



SUSTAINABILITY REPORT 2015

The funnel on our new HERO vessels covers an exhaust gas cleaning system that removes sulphur oxides from the exhaust gas.

Just how we do business

The Wilhelmsen group has been doing business all around the world since 1861. If we want to survive the next 155 years and beyond, we need to deliver profitable and sustainable results.

OUR RECIPE FOR SUCCESS

To deliver the right results the right way, we need healthy, motivated and competent employees, a healthy and ethical business world without corruption, healthy local communities, and we need a healthy global environment. That is why we strive to contribute to the best of our efforts on all these areas.

This report is our way of showing our sustainability impact during 2015, and how we wish to progress in 2016. In addition to wanting to improve the way we do business, we also want to be more transparent and open in our reporting. We aim to get better, and we truly believe we are on the right path.

SOME OF MY PERSONAL HIGHLIGHTS FROM 2015

I am particularly happy to see that 95% of our land based employees and more than 50% of our seafarer pool have completed our compliance training.

I am also proud to say that 94% of our sailings through the Suez Canal were conducted without any form of facilitation payments in 2015.

Our lost time injury frequency rate improved in 2015 to 0.56 following focused initiatives, and we will continue to work for a safe and healthy working environment for all employees.

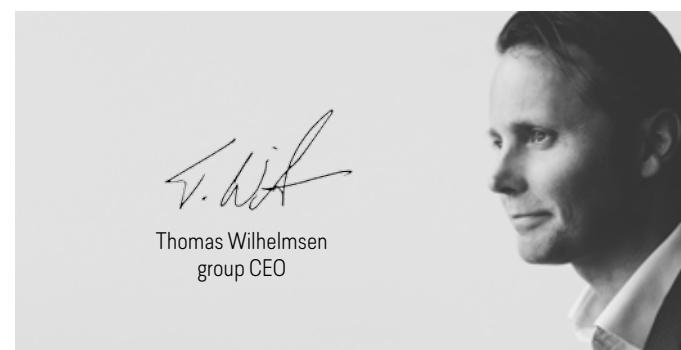
Green shipping has been a top priority for the Wilhelmsen group for many years. Two of several interesting initiatives to reduce fuel consumption last year were the change of the bulbous bows on four vessels and the increased number of hull cleanings performed together with the young talents behind EcoSubsea.

We care for the communities in which we operate. An impressive list including more than 80 charitable contributions was recorded in 2015.

STRONG, GENUINE COMMITMENT

Being the fifth generation heading up the group of companies, I have a strong personal commitment to our long-term goals and ambitions. With a thorough anti-trust investigation of the car carrying industry, we have seen how misconduct can affect our reputation and bottom line. At the other end of the scale, we have also seen how our firm stand against facilitation payments has shown remarkable results in Suez. This is encouraging and strengthens our belief in our long-term ambition which is a corruption free industry.

Being a shaper of the industry means being at the forefront of sustainability. Being a shaper is not something we can turn on and off at will. It is a true commitment. It is just how we do business.



Thomas Wilhelmsen
group CEO

2015 HIGHLIGHTS

90%

90% engagement
survey completion
rate (target: 85%)

2.0

Total recordable case
frequency rate of 2.0
(target: 2.8)



LOST TIME INJURY FREQUENCY RATE
OF 0.56 (TARGET: 0.65)



ZERO TOLERANCE POLICY TOWARDS
FACILITATION PAYMENTS INTRODUCED



TWO NEW, ENERGY EFFICIENT VESSELS
WITH SCRUBBERS DELIVERED



TWO VESSELS RECYCLED IN ACCORDANCE
WITH HONG KONG CONVENTION



ZERO
WORK
RELATED
FATALITIES



5% OF DIVIDEND ALLOCATED TO
"WE CARE" INITIATIVES VIA THE
TOM WILHELMSSEN FOUNDATION

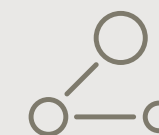
MORE THAN 80 CONTRIBUTIONS
TO LOCAL COMMUNITIES VIA
OFFICES AND EMPLOYEES

95%

OF ALL LAND-BASED
EMPLOYEES TRAINED IN
ANTI-CORRUPTION



79 598 eLearning courses
completed



Ship performance system
from Shippersys installed
on all vessels



1.67% sickness absence rate
for onshore operations

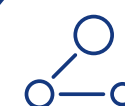
TARGETS FOR 2016



Zero work related
fatalities

2.8

Total recordable case
frequency rate not to
exceed 2.8



Installing Shippersys
system on all EUKOR
vessels

100%

100% completion rate on
anti-corruption training for
land-based employees



No oil spills

0.6

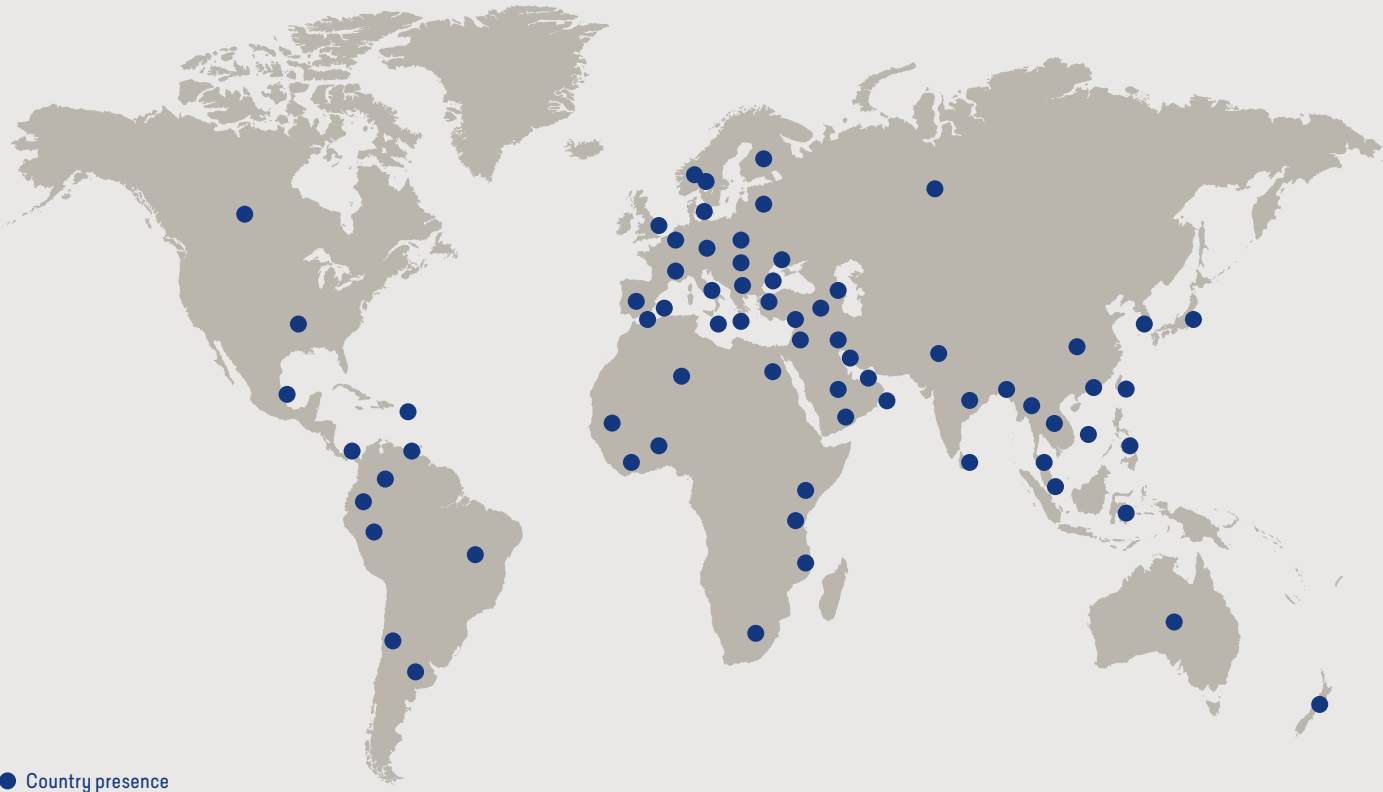
Lost time injury
frequency rate not to
exceed 0.6

THE WILHELMSSEN GROUP

AN OVERVIEW

The Wilhelmsen group is a diverse group of maritime related companies operating on six continents. We have 310 offices all over the world, and deliver products and services to more than 50% of the merchant fleet.

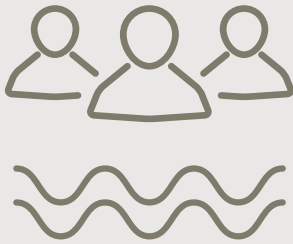
You can find an overview of the group structure and a brief explanation of the products and services offered by the different entities on the next page. For an exhaustive list of group companies and associated structure, please see pages 126-132 in our annual report for 2015.



PRESENCE



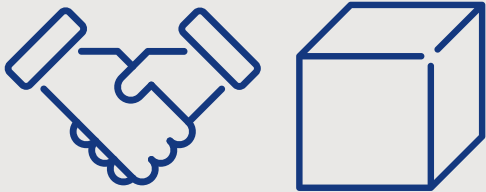
NO OF EMPLOYEES



TOTAL
23 800

SEAFARERS
10 100

KEY BUSINESS FIGURES



NO OF PRODUCT DELIVERIES
220 000

M³ OF CARGO TRANSPORTED
74 MILLION

NO OF PORT CALLS HANDLED
75 000

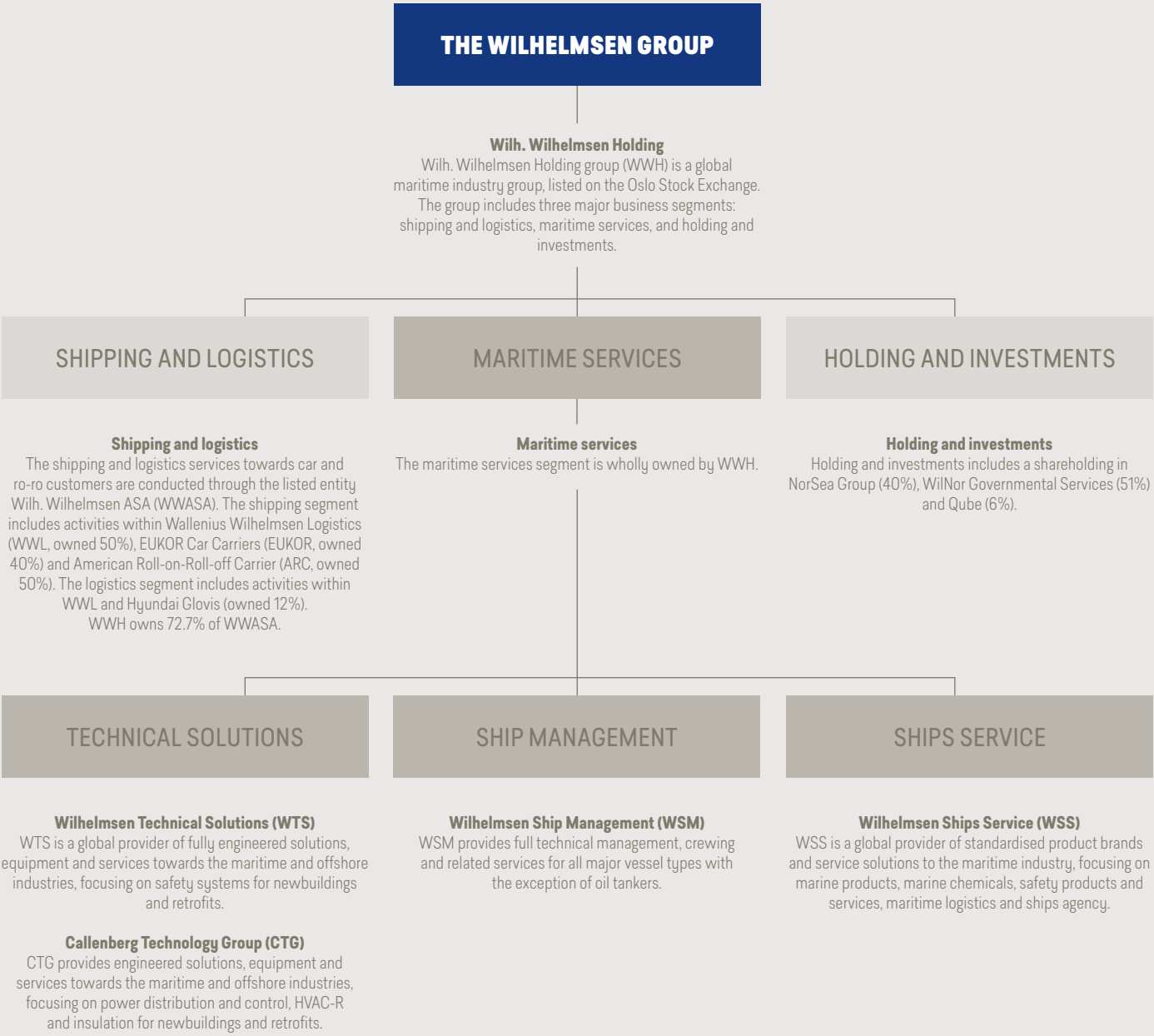
NO OF PRODUCTS OFFERED
4 300

KEY FINANCIAL FIGURES



REVENUE
USD 3 321 000 000 (3 693 000 000)

OPERATING PROFIT
USD 165 000 000 (381 000 000)



Our way

For us, doing business is about maximising profit *and* making sure we do business the right way.

GRI

Our sustainability report is based on the fourth generation of sustainability reporting guidelines developed by the Global Reporting Initiative (GRI G4). We report in accordance with the “core” option, which comprises the essential elements of sustainability in the group’s work. More information about the guidelines can be found on GRI’s webpage globalreporting.org.

MATERIALITY ASSESSMENT

One key element of the GRI guidelines is to find the aspects of business we consider to be of most importance to our impact on the environment and the societies in which we operate. These aspects are identified through a materiality assessment, where the importance of different topics are ranked by us and our stakeholders, such as our board, group management team, employees, customers, suppliers, competitors, industry players and shareholders. The process steps are shown on the opposite page.

We conducted a materiality assessment in 2013. The outcome was a priority list, displayed on the opposite page. This has guided our work and reporting in 2014 and 2015. We recognise that this list should be evaluated on a regular basis to ensure that we always are focusing on the most critical issues. Our intention is to conduct a new materiality assessment in 2016.

Based on the assessment, we have divided the high priority aspects into five groups, which form the basis of this report:

- Environmental impact
- Community contribution
- Ethics and anti-corruption
- Health and safety
- Our employees

These topics are relevant for all entities, throughout the whole value chain, and in all geographical areas.

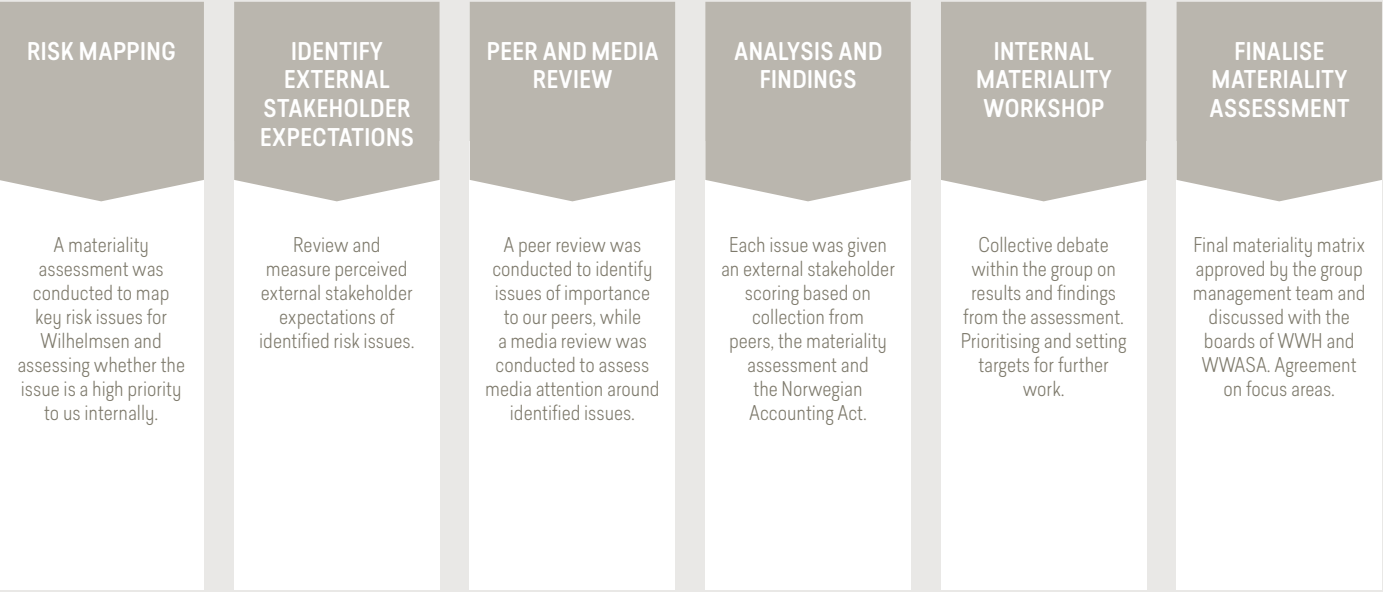
CONTINUOUS IMPROVEMENTS

We aim to build a transparent reporting system. In time, we expect to have external assurance for the information provided. In the meantime, we use DNV GL, our accounting auditor PricewaterhouseCoopers AS and stakeholder engagement for advice and to identify ways to improve.

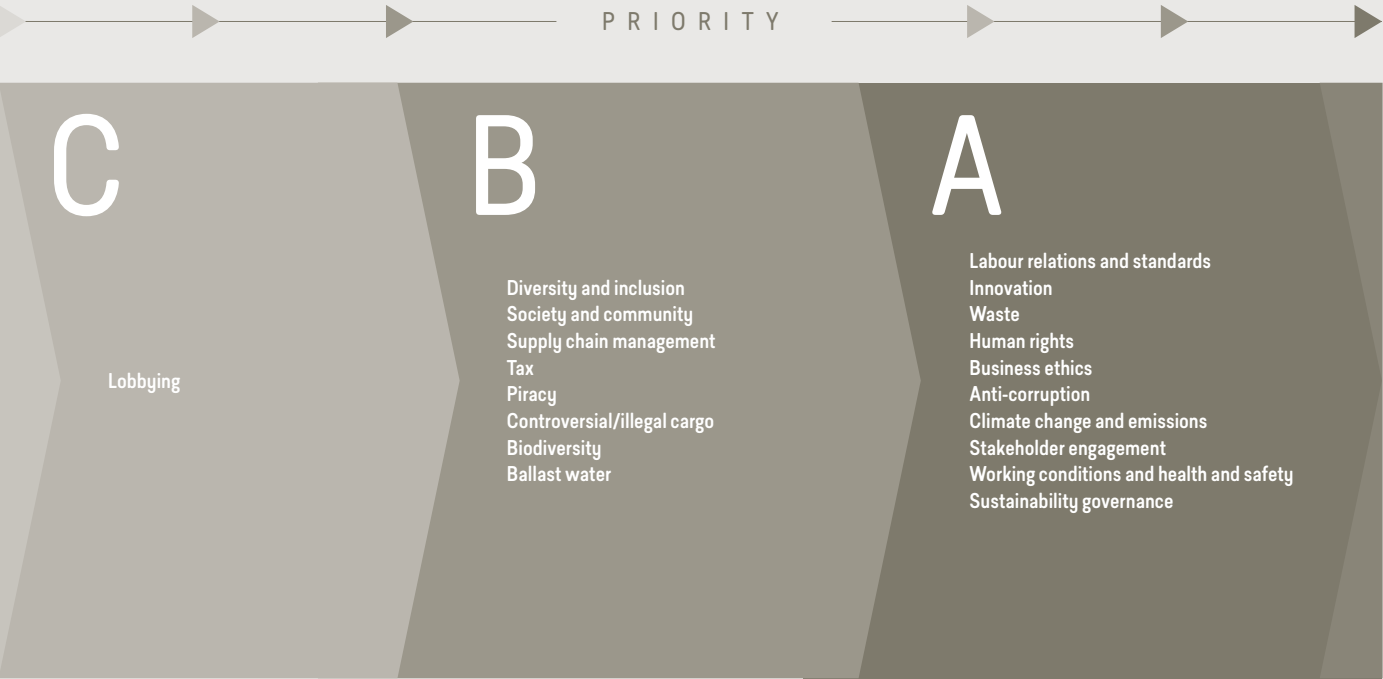
In addition to specifying relevant targets for 2016, we work continuously to improve our sustainability processes. We review and update guidelines and standards for managers, employees, customers, suppliers, subsidiaries, joint ventures and business partners, clearly expressing the group’s expectations regarding material aspects of sustainability.

The subsidiaries handle business relevant issues on a central or local level, depending on the nature of the issue.

THE ASSESSMENT PROCESS



MATERIAL ASPECTS



HOW WE ENGAGE WITH OUR STAKEHOLDERS

We are regularly in dialogue with key stakeholders who engage with issues relating to the maritime industry and the corporate activities of the Wilhelmsen group. The dialogue contributes to understanding the expectations of our surroundings and transferring them to the group. It also enables us to communicate corporate decisions to stakeholders and provide them with explanations for our underlying motives. The table below provides examples of how we involve stakeholders in important topics.

KEY TOPICS	 EMPLOYEES	 INVESTORS	 CUSTOMERS	 SUPPLIERS	 COMMUNITY
	Engagement, commitment, leadership, culture Business ethics, working conditions, HSEQ, training KPI results and targets	Results, prospects Knowledge sharing Main business drivers	Campaigns, plans Satisfaction, feedback Innovation, proper use, expertise advice	Human rights, child labour, environmental protection Sustainability governance, transparency, values Working conditions, HSEQ, regulations	Climate, environmental impact Anti-corruption, rules and regulations, labour regulations and standards Education
CHANNELS AND ACTIVITIES	 EMPLOYEES	 INVESTORS	 CUSTOMERS	 SUPPLIERS	 COMMUNITY
	Engagement survey Performance appraisal Industrial democracy Code of conduct	Annual and quarter reports and presentations, capital markets day Press releases Investor meetings	Customer meetings, regular dialogue Customer surveys Road-shows and fairs	Supply chain code of conduct Procurement policies Supplier audits	Meetings and discussions with NGOs Ship owners associations Sponsorships Presentations and guest lectures



Empowered employees for the future

We believe that empowered employees in an innovative and learning organisation are our main competitive advantage in meeting the needs and wants of our customers.

OUR RESPONSE TO THE WAR FOR TALENT

The war for talent is intensifying. Retaining and attracting talent are key to ensure future growth and essential to ensure we deliver on our long-term strategic ambitions.

In 2015, we started to develop a new process to map and manage talent in the organisation. As part of our annual performance appraisal process, a new talent identification tool will be introduced in 2016.

High performers with strong leadership potential are identified and prepared to take on key positions in the group through a combination of internal training programmes, on-the-job training and job rotations.

Maritime trainee

Attracting and developing talent is a focus area for the group. One of the initiatives we have good experience with is the trainee programme called Maritime Trainee, organised by the Norwegian Shipowners' Association (NSA). The programme has been a fruitful source of talent for us for a decade. Two graduates, one engineer and one economist, are recruited every year

to a two-year programme in which the trainee rotates within the different business areas in the group companies. Six times during the two years, they also attend learning modules hosted by the NSA, where maritime trainees from different companies in the maritime industry gather to learn about each other's companies, business areas, challenges and opportunities in the industry. So far, we have had 20 trainees, and of these 17 are still in the group.

Unfortunately, the maritime trainee programme hosted by the NSA is faced with the economic challenges the maritime industry currently is facing. Despite our wish to continue the programme, it has been discontinued. Our intention is to support the programme if and when it is revitalised.

We will in 2016 assess the possibility of developing an internal trainee program focusing on innovation and digitalisation. The decision will be made in Q2.

Developing leaders for the future

The world is becoming more complex. To meet challenging and changing environments, we are dependent on highly qualified leaders.



In 2015, the first group of tomorrow's leaders went through a newly developed advanced leadership programme. The course is developed together with **Thunderbird School of Global Management** and focuses on expanding senior leaders' field of vision on the global maritime industry and the global economic trends that will continue to drive demand and competition. Participants are challenged to develop their versatility skills and their ability to play multiple roles in a complex global business. Adding to this, they learn to balance running the business, while at the same time leading for the future long-term growth of the group. The programme is also a great opportunity to build a global network of leaders across the entire Wilhelmsen group.

By the end of 2016, more than 30 future senior leaders will have conducted our advanced leadership programme.

Driving performance

We strive to create a performance culture where engaged employees deliver desired results and are rewarded accordingly. We measure employee performance through annual engagement surveys, performance appraisals and annual activity plans.

The performance appraisal process is mainly a dialogue between manager and employee. In 2015, the completion rate was 77%, hence we still have improvement potential. Actions and initiatives from the performance appraisal process is developed into an annual activity and development plan.

In 2016, we will introduce a new digital performance appraisal process in order to improve and further develop our performance management processes and our employees.

Motivated and engaged employees are also key in driving performance. To measure our ability to provide an engaging and safe work environment in which all employees are motivated to work and achieve their full potential,



Our maritime trainee Tore Stang visits MV Tarago during his rotation in WSM.

we conduct annual engagement surveys. In 2015, the response rate was 90%, above the target of 85%.

Together with **Ennova**, we have developed a tailor made engagement survey linked to our strategic ambitions, values and our vision. In 2015, our engagement score was 69, slightly below the target of 72. The score is a combination of how our employees measure their satisfaction and motivation. The score varies, at times substantially, between countries and companies. Low performance are addressed and expected to improve through a target process.

Even though the score was lower than our expectations, our employees show a high sense of loyalty, and this is a strong motivational factor for our employees. Loyalty is also measured through turn-over rate, which in 2015 was 8.34% as an average for the whole group. In some business units and countries the rate is deemed too high and initiatives have been implemented in order to reduce the high turnover rate.

The 2015 survey also showed that the "I Comply" campaign we ran in 2014 and 2015 has been successful.

Last, our leadership index dropped somewhat compared with previous years. We also notice that the leadership impact varies in different cultures. Low performance is addressed directly, knowing that strong, motivating leaders are key in driving performance.

BUILDING A STRONG CULTURE

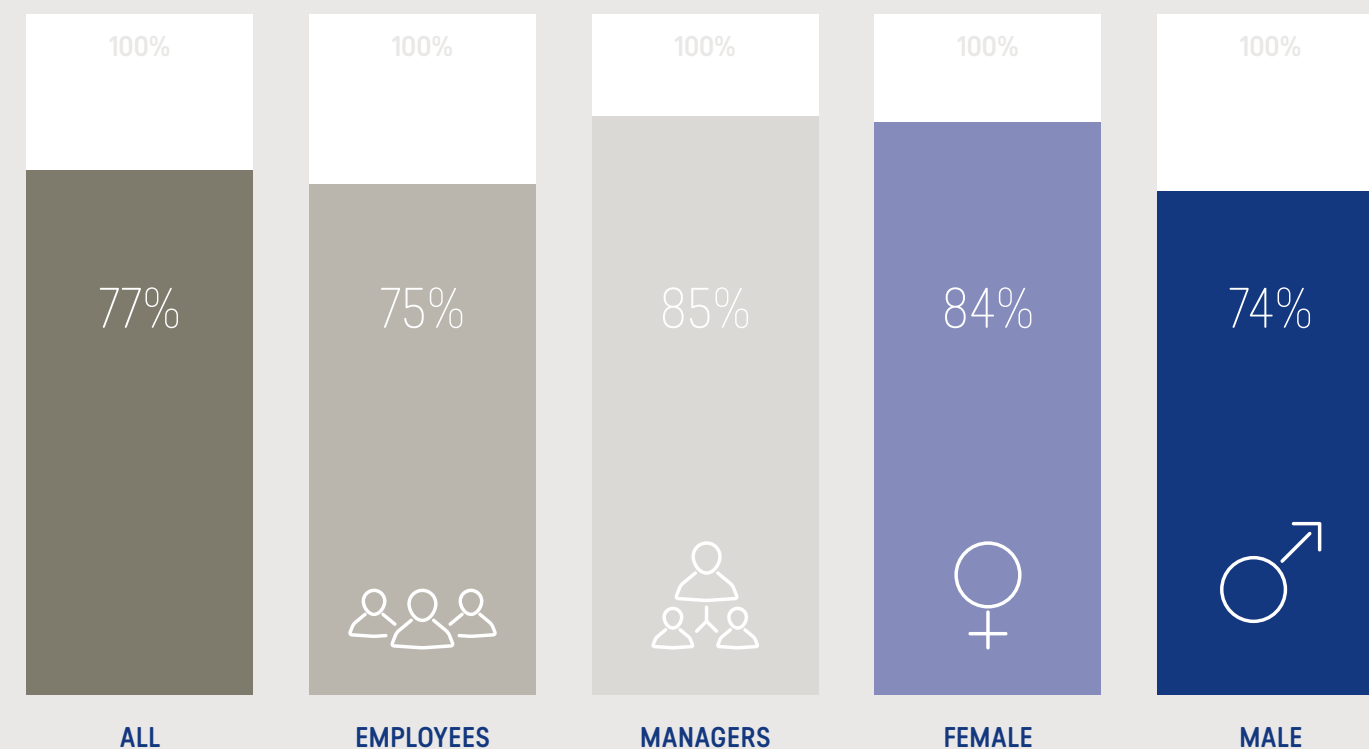
High ethical standards and strong governance are prerequisites for doing business in the future. We consider it our licence to operate. By building a strong, sustainable culture we believe we achieve a competitive advance. Our governing elements include our Code of Conduct, vision, values and leadership expectations. You can read more about them on our webpages.

In 2014 and 2015, the focus has been on anti-corruption, theft and fraud. This focus will continue in 2016. We will also focus on competition law. Read more about our initiative on [page 31-33](#).

In 2016, we will also revise and update our governing elements followed by an internal awareness campaign to ensure all our employees are aware of our expectations and how we conduct business and behave as Wilhelmsen employees. Guidelines and standards are reviewed every year by the board and the management group, and communicated to employees through our internal magazine, intranet pages and our engagement survey.

Last, but not least, we know that companies fostering an innovation culture is key to shape an industry and stay ahead of competitors. In 2016, we will therefore explore the opportunities for an innovation talent programme as part of our aim to attract talent to the industry and look at how innovation and experimentation skills and processes can be included in our daily work.

PERFORMANCE APPRAISALS COMPLETION RATE



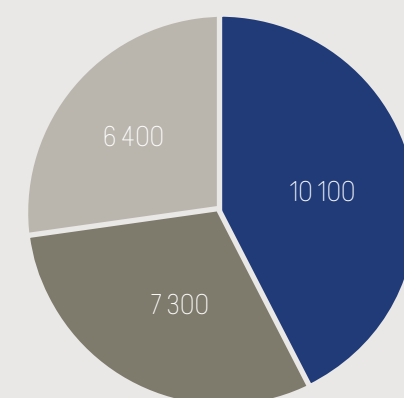
ENGAGEMENT SURVEY:

RESPONSE RATE: 90% (TARGET 2015: 85%, TARGET 2016: 85%)
ENGAGEMENT SCORE: 69 (TARGET 2015: 72, TARGET 2016: 72)

TURNOVER

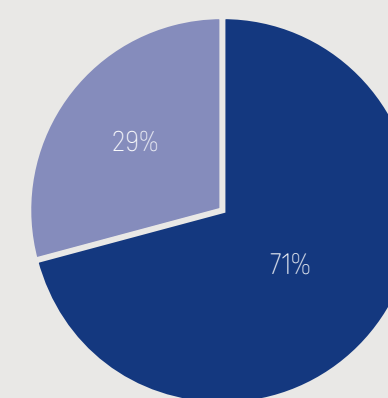
8.5%

TOTAL NUMBER OF EMPLOYEES 23 800



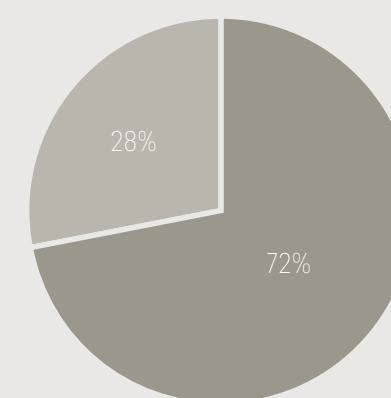
Seafarers Joint ventures Wholly and partly owned subsidiaries

GENDER MIX 2015



Women Men

GENDER MIX 2014



Women Men

Improving gender and cultural diversity

In 2015, 29% of our employees were women, which reflects that our industry by nature is male dominated.

Our ambition is to enrich the group with diversity, both in terms of increasing the number of female leaders and making sure various cultures are represented in management teams. We do not expect major changes in 2016, as the changes necessitate focus targets over time.

Investing in competence development

“Learning and innovation” is one of our core values, and we pay particular attention to competence and knowledge development. A learning organisation with motivated employees contributes to efficient operations and has a positive impact on revenue and earnings.

Training related to each employee’s working situation receives most attention. In 2015, an average employee received 4 days of training. Our ambition is 5 days of training per employee per year.

In addition, we have an internal training institution, WW Academy, offering employees a variation of courses and development opportunities. WW Academy also provides programmes for leadership development, in addition to a broad range of specific training programmes. WW Academy is an important contributor in order to develop common attitudes, expectations, ways of working, and common business standards.

In 2015, 246 employees went through classroom learning programmes or instructor lead training arranged by WW Academy, in addition to training facilitated by local offices. An impressive 79 598 eLearning modules were completed, corresponding to a 300% increase from 2014. The reason for the large growth in the number of completed courses is the implementation of a new enterprise resource planning system in WSS. This was a major application change that required several thousand people to be trained.

Focus areas for 2016

Talent management, driving performance and ethics and governance will continue as focus areas in 2016. In addition, we will have a stronger focus on innovation and experimentation.

TARGETS 2016

- Revise and update our Code of Conduct and leadership expectations
- Explore how we can strengthen innovation skills and processes in the organisation
- Introduce talent mapping as part of the group’s performance appraisal process
- 80% completion rate for performance appraisals
- 85% completion rate on our engagement survey with a score of 72



Employees in our office in Durban, South Africa, presents the full breadth of our ships service offer.

A safe and healthy working environment

We believe that an engaging and safe working environment at sea and on land is integral to an efficient, sustainable and profitable business. Our governing documents clearly articulate principles for health and safety.

ZERO INJURIES GOAL

We continuously work towards an overall goal of zero injuries. To achieve this, we maintain high standards of health and safety to prevent hazards and incidents for all our employees and other parties working on behalf of the company. The overall responsibility for health and safety resides with senior management and the board of respective entities in the group. Relevant departments, including HSEQ, HR and operational teams manage the day-to-day implementation.

Incidents are evaluated and analysed by the HSEQ departments, and important lessons learned are communicated amongst the functions and relevant business units through safety bulletins and meetings. Employees are encouraged to report hazards and unsafe or non-compliant behaviour without fear of retribution. Employees also have the opportunity to use the group's global whistleblowing system.

All employees in the Wilhelmsen group are responsible for reporting incidents, near-incidents, safety breaches and hazards. To strengthen our safety culture globally, we have increased our focus on reporting.

Group health and safety advisory team

A group advisory team was formed in 2015 to support the continued

development of the health and safety (H&S) culture in the group. The team is responsible for implementing a reporting framework, increasing management attention and initiating various employee programmes such as awareness, training and reporting programmes.

The team meets quarterly and will provide input to the group management team on health and safety outcomes and improvement opportunities.

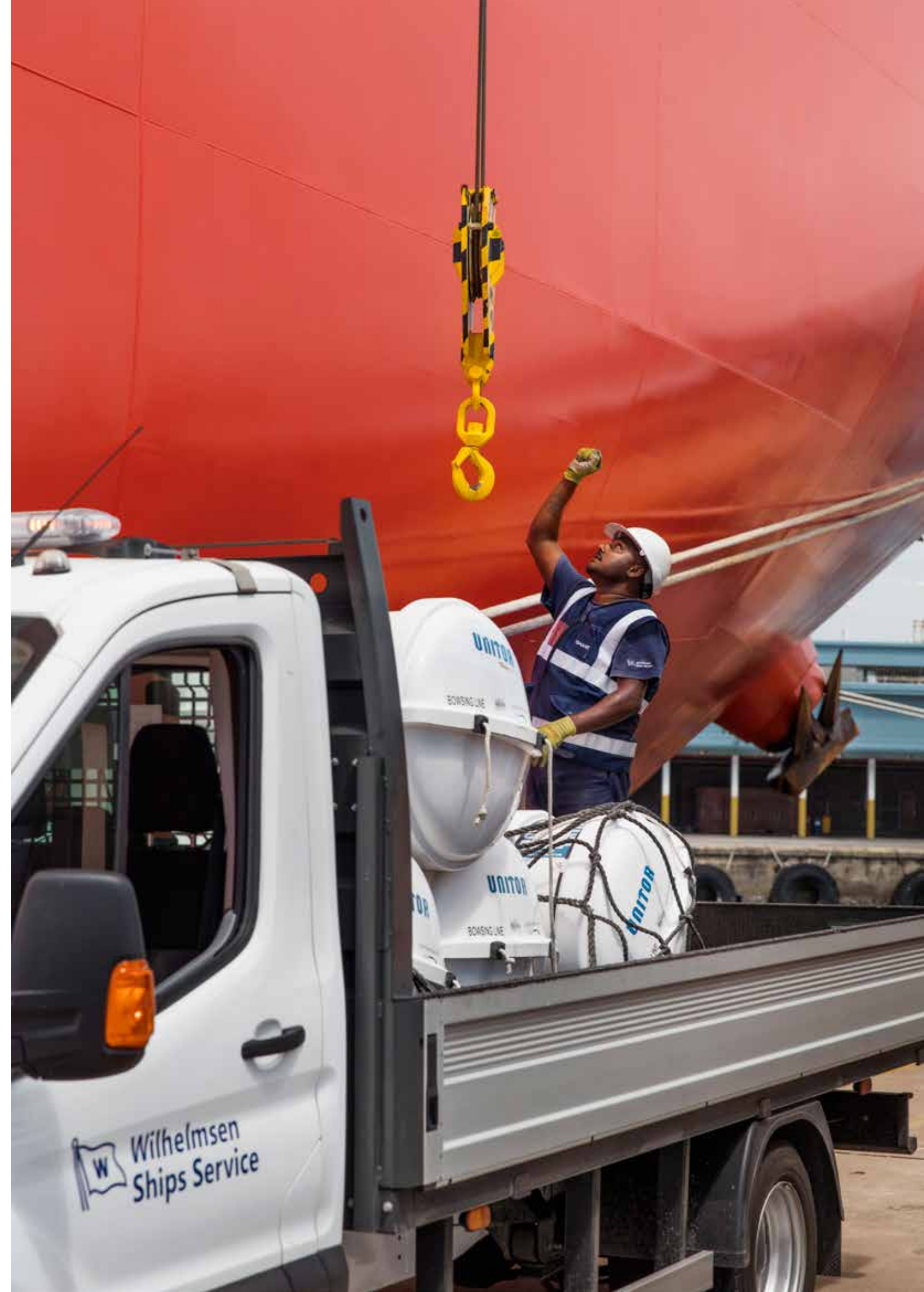
Health and safety metrics

In 2015, we reviewed the H&S reporting practices and decided on five KPIs that will be reported on a quarterly basis, listed below. The numbers reported in 2015 are shown on [page 19](#).

- Sickness absence rate (from 2016 for vessels)
- Occupational disease rate (from 2016)
- Lost time injury frequency rate
- Total recordable case frequency rate
- Total safety observations

These metrics will be reported using industry standard methods¹ for two types of operations within the group:

- vessel based operations, where H&S exposure is 24 hours per day
- onshore operations, where H&S exposure typically is 8 hours per day



Our work on vessels

Today, shipping is considered one of the most regulated industries worldwide. There is a comprehensive framework of global maritime safety regulations such as Standards of Training, Certification and Watchkeeping, and Safety Of Life At Sea (SOLAS). Staying in the forefront of new regulations is not only a desired goal for the Wilhelmsen group, but vital in order to realise and act upon new business opportunities.

All seafarers employed in the Wilhelmsen group are covered by collective bargaining agreements ensuring proper working conditions, health care and rest hours. Health and safety briefings are carried out for the seafarers at the management office and manning office prior to joining a vessel.

WSM continued to build on a hazard hunt campaign that started in 2012, focusing on different areas on-board based on analyses of incidences from the period before. The main focus areas in 2015 were hand and finger injuries and house-keeping on deck and in the engine room.

The lost time injury frequency for vessels managed by WSM was 0.56 in 2015, down from the previous year and below the target of 0.65. The improvement is considered to be a reflection of dedicated focus to improve the health and safety standards on-board.

Hazard hunt campaigns and awareness efforts will continue into 2016 to ensure the positive result in 2015 is sustained.

We have been working with Maritime Crew Resource Management (MCRM) for several years during officers conferences. This material will now be part of a Safety Toolbox available to all on-board our vessels. This

will increase the knowledge and understanding of behavioural based safety aspects of the MCRM model such as situational awareness, fatigue etc.

Our work onshore

We continue to build a robust health and safety culture onshore in our 310 offices. The identification, monitoring and reporting of cases in all locations will continue to be a key focus area.

WSS systematically implements the OHSAS 18001 to drive an improved safety culture. In 2015, this led to the implementation of job safety risk assessments, analysis and improvement of H&S competency and capacity, and implementation of 16 mandatory general safety awareness training modules. WSS Ships Agency also introduced a global Land and Launch transportation standard to reduce transport risk.

WSS also integrates safety design in product and service offers. In 2015, a new product to remove exposure to chemical gases and spillage during handling was introduced, as well as new product labelling for the galley and accommodation product range, being introduced to make safety “easier”. WSS aims to improve systematic management of local H&S rules and regulations and establish site safety committees. WSS aims to achieve OHSAS 18001 certification in 2016.

TARGETS 2016

- LTIF < 0.6 on vessels managed by WSM
- WSS to be certified according to OHSAS 18001, Occupational Health and Safety Management Systems—Requirements
- Four statements on health and safety measures included in quarterly financial reports

¹ Industry standards OCIMPF and GRI formulas are used. The common unit used for vessel operations is 1 000 000 man-hours, and 200 000 man-hours for onshore operations.

VESSEL BASED OPERATIONS



Total recordable case frequency rate of 2.01. Target 2015: 2.80. Target 2016: 2.80.



Lost time injury frequency rate of .056. Target 2015: 0.65. Target 2016: 0.6.



Safety observations reported 2015: 9 388

**ZERO WORK
RELATED
FATALITIES**

**GLOBAL SICKNESS
ABSENCE RATE TO BE
RECORDED FROM 2016**

ONSHORE OPERATIONS



Total recordable case frequency rate 2015: 1.32 Target to be determined early 2016



Lost time injury frequency rate 2015: 0.59 Target to be determined early 2016



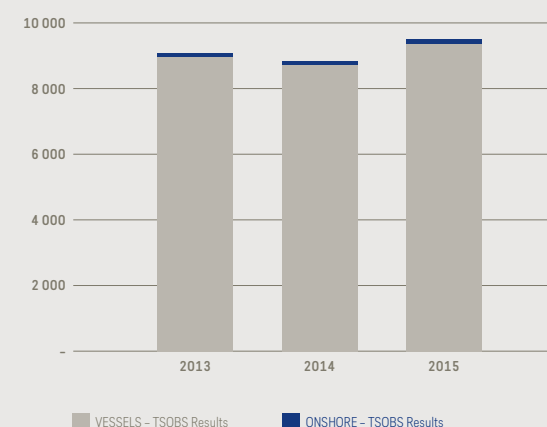
Safety observations reported 2015: 138

**ZERO WORK
RELATED
FATALITIES**

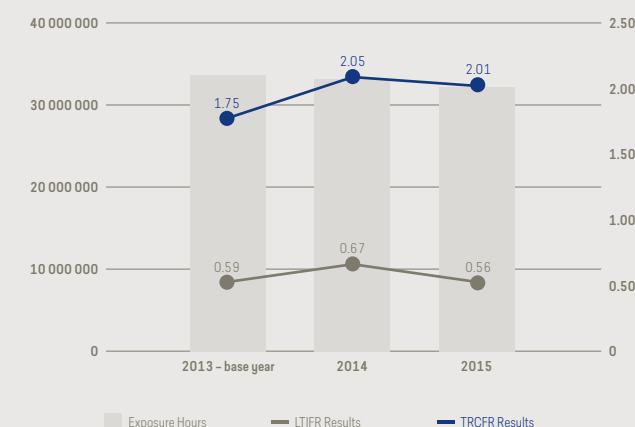
**SICKNESS ABSENCE
RATE: 1.67%
(BASE YEAR 2015)**

Total safety observations

ONSHORE and VESSEL sites

**Lost time injury frequency rate**

and total recordable case frequency rate VESSEL sites



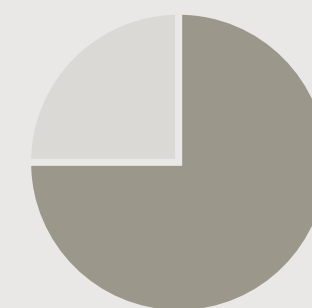
TURNOVER RATE

← → **8.5%**

42 000

EXPOSURE HOURS 2015

**VESSEL BASED OPERATIONS 75%
ONSHORE OPERATIONS 25%**



We care about our communities

We have a continuous history and tradition for supporting academia, environmental and humanitarian organisations, research institutes, as well as culture and sporting events. This is a tradition we value. It is our way of showing that we care for the local communities in which we operate.

CHARITABLE DONATIONS AND SPONSORSHIPS

Contributions are made at several levels of the organisation. 5% of the group's annual dividend is allocated to The Tom Wilhelmsen Foundation, owned by the majority shareholder, which sponsors various charitable causes every year. In 2015, the contribution to the fund was NOK 3 million.

On group level, the corporate communications department manages contributions and main sponsor agreements, while subsidiaries contribute to their local communities based on current needs and priorities.

In addition, local employees contribute through events such as organised charity runs and school teaching. The examples shown on [page 23](#) describe some of the projects our employees supported in 2015.

Out of the many contributions made in 2015, we would like to focus on two areas of particular interest for our company and industry. A more comprehensive overview of our sponsorships can be found on our [website](#).

MARITIME KNOWLEDGE, COMPETENCE AND RECRUITMENT

Professorship

Since 2006, The Tom Wilhelmsen Foundation has had an agreement with BI Norwegian Business School for the continuation of an endowed

professorship, held by Professor Torger Reve. In 2015, the agreement was renewed to last until 2019. The intention is to continue and strengthen the knowledge and research related to the maritime industry with focus on innovation, strategy, industrial competitiveness and economic development.

Ocean talent camp

As our employees are vital to our organisation and to our industry, the race for young talent is crucial. Ocean Talent Camp is an exhibition for Norwegian youth, where they can meet ocean related companies in Norway. It is a collaboration between the maritime industry and the maritime conference Nor-Shipping with the aim of putting the spotlight on maritime careers and the possibilities within the maritime sector. We have been a contributor and participant since the start in 2013. In 2015, almost 10 000 pupils visited our stand and participated in our fun and low-key car carrier building competition.

The maritime industry includes an ocean of opportunities around the world. Making young students interested in the maritime industry is one of our ways of attracting talent. You can read more about our maritime trainee programme and how we work together with the industry to attract talent on [page 10](#).



Pupils from Norwegian schools are building and testing their own car carriers on our stand at Ocean Talent Camp. Photos: Nor-Shipping/Jens Sølvberg



A girl in the window of her family's new SOS Sample house. Photo: SOS Barnebyer/SOS Children Villages

SOS CHILDREN'S VILLAGES

Children's Village, Cebu

We have contributed to the work of SOS Children’s Villages in the Philippines since 2009, on a variety of projects. In 2015, we supported the Children’s Village in Cebu, housing about 100 children growing up in families headed by SOS mothers.

The aim of a SOS Children’s Village is to provide stable and consistent care to children who cannot remain with their biological family. The children are provided access to adequate day care, kindergarten, primary, secondary, tertiary and vocational education as well as college studies. Courses include social work, education, engineering, hotel and restaurant management, political science and business administration.

During 2015, 33 of the youths living in the Wilhelmsen supported village attended college, whereof four have chosen a maritime career. They take part in the cadet programme managed by the Norwegian Training Centre in Manila, to make them ready for service on-board Norwegian ships.

Housing project

We are proud to be one of the main sponsors of this important community resettlement project providing new homes to families who lost their

houses to Typhoon Haiyan in 2013. SOS Children’s Villages report that the construction of 320 housing units in Barangay Pago is underway. The progress has been somewhat delayed due to cyclones and heavy rain, leaving ferry traffic as the only way of transportation of material. However, the 120 first houses are ready for handover and the project is expected to be finalised midyear of 2016.

Targets 2016

- 5% of dividend allocated to “we care” initiatives
- Participate at Ocean Talent Camp
- Evaluate possibility for Wilhelmsen innovation talent camp

As the numbers of refugees crossing the Mediterranean Sea has increased in 2015, all WWASA vessels have been equipped with an emergency kit. Our vessels are not particularly suitable for rescuing refugees, but saving people in distress at sea is a duty and also an important part of the Wilhelmsen seamanship. Should the need arise, we want to be well prepared. The emergency kits contain supplies such as food rations, water canisters, disinfectants and silver bags to keep warm.

SELECTED INITIATIVES FROM 2015

Company	Place of contribution	Type of contribution/activity
Headoffice (WWH, WWASA, WTS, WSS, WSM)	Lysaker, Norway	Employees participated in a Charity Climb where WWH and participating employees contributed financially to SOS Children's Villages by donating money per set of stairs climbed.
Headoffice	Lysaker, Norway	The Christmas present to all employees in the headoffice was to support families in Syria with food packages through the Norwegian Red Cross. One package of food per employee in Norway was donated. Each package provided nourishment for a family of five for one month.
WWASA	Lysaker, Norway	Financial contribution to the Salvation Army's Christmas Kettle project. All gifts received during the year was gathered to a Christmas lottery where all proceeds were donated.
WSM	Constanta, Romania	Donation to the construction of a mechanics workshop for a boys' home in Mihail Kogalniceanu, Romania. The workshop will serve as an educational centre where youth from impoverished families come and learn skills in woodcraft, carpentry and mechanics.
WTS	Guizhou, China	Donation of 150 books to Xindian Middle School, Pu An county.
WSS	Tanzania	One employee and his son climbed the Kilimanjaro, raising money towards the Al Noor Training Centre for Children with Special Needs.
WSS	Melbourne, Australia	Employees raised money towards prostate cancer by participating in Movember – Changing the Face of Men's Health.
WSS	Cairo, Egypt	Employees participated in a charity half marathon, raising money towards a safe and healthy non polluted environment, organized by Cairo Runners Association.
WSS	Tbilisi/Poti, Georgia	Financial contribution to government body for aid after flooding disaster
WSS	Dubai, United Arabic Emirates	Financial contribution to sponsorship to young shipping talents through YoungShip Dubai
WSS	Durban, South Africa	Supporting I Care – Giving Street Kids a Future by employee visits to I Care homes, and hosting of a Festive Season lunch with I Care. Also sponsored soccer kits for the I Care soccer team in which most of the boys play.

Towards zero emissions

As we strive to be a shaper of the maritime industry, we are pursuing numerous initiatives aimed at reducing the environmental impact of our business. Our goal is to continuously improve our operations and seek to achieve minimum emissions.

ENVIRONMENTAL ACCOUNT FOR 2015

Vessels in scope

By 31 December 2015, the ship operating companies, WWL, EUKOR and ARC, controlled 137 vessels. This environmental account covers the 29 vessels owned and controlled by WWASA and operated by WWL and EUKOR. These are the vessels for which we can directly affect the environmental performance through investments and vessel operation.

Two vessels under WWASA's control, the ro-ro vessels Tagus and Tasco, underwent green recycling at approved green recycling yards during the first quarter of 2015. In accordance with the Hong Kong convention, hazardous material lists and green passports were certified and issued by class. Given the current market conditions, we expect to take out older, less efficient vessels also in 2016.

The group companies took delivery of two new vessels in 2015. Both vessels, the pure car and truck carriers Thermopylæ and Thalatta, were for WWASA's account and commenced service for WWL.

For a full overview of WW owned vessels, please see page 134-135 in the annual report.

Fuel consumption and emissions

The total fuel consumption of the WWASA vessels decreased in 2015, which lead to decreased CO₂ emissions. CO₂ emitted from our fleet totalled 1.7 million tonnes in 2015, equivalent to a 1.3% decrease from 2014.

Several factors led to the decrease throughout the year. The two vessels that were recycled had less cargo capacity than the two that entered the fleet. The latter are also more fuel efficient due to optimisation of the hull shape and the machinery. The increase in capacity given the same number of vessels gives an economy of scale factor, which contributes to reduced fuel consumption. The bulbous bow change on four vessels also positively affected the consumption. Another important factor is an increased number of hull cleanings. This gives a further contribution and improvement of the fuel consumption and emissions from our fleet – despite a marginal increase in speed (which in turn would increase consumption).

The fuel efficiency indicator for 2015 was 19.4 gram per tonne nautical mile, equivalent to an increase of 1.9% compared with 2014. As the total fuel consumption of the fleet was reduced in 2015, the fact that the indicator has increased reflects a reduction in transportwork. This means that in 2015, we carried less and lighter cargo than in 2014.

Emitted CO₂ equalled 60.52 gram per cargo tonne miles in 2015, compared with 59.19 in 2014, corresponding to the increased fuel consumption per tonne mile.

NO_x emissions decreased by 3.5% due to reduced fuel consumption and fleet renewal.

The average sulphur content was 2.04%, up 19% year over year. This is below the legislative limit of 3.5% set by the International Maritime Organisation (IMO). Removal of WWL's internal low sulphur fuel oil policy is the main reason for the increase in sulphur emissions. A new revised fuel oil policy is to be concluded early 2016.

HOW WE CONTRIBUTE TO SHAPING THE MARITIME INDUSTRY

We acknowledge the environmental challenges the world is facing, especially concerning increasing CO₂ emissions and local NO_x and SO_x pollution. We support the precautionary principle that only sustainable solutions to these challenges are acceptable. We strive to deliver services to our customers and stakeholders with minimal effect on the environment.

We believe that shipping companies who understand, respond to and utilise the energy efficiency and environmental challenges in our industry will be tomorrow's winners, and that new business opportunities will emerge as a result of these challenges. Through our vision "shaping the maritime industry", we recognise that we have a special responsibility to investigate new technology, solutions and ways of working to reduce emissions and fuel consumption on-board our vessels, but also through providing green products and solutions to the merchant fleet.

Realising that our main contribution to a cleaner environment is through reducing fuel consumption by our vessels, the initiatives below are all related to our ship operating activities.

Working with partners

We work closely with industry partners such as other shipping companies, academia, non-governmental organisations and equipment providers to increase and share knowledge, recognise opportunities and develop new and innovative solutions.

We also work closely with our partner Wallenius Lines, our operating companies WWL, EUKOR and ARC, and our ship management offices to optimise our vessels and fleet energy efficiency.

Working Group 5

Through our participation in the Working Group 5 (WG5), consisting of the Norwegian ship owners Thorvald Klaveness, BW Gas, Solvang Shipping, Grieg Shipping, Hoegh Autoliners and us, we work for a more efficient and transparent shipping industry. One of the deliverables from this cooperation was the completion of the FRAM project in 2015. The FRAM project is an industry initiative inviting shipping companies to voluntarily measure, report and verify CO₂ emissions from their vessels, and use the data and insights to become more energy efficient and environmentally conscious. In addition to the WG5 members, the project collaborates with World Wildlife Fund, DNV GL and The Norwegian Shipowners' Association. The FRAM portal is now running and we are continuously reporting on a voluntary basis. The WG5 is currently in a process of aligning strategic ambitions and the way forward, with us as eager participants.

SFI Smart Maritime

As one of several industry partners, we entered the research collaboration centre called SFI (Center for research based innovation) Smart Maritime in 2015, hosted by the Norwegian Marine Technology Research Institute and in collaboration with the Norwegian University of Science and Technology (NTNU). This is an opportunity for long term cooperation between industry companies and research partners. The purpose of the project is to establish a Norwegian centre for improved energy efficiency and reduced harmful emissions from the maritime sector. Its mission is to create innovations securing sustainability and competitiveness of the maritime transport sector. By developing new knowledge, methods and technology, and by educating students, SFI Smart Maritime will contribute to strengthen the Norwegian maritime industry's international competitiveness. The centre will collaborate closely with global industry players, national and international research communities, maritime centres, networks and clusters. After an eight year running period, the centre will become a permanent part of the planned Ocean Space Center in Trondheim, Norway.

Environmental innovation

Together with Callenberg Technology Group, WWASA has been awarded the SHIPPINGInsight Award for 2015. The award recognises achievements in fleet optimisation and ship operating efficiency. Callenberg installed an integrated engineered solution on-board MV Tønsberg, capable of controlling and managing engine room equipment. The engine room – energy management technology (EMT solution) uses True Demand™ automation technology that responds to the varying conditions of the engine room. In addition to delivering energy savings, the crew can constantly monitor and verify the status of each controlled unit and ensure that the savings are sustainable. This opens more scope for benchmarking and energy optimisation.

EcoSubsea

The underwater hull cleaning company EcoSubsea, winner of the Ocean Exchange Orcelle Award and Nor-Shipping Young Entrepreneur award, both in 2013, received its permission to operate in the port of Southampton in 2014. During 2015, several of our vessels had their hulls inspected and cleaned due to excessive marine biofouling. EcoSubsea’s remote operated vehicle (ROV) technology makes the hull cleaning process effective and environmentally friendly without affecting the antifouling. Seawater used in the cleaning process circulates through filters and UV treatment systems before discharge back to sea. This method eliminates risky diving operations. Excessive emissions due to overconsumption in our fleet are cut in the process.

Shippersys

We continue the close collaboration with Shippersys AB, a joint venture between WWASA, Wallenius Lines and StormGeo.

During 2015, all of WWASA’s 29 controlled vessels had their former reporting platform replaced with the performance system solution from Shippersys. Provided with invaluable operational, environmental and weather data for our fleet, we continuously develop our performance monitoring and measurement tools. The Shippersys Optiballast tool, integrated with the ship’s loading computer, allows the crew to optimise the location of ballast in order to achieve optimal trim at a given load condition. We expect to have the the full EUKOR fleet covered in 2016.

Fleet optimisation

We optimise vessels and operations continuously. A retrofit project involving four of our ro-ro vessels was conducted in 2015. The vessels’ bulbous bows were retrofitted during normal dry-docking schedule. The data obtained so far indicate a significant reduction in fuel consumption after the retrofit. However, at year end, there is still need for further data collection in order to quantify the emission reduction following the new bulbs.

Our large car and truck carriers (LCTCs) have undergone the same careful evaluation as our ro-ro vessels, resulting in a decision to retrofit two of the vessels due for dry-dock in 2016.

Energy management

In order to widen our approach towards environmental consciousness and fleet performance, Wilhelmsen Lines Car Carriers, located in Southampton, decided to get an ISO5000 energy management certification. The process will commence and be completed in 2016. In order to capitalise on the process, identified best practices will be the basis for further evaluation of an entire fleet implementation.

Fleet renewal

Our newest addition to the fleet, MV Thermopylae and MV Thalatta, were delivered in 2015. The vessels represent our next generation pure car and truck carrieres, designed for the new Panama Canal expansion. The wider beam gives improved stability, increased cargo intake and reduced need for water ballast. Great effort and precision have been taken regarding hull form development and fuel consumption by analysing realistic operating profiles based on operational data from the Shippersys reporting solution. Propeller and rudder with rudder bulb have been designed for optimal performance in sea going condition, giving additional fuel savings. To limit SO_x emissions, exhaust gas cleaning systems (scrubbers) have been installed. The third and fourth sisters were keel-laid during 2015 at Hyundai Samho Heavy Industries in Korea and will commence service for WWL in 2016.

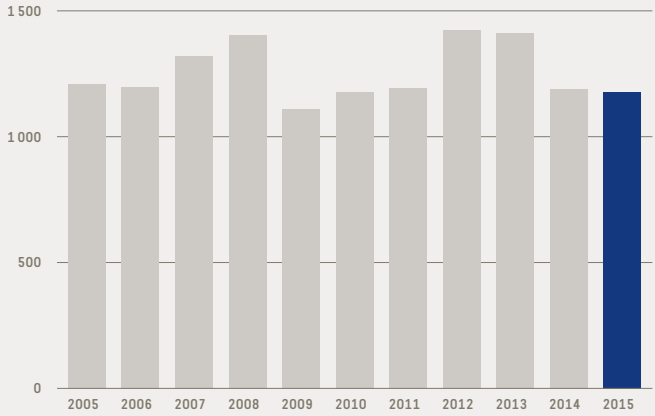
Green investments

In February 2016, NorSea Group (owned 40% by WWH) was awarded a contract by Statoil for the preparation for and assembly of the world’s first floating wind farm outside Scotland. This is in line with the pronounced strategy of being more engaged in wind projects, also shown through the acquisition of the Danish wind power company Øer. We believe the most sustainable way to make the world greener is to invest in projects that are both environment friendly and also increase the bottom line. We hope the contract with Statoil is the first step towards more business in the wind power industry.

TARGETS FOR 2016

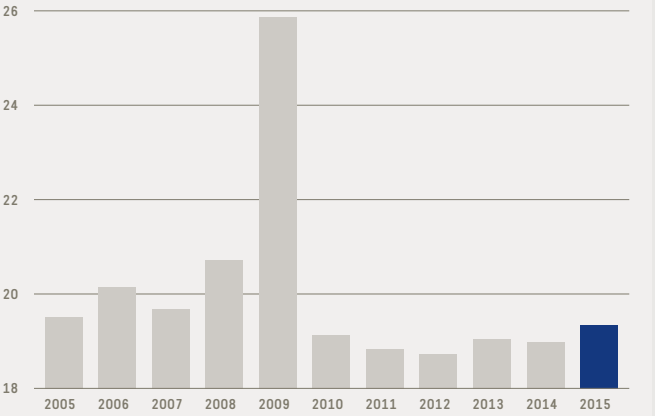
- Revise fuel oil policy
- Fleet renewal
- Install Shippersys on all EUKOR vessels to optimise performance
- Change bulb on two large car and truck carriers to reduce fuel consumption and emissions
- Energy management certification (ISO50001) for the Southampton office currently managing 14 vessels
- Report on energy management at Wilhelmsen head office
- Increase wind power activity in NorSea Group

TOTAL CO₂ EMISSIONS



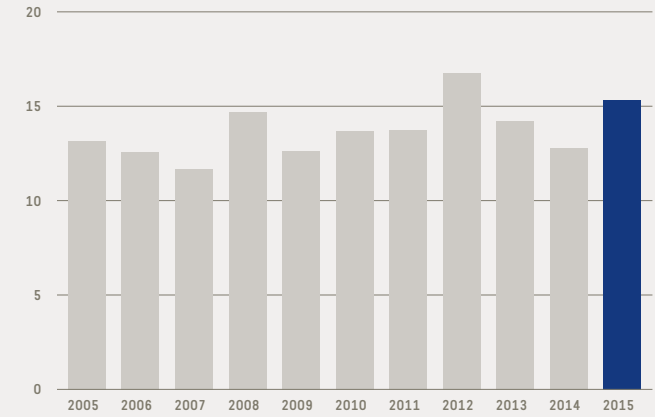
Total CO₂ emissions emitted from the WWASA fleet are based on bunker delivery notes (BDN) for all bunkerings in 2015. To obtain the actual fuel consumption, corrections for fuel remaining on-board (ROB) on 31 December 2014 and 31 December 2015 are included in the balance. Total heavy fuel oil (HFO) and marine gas oil (MGO) consumed in 2015 was respectively 322 000 metric tonnes and 54 000 metric tonnes. CO₂ emissions are based on IMO standards for HFO and MGO. Total CO₂ emissions from the WWASA fleet in 2015 was 1760 000 tonnes.

G FUEL/TONNE NM



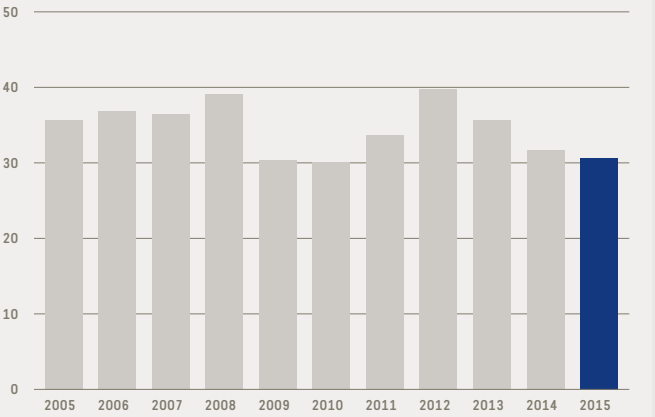
Gram fuel per tonne nautical mile is a transport efficiency indicator. The efficiency indicator g fuel/tonne nm was 19.4 for 2015.

TOTAL SO_x EMISSIONS



Total SO_x emissions emitted from the WWASA fleet are based on sulphur content in the BDNs for 2015 corrected for vessels’ ROB year-start and year-end. Average sulphur content in the fuel consumed in 2015 was 2.04% and total SO_x emitted from the WWASA fleet was 15 300 tonnes.

TOTAL NO_x EMISSIONS



Total NO_x emissions emitted from the WWASA fleet are based on total fuel consumed per vessel, based on the BDNs corrected for vessels’ ROB year-start and year-end, and engine specific NO_x emissions per kWh specified in the NO_x certificate for each engine. Total NO_x emitted from the WWASA fleet in 2015 was 30 600 tonnes.

Staying at the forefront of regulations

Major environmental regulations dealing with air pollution, greenhouse gases and invasive marine species will come into effect this decade, aiming at reducing the environmental impact of shipping. Their scope will include international, regional, country and state level regulations. Our ambition is to be at the forefront of environmental regulations, both those already implemented and those expected.

On the following pages is an overview of some major upcoming maritime environmental regulations and how we are prepared or preparing to meet them.

REGULATIONS IN THE PIPELINE

Global regulatory price of CO₂

IMO has been discussing a market-based mechanism for CO₂ emissions from shipping. Concurrently, the EU is developing a proposal to include maritime transport emissions in the EU's greenhouse gas (GHG) reduction commitments. It is also anticipated that the EU will adopt a measurement, reporting and verification requirement in the short-medium term to better quantify the scale and distribution of GHG emissions from the European fleet.

WWASA's position: Reducing fuel consumed per unit transported is the most efficient contribution to reduce CO₂ emissions, and the company works to influence IMO to form new regulations aiming to obtain a level playing field for the shipping industry. The Ship Energy Efficiency Management Plan on-board all our vessels will be the key to implement and follow-up initiatives to obtain more energy efficient operations.

Ballast water management convention

When ratified, an IMO convention will require vessels to install ballast water treatment systems at the first dry-docking one year after ratification. The convention will enter into force when at least 30 countries, comprising at least 35% of the world tonnage, have ratified it. As of 31 December 2015, 47 member states representing 34.35% of the world tonnage have ratified the convention, slightly less than needed for entry into force. However, the US implemented the convention for US waters starting 1 January 2016, meaning that all vessels entering into US waters now are required to have ballast water treatment systems in operation at the first scheduled dry-docking after this date. The US regulations require US Coast Guard (USCG) type approved ballast water treatment systems. No such type approvals were granted in 2015, and the first USCG type approved systems are expected mid-2016. As a consequence, vessels due for dry-docking in 2016 are granted an extension from USCG until their next dry-docking.

WWASA's position: We endorse ballast water treatment, and several vessels are equipped with pilot installations to find the most suitable and

reliable system for retrofit. We are following closely the development with USCG type approvals to make the right choice of equipment, meeting USCG as well as IMO standards.

The Hong Kong Convention

The 2009 Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships aims to ensure that ships, when recycled, do not pose any unnecessary risks to human health, safety or to the environment. The convention is yet to be ratified by the necessary 15 states, representing 40% of world merchant shipping. Norway was the first country to sign the convention. By end 2015, three countries had signed the convention.

WWASA's position: Our policy is that all vessels should be recycled in accordance with The Hong Kong Convention. All our vessels are issued with Inventory of Hazardous Materials/Green Passport certified by class before recycling.

Emission Control Areas

The International Convention for the Prevention of Pollution from Ships (MARPOL) defines certain sea areas as "special areas" in which, for reasons related to their oceanography, ecological conditions and sea traffic volume, require special controls for the prevention of sea pollution. Today, there are several such Emission Control Areas (ECAs) in operation in both Europe, the US and the Caribbean, covering SO_x and NO_x emissions. The major ECAs are listed below.



Source:
Exhaust Gas Cleaning
Systems Association

Designated ECAs and date of entry into force:

- 2006-05-19: Baltic Sea
- 2007-11-22: North Sea
- 2012-08-01: US and Canada
- 2014-01-01: Caribbean

ECA sulphur limits:

- 2010-07-01: Max 1.00%
- 2015-01-01: Max 0.10%

ECA NO_x Limits

- 2011-01-01: Tier II
- 2016-01-01: Tier III

In addition to the above ECAs under MARPOL, there are other environmental regulations that apply:

EU Sulphur Directive

- 2010-01-01: Max 0.1% at berth

Turkey Sulphur Regulation

- 2012-01-01: Max 0.1% at berth

Global Sulphur Limits

- 2012-01-01: Max 3.50%
- 2020-01-01*: Max 0.50%

* May be delayed until 2025, following an analysis to be finished no later than 2018

California Air Resources Board Sulphur in fuel limits (24 nm from coast):

- 2009-07-01: Max 1.5% MGO, or 0.5% MDO
- 2012-08-01: Max 1.0% MGO or 0.5% MDO
- 2014-01-01: Max 0.1% MGO/MDO

Port of Hong Kong:

- 2015-07-01: Max 0.5% at berth

New ECAs that are being established:

- Zhujiang (Pearl River) Delta
- Yangtze River Delta
- Bohai Sea

The Chinese Ministry of Transport has recently announced the introduction of measures to reduce harmful emissions from shipping on the Chinese coast. To comply with the new requirements, vessels are to use fuel oil with a sulphur content of no more than 0.5% when at berth, or other equivalent measures to reduce emissions. This will year by year be gradually extended until 2020, where the complete designated ECAs are covered.

WWASA's position: Through our low sulphur policy, we have gained vast experience with low sulphur operations. To meet the requirement of future ECAs, we are working closely within the group and with industry partners to find the most cost-efficient and environmentally sound solution. Currently there is no single solution to the sulphur challenge, and the group is engaged in a four stream approach exploring different options. One initiative is installation and testing of scrubbers on-board one of our existing vessels and installation on-board our four new vessels (two delivered in 2015). We support the Trident Alliance initiative to ensure robust enforcement of maritime sulphur regulations and are willing to collaborate to help bring it about.

Towards a corruption free industry

We have clear policies on ethics and anti-corruption. We do not tolerate any form of corruption, and we expect all employees to live up to the high ethical standards we lay down in our governing documents and code of conduct. Good business standards and performances are not something we can turn on and off at will. They are permanent, they are a commitment. They are just how we do business.

SIX PRINCIPLES GUIDING OUR ANTI-CORRUPTION EFFORTS

We follow international recognised guidelines in our anti-corruption work, such as the UK Bribery Act 2010 and the guidelines from the Ministry of Justice. The six principles outlined in these guidelines form the basis of our anti-corruption efforts.

1. Top-level commitment: We have a clearly articulated policy against corruption. Our group management team constantly communicate their commitment towards zero tolerance for any kind of corrupt activities throughout the organisation.
2. Proportionate procedures: Our anti-corruption measures are proportionate to the variation in risk we have across our diversified organisation and the various parts of the world where we operate.
3. Risk assessment: Corruption risk assessments are carried out in all our business areas, identifying whether we face a high, medium or low risk. The risk varies, depending on geographical location and the nature of the business we conduct. As an example, the risk assessment for WSS is described on [page 33](#).
4. Communication (including training): We constantly communicate the anti-corruption policy in order to make sure that our policy is understood throughout the organisation. Anti-corruption training is compulsory for all employees.
5. Due diligence: We conduct due diligence of business partners where appropriate and in a variety of forms. The comprehensiveness of the

due diligence conducted is proportionate to the risks. We utilise licensed screening systems to conduct due diligence in-house and, if necessary, source from third party consultants.

6. Monitoring and review: We acknowledge that monitoring, reviewing and reporting is challenging, yet essential to ensure effective implementation. The boards of WWASA and WWH as well as the group management team receive and review quarterly anti-corruption reports. To ensure our data are accurate, we have a number of reporting initiatives including a whistleblowing channel, giving all employees the opportunity to anonymously report irregularities, thorough investigation of complaints, audits of risk exposed areas of operation, and third party verification of our anti-corruption procedures. All potential breaches are handled according to our routines and regulatory framework.

You can find more information on our whistleblowing system, our values, our code of conduct and our anti-corruption policy on wilhelmsen.com.

INCIDENTS IN 2015

Two of WWASA's joint ventures, WWL and EUKOR, have together with the car carrying industry been under anti-trust investigations since 2012.

The authorities in Japan (2013), South Africa (2015) and China (2015) have fined WWL for anti-trust behaviour. EUKOR has been fined in China (2015). The companies continue to be part of anti-trust investigations in several jurisdictions, of which the EU and US are the bigger jurisdictions. As some of the processes are confidential, WWASA is not in a position to comment on the ongoing investigations within the respective jurisdictions. The processes are expected to continue to take time, but further clarifications within some jurisdictions are expected during 2016 and 2017.

Except for the anti-trust investigation related to the car carrying industry, no serious incidents regarding breach of our Code of Conduct leading to local or international investigations were reported in 2015.

JOINT VENTURES

Although our joint ventures, associates and available for sale assets are not part of our programme or measurements, we expect them to operate with the same high standards on ethics and compliance. The expectations are clearly conveyed through board members of the respective companies. In addition, we actively share our policies and best practice documents with our joint venture partners and operating

companies with the aim of moving towards alignment of anti-corruption standards and practices.

FOCUS IN 2015

Training

The group wide anti-corruption programme “I Comply” was rolled out in the second half of 2014. The roll out continued in 2015, with emphasis on e-learning modules, training through workshops and addressing the importance of our anti-corruption work at management conferences throughout our organisation.

In 2015, more than 5 000 seafarers went through compliance training. Despite limitations caused by the fact that seafarers sign on and off and new seafarers come into the pool, our aim is to increase the rate further in 2016.

For land based employees, the goal was 100% completion rate on the compliance training. By the turn of the year, 95% had completed the mandatory training. Lack of follow up on deadlines for new employees partly explain the underperformance. Initiatives have been put in place to ensure goal achievement in 2016.

A major step towards a corruption free industry

Historically, facilitation payments have been a big challenge within the shipping industry. In February 2015, we rolled out a zero tolerance policy on facilitation payments on all WW owned vessels in all ports around the world.

WW is also one of seven ship owning companies participating in a Suez pilot project run by the Maritime Anti-Corruption Network. The project kicked off on 9 December 2015, marking the International anti-corruption day, and will last until 9 April 2016. The purpose of the project is to implement a zero tolerance policy against handouts/gifts (facilitation payments) in Suez Canal transits.

Historically, a single Suez transit has required the handout of 40-50 cartons of cigarettes. In 2015, our records show that 32 out of 34 transits were completed without any form of facilitation payments. The only situation that allows for a deviation from our zero policy is when our employees are facing a situation where there is a health or safety threat to our crew, vessel or cargo.

The feedback from our vessels is that our anti-corruption efforts are working. They notice a change in attitude based on our zero tolerance stand, and that the “new” generation of pilots and port officials bring with them a new attitude towards the historical and cultural based demand for facilitation payments. This is a major shift in the maritime world towards a corruption free industry.

Industry partnerships

We believe in partnerships in our fight against corruption. In addition to taking part in the **Maritime Anti-Corruption Network**, we were accepted as members of **Transparency International Norway** at the beginning of 2016. Being part of their network allows us to draw on their expertise and experience with corruption in various parts of the world on how to best deal with the training needed and the challenges our personnel will face.

Last, but not least, WSM was certified by TRACE, an anti-bribery standard setting organisation, in early 2016. This demonstrates our commitment to commercial transparency and allows WSM to serve as a valued business partner to multinational companies. “By independently becoming TRACE Certified, Wilhelmsen Ship Management is helping to raise anti-bribery compliance standards across the shipping and maritime industry. We applaud them for their commitment to integrity and transparency and look forward to other ship owners and logistics companies continuing to follow their lead,” said Alexandra Wrage, president and founder of TRACE International. For further information about TRACE, please refer to their [webpage](#).

WSS is currently in the process of being TRACE certified as well, and we hope to achieve the certification in the first half of 2016.

Risk assessments

WSS, WSM, WTS, CTG and WWASA each assess risk on a business area basis.

WSS is the business area within the WW group with the highest number of land based employees, with a capacity to provide service and products to the maritime industry in 2 200 ports in 125 countries. Due to the magnitude of their operations and their exposure by operating in geographical areas where corruption in general is widespread, WSS conducted a comprehensive risk assessment in 2015. The outcome of the assessment was that the main risk factor relates to the general level of corruption in the country of operation. WSS does not operate in high risk sectors,

typically being identified as extractive, defence, and heavy engineering, where operations are linked to government approvals and the winning of licences. Therefore, the WSS exposure to the risk of “grand” corruption is low. The typical exposure would be related to facilitation payments or petty corruption. WSS’ business is predominantly of transactional nature.

WSS realises that individual breaches to our anti-corruption policy may occur regardless of how much efforts and resources are put into anti-corruption work. The focus is therefore to ensure that any system or routine breaches of the policy that potentially could accumulate into a major breach are eliminated.

Going forward

We operate in many geographical areas where corruption and bribes are still a major problem. We recognize that even if we see a move in the right direction, our efforts will have to continue and be further strengthened throughout our organisation. However, our long-term goal is firm. Our ambition is a corruption free industry.

In 2016, we will continue to focus on “living” our business standards. Learning and understanding the standards are important parts of our recruitment routines and new employees undergo mandatory ethics training.

Further, we will continue to emphasise our zero tolerance goal. We expect all our employees to say no to corruption.

For a selected and risk exposed group of employees, we will conduct competition law training. Our goal is to train 100% of the pre-defined group. Training will include eLearnings and workshops.

In 2016, our ambition is to take our monitoring one step further by carrying out internal compliance audits in order to verify and document that we “live” our zero tolerance policy.

TARGETS 2016

- Increase the number of seafarers who have completed compliance training
- 100% of land-based employees completed compliance training
- 100% of selected employees conducted competition law training
- Internal “zero tolerance” audits
- WSS to be TRACE certified

GRI index

● Full disclosure 🌙 Partial disclosure **AR:** Wilh. Wilhelmsen Holding ASA annual report **SR:** Sustainability report **WEB:** www.wilhelmsen.com

GENERAL STANDARD DISCLOSURES				
Indicator	Description	Where to find	Omissions	Disclosure
STRATEGY AND ANALYSIS				
G4-1	CEO statement on sustainability	SR p. 2		●
ORGANISATIONAL PROFILE				
G4-3	Organisation name	Wilh. Wilhelmsen Holding ASA		●
G4-4	Primary brands, products, and services	AR pp. 16-19 (directors report, performance of the group) and 126-128 (corporate structure), and WEB		●
G4-5	Location of headoffice	Lysaker, Norway		●
G4-6	Number of countries, significant countries	71 countries. For details, see AR pp. 126-132 (corporate structure), or map on WEB		●
G4-7	Nature of ownership and legal form	WWH is listed on the Oslo Stock Exchange. For a list of the 20 largest shareholders, see AR p. 90 or WEB		●
G4-8	Markets served	AR pp. 72-75 (Note 16)		●
G4-9	Scale of organisation	AR pp. 10-11 and p. 32 (income statement), and SR pp. 4-5		●
G4-10	Workforce by employment contract, gender, region, etc.	SR p. 13 and WEB	Partially due to lack of data on employment type employees/ supervised workers.	🌙
G4-11	Collective bargaining agreements	100% of seafarers. Land based employees are not covered by collective bargaining agreements.		●
G4-13	Significant changes in organisation size	WMS acquired rope manufacturer Timm. WilNor Governmental Services established (JV, ownership WWH 51%, NSG 49%). WWASA disposed of 0.5% shares in Hyundai Glovis.		●
G4-14	Addressing the precautionary approach	SR pp. 24-26		●
G4-15	Charters, principles and initiatives	WEB		●
G4-16	Organisation memberships	WEB		●

Indicator	Description	Where to find	Omissions	Disclosure
IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES				
G4-17	Entities included in financials, and in sustainability report	AR p. 16-19 (performance of the group), 37 (consolidation policies), and 126-128 (corporate structure). Joint ventures, associated companies and minotiry interest companies are not covered by the SR.		●
G4-18	Report content process and reporting principles	SR pp. 6-8		●
G4-19	Material Aspects			●
G4-20	Aspect Boundaries in organisation			●
G4-21	Aspect Boundaries outside organisation			●
G4-22	Reasons and effects of restatements	Changes in reporting on health and safety, see SR p. 16		●
G4-23	Changes in Scope and Aspect Boundaries	None. To be re-evaluated in 2016		●
STAKEHOLDER ENGAGEMENT				
G4-24	Stakeholder groups	WWH AR p. 28 (stakeholder engagement) and SR p.8		●
G4-25	Identification of stakeholders			●
G4-26	Approach to stakeholder engagement			●
G4-27	Key topics and concerns raised by stakeholders			●
REPORT PROFILE				
G4-28	Reporting period	Fiscal year 2015		●
G4-29	Date of most recent previous report	Fiscal year 2014 report published 1 April 2015		●
G4-30	Reporting cycle	Annual		●
G4-31	Contact point for questions	Group vice president corporate communications, benedicte.teigen.gude@wilhelmsen.com		●
G4-32	GRI reporting level	In accordance with GRI 4, core level. No external assurance.		●
G4-33	External assurance policy	The report has not been externally assured. DNV GL, accounting auditor PricewaterhouseCoopers AS (PWC) and stakeholder engagement is used for advice and to identify ways to improve. PWC has included the financials of the report in their Auditor report. See AR pp. 98-99		●
GOVERNANCE				
G4-34	Governance structure	AR pp. 104-115		●
ETHICS AND INTEGRETY				
G4-56	Ethics and integrity	WEB		●

SPECIFIC STANDARD DISCLOSURES				
Indicator	Description	Where to find	Omissions	Disclosure
WW & THE ENVIRONMENT				
G4-EN3	Energy consumption	SR pp. 24-27	Missing data for energy consumption on land. However, electricity/fuel consumption on land is insignificant compared to that of the fleet.	🌙
G4-EN15	Reduction of Greenhouse Gas emissions	SR pp. 24-27	Missing data for land-based operations. However, emissions on land is insignificant compared to that from the fleet.	🌙
G4-EN21	NOX, SOX, and other significant air emissions	SR pp. 24-27	Missing data for land-based operations. However, emissions on land is insignificant compared to that from the fleet.	🌙
WW AND THE COMMUNITY				
G4-DMA	Disclosure on management approach	SR p. 20		●
G4-EC1	Direct economic value generated and distributed	AR pp. 32-97 (accounts and notes), in particular p. 32 (income statement), p. 42 (note 1), pp. 49-51 (note 4), pp. 54-56 (note 6), pp. 57-59 (note 8), and SR pp. 20-23	Most of the figures are reported, however not set up as required by GRI due to business complexity and lack of reporting of local breakdown	🌙
G4-EC3	Coverage of the organisation's benefit plan obligations	AR p. 40 (pension obligations), pp. 43-48 (note 2) and pp. 57-59 (note 8) pp. 57-59 (note 8), and SR pp. 20-23		●
G4-EC7	Development and impact of infrastructure and services supported	SR pp. 20-23 and WEB		●
OUR EMPLOYEES				
G4-DMA	Disclosure on Management Approach	AR pp. 104-115 (corporate governance) and SR pp. 10-14		●
G4-EC6	Proportion of senior management hired locally	80% are hired locally (35 of 44)		●
	Definition of 'senior management'	Senior management is defined as the four highest layers of management hierchy from group CEO and group and central management teams down to business stream and regional vice presidents		
	Difinition of 'local'	Defined as hired on a local contract		
	Definition of 'significant locations of operation'	Headoffice and regional headoffices		

Indicator	Description	Where to find	Omissions	Disclosure
OUR EMPLOYEES				
G4-LA1	New employee hires and turnover	SR p. 13 and WEB		●
G4-LA4	Minimum notice periods	According to local rules and regulations. According to standard CBA for seafarers.		●
G4-LA9	Average hours of training	Four days in average for land-based employees.	Much training is directly linked to work field and position and not recorded centrally. The figures reported is substantially lower than the actual time spent on personal and professional development for each employee. Missing numbers for training per gender.	🌙
		Seafarers have extensive training throughout the year in order to be in compliance with rules and regulation and best practice.	Our systems are built to ensure proper certificates and competences for the seafarers, and not for collecting quantitative statistics such as number of training hours/days. We are therefore not able to report on the average number of training hours per year for seafarers.	
G4-LA11	Performance and development reviews	Landbased employees: 77%. Employees: 75%, managers: 85%. Female: 84%, male: 73%. Seafarers: 100%		●
HEALTH AND SAFETY				
G4-DMA	Disclosure on Management Approach	SR pp. 16-18		●
G4-LA6	Injuries, deseases, fatalities	SR pp. 16-18	Partially due to lack of group level system for registering/collecting global health and safety issues.	🌙
G4-LA8	Health and safety topics in trade union agreements	Following topics are fully covered in CBA for seafarers: Working hours, sickness and injury (incl. sick pay), compensation for disability and death, medical treatment.		●
G4-DMA	Disclosure on Management Approach	SR pp. 31-33		●

GENERAL STANDARD DISCLOSURES				
Indicator	Description	Where to find	Omissions	Disclosure
ETHICS AND ANTI-CORRUPTION				
G4-S03	Operations assessed for risk	SR pp. 31-33. Completed trainings in WW Business Standards: 5 036 of total 5 290 by the end of 2015. All geographical regions are covered.	All business areas conducts risk analysis on compliance. However, we are not currently able to provide the percentage of operations which have been assessed.	◐
G4-S04	Communication and training on anti-corruption policies and procedures	SR pp. 31-33. Completed trainings in WW Business Standards: 5 036 of total 5 290 by the end of 2015. All geographical regions are covered.	We have not yet reported on employee category and region. Those not having a company email are excluded (typically personnel working at a warehouse in a production line environment)	◐
G4-S05	Confirmed incidents of corruption and actions taken	SR pp. 31-33. There were two separate incidents of employees breaking our compliance regulations in 2015. None of the incidents involves confirmed corruption. The two cases resulted in dismissals. Both cases were reported to the board of directors.		●
G4-S07	Legal actions and their outcomes	AR p. 18 (update on anti-trust investigation)		●
G4-S08	Significant fines and sanctions	AR p. 18 (update on anti-trust investigation)		●



Do you have improvement suggestions? We are happy to receive your feedback and input!
Send to benedicte.teigen.gude@wilhelmsen.com

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