

# Stainless Tankers ASA – Human Rights Policy

## Introduction

At Stainless Tankers ASA (“**STST**” or the “**Company**”), our operations have an impact on the human rights of individuals worldwide. Whether through our supply chain or the regions in which we operate, we understand the significance of preserving the essential value of every person affected by our business. While we may not have a direct relationship with every stakeholder throughout the entire value chain, we acknowledge our influence and the responsibility that comes with it.

STST is committed to upholding and promoting human rights and ensuring fair and safe working conditions. This policy outlines our approach to these principles within the context of the applicable international framework of rules and guidelines.

While this policy reflects the values our Board of Directors (the “**Board**”) wants us to uphold, our reliance on third parties for substantially all services required to run our business means this policy must be adhered to by our main suppliers and business partners.

## Our Company

STST was conceived as an investor friendly limited life vehicle with the aim of capturing the current upcycle in the chemical tanker markets. Consequently, our organizational strategy is to remain a lean company sourcing all required services from third parties.

Our main business partner and manager is Tufton Management Limited (“**Tufton**”), which provides the Company’s executive team, comprising the CEO and CFO (the “**Management**”), as well as all services required by the executive team for managing the Company. These services include finance and accounting, supervision of third-party technical and commercial managers, and the management of all corporate and administrative matters.

The operation of our fleet involves two main groups of suppliers of services. These are technical managers, which look after crewing and all technical matters, and commercial managers, which arrange for the commercial employment of our vessels and the operation of voyages.

This policy document aims to outline the relevant policy framework that defines the fundamental human rights which must be adhered to, as well as embed these rights into the Company’s operations. It also aims to outline the required process for ensuring that STST only works with business partners and suppliers that share our core values and commitment to fundamental human rights.

## Policy Framework

The Board and Management are committed to respecting human rights as defined and expressed in the International Bill of Human Rights, the ILO Fundamental Conventions on Labor Standards and the UN

Guiding Principles on Business and Human Rights. The common aim of these principles and guidelines is to promote the respect of fundamental human rights for employees and to prevent any practices that infringe upon or have an adverse impact on such rights. Additionally, they seek ways to prevent or mitigate any adverse impacts on human rights that are linked to the operations of an organisation or any of its business partners and suppliers.

The implementation of these principles affects every aspect of a company's affairs. It requires fair treatment of employees, as well as honesty and integrity in every interaction within and outside the organization. It condemns the taking of unfair advantage through manipulation, concealment or misrepresentation of facts and any other unfair dealing practices. Furthermore, it explicitly prohibits unlawful discrimination or harassment on account of ethnic or national origin, gender, age, sexual orientation, or religion, and encourages the development of a diverse and inclusive work environment.

We strongly believe that embracing these principles fosters a constructive and pleasant work environment and contributes to the mental health of employees, which leads to enhanced productivity and long-term business success. Respect for human rights of employees also requires providing them with a safe work environment. Serious injuries and the loss of life from accidents and diseases caused by inadequate safety and protection of the work environment remains an unfortunate reality and comes with significant human and financial cost to organisations.

We are therefore specifically committed to endorsing the ILO Maritime Labour Convention 2006 and ILO declaration amendment of June 2022, which place particular emphasis on the requirement to ensure a safe and healthy working environment as part of an employee's fundamental human rights. This commitment is especially relevant for the crews working on our vessels.

We also explicitly condemn any activities leading to compulsory labour and human trafficking, as defined in the Modern Slavery Act of 2015. The Act defines modern slavery as "slavery, servitude and forced or compulsory labour" and "human trafficking", all of which are serious human rights infringements that require a zero-tolerance approach.

Finally, STST is committed to complying with the Norwegian Transparency Act. Under the Act, we are required to conduct due diligence assessments regarding respect for human rights and decent working conditions in our own company and related to our suppliers and business partners. Our company became subject to the Act in 2023, and our policy implementation discussed below is designed to ensure compliance with the Act.

## **Policy Implementation**

The Board has determined that, considering the organisational context provided earlier, effective adherence to human rights requires us to perform a regular review with a focus on:

- a) The appropriateness of the Company's policy and measures taken by Management to ensure compliance by all parties, including conducting annual due diligence.

- b) The adequacy of due diligence performed on our business partners and suppliers to identify actual or potential adverse impacts on human rights by any of these parties, and the steps taken to ensure we hold them to the same high standard as we set for ourselves.

Additionally, our Board recognizes the importance of providing channels for individuals to report human rights violations. Tufton have established mechanisms that allow anyone associated with STST, including business partners and other stakeholders, to report any concerns or instances of human rights violations confidentially and anonymously they may observe. These reporting channels are thoroughly communicated to all relevant parties, and we encourage and support a culture of transparency and accountability. Reports received through these mechanisms are promptly investigated, and appropriate actions are taken to address any substantiated violations. We and Tufton are committed to protecting the anonymity and safety of those who make reports, and we take measures to ensure that whistle-blowers are not subjected to any form of retaliation.

The extent of our due diligence on our business partners and suppliers is guided by both the specific risks involved in our industry and the OECD Guidelines for Multinational Enterprises and the Norwegian Consumer Authority's guidance on the Transparency Act (together the "**Guidelines**").

The Guidelines prescribe a process that aims to a) embed responsible business conduct into an organisation's policies, b) identify actual or potential adverse impacts on human rights, c) implement measures to cease, mitigate and prevent such actual or potential adverse impacts, d) monitor such measures and communicate with affected parties, and e) cooperate in any required remediation of, or compensation to affected parties.

More specifically, the due diligence performed on our business partners and suppliers should address at a minimum the following areas:

1. Review of the human rights policies implemented in their organisations and assessment of the compatibility of such policies with the values and principles adopted by the Board.
2. Assessment of adequacy of health and safety policies for both vessel crews and shore-based staff. Review of steps taken to prevent accidents and injuries and processes for dealing with any actual such accidents and injuries. Equally, ensure that the policies adequately seek to prevent and address the development of mental health issues among employees.
3. Review of processes implemented which ensure fair treatment of employees and prohibit discrimination based on ethnic or national origin, gender, age, sexual orientation, or religion.
4. Assess whether our business partner or supplier encourage the development of a diverse and inclusive work environment and condemn activities that may lead to compulsory labour and human trafficking.
5. Review of safeguards implemented for ensuring third parties that work with our business partners and suppliers adhere to the same human rights conventions and share the same values on fundamental human rights.

6. Ensure that our suppliers properly review the human rights policies of shipyards where our vessels are drydocked, and of customers which charter and operate our vessels, and are comfortable with the adherence of such shipyards and customers to human rights.
7. Ensure that our business partners and suppliers have implemented mechanisms for employees to report human rights violations through whistle-blowing channels.

The due diligence should be conducted by the Management in cooperation with Tufton, at a minimum on an annual basis. They will work together to thoroughly evaluate and assess the relevant areas to ensure compliance among all parties, using both a questionnaire and discussions with key personnel, as required. For new business partners and suppliers, due diligence must be concluded prior to conducting any business with such parties.

STST, in cooperation with Tufton, has continued to enhance its commitment to upholding human rights by maintaining ongoing sanctions screening processes against global human rights lists. This proactive measure ensures that we remain vigilant in identifying and mitigating potential risks associated with our business partners and operations. STST will continue to monitor and regularly assess its human rights policy and practices, as well as the effectiveness of its due diligence processes, to ensure continual improvement, transparency, and accountability.