



2024 Transparency Act Report

BW LNG | Human Rights Due Diligence



2024 BW LNG TRANSPARENCY ACT REPORT ON HUMAN RIGHTS DUE DILIGENCE

1. INTRODUCTION

This report has been prepared in accordance with the requirements of Section 5 of the Norwegian Transparency Act. It details the BW LNG Group's due diligence process and efforts to identify, prevent, and mitigate any adverse impacts on fundamental human rights and decent working conditions.

The reporting period spans from 1 January to 31 December 2024, covering the following entities: BW LNG AS ("BW LNG"), BW Fleet Management AS ("FM"), BW Gas Foreign Manning AS, BW Gas NIS Manning AS, and BW Fleet Management AS (Pakistan branch). These entities collectively form the BW LNG Group, with BW LNG Limited domiciled in Bermuda acting as its parent company. Further details about the BW LNG Group can be found [here](#).

The BW LNG Group specializes in delivering floating LNG solutions to support progress towards a lower carbon society. Through its shipping unit, the Group facilitates global LNG transport through its fleet of LNG vessels, while its gas solutions unit develops, owns, and operates floating gas infrastructure. The BW LNG Group operates a fleet of 33 LNG vessels and FSRUs, including three newbuilds (the "Fleet").

The commercial, operational and technical management of the Fleet is managed in-house. BW LNG primarily acts as a management office, overseeing various business activities within the BW LNG Group. FM provides the technical and crewing services for the Fleet, while the remaining companies serve as providers of crew services to FM.

In 2024, the BW LNG Group had about 1,600 employees, of whom about 1,500 were seafarers.

2. BW LNG'S APPROACH TO HUMAN RIGHTS AND DECENT WORKING CONDITIONS

2.1. Compliance Structure

The Board of Directors and management of BW LNG Limited are committed to promoting fundamental human rights and decent working conditions. The Board of Directors oversees the BW LNG Group's due diligence assessment, while the management team manages operational responsibilities.

The BW LNG Group has strengthened its established risk management framework to evaluate risks associated with potential and actual impacts on human rights and decent working conditions within BW LNG and FM. This assessment covers adverse impacts that may result from the companies' operations, products, or services, as well as those connected to their supply chain and business partners.

2.2. Framework for our policies on Human Rights and Decent Working conditions

The BW LNG Group supports internationally recognized human rights, including:

- The International Bill of Human Rights
- The ILO's core conventions on fundamental principles and rights at work
- The International Labour Organisation's Maritime Labour Convention 2006
- The Transparency Act

- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights

The BW LNG Group recognises and promotes the positive contribution companies can make to economic, environmental, and social development and accepts that business can have a negative impact on human rights and working conditions.

The BW Group is also a member of Maritime Anti-Corruption Network. Combating and preventing corruption remains key, as the presence of corruption undermines the rule of law and thus weakens the protection of human rights.

2.3. Internal and External Policies

In line with its commitment to promoting human rights and decent working conditions, the BW LNG Group adopted a Human Rights and Decent Working Conditions Policy setting out the Group's principles and standards for respecting fundamental human rights and decent working conditions.

The BW LNG Group also implemented a Business Partner Code of Ethics and Business Conduct, reinforcing its strong commitment to upholding fundamental human rights and decent working conditions and expectations that its Business Partners adhere to comparable standards.

At BW LNG, we are committed to ensuring zero harm to people, the environment, cargo, and property. In 2024, we expanded this focus to encompass the commitment that "we uphold human rights and decent working conditions in all our operations," enhancing our emphasis on the crucial aspects of human rights and working conditions in our day-to-day operations.

In addition to this, FM also have a considerable number of policies which specifically address the working conditions on our vessels.

2.4. Grievance Mechanisms

BW LNG Group has a whistle-blowing channel managed by an external party. This is a safe and confidential avenue for employees, stakeholders, and other external parties to report misconduct. The hotline is available for the employees on the 24/7 intranet, and reports can be made in multiple languages. For stakeholders and other external parties, the whistle-blowing channel and a contact form can be found [here](#).

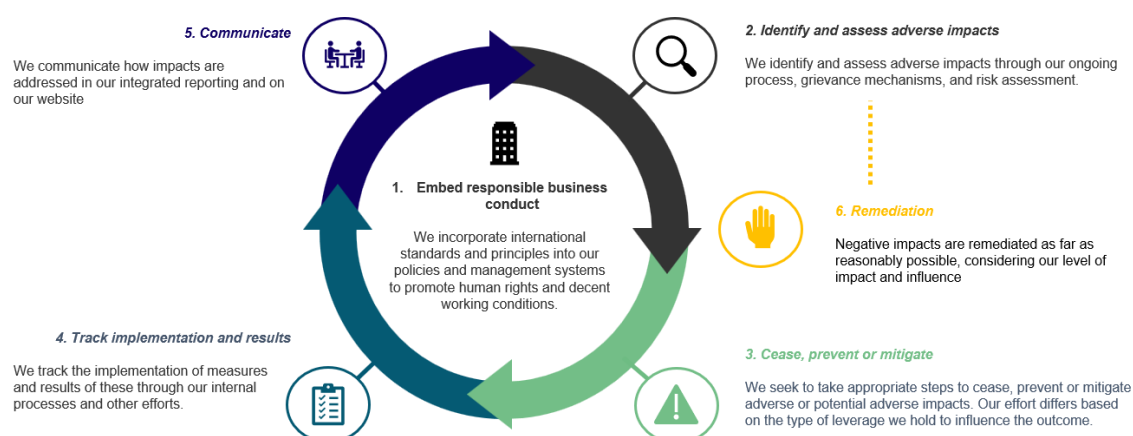
In addition, FM has established an On-Board Complaint Procedure (OBCP) that can be used by seafarers to lodge a complaint relating to their work contracts and on-board conditions that constitute a breach of the requirements of the Maritime Labour Convention (MLC). As a further formal channel for raising safety and environmental concerns, seafarers may also contact the Designated Person Ashore (DPA) [here](#), as required by the International Safety Management (ISM) Code. The DPA serves as a direct point of contact for all safety and environmental matters.

3. BW LNG'S DUE DILIGENCE PROCESS

In general, the shipping industry faces an inherent risk of adverse impacts on fundamental human rights and decent working conditions. Consequently, the BW LNG Group has taken several steps to mitigate these risks.

BW LNG Group performs a due diligence process following the steps set out in the UN Guiding Principles for Business and Human Rights ("UNGPR"), the OECD Guidelines for Multinational Enterprises, and the Norwegian Transparency Act.

The due diligence process is an ongoing process of identifying, preventing, mitigating, accounting for, and addressing actual and potential adverse impacts that our activities may have.



The due diligence process is risk-based, considering the severity and probability of adverse impacts on fundamental human rights and decent working conditions.

BW LNG Group has performed a risk mapping exercise in relation to fundamental human rights and decent working conditions across BW LNG and FM, as well as the companies' suppliers and business partners. The risk mapping exercise was performed by a working group, including management team members and persons from the following departments: manning, procurement, operations, newbuild, legal, and compliance.

The purpose of the risk mapping exercise is to enable us to conduct an initial prioritization of BW's and FM's risks and identify the most significant risks based on the industry, geography, services, and businesses, as well as known risks. Based on this, we also identified areas:

- Where the risk of any adverse impact on fundamental human rights and decent working conditions is most likely and most significant; and
- Where the strength of the BW LNG Group's relationship with suppliers and business partners presents the greatest chance of ceasing, preventing, or mitigating any identified adverse impacts.

Throughout 2024, we have enhanced the foundation of our due diligence process by acquiring a new supply management system. This upgrade will strengthen the ongoing due diligence efforts for our suppliers and enable a more targeted approach.

4. RISK ASSESSMENT AND MITIGATING ACTIONS

This section of the report provides the most significant risks identified as part of our 2024 risk assessment process, as well as a description of our approach to manage these risks.

4.1. Own operations

Overall, our risk assessment has shown that there is a low risk for adverse impact on human rights and decent working conditions in our own operations.

BW LNG

As a management office, BW LNG conducts business activities that are known to have limited risk for adverse impacts on human rights and decent working conditions. Management and office services are by nature considered low-risk, especially as the company is operated out of Norway, which is a low-risk country relating to human rights and labour rights.

FM

FM, as the technical and crewing manager of the Fleet, employs about 1,500 seafarers. The health, safety, and welfare of the seafarers remains a top priority for FM, and the company prioritizes the well-being and professional development of the employees, encouraging a culture of respect and equal opportunity, and ensuring adherence to labor laws. The LNG vessels hold MLC Certificates and have Blue Certificates, confirming that they are covered by an ITF agreement acceptable to the International Transport Workers' Federation. The seafarers are also subject to our various policies that are put in place to protect and aid the working environment onboard the vessels.

In addition to the policies, an On-Board Complaint Procedure is established for the seafarers to lodge a complaint relating to their work contracts and on-board conditions that constitute a breach of the requirements of the MLC. Any complaint is treated as strictly private and confidential. In all cases, seafarers also have a right to file their complaints directly with the master, the ship owner and to any appropriate competent external authority, where necessary.

4.2. Suppliers and Business Partners

Through our risk assessment process, BW LNG has identified shipyards as the most significant risk in our supply chain. To address this, we have developed an internal audit routine that includes auditing all new shipyards and conducting periodic follow-up audits with those already in our network. In 2023, we expanded our audit scope to include human rights and decent working conditions, and we will revisit the scope in 2025 to update the processes drawing on insights from audits already conducted, in particular from the human rights assessment performed in the last quarter of 2024.

FM will also have local site teams accompanying the vessels during dry docking, repairs, and newbuilding projects. The site teams will overlook the construction and/or repair to ensure the quality of the work conducted, but they will also function as neutral observers of the operations carried out at the yard.

In addition to our standard audit procedures, an additional comprehensive human rights assessment was performed at one of our yards in the last quarter of 2024. The assessment covered both the yard itself as well as a number of selected subcontractors. While the overall feedback was good, there were a number of findings, whereby the key findings are summarised below:

- Responsible recruitment practices: Insufficient systems to embed responsible recruitment practices throughout the yard’s operations and supply chain. Due to the high number of foreign workers, there is a heightened risk of recruitment fees, payment of deposits, and varied terms and conditions between workers’ home and destination countries.
- Anonymous Grievance Mechanisms: A lack of confidential reporting channels for workers, making it likely that issues could go unreported and unresolved.
- Subcontractor due diligence: The lack of sufficient human rights due diligence by the yard of their subcontractors, means that there is a limitation in oversight of risks experienced as subcontractor level.

BW LNG has shared and discussed the findings from the human rights assessment with the yard at the beginning of 2025 and is now working with the yard to establish an action plan to address the above points as well as other findings from the report. Our local site team will continue to play a key role in following up with the action plan with the yard taking a collaborative approach to ensure corrective measures are implemented.

Most of the findings involve the yard’s subcontractors, where BW LNG has less direct influence. However, we are taking these findings seriously and have shared and discussed them with the yard. Continued follow-up with the yard remains a key focus area in 2025.

Signed on 6 June 2025

BW LNG AS

Signed by:

AC7CBED74BFF4FC...
Billy Chiu

Chairman of the Board

DocuSigned by:

F71893B0D2174F9...
Erika Yining Feng

Board Member

Signed by:

93A2065CA389403...
Yngvil Signe Eriksson
Åsheim

CEO
Board Member

BW Fleet Management AS

Signed by:

AC7CBED74BFF4FC...
Billy Chiu

Chairman of the Board

DocuSigned by:

F71893B0D2174F9...
Erika Yining Feng

Board Member

DocuSigned by:

647F1C9307A24EB...
Helge Drange

Managing Director
Board Member