

We strive to conduct our business in a responsible and upright manner. We welcome concerns from anyone within or outside Maersk on acts made by employees, management, our board of directors and business partners linked to the Maersk operations, including third-party agents, brokers, vendors, suppliers or contractors/subcontractors.

However, before you file a report through the **Maersk Whistleblower system**, we would like to inform you of how to use the system and how the reports made through the system are handled. Please read and accept the below.

If you do not wish to accept the terms below, we are unable to accept any information through this helpline system and suggest you report the matter directly to your supervisor or manager, or to a representative of the Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation.

1. What is the Maersk Whistleblower system?

The **Maersk Whistleblower System** is a web and phone-based intake system provided by Whistleblower Security (Case IQ) to its employees, vendors, suppliers and business partners (“Reporters”) for reporting suspected serious violations of laws or regulations, or company policies.

The system is operated and administered by Case IQ, on servers hosted and operated in the European Union. Case IQ has entered into contractual commitments with Maersk to secure the information you provide in accordance with applicable law. Case IQ is merely operating on behalf of and according to instructions given by Maersk and is committed to maintaining stringent privacy and security practices, including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

If you have any questions regarding the system and how your report is handled, please contact: Maersk, Compliance team.

2. How to use the Maersk Whistleblower system?

Use of the **Maersk Whistleblower System** is entirely voluntary. You are encouraged to report possible violations and concerns directly to your supervisor or manager, or to a representative of Human Resources, Legal, or Corporate Compliance Departments. If you feel that you are unable to do so, you may use the **Maersk Whistleblower system** to make your report.

The **Maersk Whistleblower system** is a confidential online reporting system that allows you to report suspected violations of law or company policies in the following areas: fraud, corruption, foreign trade controls violations, insider trading, data privacy violation, competition law violations, breach of IT security, HSSE matters, sexual harassment or discrimination.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company’s operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from Maersk for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Knowingly providing false or misleading information will not be tolerated.

3. What personal data and information is collected and processed?

The **Maersk Whistleblower system** captures the following personal data and information that you provide when you make a report:

- (i) your name and contact details (unless you report anonymously) and whether you are employed by Maersk,
- (ii) the name and other personal data of the persons you name in your report if you provide such information; and
- (iii) a description of the alleged misconduct and the circumstances of the incident.

We encourage you to identify yourself in order for us to follow-up with questions we may have. Please note that depending on the laws of the country in which you are residing, the report may not be made anonymous.

The lawful bases:

- Is your consent given herein for processing your personal data.
- Processing is necessary for compliance with a legal obligation to which Maersk is subject.

You can withdraw your consent at any time by opting out by contacting us at Whistleblower@maersk.com. However, this will not affect our right to use personal data obtained prior to the withdrawal of your consent, or our right to continue parts of the usage based on the other legal bases than your consent.

4. How will the personal data and information be handled?

All personal data and information received through the **Maersk Whistleblower System** will be treated confidentially and will be accessible to a limited number of persons in Maersk, on a need-to-know basis.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide will on a need-to-know basis only be accessed, processed and used by the relevant personnel of Maersk, including Human Resources, Finance, Internal Audit, Legal, Corporate Compliance, management, external advisors (e.g., legal advisors), or, in limited circumstances, by technical staff at Case IQ. Those individuals may be located in the United States, the United Kingdom, or elsewhere. For further information on how we transfer personal data, reference is made to the sections “Sharing of Personal Data” and “Transfer and protection of your personal data” in our website privacy notification under the following link: <https://terms.maersk.com/privacy>.

Personal data and information you provide may also be disclosed to the relevant police and/or other enforcement or regulatory authorities. Such disclosure will take place in accordance with applicable law.

The personal data you provide will be kept as long as necessary to process your report, or, if applicable, as long as necessary to initiate sanctions or to meet our legal or financial needs.

5. Use of Artificial Intelligence (AI)

AI is used within CaseIQ only after a case is created and accessed by authorized investigators. Its purpose is limited to assist with case summarisation. The AI processes only the information provided by reporters and verified by investigators. All AI-generated summaries are reviewed and validated by investigators before use, ensuring accuracy and minimizing bias. Investigators

continue to follow Maersk's standard investigation process, including evidence gathering, interviews, and outcome determination.

All AI generated summaries are reviewed and validated by investigators before use to ensure accuracy and reduce the risk of bias. Investigators continue to follow Maersk's standard investigation procedures, including evidence gathering, interviews, and determination of outcomes.

AI features are optional and can be disabled at any time.

6. Accessing information concerning the report and your personal data

As a reporter you may request access to the information about the report and request corrections of your personal data in accordance with applicable law. To make any such corrections, please contact us at Whistleblower@maersk.com for such requests.

Maersk will promptly notify any person who is the subject of a report to the **Maersk Whistleblower system** except where notice needs to be delayed ensuring the integrity of the investigation and preservation of relevant information.

With some exceptions, the subject of the report may access information concerning the report (except for the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law.

7. Where to complain about your rights

If you believe your rights regarding personal data or the handling of your report have not been respected, you have the right to file a complaint. You may first contact the Maersk Data Privacy team at dataprivacy@maersk.com for clarification or to raise concerns related to your report or personal data. Should you wish to escalate further, or if you are unsatisfied with the resolution provided, you may submit a formal complaint to the data protection authority or regulatory body in your country of residence. These authorities are empowered to investigate concerns regarding data privacy and the handling of personal data according to local law. Contact details for the relevant authority can typically be found on the official government or regulatory websites.