused on COVID-19 measures and mental health and wellness. Crew changes were conducted where possible, when risk mitigation conditions were met, and according to international and local guidelines. Management continued to be active in measures to enable the safe and unhindered movement of seafarers to and from their workplace.

For onshore operations, campaigns focused on safety risks, COVID-19 measures and mental and physical health and wellness, including the working from home situation. The LTIF rate onshore was 0.36 in 2021, within target not to exceed 0.40. The TRCF rate result of 0.52 was within target not to exceed 1.00. The targets will remain the same for 2022. The sickness absence rate was 2.05% for onshore operations, in line with previous year. There were two onshore occupational disease cases recorded in 2021 resulting from work-related stress.

All reported incidents were investigated to avoid similar incidents in the future, improve necessary training and awareness measures.

Progress on targets

Target 2021	Result 2021	Target 2022
Lost time injury frequency (LTIF) rate Onshore not to exceed 0.40 On vessels not to exceed 0.40	0.36 0.35	not to exceed 0.40 not to exceed 0.40
Total recordable case frequency (TRCF) Onshore not to exceed 1.00 On vessels not to exceed 2.80	0.52 1.26	not to exceed 1.00 not to exceed 2.80
Engagement survey score >75	78	Greater than 75

Metrics	2021	2020	2019
Onshore (exposure 8 hours a day, 5 days a week)			
Exposure hours	8 771 793	9 222 182	9 094 979
Lost time injury frequency rate	0.36	0.13	0.18
Total recordable case frequency rate	0.52	0.30	0.33
Safety observations	1 937	9 450	5 414
Sickness absence	2.05%	2.01%	1.68%
Seafarers on vessels (exposure 24 hours a day, 7 days a week)			
Exposure hours	34 001 856	35 570 856	29 683 152
Lost time injury frequency rate	0.35	0.28	0.32
Total recordable case frequency rate	1.26	1.4	1.46
Safety observations	9 973	10 969	9 782
Sickness absence	0.02%	0.01%	n/a

Response to COVID-19

The group's variety of ongoing initiatives to maintain employee wellbeing and a healthy and safe work environment were particularly critical during the year due to the ongoing pandemic. The focus was on physical and mental health and safety, working conditions (including working from home), employee assistance programs, safe social activities, employee engagement surveys and opportunities for personal development.

Through 2021, we have responded globally and locally to the situation with communications, site risk assessments, business continuity planning and situation reporting in place for our business units and local emergency response teams. During our annual engagement survey, employees responded that they feel well taken care of, have received sufficient and timely information, have experienced the company taking sufficient measures to reduce risk of infection, and have been able to keep motivation despite most working from home. In 2021, we introduced an employee driven health and wellness hub. The hub is a place for employees to share their experiences and thoughts about staying well and how to deal with the pandemic during challenging times. The hub also includes information related to nutrition, fitness, mental wellness, and support tools.

For our seafaring employees, the challenges related to crew change continued into 2021. During the year, we have conducted crew changes where possible, when risk mitigation conditions were met, and according to international and local guidelines. We have also offered vaccines to crew where possible. Management has also been active in raising awareness of the need for seafarers to be recognised as key workers, to enable the safe and unhindered movement of seafarers to and from their workplace. Management has been making personal calls to the crew regularly, to ensure crew health, safety, and wellness, and to seek feedback from crew on how we can support them better during this difficult time. In 2022, we will continue to apply appropriate COVID-19 response measures and wellness activities for our employees.

EQUALITY, DIVERSITY AND INCLUSION

The maritime industry has been and still is male dominated. Being a global company with operations in more than 60 countries and representing employees from 85 nationalities, the Wilhelmsen group is diverse. Despite an ethnically diverse workforce, where engagement survey results support a culture characterised by zero-tolerance for harassment and discrimination, where differences are valued and respected, the percentage of females in the organisation has been stable for several years, suggesting increased attention is necessary. We believe an even more diverse workforce is valuable for several reasons:

- It allows us to access the broadest talent pool possible
- It enables better decision making and increased value creation
- It is part of our social responsibility, contributing to higher workplace participation

Metrics	2021	2020	2019
Number of nationalities onshore	85	84	89
% of senior management from local communities	70%	71%	61%
Females – % of employees onshore	36%	35%	35%
Females – % seafarers	1%	1%	1%
Females – % senior management *	22%	25%	25%
Females – % in group leadership program	39%	27%	28%
% of female of Wilh. Wilhelmsen Holding ASA board	40%	40%	40%

*Senior management defined as the top three levels in each key legal entity and managing director in smaller entities.

In 2021, we set an ambition of increasing the number of female leaders and internal board members. By 2030, our ambition is to have 40% of each gender represented in the top three level of management onshore and in internal boards. The ambition has been approved by the group management team and endorsed by the Wilhelmsen board of directors.

To reach the ambition, we need to actively engage in a wide range of equality and non-discrimination activities including recruitment, salary-and work conditions, promotion and development opportunities, diversity management training, and work-life balance to mention some.

As needs vary pending on location, local HR is responsible for developing activities tailor-made to local needs to support the group's overall ambition. A group with HR representatives from the global organisation has been active in developing a toolbox with a broad set of activities to inspire and motivate the local organisation.

At Wilhelmsen, employees have the right to equal opportunities. Harassment and discrimination based on race, gender or similar grounds, or other behaviour that may be perceived as threatening or degrading, is not acceptable. To ensure we strive to build a culture where employees feel safe and are heard and accepted for who they are and what they bring to the workplace, we conduct an annual Engagement Survey capturing discrimination, harassment, and inclusion. We will further assess if the Engagement Survey should be expanded to include a question related to diversity

Achievements and ambitions

2021 achievements	2022 targets	2023 ambitions	2030 ambition
<ul style="list-style-type: none"> Equality and diversity assessment identified opportunities and risks. Action plan developed. Target set for gender diversity in top three mgmt. levels Target set for gender diversity in internal boards Report on gender-pay gap for Norway Dashboards to monitor progress developed Sharpened language in policies Diversity included as opportunity in materiality assessment 	<ul style="list-style-type: none"> Diversity included as strategic challenge and opportunity in group long-term strategy Quarterly reviews of equality, diversity, and inclusion progress by HR executives, global mgmt. team, and board Pilot unconscious bias training for human resource executives Communication plan to increase internal awareness of equality, diversity, and inclusion Assess opportunities to develop diversity and inclusion index based on existing engagement survey scores 	<ul style="list-style-type: none"> Strengthen leadership accountability through unconscious bias and diversity management training 	<ul style="list-style-type: none"> 40% of each gender in top three mgmt. levels and internal boards

management and/or if we can develop a diversity and inclusion maturity index based on existing survey scores.

Metrics	2021	2020	2019	Ambitions
Discrimination reported in Engagement survey	<2%	<5%	<9%	Zero
Bullying reported in Engagement survey	<2%	<2%	<4%	Zero
Sexual harassment reported in Engagement survey	Zero	<2%	<4%	Zero
Inclusion: Based on two questions in the Engagement survey (In my team we respect and trust one another, and I feel respected and appreciated for who I am at work)	>80	>80	>80	A score on the Engagement survey >75 is considered a good score

Gender-pay gap for Norway

To comply with local regulations, a gender pay gap analysis was conducted in 2021 for the group’s 100% owned companies in Norway. 333 employees were included in the analysis, representing 275 different positions and/or job titles. Positions were grouped into seven levels based on complexity, requirements, functional descriptions, and impact on the organisation. Data related to working conditions, salary and variable pay are available in appendix 4.

The analysis showed that median pay for females in Norway is 21% lower than males. From the analysis we have identified some improvement areas including fine-tuning use of job profiles and titles to improve data quality and comparisons made. This work will be undertaken in 2022.

Succession management

To ensure the group has a diverse and sustainable pipeline of leaders, a new succession management process was introduced in 2021 and included 46 senior executives. 96% positions were in Europe or Asia, following the two main hubs for the group’s management teams being Norway and Singapore. 76% of the positions were held by males. For most of the positions (76%), two or more candidates were identified.

As part of securing a sufficient and diverse pipeline of leaders, the succession process will be extended to another approximately 250 positions in 2022.

COMPETENCE DEVELOPMENT

To truly live our vision of shaping the maritime industry and building on our values, *learning and innovation and teaming and collaboration*, we consistently work to stay relevant and ensure we have the skills and competencies necessary to create business value today and in the future. Our approach to learning includes three simple words – learn, apply, and share. By learning something new, applying it in our work, and sharing it with our colleagues, we know we create greater business impact. A learning organisation with motivated employees contributes to efficient operations and has a positive effect on financial performance.

Personal development plans are integrated in our performance appraisal and review processes. In 2021, employees were encouraged to spend a minimum of eight hours of training. For most of our employees, the number of hours is a lot higher. In addition to formal training, employees also conduct mandatory training, and most will learn and apply new things as part of their continuous improvement and development of their working day.

Our seafarers have extensive, ongoing training throughout the year to comply with rules and regulations and best practice. Our systems are built to ensure authentic certificates are achieved and essential competencies are learnt by our seafarers, rather than for collecting quantitative statistics such as number of training hours/days. We are therefore not able

to report on the average number of training hours per year for seafarers.

Learning and development	2021	2020	2019
Performance appraisal – % completion rate	98	92	95
Minimum training hours onshore	8	8	8
Mandatory business standards training – % completion rate	100%	84%	31%
Mandatory competition law training for specific employees based on role – % completion rate	100%	n/a	n/a
Mandatory cyber security training	100%	95%	70%

Leadership development

Securing an inspiring and engaging work environment where our employees can do their best and live up to the standards in our governing elements, requires a lot from our leaders. Our Leadership Development Journey consists of two to three learning modules per year for all leaders (approximately 1 050) in the Wilhelmsen group. In 2021, 92% of targeted leaders completed one module on our leadership expectations and one module on leading in challenging times. 39% of the participants were female.

In 2022, we will continue our learning journey focusing on change management. The aim is to prepare leaders for the changes in our business surroundings and the transformation needed for many of our business related to new technology and energy transformation and how to inspire, motivate, and lead the organisation through changes ahead.

HUMAN RIGHTS AND EMPLOYMENT CONDITIONS

We support and respect the protection of internationally proclaimed human rights. As an employer, we uphold the freedom of association and recognise the right of our employees to collective bargaining. We are also committed to eliminating all forms of forced and compulsory labour including child labour, modern slavery, and human trafficking, and to eliminate discrimination in respect of employment and occupation.

Employee engagement

The annual employee engagement survey, measuring our ability to provide an engaging and safe work environment, was conducted in the third quarter. The results point to consistent and positive high engagement, where employees feel positively taken care of during the COVID-19 pandemic.

There is always room for improvement. Senior management and individual managers in all locations were required to conduct follow up discussions with their teams.

Where results were less than the expected benchmark, managers were required to implement specific actions to improve results.

In addition to the engagement survey, employees are offered an annual performance review and mid-year review where achievements are recognised, development areas discussed and targets for the second period agreed.

Employee engagement	2021	2020	2019
Performance appraisal completion rate	98%	92%	95%
Engagement survey score	78	76	73
Engagement survey completion rate	91%	88%	88%
Net promoter score	33	39	n/a
Mandatory cyber security training	100%	95%	70%

Employment conditions

Local and internationally accepted labour and human rights form the basis for how we treat our employees. To ensure decent working conditions, our People Policy states that we will:

- provide an engaging and safe work environment with equal opportunities for all employees to contribute and create value,
- offer a professional and consistent management of our people, and
- offer employees possibilities to grow and excel.

In 2021, 12 potential violations related to our People Policy (mainly claiming unfair dismissals, bullying/harassment) were reported through the whistleblowing channel. 10 of the cases were dismissed, and 2 lead to improved procedures and mitigating activities. By year end, all of the cases were closed with corrective measures where applicable. None of the cases were related to human rights.

During the year, we updated our People Policy to also include our ambition to engage with suppliers and customers that demonstrate their commitment to the UN Global Compact or similar through transparently reporting on their environmental, social, and governance practice and performance and/or contribute to accelerate such a commitment.

In 2022, the Norwegian Transparency Act enters into force 1 July, which requires companies to publish statements of due diligence, and upon request provide information on how they work to deal with negative consequences on basic human rights and decent working conditions. This relates to our own organisation and also our suppliers. With thousands of suppliers in our world-wide operations we will need to work diligently to further strengthen our efforts and due diligence to ensure compliance with the Act.

Collective action for seafarer's rights

During the year, Ship Management played an active role together with other members of the Sustainable Shipping Initiative (SSI) to develop a [Code of Conduct](#) and assessment tool to protect the human rights and welfare of the world's nearly 2 million seafarers. The Code of Conduct seeks to address systematic risks and impacts experienced by seafarers through:

- emphasizing rights in the Maritime Labour Convention that are not being adequately enforced; and
- including rights and issues that are important to seafarers but not currently covered in the regulation.

The goal is to continue to lift the industry treatment of seafarers beyond minimum compliance.

The company also became a signatory to the [Neptune Declaration on Seafarer Wellbeing and Crew Change](#). The

declaration commits the company to shared responsibility in addressing four key areas related to the ongoing crew change crisis resulting from the pandemic:

- Recognise seafarers as key workers and give them priority access to COVID-19 vaccines
- Establish and implement gold standard health protocols based on existing best practice
- Increase collaboration between ship operators and charterers to facilitate crew changes
- Ensure air connectivity between key maritime hubs for seafarers

LOCAL COMMUNITIES

We care for the local communities in which we have operations and as a responsible employer it is important for us to give back

to the communities. Each year, our employees are therefore invited to make a difference in their community by applying for “Do good locally program” funding on behalf of a local not for profit organisation. Whilst most activities needed to be rescheduled or reshaped due to COVID-19 in 2021, a number of initiatives were completed.

Some of the projects selected in 2021 focused on; supporting marine biodiversity in the Barcelona area, providing education for children with cerebral palsy in Turkey, donating food to homeless people with disabilities in Malaysia, supporting seafarers living with HIV and delivering humanitarian assistance to migrant workers in Singapore, to mention just a few.



During 2021 Ship Management played an active role together with other members of the Sustainable Shipping Initiative (SSI) to develop a Code of Conduct and assessment tool to help protect the human rights and welfare of the world's nearly 2 million seafarers.

4



Governance



Governance

Our ambition is to be a responsible, trusted, and compliant value chain partner. To ensure we have sound governance of our group of companies, we have a robust governance and management system in place. In 2022, we will also issue an owner’s statement, describing how we govern and the requirements we set to our portfolio of companies and investments.

For the purpose of this report, governance is related to how we aspire to reach our ESG ambitions, including how we set and follow up on them, requirements we apply to the investments we make, our whistle-blowing routines, as well as how we work with anti-corruption and supply chain management. Corporate governance is covered in a separate report, available on wilhelmsen.com.

COMPLIANCE

The industry we are operating in is exposed to several risks. To mitigate risks and prevent and mitigate unethical business practise, we have a governance system in place including policies, audits, risk assessments, and reporting. We also have an external and internal whistleblowing channel and perform continuous awareness training to ensure our employees understand our expectations.

We also find it valuable to participate in networks with other companies in our industry and other business partners, as we believe in collaborating to move the industry and the world in the right direction and contribute to develop regulatory requirements.

At Wilhelmsen, we have zero-tolerance for corruption, and we work tirelessly to achieve a culture of fully compliant employees. Each year that passes, we see an increase in number of whistleblowing cases which show us that our employees and partners speak out more, and we are happy to see that number goes up. All the while, the whistleblowing cases we

have each year also tell us that working towards our goal of a fully compliant workforce never stops. We unfortunately still have cases every year of employees operating in non-compliant ways. By continuing our work towards zero corruption, a sound and compliant culture, and having the systems in place to report and act on non-compliance, we see improvements every year, and we feel confident that we can achieve the right results the right way.

Whistleblowing channel

The whistleblowing channel provides all employees and external stakeholders with a secure channel to report violations of laws, our governing elements, and internal policies. Our whistleblowing channel enables all employees of Wilhelmsen, business partners, and stakeholders to report any serious concerns or offenses in a confidential manner. The whistleblowing channel can be found on wilhelmsen.com.

Whistleblowing cases

In 2021, 28 whistles were received related to allegations of fraud/corruption, data protection, health and safety and other HR related issues. In 26 of the whistles, the reported issues have been concluded with appropriate action taken where applicable. At the end of the year, two of the whistles received in 2021 were pending a conclusion. In addition, we have three open cases from 2020, bringing the total open cases up to five.

There were no confirmed incidents of corruption and no confirmed incidents of discrimination and harassment.

Metrics	2021	2020	2019
Number of whistles	28	25	19
Number of whistles open at year-end*	5	3	2
Number of whistles related to alleged corruption	1	2	1
Number of whistles related to alleged discrimination and harassment	12	No records	No records
Number of dismissals related to confirmed breaches of the company's Code of Conduct and Business Standards	3	No records	No records

*This includes whistles open from previous years (not resolved due to Covid restrictions, with none perceived as business critical)


Awareness training

Facilitation payments remain a challenge in the industry. We do not tolerate any form of corruption, and we expect all employees to live up to the high ethical standards we lay down in our [governing elements and Code of Conduct](#). Business standards work is ongoing and constant, and our various stakeholders depend on us being a transparent and compliant partner.

Contribution to the SDG targets

16

PEACE, JUSTICE AND STRONG INSTITUTIONS



16. Peace, justice, and strong institutions – Substantially reduce corruption and bribery (Target 16.5). Develop effective, accountable, and transparent institutions at all levels (Target 16.6)

Key risks and opportunities

Key opportunities	Key risks
<ul style="list-style-type: none"> • Customer and market confidence in ethical business culture • Healthy partnerships with serious actors • Higher employee engagement as a responsible employer 	<ul style="list-style-type: none"> • Non-compliance events with security, reputational and/or financial consequences • Operational or supply chain disruption • Business dealings in high governance risk countries

All new employees participate in mandatory business standards training as part of the onboarding process. The training addresses anti-corruption, theft and fraud, GDPR and data protection, competition law, and whistleblowing.

An impressive 100% of employees completed business standards training and a selected group of employees also completed specific competition law training. Reaching a 100% compliance rate even for mandatory training requires hard work. In addition to having built a strong culture with focus on high ethical practice over many years, we believe that our success is a result of active management attention, dashboards monitoring progress, screen savers reminding our employees of the tasks ahead, and a wide range of communication activities through several channels.

In addition, the group used the international anti-corruption day 9 December to create awareness related to fraud and corruption. The group has also completed awareness training related to the whistleblowing channel.

In 2022, we will conduct a refresher training for all employees worldwide, running a shorter version of the business standards training with the target of 100% completion.

Reporting and control

The COVID-19 situation has had an impact on compliance activities that require travel and physical presence at our locations, such as investigations and audits. Follow up of potential irregularities was mainly conducted by providing guidance and instructions to local and regional resources. As in previous years, internal fraud cases have been detected, with one case reported to the police and currently being investigated. We have also guided in other cases from various

group companies, resulting in matters ending up in local police and judicial systems.

All group companies are expected to make risk assessments and initiate mitigating actions where applicable. The board receives a quarterly update on potential compliance issues and awareness training and have an annual deep dive related to compliance, regulatory requirements etc.

Partnerships and alliances

We also find it valuable to participate in networks with other companies in our industry and other business partners, as we believe in collaborating to move the industry and the world in the right direction and contribute to develop regulatory requirements.

We are actively engaged in the [Maritime Anti-Corruption Network](#), where one of our employees serves on the board of directors. Several of our companies are also [TRACE](#) certified and we are a member of [Transparency International](#) Norway.

New business and M&A activities

As part of opening business in new countries and/or investing in new companies and/or merging or acquiring new businesses, we conduct country assessments and integrity due diligence as part of the assessment.

Cyber security

Our objective is to minimise cyber security risk and data protection risk and to secure employees' active contribution to a risk prevention culture. The key focus areas are to continuously improve our cyber security maturity, strengthen operational measures, and increase employee competence in cyber security and data protection risk prevention behaviour.

Progress on targets

Goal 2021	Result 2021	Target 2022
95% completion rate for business standards training	100% onshore 96% seafarers	Refresher business standards training with 100% completion rate
Continued screening of new suppliers. Audits as per schedule as far as practicable.	Matured screening and risk management processes in place. 75 supplier audits conducted.	Continued screening of new suppliers against strict criteria. Audits as per schedule as far as practicable.

In 2021, cyber security maturity efforts were focused on strengthening risk management and governance. Mandatory cyber security training was also conducted in the year with a 100% completion rate.

We will continue to develop the maturity of our systems to keep up with regulatory updates as well as strengthen our defence based on experience over time.

GDPR

GDPR practices are managed through our internal network of personal data protection administrators. In 2021, an external review of GDPR compliance was conducted and quarterly internal reviews were implemented. Two improvement areas were identified during the year related to documentation of local processing activities and recording data processing agreements with relevant vendors. The global data protection officer processed 30 enquiries and incidents during the year.

SUPPLY CHAIN MANAGEMENT

We are committed to doing business with responsible suppliers. We need to ensure our ESG expectations are clear to suppliers and that products and services are compliant with our standards.

Ship Management works with suppliers who will comply with the International Marine Purchasing Association (IMPA) ACT Supplier Code of Conduct (SCoC). The SCoC seeks to improve the economic, social, and environmental sustainability of international shipping and marine industries and is aligned with the United Nations Guiding Principles on business and human rights. The company places clear responsibilities on suppliers to comply with minimum requirements on the following areas:

- Preventive measures of financial fraud
- Sanctions and compliance
- Quality management systems and accreditation
- Business ethics and code of conduct
- Supporting the UN Convention on the rights of the child



- Cybersecurity precautions
- Reduction in single use plastics

Ship Management vets and verifies all applications from companies to become a supplier and retain all supporting documentation for future reference. Suppliers agree to be audited at any time and will be audited from time to time. All suppliers with framework agreements are required to re-submit their applications annually. Suppliers who do not meet the minimum standards will be removed from the approved supplier list. The company conducted 429 assessments of new suppliers in 2021 and 86% were accepted according to the company's standards. During 2021, conducting physical audits of suppliers was not possible due to COVID-19 restrictions. An annual review of contracted suppliers was conducted in accordance with ISAE 3402 procurement controls requiring the selected suppliers to complete a self-assessment questionnaire which was then subject to review and follow up. 58 contracted suppliers were invited to complete the questionnaire, of which 65% were found to be satisfactory and were awarded 'approved' supplier status, whilst 35% were removed as approved suppliers.

In Ships Service, suppliers are risk assessed and are required to sign a supplier Code of Conduct which addresses compliance, fair business conduct, corruption and bribery, working conditions including health and safety, harassment, and discrimination, human rights and child labour, and environmental aspects. The company conducted 17 risk-based audits of suppliers in 2021, in addition to periodic performance assessments / reviews.

In 2022 we will continue the work to prepare for the Transparency Act regulations in Norway which enter into force on 1 July, 2022. The Act requires companies to promote respect for basic human rights and decent working conditions, conduct due diligence of its supply chain and ensure the public has access to this information.

RESPONSIBLE OWNERSHIP

The group includes environmental, social, and governance (ESG) issues in its investment analysis, business decisions, ownership practises, and financial reporting. The group's policy is to secure that there are clear expectations to portfolio companies to manage risk and exposure and implement a systematic approach to ESG.

As an active owner, the group has expressed expectations to companies where it has equity investments to reduce environmental impact; contribute to promote human rights, sound working standards; and work towards eliminating corruption in own operations and investments, as well as the operations of suppliers and business partners. The group has also expressed expectations and support for those companies to invest in green growth and to take an active role in the decarbonisation of the maritime and logistics sector.

Management and the Board assess investment risks and opportunities related to equity investments under different scenarios on an annual basis. Information and interactions with relevant personnel at these companies inform this evaluation. The group participates in investor meetings with these companies as an opportunity to address expectations, strategy and ESG matters. In response to the rapidly developing focus on ESG issues, the group will prepare in 2022 a detailed ownership requirements statement to clarify its expectations towards companies where it has a significant shareholding.



We are committed to doing business with responsible suppliers. We need to ensure our ESG expectations are clear to suppliers and that products and services are compliant with our standards.

5

Appendices



Appendix 1: GRI Index

The 2016 version of the below GRI Standards have been used for this report with the exception of GRI 403: Occupational health and safety which is based on the 2018 version of the standard.

Number	Disclosure Title	Disclosure	Description
102-1	Name of the organization	Wilh. Wilhelmsen Holding ASA (Wilhelmsen)	Fully
102-2	Activities, brands, products, and services	Company information and annual reports are available on our website: http://www.wilhelmsen.com/about-wilhelmsen/companies/ Annual report/Directors report page 14 Annual report/Corporate structure page 100	Fully
102-3	Location of headquarters	Lysaker, Norway	Fully
102-4	Location of operations	Annual report/Corporate structure page 100	Fully
102-5	Ownership and legal form	Wilhelmsen is listed on the Oslo Stock Exchange. A current list of the largest shareholders is available on our website: http://www.wilhelmsen.com/investors/the-share/20-largest-shareholders/ Annual report/Equity page 29	Fully
102-6	Markets served	Annual report/Note 2 Segment reporting page 32	Fully
102-7	Scale of the organization	Annual report/Directors report page 14 Annual report/Income statement page 26	Fully
102-8	Information on employees and other workers	ESG report/Social/Demographics Partially reported due to lack of data on employment type full/part time and supervised workers.	Partially – information unavailable
102-9	Supply chain	ESG report/Governance/Supply chain management Partially reported due to lack of data for all business segments.	Partially – information unavailable
102-10	Significant changes to the organization and its supply chain	There are no significant changes to the reporting boundary for this period. Annual report/Directors report page 14	Fully
102-11	Precautionary Principle or approach	Wilhelmsen internet site/Governing elements Corporate governance report	Fully
102-12	External initiatives	ESG report/Working with Stakeholders	Fully
102-13	Membership of associations	ESG site/Stakeholders ESG report/Working with Stakeholders	Fully
102-14	Statement from senior decision-maker	ESG report/CEO message Annual report/Group CEO statement page 10	Fully
102-16	Values, principles, standards, and norms of behaviour	Wilhelmsen internet site/Governing elements Corporate governance report	Fully
102-18	Governance structure	Wilhelmsen internet site/Governing elements Corporate governance report	Fully
102-40	List of stakeholder groups	ESG report/Working with stakeholders	Fully
102-41	Collective bargaining agreements	100% of seafarers. Onshore employees are not covered by collective bargaining agreements.	Fully
102-42	Identifying and selecting stakeholders	ESG report/Working with stakeholders	Fully
102-43	Approach to stakeholder engagement	ESG report/Working with stakeholders	Fully
102-44	Key topics and concerns raised	ESG report/Working with stakeholders	Fully

Cont. appendix 1: GRI Index

Number	Disclosure Title	Disclosure	Description
102-45	Entities included in the consolidated financial statements	Annual report/Directors report page 14 Annual report/General accounting principles page 30 Annual report/Corporate structure page 100 Joint ventures, associated companies and minority interest companies are not covered by the ESG report.	Fully
102-46	Defining report content and topic Boundaries	ESG report/About our report Corporate governance report	Fully
102-47	List of material topics	ESG report/Materiality assessment overview	Fully
102-48	Restatements of information	No restatements.	Fully
102-49	Changes in reporting	ESG report/Scope of the report	Fully
102-50	Reporting period	Fiscal year 2021	Fully
102-51	Date of most recent report	Fiscal year 2021 report published 25 March 2022	Fully
102-52	Reporting cycle	Annual	Fully
102-53	Contact point for questions regarding the report	Head of sustainability – Melanie Moore email: melanie.moore@wilhelmsen.com	Fully
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option. No external assurance.	Fully
102-55	GRI content index	ESG report/GRI content index	Fully
102-56	External assurance	The ESG report has not been externally assured. Price Waterhouse Coopers AS (PWC) has included the financials of the annual report in their Auditor report.	Fully
103-1	Explanation of the material topic and its Boundary	ESG report/Management Approach/Materiality assessment	Fully
103-2	The management approach and its components	ESG report/Management Approach/Materiality assessment	Fully
103-3	Evaluation of the management approach	ESG report/Management Approach/Materiality assessment	Fully
201-1	Direct economic value generated and distributed	Annual report/Accounts and notes page 24 Most figures are reported, however not set up as required by GRI due to business complexity and lack of reporting of local breakdown.	Partially – information unavailable
201-3	Defined benefit plan obligations and other retirement plans	Annual report/Note 11/Pension page 52 Annual report/Note 6/Employee benefits page 43	Fully
202-2	Proportion of senior management hired from the local community	ESG report/Social/Equality, diversity and inclusion	Fully
205-1	Operations assessed for risks related to corruption	ESG site/Governance/Compliance All business areas conducts risk analysis on compliance. However, we are not currently able to provide the percentage of operations which have been assessed.	Partially – information unavailable
205-2	Communication and training about anti-corruption policies and procedures	ESG report/Governance/Compliance Partially due to not broken down by business partners.	Fully

Cont. appendix 1: GRI Index

Number	Disclosure Title	Disclosure	Description
205-3	Confirmed incidents of corruption and actions taken	ESG report/Governance/Compliance Annual report/Whistleblowing and anti-corruption page 21	Fully
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	ESG report/Governance/Compliance	Fully
305-1	Direct scope 1 GHG emissions	ESG report/Environment/GHG emissions and Climate Based on GHG Protocol's operational control approach. DEFRA conversion factors utilised in calculations for all GHG emissions measured in CO ₂ e. The GWPs used in the calculation of CO ₂ e are based on the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4) over a 100-year period.	Fully
305-2	Direct scope 2 GHG emissions	ESG report/Environment/GHG emissions and Climate Based on GHG Protocol's operational control approach. DEFRA conversion factors utilised in calculations for all GHG emissions measured in CO ₂ e. The GWPs used in the calculation of CO ₂ e are based on the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4) over a 100-year period. Location based average emissions factors are used and reported. Gross market-based energy indirect (Scope 2) GHG emissions are not reported.	Partially – information unavailable
308-1	New suppliers that were screened using environmental criteria	ESG report/Governance/Supply chain management Partially reported due to lack of data for all business segments.	Partially – information unavailable
401-1	New employee hires and employee turnover	ESG report/Social/Demographics Partially due to not broken down by gender or region.	Partially – information unavailable
402-1	Minimum notice periods regarding operational changes	According to local rules and regulations. According to standard CBA for seafarers.	Fully
403-1	Occupational health and safety management system	ESG report /Social/Occupational health and safety.	Fully
403-6	Promotion of worker health	ESG report/Social/Occupational health and safety	Fully
403-9	Work-related injuries	ESG report/Social/Occupational health and safety	Partially – information unavailable
403-10	Work related ill health	ESG report/Social/Occupational health and safety	Partially – information unavailable
404-1	Average hours of training per year per employee	ESG report/Social/Competence development Average training hours not defined per gender. Number of seafarer training hours is not recorded (certification and competencies are recorded).	Partially – information unavailable
404-3	Percentage of employees receiving regular performance and career development reviews	ESG report/Social/Competence development Partially due to not broken down by gender.	Partially – information unavailable
405-1	Diversity of governance bodies and employees	ESG report/Social/Demographics ESG report/Social/Equality, diversity and inclusion Partially due to not broken down by region.	Partially – information unavailable
414-1	New suppliers that were screened using social criteria	ESG report/Governance/Supply chain management Partially reported due to lack of data for all business segments.	Partially – information unavailable
419-1	Non-compliance with laws and regulations in the social and economic area	ESG report/Governance/Compliance	Fully

Appendix 2: Memberships and associations

Initiative/principle/association	Description
Dansk Industri (DI)	Confederation of Danish Industry (DI) is a private organisation funded, owned and managed entirely by 10,000 companies within manufacturing, trade and service industry.
Danske Speditører	Danish freight forwarders are an industry organization for a large number of member companies that plan and trade in transport and logistics services as a link between the trade and manufacturing sector and the transport industry. Danish freight forwarders are members of the Nordic Freight Forwarding Federation (NSF), FIATA and Dansk Erhverv. The Nordic Freight Forwarders Association carries out the interests of the Nordic organizations in the field of transport and distributes NSAB – General Provisions of the Nordic Freight Forwarder.
Digital Norway	A business-driven initiative to digitise Norwegian businesses. Develops arenas for sharing expertise and knowledge across companies and industries and provides concrete services for companies that want to speed up their own digitalisation efforts. Works with digitalisation projects across companies and industries across the country.
International Chamber of Shipping (ICS)	ICS is the principal international trade association for merchant shipowners and operators, representing all sectors and trades and over 80% of the world merchant fleet.
International Hazmat Association (IHMA)	IHMA ensures high quality IHM preparations by setting good quality standards and filling gaps of the current practices and international guidelines. A global network of highly motivated and experienced IHM experts is ensuring that this goal will be achieved and shipowners as well as ship recyclers will receive what they are looking for, affordable IHMs providing clear and reliable information on hazardous materials on board.
International Life-saving Appliance Manufacturers' Association (ILAMA)	ILAMA plays a significant role in the international maritime and offshore oil and gas safety scene. By sharing its members' views, experience and technical papers, ILAMA ensures that regulatory bodies and the International Maritime Organisation are aware of their collective concerns.
International Ship Recycling Association (ISRA)	ISRA is a platform for recyclers who have developed a quality standard based on requirements needed to protect environment and secure works safety during the recycling-process.
ITD – Int. Transport Danmark	ITD is a private industry organization for the professional transport and logistics companies. They take care of the transport and logistics industry politically nationally and internationally. At the same time, they provide us with targeted tools that make a positive difference in the everyday life.
Maritime Anti-Corruption Network (MACN)	MACN is a global business network promoting good corporate practice in the maritime industry for tackling bribes, facilitation payments, and other forms of corruption.
Maritim Forum	Maritim Forum is an interest organization that brings together the entire Norwegian maritime industry in a comprehensive maritime cluster. Maritim Forum brings together both the employee and employer side of the industry, and represents the common interests of the cluster.
NCE Maritime CleanTech (NCE MCT)	The cluster organisation uses the Norwegian maritime expertise, built up over generations, as a springboard for the development of new energy-efficient and environmental friendly technologies. The cluster focus on establishing sustainable innovation projects with commercial potential, and work together for new clean maritime solutions.
Norwegian Shipowners' Mutual War Risk Insurance Association (DNK)	The Association's purpose is to insure on a mutual basis, interests attached to vessels, drilling rigs and similar movable units against war risk. The Association is open for membership by companies within the Norwegian Shipping Community.

Cont. appendix 2: Memberships and associations

Initiative/principle/association	Description
Ocean Industry Forum Oslofjord	The Ocean Industry Forum is a cooperation forum for key players from the various parts of the ocean-based industries in the region. The goal is to further strengthen the Oslofjord region and Norway's position as the place where the most innovative and profitable solutions and the highest standards for maritime quality are created and commercialised.
Offshore Energy	Organisation for oil and gas, wind industry within offshore in Denmark
Oil & Gas Denmark	Oil Gas Denmark is a trade organization for all companies in the upstream oil and gas production sector. This involves oil producing companies as well as partners, suppliers and service companies operating within exploration and production of oil and gas in Denmark.
Sustainable Shipping Initiative	The Sustainable Shipping Initiative (SSI) is a multi-stakeholder collective of ambitious and like-minded leaders, driving change through cross-sectoral collaboration to contribute to – and thrive in – a more sustainable maritime industry. Spanning the entire shipping value chain, SSI members are shipowners and charterers; ports; shipyards, marine product, equipment and service providers; banks, ship finance and insurance providers; classification societies; and sustainability non-profits.
The Baltic and International Maritime Council (BIMCO)	BIMCO is the world's largest international shipping association, with 2,100 members in more than 120 countries. Our global membership includes shipowners, operators, managers, brokers and agents. The association's main objective is to facilitate the commercial operations of its members by means of developing standard contracts and clauses, and providing quality information, advice, and education. BIMCO promotes fair business practices, free trade and open access to markets and is a strong advocate for the harmonisation and standardisation of all shipping related activity.
The Norwegian Oil and Gas Association	The Norwegian Oil and Gas Association (Norwegian Oil and Gas) is a professional body and employer's association for oil and supplier companies engaged in the field of exploration and production of oil and gas on the Norwegian Continental Shelf. The Norwegian Oil and Gas Association works to solve common challenges for the members and to strengthen the competitiveness of the Shelf
The Norwegian Shipowners' Association	The Norwegian Shipowners' Association is an employer organization serving more than 160 companies in the field of Norwegian shipping and offshore contractor activities. The members are the core and driving force within the Norwegian maritime environment. The members of the Norwegian Shipowners' Association employ more than 55,000 seafarers and offshore workers from more than 50 different nations.
TRACE International	TRACE International is a non-profit business association that pools resources to provide members with anti-bribery compliance support.
Transparency International Norway (TI)	Transparency International is a global civil society organisation leading the fight against corruption. Through more than 100 chapters worldwide, TI raises awareness of the damaging effects of corruption and works with partners in governments, businesses and civil society to develop and implement effective measures to tackle it.
UN Global Compact	A voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals.
Green shipping programme (Norway)	The Green Shipping Programme aims to find scalable solutions for efficient and environmentally friendly shipping. The results will be cost-effective emission cuts, economic growth, increased competitiveness, and new jobs in Norway. Both authorities and industry actors participate in the programme and are working together to achieve these goals.

Appendix 3: TCFD disclosure

#	TCFD	Disclosure
Governance		
1	Describe the board's oversight of climate-related risks and opportunities.	The board reviews risk and opportunities quarterly under different scenarios including pathways for the decarbonisation of the maritime and logistics sectors and the global energy transition.
2	Describe management's role in assessing and managing climate-related risks and opportunities.	Management reviews risk and opportunities at least quarterly in value creation maps and assessments of portfolio under different scenarios including pathways for the decarbonisation of the maritime and logistics sectors and the global energy transition.
Strategy		
3	Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	<p>Wilhelmsen is exposed to physical and transition climate risks on a general basis and related to specific group companies.</p> <p>Physical risks related to assets and operations, such as more extreme weather and rising water levels, are considered to be medium to long term risks.</p> <p>Transition risks related to the group are considered to be more short to medium term. This includes regulatory, reputational, market, and technology risks. The energy transition and the decarbonisation of shipping are the backdrop for the transition risks for the group, but also present significant opportunities.</p> <p>The Norwegian government's climate program coupled with the EU green deal measures, International Maritime Organisation's (IMO) greenhouse gas (GHG) emissions ambition, other regional and national government's climate measures and energy transition priorities, as well as stakeholder's increased attention on ESG issues, all exemplify the changing climate risk and opportunity landscape for Wilhelmsen.</p> <p>Wilhelmsen continues to work with partners to drive energy infrastructure transformation and maritime decarbonisation. This includes services to the offshore wind industry, projects related to zero emission and autonomous vessel operation, enabling the hydrogen value chain, and digital services.</p>
4	Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning	Wilhelmsen's management of climate risks and opportunities are evaluated and integrated in the management and board's strategic reviews. A summary of the strategic direction and a risk review is included in the Director's report for 2021.
5	Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	The framework conditions including regulations and incentives for the green transition are evolving rapidly to secure that national, regional, and international commitments to the Paris agreement are met. Wilhelmsen's considers scenarios informed by these commitments including for example: Norway to reduce emissions by at least 40 percent by 2030 compared to 1990, including a 50% reduction from domestic shipping; EU to reduce emissions by at least 55% by 2030 compared to 1990; and IMO international shipping emissions by at least 50% by 2050 compared to 2008.
Risk management		
6	Describe the organization's processes for identifying and assessing climate-related risks.	This is included in strategy development and review processes, which is informed by public and private industry reports and interactions with relevant experts and organisations.
7	Describe the organization's processes for managing climate-related risks.	The risks and opportunities are integrated in both the group and individual entities' strategies.
8	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management	The group's risk management matrix categorizes strategic, financial, ESG and governance risk.

Cont. appendix 3: TCFD disclosure

#	TCFD	Disclosure																															
Metrics and targets																																	
9	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	The group uses a risk matrix method to determine the probability and consequence of risks and opportunities including those related to climate. Management reviews risk and opportunities at least quarterly in value creation maps and assessments of portfolio under different scenarios including pathways for the decarbonisation of the maritime and logistics sectors and the global energy transition.																															
10	Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 GHG emissions, and the related risks.	<p>In 2021, the group established an initial GHG emissions inventory based on the GHG Protocol standard for scope 1 and 2 emissions for consolidated entities where we have operational control. The group will build on the scope of this inventory as data integrity is improved and will seek verification of the inventory data for the 2022 ESG report.</p> <p>Scope 1 and 2 emissions The scope 1 and 2 emissions for consolidated companies are described below in tonne of CO₂ equivalent (tCO₂e).</p> <table border="1"> <thead> <tr> <th rowspan="2">Year</th> <th colspan="3">tCO₂e</th> </tr> <tr> <th>Scope 1</th> <th>Scope 2</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>1 891</td> <td>2 669</td> <td>4 562</td> </tr> <tr> <td>2021</td> <td>1 855</td> <td>2 824</td> <td>4 679</td> </tr> </tbody> </table> <p>Several data collection and reporting improvement actions have been identified to continue to build a robust reporting framework over time. Office sites are particularly challenging to account for as the vast majority of our employees work in multi-user leased spaces where there is limited/no operational control of facilities. In 2022, consolidated companies will set science-based targets and their emissions reductions program.</p> <p>Scope 3 emissions The group included two categories of scope 3 emissions in the initial inventory work – category 7 employee commuting for seafarers; and category 15 investments. This was based on accessibility of data and further categories will be included in the inventory over time.</p> <p>The scope 3 emissions related to seafarer’s air travel commuting to/from vessels are described below based on calculations from third party travel providers. Travel plan optimization is key to secure seafarers join vessels and return home in a safe, secure, and efficient manner.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>tCO₂e</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>15 391</td> </tr> <tr> <td>2021</td> <td>21 260</td> </tr> </tbody> </table> <p>The scope 3 emissions related to the group’s equity investments are described below. This is based on the proportion of the group’s equity investments in Wallenius Wilhelmsen ASA (37.8%), Hyundai Glovis (11%) through Treasure ASA, and Qube (1.8%). It is calculated based on the GHG Protocol’s investment-specific method using publicly available data from the operating companies. The group has neither financial control nor significant direct influence over the operating entities in this portfolio.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>tCO₂e</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>2 270 616</td> </tr> <tr> <td>2019</td> <td>2 127 101</td> </tr> <tr> <td>2020</td> <td>1 687 632</td> </tr> <tr> <td>2021</td> <td>'data not available at time of this report</td> </tr> </tbody> </table> <p>The main source of the emissions are the operating companies’ scope 1 emissions related to energy consumption from shipping activities. The companies have established systems in place for managing climate risk and implementing emissions reduction activities. The companies have established targets to reduce the intensity and absolute greenhouse gas emissions of their operations.</p> <p><i>*The operating companies publish their emissions report after the group’s ESG report is produced. The emissions data for 2021 will therefore be reported in the group’s 2022 ESG report.</i></p>	Year	tCO ₂ e			Scope 1	Scope 2	Total	2020	1 891	2 669	4 562	2021	1 855	2 824	4 679	Year	tCO ₂ e	2020	15 391	2021	21 260	Year	tCO ₂ e	2018	2 270 616	2019	2 127 101	2020	1 687 632	2021	'data not available at time of this report
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Cont. appendix 3: TCFD disclosure

#	TCFD	Disclosure
Metrics and targets		
11	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	<p>In 2021, the group's long term GHG emissions ambition was defined and embedded in the long-term strategy process:</p> <ol style="list-style-type: none"> 1. Net zero emissions in own operations before 2030 2. Net zero emissions in the value chain before 2040 3. Net zero emissions in portfolio (equity investments) before 2050 <p>In 2022, consolidated companies will set science-based targets and their emissions reductions programs towards this ambition.</p> <p>For equity investments, the group monitors and actively engages in discussions related to climate risk and emissions reductions achievements with the relevant companies, specifically:</p> <ol style="list-style-type: none"> 1. Progress on GHG emissions reductions against stated targets 2. Progress on green growth investments / activities contributing to energy transition.

Appendix 4: Gender pay gap Norway data

Data related to working conditions, salary and variable pay in Norway.

Working conditions indicators	
Data included in analysis	Result for 2021
Total number of employees working in Norway	333
% females and males in total in Norway	35% females and 65% males
Total number of employees taking parental leave	18 employees or 5.4% of the workforce took parental leave
% females/males taking parental leave	1.8% of employees who took parental leave where female and 3.6% were males
Average no of weeks for females/males	Female took on average 21 weeks, while males took 12 weeks
Total number of employees working part time	Four employees or 1.2% of the workforce are part-time
% females/males working part time	0.9% females and 0.3% males work part-time
% females/males working involuntary part-time	No employees work involuntary part-time
Total number of temporary employees	Seven employees or 2.1% of the workforce have temporary contracts
% females/males holding temporary positions	0.9% of temporary positions (three employees) are held by females and 1.2% (four employees) by males

Cont. appendix 4: Gender pay gap Norway data

Data related to working conditions, salary and variable pay in Norway.

Salary and variable pay indicators					
Group	Females	Males	Total # employees	% difference in salary females vs males	% difference in salary when including annual variable pay females vs males
1	33%	67%	3	-39%	-38%
2	25%	75%	4	-11%	-7%
3	19%	81%	27	-12%	-3%
4	34%	65%	47	=	6%
5	22%	78%	81	-7%	-9%
6	42%	58%	112	-5%	-6%
7	46%	54%	59	-1%	-1%

Appendix 5: List of figures

ENVIRONMENT	2021	2020	2019
GHG emissions			
GHG Emissions (tCO ₂ e) – Scope 1	1 855	1 891	na
GHG Emissions (tCO ₂ e) – Scope 2	2 824	2 669	na
GHG Emissions (tCO ₂ e) – Total Scope 1 and 2	4 679	4 562	na
GHG Emissions (tCO ₂ e) – Scope 3 category 7 employee commuting for seafarers only	21 260	15 391	na
GHG Emissions (tCO ₂ e) – Scope 3 category 15 investments	n/a	1 687 632	2 127 101
SOCIAL	2021	2020	2019
Offices	239	229	241
Countries	60	62	62
Total employees	15 464	15 452	15 065
Land based employees	4476	4 813	4 835
Seafarers	10 988	10 639	10 230

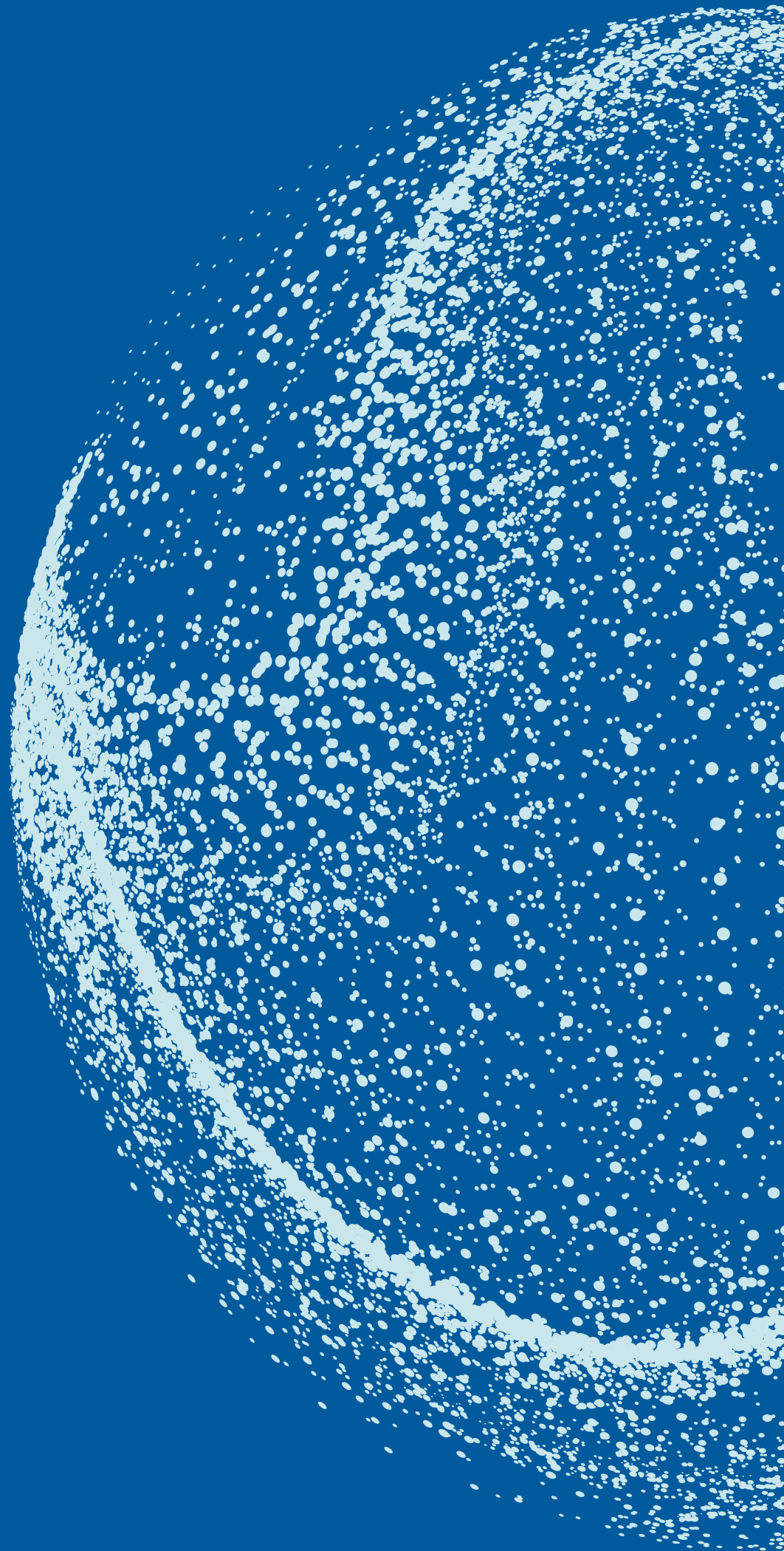
Cont. appendix 5: List of figures

SOCIAL	2021	2020	2019
Turnover rate onshore	12.74%	11.25%	12.71%
Diversity			
Nationalities onshore – number in group – top 3 are Norwegian, Indian and Malaysian	85	84	89
Nationalities onshore – % of senior management from local communities	70%	71%	61%
Females – % onshore	36%	35%	35%
Females – % seafarers	1%	1%	1%
Females – % senior management (top three levels in each key legal entity and managing director in smaller entities)	22%	25%	25%
Females – % in group leadership program	39%	27%	28%
Employee engagement			
Performance appraisal completion rate	98%	92%	95%
Engagement survey score	78	76	73
Engagement survey completion rate	91%	88%	88%
Training and campaigns			
Average training hours recorded onshore	8	8	8
Business standards completion rate onshore	100%	84%	31%
Business standards – seafarers completion rate	96%	92%	64%
Cyber security awareness completion rate	100%	95%	70%
Onshore (exposure 8 hours a day, 5 days a week)			
Exposure hours – onshore	8 771 793	9 222 182	9 094 979
Lost time injury frequency rate	0.36	0.13	0.18
Total recordable case frequency rate	0.52	0.30	0.33
Safety observations	1 937	9 450	5 414
Sickness absence	2.05%	2.01%	1.68%

Cont. appendix 5: List of figures

SOCIAL	2021	2020	2019
Seafarers (exposure 24 hours a day, 7 days a week)			
Exposure hours – seafarers	34 001 856	35 570 856	29 683 152
Lost time injury frequency rate	0.35	0.28	0.32
Total recordable case frequency rate	1.26	1.4	1.46
Safety observations	9 973	10 969	9 782
Sickness absence	0.02%	0.01%	n/a
GOVERNANCE	2021	2020	2019
Whistle blowing channel – cases received	28	25	19
GDPR enquiries and incidents recorded by data protection officer	30	30	67
Suppliers			
Number of suppliers – approximate	10 000	10 000	10 000
Number of suppliers screened with sustainability criteria	429	908	634
Number of supplier audits including sustainability criteria	75	22	42





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