

Statement on Due Diligence Assessments under the Transparency Act 2024

Wilson ASA



Statement on Due Diligence Assessments under the Transparency Act

BASIS FOR PREPARATION

This statement covers the company's organization, operational scope, policies and procedures for managing risks related to potential adverse impacts on human rights and working conditions. It outlines identified risks, potential negative impacts, measures taken or planned to mitigate them, and assesses the effectiveness of these measures.

As required by The Transparency Act, we are obliged to ensure respect for fundamental human rights and decent working conditions, as well as to account for how

we handle any negative consequences related to these areas.

The report covers the companies Wilson ASA, Wilson EuroCarriers AS, Wilson Ship AS, Wilson Shipowning AS and Wilson Management AS.

OUR COMMITMENT TO HUMAN RIGHTS

Wilson is one of the largest shipping companies in the European short-sea sector, providing shipping services to large industrial companies within different sectors. To be the preferred carrier for our customers we live by our

core values: trustworthy, competitive and safe. To maintain our status as a reliable, competitive and safe player in European industry, we recognise the importance of promoting respect for fundamental human rights and decent working conditions. This applies both to our own employees, but also to employees of our suppliers.

We care about people and the environment and conduct our business in accordance with international standards. Our commitment to human rights and decent work is rooted in our Supplier Code of Conduct and our Code of Conduct.

Wilson shall always comply with applicable national and international laws, as well as internationally recognized standards such as OECD, United Nations and ILO conventions on human rights, health and safety, labor rights, the environment, fair competition, anti-corruption and fair business practices. With a presence across Europe and crews from different parts of the world, we focus on conducting business responsibly and safely.

DUE DILIGENCE PROSESS

Our suppliers of goods and services shall comply with our minimum standard related to labour- and human rights, the environment and climate change and general responsible business practise. The minimum standards are defined in our Ethical guidelines for suppliers and is publicly available at our website.

Wilson is committed to carry out due diligence to identify and assess impacts fundamental on human rights and decent working conditions that Wilson potentially can contribute towards through the supply chain or business partners. We monitor this through risk analysis of our activities and value chain, and where we consider that there might be a risk, we carry out supplier audits based on our Ethical Guidelines for suppliers.

The risk of adverse impacts on human rights and working conditions is assessed based on the severity and likelihood of this occurring, both in our own operations and in our value chain. Together with risk assessments of supplier categories, we have identified crewing through third parties, shipyards and shipbuilding as potential risk areas. As a result, we have focused our audits on suppliers within those areas.

In addition, we continuously monitor the safety on board our ships, as this is a very important priority for us. Our crew is either employed in our own crewing agency or recruited through third-party crewing agencies. Third-party crewing agencies are included in our supplier audit.

INTERNAL WHISTLEBLOWING

Employees who experience or observe irregularities have a right and duty to notify the company accordingly. The company's guidelines for internal reporting provide a detailed description of such irregularities, how employees should and must report them, when to report and to whom. All whistleblowing can be anonymous and shall be treated confidentially unless confidentiality obstructs management of the case and is in breach of a statutory disclosure obligation.

HUMAN RIGHTS AND WORKING CONDITIONS FOR OWN EMPLOYEES

The risk of breaches of decent working conditions is highest for employees who work at sea. This is based on the nature of the work, physically demanding working conditions and the fact that workers at sea are more exposed to occupational accidents. Seafarers' labor and human rights are safeguarded through employment contracts regulated by the Maritime Labor Convention (MLC) and the International Transport Workers' Federation (ITF).

We measure compliance with safety routines on board through LTIF, which describes lost-time injuries in relation to working hours. For 2024, the LTIF was 1.58, which is higher than the company's target of less than 0.75. We have changed crews on some vessels during the period, and we see a tendency for accidents to occur where we have a new crew composition. We investigate common causes to establish measures, focus areas and campaigns to raise awareness and reduce injuries on board.

The company has also increased the focus on improving the psychosocial working environment for employees at sea. Through conferences for crew and officers, the company seeks to raise awareness of the psychosocial working environment at sea. To reduce the distance between employees on land and at sea, captains are invited on visiting rounds at the head office in Bergen. Increased connection between the crew and the organization will help foster a positive work environment.

We are constantly working to improve working conditions for employees at sea. The most important measures to achieve and maintain a safe workplace for seafarers are qualified crew, safety management systems, safety campaigns, training and adequate manning on the ships. In 2024, we conducted a psychosocial health survey among our crew. Based on the results of the survey, a working group has worked on measures; This includes the availability of, among other things, fitness equipment on board.

HUMAN RIGHTS AND WORKING CONDITIONS IN THE SUPPLY CHAIN


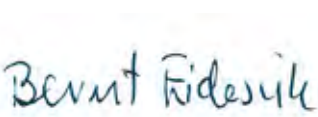


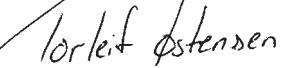
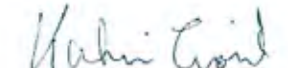

To ensure that fundamental human rights and decent working conditions are respected, the company has through analyses defined the types of suppliers and suppliers that pose the greatest risk of violations of labour and human rights. We consider labour-intensive industries, chemical industries and those that use heavy machinery to be high-risk due to potential labour rights, environmental and health hazards and safety concerns. As a result, we have focused our audits on these suppliers, in addition to staffing activities, and the suppliers that pose the greatest risk are regularly checked using physical audits.

MEASURES AND RESULTS

We carry out audits of suppliers based on risk assessment, but we also have a policy of not auditing the same suppliers annually. We follow up on the comments and areas for improvement in the report to the supplier after the audit has been completed. In 2024, we carried out one supplier audit. This has not resulted in findings about human rights or decent working conditions.

We have followed up with one supplier after findings on sanitary and safety conditions in 2023. During the period, the supplier has documented and responded to the recommended improvement points to Wilson

Signature Managing Director and Board of Directors of Wilson ASA
Bergen, March 18, 2025

 Eivind Eidesvik Chairman of the Board	 Bernt Eidesvik Deputy Chairman	 Per Gunnar Strømberg Rasmussen Board member
 Kirsti Tønnessen Board member	 Torleif Østensen Board member	 Katrine Trovik Board member
 Øyvind Gjerde Managing Director		

Signature Managing Director and Board of Directors of Wilson EuroCarriers AS,
Wilson Ship AS, Wilson Shipowning AS and Wilson Management AS
Bergen, March 18, 2025

 Eivind Eidesvik Chairman of the Board	 Øyvind Gjerde Board member/ Managing Director
---	--



**WILSON ASA**

Damsgårdsveien 135,
N-5160 Laksevåg, Norway
P: (+47) 55 30 82 00
W: wilsonship.no

WILSON MANAGEMENT AS

Damsgårdsveien 135,
N-5160 Laksevåg, Norway
P: (+47) 55 30 82 00

WILSON EUROCARRIERS AS

Damsgårdsveien 135,
N-5160 Laksevåg, Norway
P: (+47) 55 30 82 00
E: wec.chart@wilsonship.no

WILSON SHIP MANAGEMENT AS

Damsgårdsveien 135,
N-5160 Laksevåg, Norway
P: (+47) 55 30 82 00
E: shipmanagement@wilsonship.no

WILSON AGENCY NORGE AS

Damsgårdsveien 135,
N-5160 Laksevåg, Norway
P: (+47) 94 14 85 60
E: agency.norge@wilsonship.no

WILSON AGENCY B.V.

Heijlplaatstraat 23,
3089 JB Rotterdam, The Netherlands
P: (+31) 10 2952 888
E: rotterdam@wilsonagency.nl
W: wilsonagency.nl

NESSKIP EHF.

IS-170 Seltjarnarnes (Reykjavik), Iceland
P: (+354) 563 9900
E: operations@nesskip.is
W: nesskip.is

HSW LOGISTICS GMBH

Vinckeweg 22
47119 Duisburg (Ruhrort), Germany
P: +49 (0) 203 80 03-255
E: info@hsw-logistics.com
W: hsw-logistics.com

WILSON CREWING AGENCY LTD.

Section 6, 55/1 Vologodskaya Str.
Arkhangelsk, 163001 Russia
P: (+7) 8182 65 03 57
E: wca@wilsonship.no
W: wilson-crewing.com

WILSON CREWING AGENCY ODESSA LTD.

21/23 Vice-Admiral Zhukov Lane
Odessa 65026 Ukraine
P: (+38) 048 723 41 75
E: wca.odessa@wilsonship.no
W: wilson-crewing.com

**WILSON SHIP MANAGEMENT
POLAND SP. Z O. O.**

Ul. Hutnicza 16
Gdynia, 81-061 Poland