

# IIA Conference – Implementing a Compliance Program

Oslo, 23.05.25



# Agenda

1. About Wallenius Wilhelmsen
2. Our Compliance Program
3. Q&A



# About WalWil



# A history of innovation and adaptation

1861

**Wilhelmsen Group**  
Founded in Tønsberg, Norway by Morten W. Wilhelmsen

1990

**American Roll-on Roll-off Carrier (ARC)** founded by Wilhelmsen Group and Wallenius Shipping

2002

**EUKOR** formed as Wilhelmsen Group and Wallenius Shipping acquires the car carrier unit Hyundai Merchant Marine

2017

Merger to create **Wallenius Wilhelmsen Logistics ASA** as a listed company incorporating EUKOR, WWL, American Roll-on Roll-off Carrier (ARC). Keen Transport acquired

1934

**Wallenius Lines**  
Founded in Stockholm, Sweden by Olof Wallenius

1999

Merger between Wilhelmsen Group and Wallenius Shipping to form **Wallenius Wilhelmsen Lines**

2006

Wallenius Wilhelmsen changes name from **Lines** to **Logistics**

2018

Group rebranded\* as **Wallenius Wilhelmsen**, to reflect the changed structure and strategy

2023

Wallenius Wilhelmsen launches **Shaper Class** newbuild program. Acquisition of Syngin Technology completed



# Our three **key** segments

## Shipping



**3.9** USD billion  
in revenues

**1.6** USDbn of  
adj. EBITDA

**Market leader** with unrivaled  
high & heavy and breakbulk  
capabilities

## Logistics



**1.2** USD billion  
in revenues

**197** USDm of  
adj. EBITDA

Customers' **preferred partner**  
for logistics, processing and  
terminal services

## Government



**427** USD million  
in revenues

**183** USDm of  
adj. EBITDA

**Dedicated** ocean transport  
and logistics services for the  
U.S. government



# Our strategy: Become an **Integrated** Supply Chain Partner

## Mission

We lead the way to connected, sustainable supply chains

## Goals



Be our customers' first choice in core businesses



Differentiate through integrated solutions



Make net zero available and affordable



Create value for stakeholders

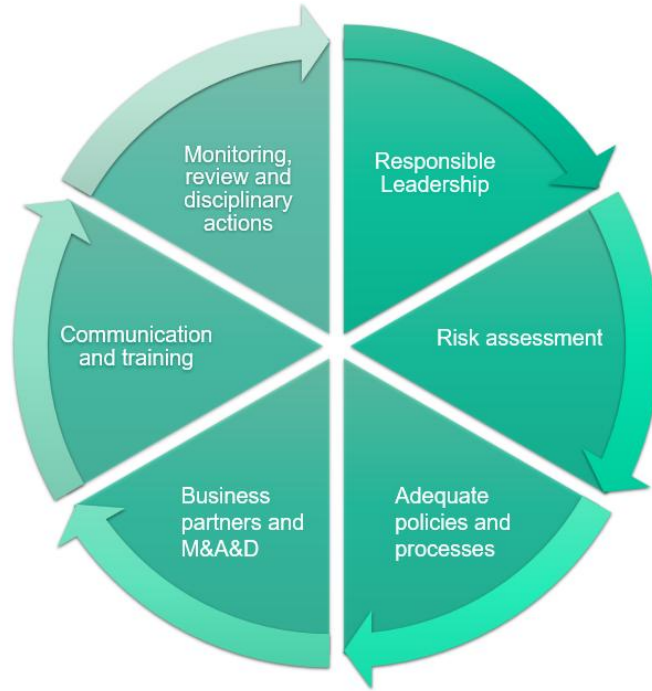
## Values

We Care — We Challenge — We Commit

# Our Compliance Program



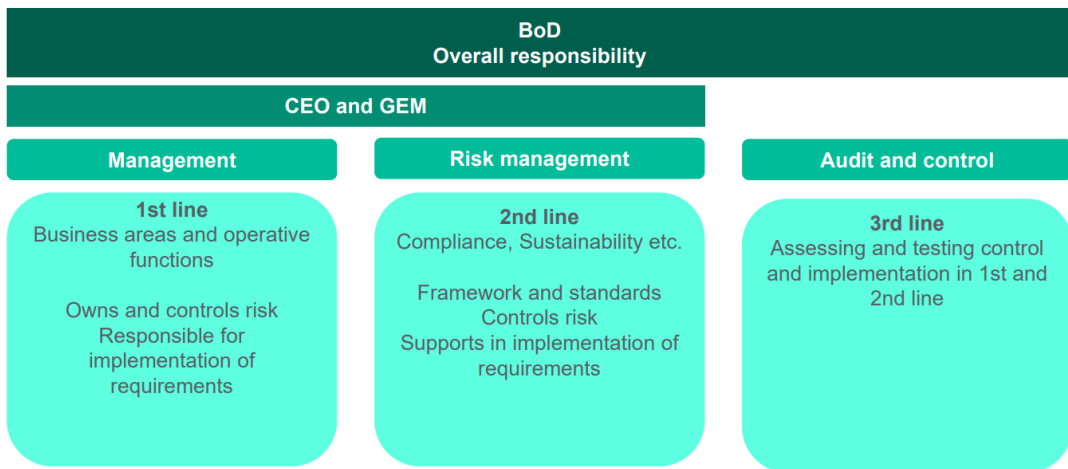
# Compliance Program – Basic Principles



## Key elements of our Compliance program

- The Compliance Action Plan is based on the key actions identified in our Compliance Risk Assessment, and aligned with the Compliance Policy
- The key elements of our company-wide Compliance Program are:
  1. *Responsible Leadership*
  2. *Risk assessment*
  3. *Adequate policies and processes*
  4. *Business partners and M&A&D*
  5. *Communication and training*
  6. *Monitoring, review and disciplinary actions*











## Resources and mandate

- The Board of Directors are ultimately responsible for overseeing the Compliance Program.
- The CEO is responsible for ensuring that an effective Compliance Program is established and implemented across the organisation.
- Tone from the top, and “walk the talk”
- Ensure adequate competency and provide support for management

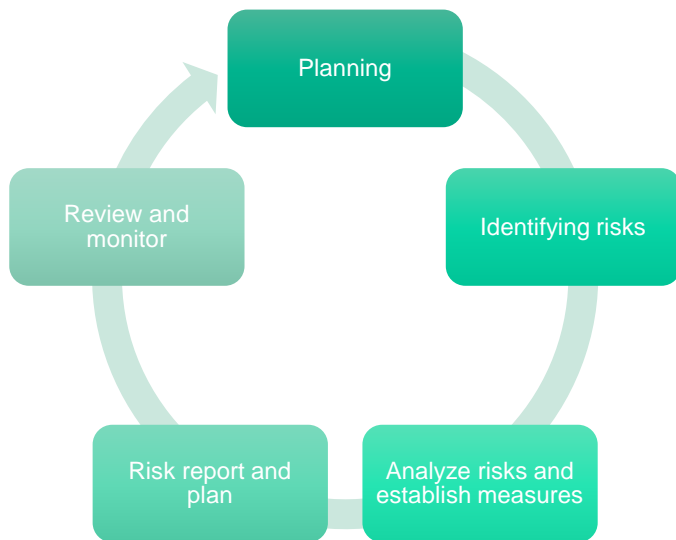
# W° Collaboration between the different defense lines

	2 <sup>nd</sup> Line of Defense		3 <sup>rd</sup> Line of Defense
	Compliance	Other	Internal Audit
 <b>Owner</b>	CECO	CSO, ERM etc.	Head of Internal Audit (atm outsourced)
 <b>Subject</b>	CoC, Sanctions, ABAC +	CSRD, Fin. Mngt +	Strategic, operational and compliance risks
 <b>Scope</b>	Local to global	Local to global	Local to global
 <b>Activities</b>	Compliance reviews	Internal controls	Audits (specific topics to global processes, maturity assessments), improvement projects
 <b>Reporting line</b>	CPO, Board	CEO, CFO, Board	CFO, BAC, BoD
 <b>Involve</b>	CSO, ERM, IA	CECO, IA, External audit	Sust. (Governance), Risk, Compliance, Accounting

We cooperate with ERM, Sustainability & IA to develop an internal assurance approach

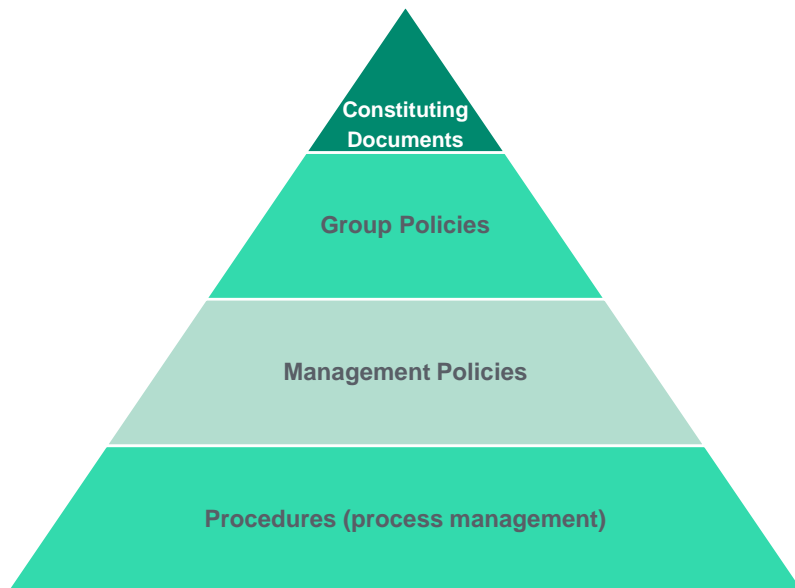
## Interaction between 2<sup>nd</sup> and 3<sup>rd</sup> line

- Compliance high on the agenda
- Risk based discussions to ensure right focus and priorities
- Some of the internal audits performed 2024-2025
  - Gifts & hospitality
  - Export control and Sanction
  - Governance and IDD of commercial agents



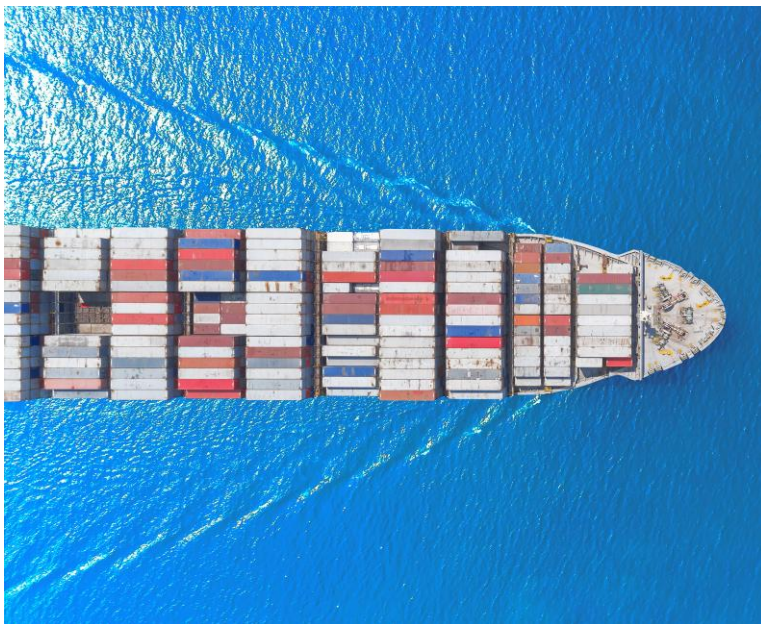
## Process for risk assessment

- Our risk assessment is the basis for “everything” – our compliance program, resources, focus areas etc.
- Includes an assessment of country and industry risk of own operations and of our business partners and suppliers, size, complexity, and own experience / legacy
- Risk topics, risk levels and actions to mitigate risks are discussed and agreed with employees and managers ensuring ownership and engagement in first line
- Risks with a high-risk level and mitigating actions are reported to the Compliance Committee and BAC



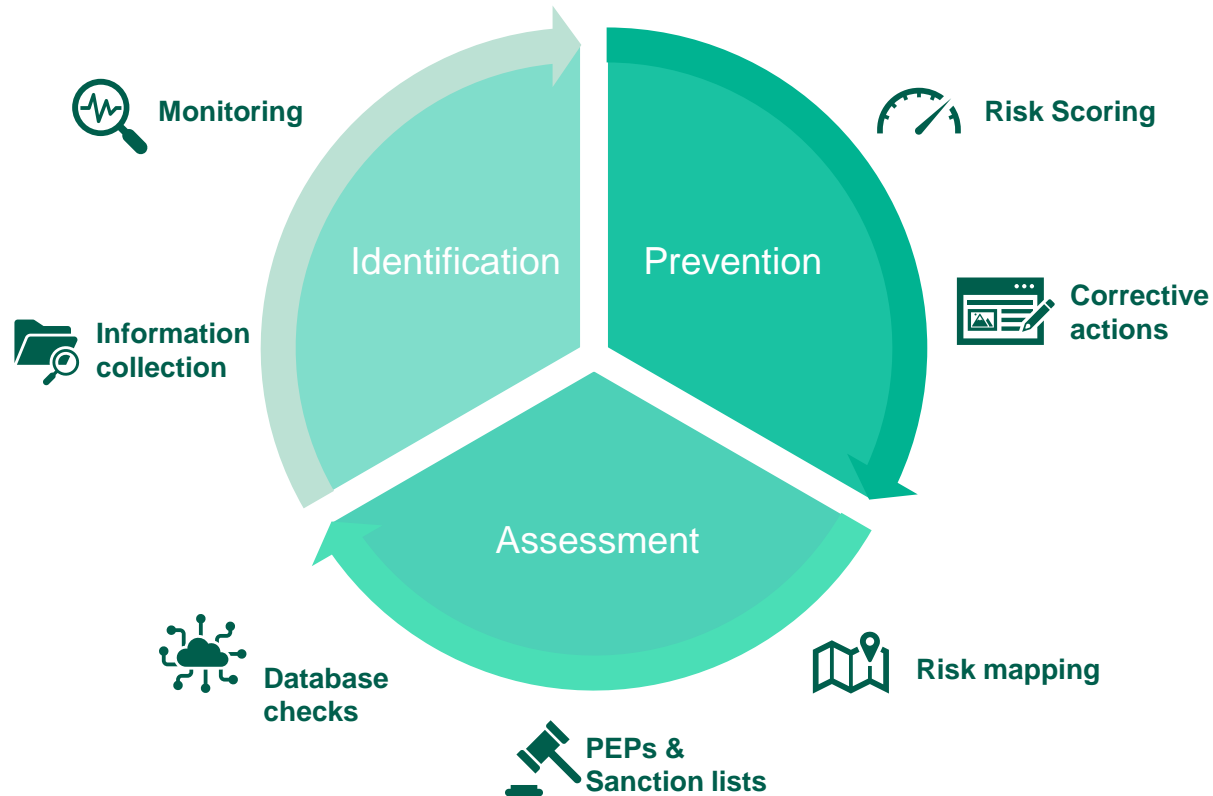
## Governance framework

- Our governance framework brings together the following
  - *Constituting Documents* provide defined roles and decision-making structures, e.g. our Code of Conduct
  - *Group and Management Policies* provide clear requirements, e.g. Compliance Policy
  - *Procedures* providing practical guidelines and processes, e.g. Gifts & Hospitality Procedure



## Process for evaluating business partners

- Risk based due diligence to ensure appropriate evaluation of our business partners, incl. customers, agents, suppliers
- Basics to ensure screening of business partners in our screening tool against sanctions lists and adverse media
- In line with our risk assessment, improved our policies and processes around
  - Export control and sanction regulations
  - IDD process for our business partners
  - Supplier Code of Conduct
  - Incorporating appropriate compliance clauses in contracts





## Communication strategy



Internal articles



Portal and SharePoint sites



Townhall sessions

## Training program



E-learning



Classroom trainings on core topics

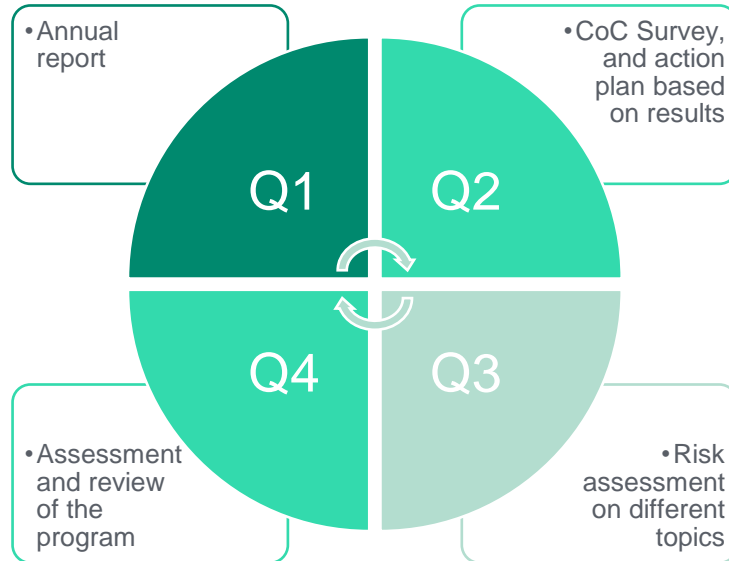


In-depth dilemma trainings

*Tone from the top*

## Creating awareness in the company

- Compliance always a point on the CEO's agenda
- Different platforms and channels for "spreading the word"
- Using lessons learned to enhance focus and understanding
- Mandatory training on core Compliance topics
- Risk-based approach towards our employees and different functions



## Are we compliant?

- Defined monitoring and review activities in our Compliance Policy
- Regular reporting to CEO, Compliance Committee and BAC/BoD
- Whistleblowing channel identifies cases which our internal control system might not be able to catch
- Global guideline for disciplinary actions





Thank you