

## **BW LPG AS – ACCOUNT FOR DUE DILLIGENCE RELATING TO FUNDAMENTAL HUMAN RIGHTS AND DECENT WORKING CONDITIONS**

### **1 INTRODUCTION**

BW LPG AS is subject to the Norwegian Transparency Act based on the financial year of 2021 and 2022.

The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions in connection with the production of goods and the provision of services and ensure the general public access to information regarding how the enterprises address adverse impacts on fundamental human rights and decent working conditions.

By way of due diligence in accordance with the OECD guidelines for multinational enterprises, BW LPG AS identifies risks for adverse impact, implements measures, monitor and communicates with stakeholders to ensure respect for human rights and decent working conditions.

### **2 BW LPG AS' ORGANISATION AND AREA OF OPERATIONS**

BW LPG AS is a management office and forms a part of the BW LPG Group which is the world's largest VLGC carrier of liquified petroleum gas. BW LPG AS is situated in Oslo and has 29 employees. BW LPG AS' business activities consists of different management services related to the business activities of the BW LPG Group.

BW LPG AS is owned by the Singapore situated management office BW LPG Pte Ltd. The parent company of the BW LPG Group, BW LPG Ltd, is listed on the Oslo Stock Exchange. More information about the BW LPG Group can be found here: <https://www.bwlpg.com/>

BW LPG AS' area of operations can be summarised as follows:

- Intergroup management BW LPG Group
- Services related to chartering of vessels
- Managing technical aspects of vessels
- Projects, M&A, research and analysis
- IT technology and strategy

### **3 GUIDELINES AND PROCEDURES**

#### **3.1 Internal and external guidelines and policies**

In accordance with the Transparency Act section 4 a. BW LPG AS, as part of the BW LPG Group, has in place several guidelines and policies that sets out requirements for fundamental human rights and decent working conditions. These guidelines shall ensure that BW LPG AS respects fundamental human rights and decent working conditions in connection with all business activities and that responsible business conduct is anchored in BW LPG AS' governing documents.

Internal guidelines and policies for BW LPG Group which also applies to BW LPG AS can be found [here](#). The guidelines and policies includes but are not limited to:

- BW LPG Ship Recycling Policy
- BW LPG Diversity, Inclusion & Non-Discrimination and Anti-Harassment Policy
- BW LPG Seafarers' Labor and Human Rights Policy
- BW LPG Labor and Human Rights Policy
- BW LPG Contractor Safety Policy
- BW LPG Seafarers' Anti-Harassment and Anti-Bullying Policy
- BW LPG Procurement Policy

Towards suppliers and business partners, BW LPG AS has a Supplier Code of Conduct that must be accepted before entering into a business relationship with BW LPG AS. This Code of Conduct requires suppliers and business partners to ensure fundamental human rights and decent working conditions when carrying out their business activities.

Guidelines and policies towards suppliers and business partners of BW LPG Group which also applies to BW LPG AS can be found here: <https://www.bwlp.com/sustainability/policies-and-guidelines/bw-lpg-procurement-policy/>

### **3.2 Working conditions and HSEQ**

All employees in BW LPG AS has employment contracts that are compliant with the Norwegian Working Environment Act and other applicable employment regulations in Norway. These contracts together with BW LPG Group's guidelines and policies has as its object to ensure decent working conditions for the employees in the BW LPG AS.

Relating to HSEQ, BW LPG Group has a Zero Harm company-wide safety campaign that aims to ensure that safety remains the top priority across all of BW LPG Group's operations.<sup>1</sup> This campaign covers both physical and mental wellness. BW LPG Group has a robust system to investigate work-related incidents, this includes training requirements and a process to determine and identify hazards, and derive corrective and preventive measures.

### **3.3 Whistle-blowing channel**

BW LPG Group has a whistle-blowing channel that is managed by an external party.<sup>2</sup> This is a safe and confidential avenue for employees to report misconduct. The hotline is available on the 24/7 intranet and reports can be made in multiple languages. For stakeholders and other external parties that has something to report or other inquiries, a contact form and contact information can be found here:

<https://www.bwlp.com/contact/>

---

<sup>1</sup> <https://www.bwlp.com/sustainability/social/health-safety/>

<sup>2</sup> <https://www.bwlp.com/sustainability/policies-and-guidelines/bw-lpg-whistleblowing-policy/>

### **3.4 Measures to cease and mitigate the risks for adverse impacts**

BW LPG AS has zero tolerance for any violation of labour and human rights. Any employee, including senior management, found to be in violation of this Policy will be subject to disciplinary action. BW LPG Group's guidelines and policies contains regulations on how the group shall cease or mitigate the risk of adverse impacts on human rights and decent working conditions. More information about BW Group's work with these matters can be found here:

<https://www.bwlp.com/sustainability/governance/>

<https://www.bwlp.com/sustainability/targets-and-performance/>

## **4 RISK ASSESSMENT**

BW LPG AS regularly carries out human rights due diligence in accordance with the requirements set out in the Norwegian Transparency Act. The aim of the due diligence is to identify actual and potential adverse impacts on fundamental human rights and decent working conditions that BW LPG AS has either caused or contributed toward, or that are directly linked to BW LPG AS' operations, products or services through the supply chain or business partners. The due diligence process includes monitoring of BW LPG AS' performance through audits conducted both in its own and suppliers business, through follow-up on reports from the whistle-blowing channel, management-labour dialogue, information requests to suppliers and business partners and other measures suitable to identify and assess risks related to human rights and decent working conditions.

As a management office, BW LPG AS carries out business activities that are known to have a limited risk for adverse impacts on human rights and decent working conditions. Management and office services is by nature considered low-risk, especially as the business is carried out within Norway, which is a low-risk country relating to human rights and labour rights. Further, as a management office BW LPG has few suppliers and business partners.

Based on these known facts and a mapping followed by an risk-based assessment of BW LPG AS' own business, its suppliers and business partners, BW LPG AS has found no actual adverse impacts on human rights and decent working conditions that are either directly or indirectly caused by its business.

BW LPG AS acknowledge the needs to continuously monitor and ensure compliance with labour laws and fundamental human rights. However, it has not been identified significant risks for adverse impacts and decent working conditions.

BW LPG AS complies with Norwegian labour laws and regulations and international conventions on human rights and labour rights, and has in place a comprehensive collection of guidelines and policies through BW LPG Group, BW LPG AS is of the opinion that it has necessary tools to identify and prevent risks for adverse impacts on human rights and decent working conditions.

BW LPG AS expects that these measures are sufficient and to mitigate the risk of adverse impacts in the future.

BW LPG AS will continuously monitor its operations, supply chain and business relationships, and communicate with relevant stakeholders, also through its whistle blowing channels to swiftly detect changes in the basis for this risk assessment.

\*\*\*