



**BW LPG LIMITED**  
(the “Company”)

**WHISTLEBLOWING POLICY AND PROCEDURES**

10 May 2024

**POLICY**

BW LPG is committed to ensuring that Stakeholders who wish to report their Concerns about potential or actual ethical breaches within the Company are protected from reprisal or victimisation for reporting such concerns.

Any stakeholder who files a Concern that is frivolous, or one made with malicious or mischievous intent, will not be protected by this Policy.

**POLICY STATEMENT**

BW LPG is committed to upholding the highest standards of integrity and compliance across all our operations. Our speak-up culture recognizes the importance of reporting concerns about unethical, illegal, unlawful, or inappropriate behavior within the organization. This policy aims to provide a secure, confidential, and effective mechanism for reporting any Concerns.

**POLICY PURPOSE**

This Policy outlines the scope, purpose, and procedures for reporting Concerns about unethical, illegal, unlawful, or inappropriate activities within the organization. It is aimed to encourage Stakeholders to speak up and report Concerns anonymously or by name, while providing protection from retaliation.

**Main Objectives**

- **Promote Transparency:** BW LPG is committed to fostering a culture of transparency where everyone, no matter their position or rank, feels empowered to report Concerns related to misconduct without fear of reprisal.
- **Protect our People:** We commit to protect the rights of those who step forward with legitimate Concerns.
- **Enhance Accountability:** Via a transparent reporting framework, we diligently ensure that reported Concerns receive prompt and impartial investigation and resolution.

**POLICY SCOPE**

This Policy applies to the broad range of stakeholders who interact with or are associated with the Company. This can include, but is not limited to, the Executive Management Team, BW LPG’s Board of Directors, employees, contractors, seafarers, suppliers and vendors, shareholders and investors, customers, auditors, and regulatory authorities (“**Stakeholders**”).

The scope of this Policy does not apply to employees wishing to raise personal grievances for which there is a separate protocol involving their managers or other designated personnel.

### **What can be reported?**

The Policy covers any actions that could have an impact on the Company ("**Concern**"), including but not limited to the following:

- Accounting, internal accounting controls or auditing complaints ("**Accounting Complaints**"), including those regarding any:
  - fraud or deliberate error in the preparation, evaluation, review or audit of any financial statements of the Company;
  - fraud or deliberate error in the recording and maintaining of financial records of the Company;
  - deficiency in, or noncompliance with, the Company's internal accounting controls;
  - misrepresentation or false statements made to or by an officer or accountant regarding a matter contained in or affecting any financial record, financial report or audit report of the Company; or
  - deviations from full and fair reporting of the Company's financial condition or results
- 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 a Company 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 the Company's reputation

### **POLICY PROCESS**

In accordance with industry best practice, the Company has engaged an independent compliance provider to provide an external reporting platform for Stakeholders to file a Concern. Any Concern reported using either this external site or hotline will generate a report ("**Report**").

The Report will be received by the Audit Chairperson of the Company ("**Investigator**"). Upon receipt the Investigator will scrutinize the Report and involve other members of the Executive Management ("**Investigating Party**") if required in the investigation and resolution of the Concern. The timeline of investigation will depend upon the nature of the investigation and the personnel involved. Throughout the investigation process, the relevant parties shall be kept informed of the process.

For Accounting Complaints, where a complainant has provided the Company with his or her identity and has not requested anonymity, the identity of the complainant and the details of the Accounting Complaint will nonetheless be treated as confidential, and will not be shared with anyone outside of the

Investigator and the Investigating Party or Audit Committee unless disclosure of that information is necessary to conduct an adequate investigation or to comply with judicial or other legal processes.

At each regularly scheduled Audit Committee meeting, the Investigating Party shall report on all Accounting Complaints received since the previous meeting and describe the status of any investigations undertaken. The Investigating Party shall continue to report to the Audit Committee on each Accounting Complaint at regularly scheduled Audit Committee meetings, or sooner if developments warrant or if so directed by the Audit Committee, until final resolution of the matter. Meeting agendas shall provide adequate time for the Audit Committee's discussion of any items so reported.

The Investigating Party will ensure:

- The availability of an independent whistle-blowing online reporting site and external hotline provider which guarantees anonymity, security, and a user-friendly system. This gives the option to have all communication anonymous and confidential.
- All relevant regulations related to whistleblowing, including data protection and privacy are complied with.
- There is no retaliation against whistleblowers.
- Every effort is made to respect the whistleblower's anonymity when requested except when:
  - The identity of the whistleblower, where known, in the view of the Investigating Party, is material to the investigation or in the best interests of the Company.
  - It is required by law or any other regulatory body that requires disclosure of the whistleblower, where known.
- Individuals and entities will always be informed should there be a need to disclose their identity, where known.
- Compliance with local personal data protection rules. The Company will not transfer personal data from a country within the EU/EEA to any country outside the EU/EEA unless it has signed an agreement with the receiving party containing provisions that are in conformity with EU guidelines relating to such transfers.

Should a Stakeholder notify government authorities, the media, the public or regulators of the Concern, this must be in good faith, must be concerning censurable conditions of public interest, and the stakeholder must have exhausted all options available to them under this Policy.