

Norwegian Transparency Act Statement 2025

Partankers XXII AS

1. Introduction

Partankers XXII AS («the Company») is subject to the Norwegian Transparency Act («the Transparency Act»).

According to the Transparency Act, the Company shall conduct due diligence of human rights and decent working conditions that the Company has caused, contributed to, or is directly linked to its business, in line with the OECD Guidelines. The Company is required to publish a report on the due diligence assessments. The report shall be signed by the Board and published annually.

This report covers the due diligence assessments conducted in 2025. It has been adopted and signed by the Company's Board.

The due diligence assessments shall be performed regularly and be in relation to the size of the business, the nature of the business, the context within which the business takes place, and the severity of and the likelihood of negative impact on fundamental human rights and decent working conditions.

2. General description of the business

The Company owns two LR1/Panamax tankers, Cape Taura and Cape Tempest («the Vessels»), built 2007 and 2008. Both vessels are trading in the Maersk Tankers Panamax Pool and under technical management by Columbia Shipmanagement GmbH, based in Hamburg, Germany.

The Company has no employees. Pareto Business Management AS («PBM») serves as the Company's business manager. Pareto Maritime Services AS («PMS») acts as the Company's marine manager.

3. Guidelines and routines

The Company's Board holds the overall responsibility for ensuring that the Company complies with the requirements under the Transparency Act. The Company has addressed its obligations under the Transparency Act in a separate instruction adopted by Board.

The daily follow-up of the Company's obligations under the Transparency Act is carried out by PBM, including due diligence assessments of the Company's business partners and suppliers. PBM is also subject to the Transparency Act and has established guidelines and management mechanisms to safeguard fundamental human rights and decent working conditions. PBM conducts risk and due diligence assessments and publishes an annual Transparency Act statement on its website.

PBM is part of the Pareto Securities Group and adheres to the Group's ESG framework, which includes a Human rights Policy, Code of Conduct, Code of Conduct for Business Partners and Suppliers, Anti-corruption Policy, Diversity and Equality Policy, and Sustainability Policy. These policies are available at www.paretosec.com. The Pareto Securities Group holds its business partners and suppliers to the same ethical standards.

4. Due diligence findings

A key aspect of the due diligence assessments is to identify and evaluate potential negative impacts on fundamental human rights and decent working conditions that the Company has either contributed to or that are directly linked to its business operations, products or services through supply chains or business partners. The Company shall also implement appropriate measures to address these actual or potential negative impacts and monitor the implementation and outcomes of such measures.

The due diligence of business partners and suppliers is based on the OECD Guidelines for due diligence assessments. The Company has adopted a risk-based approach to evaluate compliance with fundamental human rights and decent working conditions among its business partners and suppliers.

We have systematically mapped risks based on various factors, including country, industry, and overall business risks. The risk mapping process is based on publicly available information as well as data obtained directly from our business partners and suppliers when necessary. While no specific negative consequences have been identified to date, we have had a particular focus on the service providers within our business and supply chain. These service providers are generally managed by the Company's technical and commercial managers. Relevant risks related to service providers are crew welfare, occupational safety and healthy working conditions on board, and adherence to the Maritime Labor Convention (MLC).

As vessels operate globally, ship operations are governed by an extensive international legal framework, overseen and enforced by the ship's Class society and Flag state. In addition to routine inspections of vessels standards, certifications, and management systems, vessels are subject to frequent unannounced inspections and controls conducted by National Port state authorities, and charterers vetting inspections.

The Company's technical manager, through their management system, is obligated to visit and inspect the vessels, ensuring compliance with human rights and standards for decent working conditions. These standards are also regulated through the vessels Class certification, including the Maritime Labour Convention (MLC) and the International Safety Management (ISM) certificates. In addition, third parties audit both technical and commercial managers in their offices to ensure compliance.

In summary, our due diligence assessments as of June 2025 have not revealed a high likelihood of potential negative impacts related to the safeguarding of fundamental human rights and working conditions among our key suppliers and business partners.

5. Mitigating measures

The Company implements measures based on a risk-based approach and the principle of proportionality. Based on the completed mapping and risk assessment, the Company has implemented certain measures towards business partners and suppliers where it believes it may have a positive impact. These measures include engaging in dialogue with business partners and suppliers and obtaining information from stakeholders.

The Company aims to use its influence to ensure respect for fundamental human rights and decent working conditions.

6. Contact information

Any inquiries relating to the Company's compliance with the Transparency Act can be directed to the Company's business manager:

Pareto Business Management AS – Anna Bergsjø, anna.bergsjo@paretosec.com

Oslo, 20 June 2025

Athos Papachristoforou
(Chairman of the board)

Allan Dam
(Board member)

Natalie Kim Le Nguyen
(Board member)

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"By my signature I confirm all dates and content in this document."

Allan Dam

Underskriver

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IP: 163.116.xxx.xxx

2025-06-24 08:22:19 UTC



Nguyen, Natalie Kim Le

Underskriver

Serial number: no_bankid:9578-5993-4-2481638

IP: 80.202.xxx.xxx

2025-06-25 18:02:29 UTC



Athos Papachristoforou

Underskriver

Serial number: a.papachristoforou@schoeller-holdings.com

IP: 194.154.xxx.xxx

2025-06-27 15:30:16 UTC

Athos Papachristoforou

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