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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX that enables management, employees and other key stakeholders we work with to work together to address fraud, abuse, and other misconduct in our workplace and around our business operations while cultivating a positive working environment.

Why do we need a system like EthicsPoint?

- Hafnia has a “People-First” philosophy, where people and relationships are our most important asset. By endorsing open channels of communication, we promote a positive working environment and maximize productivity.
- An effective reporting system additionally augments our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. EthicsPoint enables you to file a confidential, anonymous report via either the telephone or the Internet.

What types of situations should I report?

The EthicsPoint system allows employees and other external stakeholders to report any violation of Hafnia's stated Code of Conduct, or other concern you may have. Our Whistleblowing Policy covers any actions that could have an impact on Hafnia which includes, but is not limited to:

- Illegal and Unlawful activities.
- Professional or ethical malpractices.
- Concealing serious wrongdoings or malpractices.
- Actions or activities that are not aligned with a legal obligation or Hafnia policy.
- Actions that may pose danger to the health and safety of any individual.
- Actions that may pose a danger to the climate or the environment (not timely / adequately resolved through safety reporting).
- Personal data breaches.
- Actions that may cause damage to property or Hafnia's reputation.

If I see a violation, shouldn't I just report it to my manager, security, or the People, Culture and Strategy Team and let them deal with it?

When you observe behavior that you believe violates Hafnia's Code of Conduct, we strongly encourage and expect you to report it. Ideally, you should first bring any concerns forward to your direct manager or other member of our management team that you work with.

We recognize, however, that there may be circumstances when you are not comfortable doing so, which is why for these circumstances we have partnered with NAVEX which enables anonymous reporting.

Why should I report what I know? What's in it for me?

Corporate misconduct can threaten the very existence of an entire company. We all have the right to work in and with a positive environment and with that right comes the responsibility of promoting an ethical working environment besides behaving in an ethical manner. It is therefore necessary to let the right people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment.

Does management really want me to report?

Whilst our Whistleblowing platform does not apply to employees wishing to raise personal grievances (for which there is a separate protocol) – we do want everyone to speak up and report it when it comes to behaviors that are unethical, illegal, unlawful, or inappropriately violating our Code of Conduct. Your reporting can minimize the potential negative impact to the reputation of Hafnia the company and our people.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server. NAVEX makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has received training in preserving these reports in the utmost confidence.

Isn't this system just an example of someone watching over me?

No. EthicsPoint is a positive aspect of our overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

It is my understanding that any report I send from a Hafnia computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?

NAVEX does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report to identify yourself, if you wish.

Tips & Best Practices

I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?

All unethical conduct, at any level, ultimately may affect Hafnia and all its employees. Recent corporate scandals have incurred some disastrous effects, demonstrating that a lapse in ethics can otherwise have a huge impact on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. NAVEX can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

What if I lose my Report Key or forget the Password I created?

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Mention in the new report that it is related to a report or question you previously submitted.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.