

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

### **1. INTRODUCTION**

This report is prepared in compliance with Section 5 of the Norwegian Transparency Act. It outlines BW LPG AS's ("BW LPG") due diligence processes to identify, prevent, and mitigate adverse impacts on fundamental human rights and decent working conditions. The reporting period is from 1 January to 31 December 2024.

This report covers BW LPG and BW LPG Fleet Management AS ("BW LPG FM"), both part of the BW LPG Group. BW LPG serves primarily as a management office based in Oslo, Norway, with 36 employees in 2024. BW LPG FM provides technical and crewing services to a portion of the BW LPG fleet.

The BW LPG Group is a world leader in LPG shipping, with BW LPG Ltd as its ultimate parent company listed on both the Oslo and New York Stock Exchanges, and BW LPG Holding Pte Ltd as its intermediate parent based in Singapore. Further details about the BW LPG Group can be found [\*here\*](#).

### **2. BW LPG's APPROACH TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS**

#### **2.1. Internal Guidelines and Policies**

As part of the BW LPG Group, BW LPG has implemented a comprehensive set of guidelines and policies that outline its commitments to upholding fundamental human rights and ensuring decent working conditions.

BW LPG FM, as the technical and crewing manager for part of the BW LPG fleet, facilitates the employment of approximately 900 seafarers. The health, safety, and welfare of its crew remains a core priority, with strong emphasis placed on the well-being, professional development, and fair treatment of all personnel. The company promotes a culture of respect, equal opportunity, and compliance with applicable labour standards and regulations. Seafarers are governed by a comprehensive set of policies aimed at safeguarding their working conditions and promoting a safe and inclusive onboard environment. These policies address key aspects such as fair treatment, non-discrimination, and protection from harassment.

In line with maritime regulations, BW LPG FM has implemented an On-Board Complaint Procedure that enables seafarers to confidentially raise concerns related to their employment contracts or onboard conditions, particularly in cases that may constitute breaches of the Maritime Labour Convention (MLC). All complaints are handled with strict confidentiality. Seafarers also retain the right to escalate their concerns directly to the ship's master, the shipowner, or relevant external authorities where appropriate.

These policies and documents serve to embed responsible business conduct across all aspects of BW LPG Group and are integral to the company's governance framework.

Key documents include:

- BW LPG Labor and Human Rights Policy
- BW LPG Seafarers' Labor and Human Rights Policy
- BW LPG Diversity, Inclusion & Non-Discrimination, and Anti-Harassment Policy

- BW LPG Contractor Safety Policy
- BW LPG Seafarers' Anti-Harassment and Anti-Bullying Policy
- BW LPG Procurement Policy
- BW LPG Ship Recycling Policy

A more comprehensive overview of the internal guidelines and policies for the BW LPG Group can be found [\*here\*](#).

## **2.2. External guidelines and policies**

The BW LPG Group expects its suppliers and business partners to uphold the same high standards of ethics and responsible business conduct that it applies internally.

As a prerequisite to engaging in any business relationship with BW LPG, suppliers are required to acknowledge and adhere to the Group's Supplier Code of Conduct, which sets clear expectations regarding the protection of fundamental human rights and the maintenance of decent working conditions throughout their operations.

New suppliers undergo an onboarding process that includes verification of certifications and references. For existing suppliers, BW LPG maintains regular oversight, with its key suppliers monitored through recognised platforms to ensure current and credible data. In 2024, BW LPG also began leveraging a digital procurement platform that incorporates an ESG evaluation component, enhancing visibility and control over supplier practices.

Risk assessments are prioritised based on factors such as industry type, geographical exposure, and the nature of the supplier relationship. Where BW LPG holds greater influence over suppliers, there is increased potential to mitigate or prevent adverse impacts. To date, no human rights-related risks have been identified through supplier audits or internal reporting mechanisms. BW LPG remains committed to continuously refining its due diligence practices, including using dedicated tools and structured assessments to strengthen supply chain governance.

BW LPG FM applies a structured audit process for all new shipyards and conducts periodic reviews of existing yards to ensure compliance with the company's standards, including those related to human rights and decent working conditions. In addition to managing its own fleet operations, BW LPG engages third-party managers, and applies the same level of scrutiny to their activities. This includes audits of shipyards used under third-party management to ensure quality, safety, and adherence to BW LPG's expectations.

To date, no significant risks or non-conformities related to human rights have been identified through these audits. However, BW LPG FM remains committed to maintaining high oversight standards and will continue to review and refine its audit protocols to address evolving expectations and emerging risks across its value chain.

Guidelines and policies towards suppliers and business partners of BW LPG Group can be found [\*here\*](#).

## **2.3. Grievance Mechanisms**

BW LPG maintains a confidential whistle-blower channel which is accessible 24/7 via BW LPG's website. Reports can be made anonymously and reporter's confidentiality is assured. The whistle-blowing channel can be found [\*here\*](#).

## 2.4. Due Diligence Process

BW LPG and BW LPG FM conduct their due diligence in alignment with the Norwegian Transparency Act, intending to identify actual and potential adverse impacts on fundamental human rights and decent working conditions. This includes impacts that BW LPG may cause or contribute to, or that are directly linked to its operations, products, or services through its supply chain or business relationships.

Our due diligence process involves the following key steps:

1. **Assess Impact:** Mapping and evaluating human rights risks within BW LPG's operations and supply chains, with a focus on identifying high-risk suppliers for further assessment.
2. **Integrate and Act:** Taking appropriate actions to address and remediate identified risks.
3. **Track Performance:** Continuously monitoring the effectiveness of mitigation measures to ensure improvement over time.
4. **Communicate:** Reporting on identified risks and responsive actions to both internal and external stakeholders.

The process is risk-based and proportionate to the size, nature, and operational context of the company. Monitoring activities include internal and supplier audits, review of whistle-blower reports, management-labour engagement, supplier questionnaires, and other relevant tools to identify and assess risks relating to human rights and working conditions.

## 3. RISK ASSESSMENT

### BW LPG (Management Office)

As a management office, BW LPG engages in business activities that are inherently low risk with respect to adverse impacts on human rights and decent working conditions. This is largely due to the nature of management and administrative services, as well as the fact that operations are conducted within Norway — a jurisdiction with strong legal protections for labour and human rights. In addition, BW LPG's business model involves a limited number of suppliers and business partners.

Based on these factors, and following a structured mapping exercise and risk-based assessment of BW LPG's own operations, suppliers, and business partners, no actual or potential adverse impacts on human rights or decent working conditions have been identified as either directly or indirectly linked to the company's activities.

While the risk remains low, BW LPG recognises the importance of continuous monitoring to ensure ongoing alignment with fundamental human rights and labour standards. The company complies fully with Norwegian labour laws, as well as applicable international human rights and labour conventions. These commitments are supported by a comprehensive suite of internal policies and procedures developed by the BW LPG Group.

### BW LPG FM (Technical and Crewing)

BW LPG FM, which oversees the technical management and crewing of a portion of BW LPG's fleet, operates in a higher-risk context due to its global activities and the employment of seafarers. The management of seafarers and the coordination of dry docking and repairs inherently carry greater exposure to labour rights risks, particularly in jurisdictions with weaker enforcement mechanisms. To mitigate these risks, BW LPG FM has implemented several safeguards: (i) Seafarer protection and (ii) Shipyard oversight. While no significant human rights risks or breaches have been identified, BW LPG FM

continues to enhance its oversight mechanisms, recognising the need for vigilance in higher-risk areas of its operations and supply chain.

#### **BW LPG Group**

With regard to Health, Safety, Environment, and Quality (HSEQ), the BW LPG Group operates a company-wide Zero Harm campaign, which promotes safety as a core value across all activities. The campaign addresses both physical and mental wellbeing. The Group maintains a robust incident investigation framework, inclusive of training programmes, hazard identification processes, and systems for implementing corrective and preventive actions.

BW LPG Group maintains a strict zero-tolerance policy for any breach of labour or human rights. Any employee, including senior leadership, found in violation of these standards is subject to disciplinary measures. The BW LPG Group's policies provide a clear framework for preventing, mitigating, and remediating risks related to adverse human rights and working conditions.

BW LPG Group believes that the current systems and measures in place are appropriate and proportionate to the risk level and will continue to mitigate such risks effectively. The company remains committed to ongoing monitoring of its operations, supply chain, and business relationships, and will engage relevant stakeholders, including through its whistle-blower channels, to ensure timely identification and response to any changes in the risk landscape.

**11 June 2025**

**BW LPG AS**

**BW LPG Fleet Management AS**

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