

Report on Human Rights Due Diligence in Utkilen - 2025



Table of Contents

Description	3
Utkilen's organization and area of operation.....	3
Policies, governance and commitment.....	4
Risk mapping and due diligence	5
Mitigation activities	5

Description

The Transparency Act was enacted by the Norwegian Parliament on 10 June 2021 and establishes legal requirements for larger enterprises' duty to report on the work they do to ensure compliance with fundamental human rights and decent working conditions in the enterprises themselves, in their supply chains and with their business partners. The Transparency Act's aim is to promote enterprises' respect for fundamental human rights and decent working conditions, and to ensure that consumers, organizations, trade unions, journalists, and the public have access to information. The Transparency Act is a Norwegian initiative, but we see similar initiatives in other European countries as well as at the EU level.

The report requires a general description of:

- The enterprise's organization and area of operation.
- Guidelines and routines for handling actual and potential negative consequences for fundamental human rights and decent working conditions.
- How the work with the due diligence assessment is organized.
- Actual negative consequences and substantial risk of negative consequences which the enterprise has identified through its due diligence assessments and measures the enterprise has taken or plans to take to stop actual negative consequences or to limit substantial risk.

3

The report shall be updated and published no later than 30 June each year, and shall be updated in the event of significant changes. Utkilen has prepared this report in accordance with these requirements.

Utkilen's organization and area of operation

Utkilen AS is a chemical tanker shipping company headquartered in Bergen, Norway. The company owns and operates a fleet of 15 chemical tankers ranging from about 6,000 to 17,000 dwt in size. Our main focus is on the Northern European market with extensive service in the Baltic Sea, and we primarily service the European petrochemical industry. The shore organization totals about 50 employees. It is the policy of the company to develop long-term business with first-class charterers, and with high contract coverage. We have a strong focus on safety and quality in everything we do, conducting our business to high standards of health, safety and environmental performance.

Policies, governance and commitment

Utkilen has developed and implemented a human and labor rights policy as part of our company Code of Conduct. The policy clearly states that Utkilen shall conduct its business in a manner that respects the rights and dignity of all people. Utkilen shall comply with all applicable laws and regulations and is committed to respecting the protection of internationally recognized human rights. In Utkilen, all individuals are to be treated with respect regardless of their background, gender, race, class, sexual orientation, political beliefs, age, or any other characteristic.

Further, a health, safety and working environment policy is in place, stating that Utkilen shall be a safe and healthy workplace for all employees. Any personnel injury is unacceptable, and our goal is zero harm to personnel. We continuously promote and maintain a strong safety culture onboard and ashore.

Utkilen is a member of IMPA ACT, an initiative of the International Marine Purchasing Association that encourages ship owners, ship operators, and ship suppliers to demonstrate a tangible commitment to responsible supply chain management and corporate social responsibility. At the core of the IMPA ACT initiative is the Supplier Code of Conduct addressing the minimum expectation to suppliers based on United Nations Global Compact's principles including human rights.

Utkilen is a member of the Maritime Anti-Corruption Network (MACN) working towards the elimination of all forms of maritime corruption by raising awareness of the challenges faced, implementing the MACN Anti-Corruption Principles and co-developing and sharing best practices, collaborating with governments, non-governmental organizations, and civil society to identify and mitigate the root causes of corruption, creating a culture of integrity within the maritime community.

Utkilen has been a signatory to United Nations Global Compact initiative since 2020 and is committed to do business responsibly by aligning our strategies and operations with the ten principles on human rights, labor rights, environment, and anti-corruption.

Utkilen shall employ necessary means of internal control, to monitor that the Code of Conduct is being fully complied with. Senior managers within the management group shall on an annual basis report compliance with the Code to the CEO. As part of the National Work Environment Laws - any employee that reports violations is protected from sanctions in accordance with the Whistle-blower mandate. Our tool for notification reporting system is found at ["MittVarsel"](#), where reports can also be filed anonymously.

Risk mapping and due diligence

The human rights due diligence process in Utkilen includes risk assessments of our potential impact on human rights. The impact assessment is risk-based, meaning that the mitigating measures introduced correspond to the degree of severity of any negative impact and the probability that the negative impact will occur. When both the probability and the degree of severity are high, the requirements for implementing mitigating measures are correspondingly stringent. Human rights risk assessments are reviewed annually during the corporate management review, and additionally if significant changes to the organization or operations occur.

Utkilen has identified that potential significant human rights risks may be present in parts of its global value chain. The most relevant principles from the International Bill of Human Rights in our context include the right not to be subjected to slavery, servitude, forced labor or child labor, the right to just and favorable conditions of work, and the right to health. The potential human rights impact from our operations are evaluated against these rights, and we regularly monitor and follow up with our suppliers and sub-contractors as part of our due diligence. Utkilen's scope of its assessments include second-tier suppliers where relevant risk is identified, in alignment with OECD guidelines and the Transparency Act.

Mitigation activities

Utkilen has implemented a due diligence process for evaluating labor conditions before selecting shipyards for vessel newbuilding or repairs. This due diligence process includes use of the "Eksportfinans – Guideline for labor rights assessments at shipyards", incorporation of contract clauses with human rights and working condition requirements, on-site physical audits and inspections of the shipyards, and active supervision by Utkilen personnel during yard stays. These measures help ensure that shipyard workers' rights are respected and that any potential issues are identified and addressed early.

Bergen, 17 June 2025

Board of Directors of Utkilen AS

Kjell Ove Breivik (Chairman)

Dag Døskeland

Anders Utkilen

Liv Hege Dyrnes

Michelle Williams

Siri-Anne Mjåtvedt (CEO)

2025-06-17 07:06:11

Siri-Anne Mjåtvedt

 **bankID**

NO BankID - 71e3a387-2450-41f3-849c-f3924a478039

2025-06-17 13:04:44

Dag Døskeland

 **bankID**

NO BankID - dbc8441c-bd0c-475b-8440-f81072f50480

2025-06-18 13:23:52

Liv Hege Dyrnes

 **bankID**

NO BankID - 07a12833-9033-40ae-91c1-6ccf1deadc2

2025-06-18 17:01:04

Anders Utkilen

 **bankID**

NO BankID - bc66571d-7543-4e94-b015-114f4771710e

2025-06-19 07:08:58

Kjell Ove Breivik

 **bankID**

NO BankID - 5be486e3-2c05-4ec9-b532-7a559fb35964

2025-06-20 09:53:15

Michelle Williams

 **vipps**

NO Vipps - a070d174-96df-4d42-aec4-62dbc08546b3