

# WHISTLEBLOWER PROTECTION POLICY

Approved by the Supervisory Board on 09 December 2021

## 1. INTRODUCTION

Euronav NV (together with its subsidiaries, the “Company”) is committed to complying with, and requiring employees to comply with, all applicable laws, regulations, accounting standards, internal accounting controls, audit practices, the Company’s Code of Business Conduct and Ethics, and all other policies and procedures established by the Company.

## 2. GENERAL PRINCIPLES & SCOPE

The Audit and Risk Committee of the Company’s Supervisory Board (the “Board”) has adopted this policy in order to:

- encourage disclosure and investigation of improprieties before they can disrupt the business or operations of the Company or lead to serious loss;
- promote a climate of accountability with respect to Company resources; and
- ensure that no employee feels at a disadvantage in lawfully raising legitimate concerns.

Individuals are encouraged to communicate concerns, reports and complaints (hereafter: “Complaints”) regarding any questionable actions, activities or other matters outlined in this policy to their supervisor, manager or other appropriate persons within the Company. If an individual does not feel comfortable talking to any of these persons about such matters, he or she is encouraged to submit a report through the telephone and web-based compliance hotline established by the Company, as described below. Any person may submit a good faith Complaint regarding such matters without fear of dismissal or retaliation of any kind.

To the extent not specifically addressed in a particular policy of the Company, and subject to all applicable laws and regulations, this policy relates to and governs the handling of Complaints about possible violations of the following:

- the Company’s Dealing Code;
- policies and procedures established by the Company and/or the Audit and Risk Committee concerning accounting, internal accounting controls or auditing matters (together, “Financial Matters”);
- applicable laws, rules and regulations;
- the Company’s Code of Business Conduct and Ethics; and
- any other code, policy or procedure established by the Company.

The Company also refers to the existence of the “*On Board Complaint (or Grievance) Procedure*”, available to all the seagoing personnel on board of the vessels of the Company. This particular procedure encourages the seagoing personnel to address and resolve any grievance in relation to their work environment on board of the vessels, by announcing such grievances to the head of departments or the ‘Designated Person Ashore’ (DPA), in line with the International Safety Management Code, applicable on all seagoing vessels. However, the Whistleblower Protection Policy also applies to all seagoing personnel. Therefore, in case of Complaints which are covered by the Whistleblower Protection Policy and for which the individual does not feel comfortable talking to their head of departments or to the DPA of the Company, the below procedure is likewise available.

### **3. PROCEDURE FOR REPORTING**

The Company has adopted a telephone and web-based compliance hotline provided by a third party service provider for employees, officers and directors of the Company to report Complaints pursuant to this policy. Any person wishing to submit a Complaint may do so via the compliance hotline hosted by the third party and following the instructions as communicated within the company and through public channels (company public website: Euronav - Whistleblower policy).

Any Complaints submitted through the compliance hotline will be received by the service provider and forwarded in a secure way to the following individuals (as further outlined in detail hereafter):

*Chairman of the Audit and Risk Committee  
Euronav NV  
De Gerlachekaai 20  
2000 Antwerp  
Belgium*

AND

*General Counsel  
Euronav NV  
De Gerlachekaai 20  
2000 Antwerp  
Belgium*

These Complaints will be provided directly to the above individuals, or to other members of the Audit and Risk Committee. The third party service provider will not discuss with or report to any other person at any time. If a Complaint involves any of the above-referenced persons, the Complaint will be reported to the non-involved person, notwithstanding the subject matter of the Complaint.

### **4. CONFIDENTIALITY**

Wherever possible, the reporting individual should provide names, dates, places and other details necessary to facilitate an effective investigation. The Company encourages individuals to identify themselves when making a Complaint to aid in the investigation. However, any person who does not want to be identified is entitled to register a Complaint confidentially and anonymously.

The Company will treat all Complaints in a confidential manner. If a person has identified himself or herself when making a Complaint in good faith, the identity of the person who registered the Complaint will be kept confidential to the extent reasonably possible, unless disclosure is required by law or regulation.

### **5. HANDLING OF COMPLAINTS AND INVESTIGATIONS**

Subject to any specific requirements of an applicable Company policy, law or regulation or any specific request by the Audit and Risk Committee, the Company will handle Complaints and investigations in the manner described below.

## 5.1. FINANCIAL MATTERS

Any Complaint concerning Financial Matters will be brought to the attention of the Chairman of the Audit and Risk Committee (the “Audit and Risk Committee Chairman”) with a copy to the General Counsel. Upon receipt of such Complaint, the Audit and Risk Committee Chairman will undertake a preliminary investigation of the Complaint and discuss the Complaint with the General Counsel; in the alternative, the Audit and Risk Committee Chairman may appoint outside advisers or internal personnel to review, investigate, organize, collate or summarize any Complaints before he or she undertakes an investigation.

After review by the Audit and Risk Committee Chairman, he or she will discuss the findings with the other members of the Audit and Risk Committee as promptly as practicable, taking into account the nature of the Complaint, to determine whether any matters require additional investigation, a response or other treatment. If so, the Audit and Risk Committee will take action as it deems appropriate. Such action may include engaging outside advisors or, where appropriate, delegating responsibility and disposition to appropriate Company personnel. Complaints with regards to Financial Matters are timely reported to the independent auditors of Euronav.

All communications and filings received by the Audit and Risk Committee will be retained in accordance with the Company’s Record Retention Policy.

## 5.2. NON-FINANCIAL MATTERS

Any Complaint concerning non-Financial Matters will be brought to the attention of the Company’s General Counsel with a copy to the Audit and Risk Committee Chairman.

The Company’s General Counsel will undertake a preliminary investigation to determine if the information can be substantiated and, as necessary, will advise the Chairman of the Audit and Risk Committee if any further action is required to fully evaluate the Complaint. If so, the Company’s General Counsel will take action as it deems appropriate and as approved by the Chairman of the Audit and Risk Committee. Such action may include engaging outside advisors or, where appropriate, delegating responsibility and disposition to appropriate company personnel.

It will be agreed with the third party hotline service provider that it will quarterly report an overview of the communications through the hotline. Based upon this overview, the General Counsel will prepare a list of Complaints indicating their materiality. Such quarterly summary of such communications and filings will be provided to the Chairman of the Audit and Risk Committee.

All such communications and filings will be retained in accordance with the Company’s Record Retention Policy.

## 5.3. NOTIFICATION OF COMPLAINTS

The Chief Executive Officer (“CEO”) and the Chief Financial Officer (“CFO”) will be apprised by the General Counsel of the existence of any investigation and they will be kept apprised of the status of the investigation regularly and in any case prior to the end of any reporting period for which the CEO and the CFO must provide written certifications and representations to the independent auditors, the U.S. Securities and Exchange Commission or any other applicable regulatory body or official authority.

Notwithstanding the above, no person who is the subject of any Complaint or investigation, including the CEO, the CFO, the General Counsel and/or the Audit and Risk Committee Chairman, will receive notification of the Complaint.

The complainant will be given the opportunity to receive the following information on their Complaint within a reasonable time frame:

- Acknowledgement that the concern was received within seven days of receipt;
- Indication as to how the matter will be dealt with;
- An estimate of the time that it will take for a final response;
- Status of investigation.

This information will be provided in a secure way via the channels of the third party hotline service provider. The timeframe to provide reasonable feedback to the complainant shall not exceed three months from the acknowledgement of receipt.

## **6. NO RETALIATION**

The Company will not permit any negative or adverse actions to be taken against any employee or other individual because that person has made a report in good faith about any matters covered by the policy even if such report proves to be mistaken. More specifically, the Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment because of any lawful act done by the employee with respect to good faith reporting of Complaints regarding financial matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 or other applicable legal provisions. Furthermore, the Company could be subject to criminal or civil actions for acts of retaliation against employees who “blow the whistle” on U.S. securities law violations and other offenses.

Retaliation in any form against an individual who has made a report in good faith will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated and resolved. The Audit and Risk Committee will take Complaints under this policy seriously.

## **7. INTERACTION WITH OUTSIDERS**

No employee will take any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of the Company’s audit.

In addition to the Complaint procedures outlined in this policy, employees should also be aware that certain U.S. federal enforcement agencies, the FSMA and other official authorities can be authorized to review any kind of reports or information. Euronav might be obliged under certain laws and regulations to report to certain U.S. federal enforcement agencies and other official authorities.

Nothing in this policy is intended to prevent an employee from reporting relevant information to the appropriate agencies or authorities.

## **8. MALICIOUS ALLEGATIONS & SELF-DISCLOSURE**

Malicious allegations may result in disciplinary action. This policy will not protect a person from the consequences of one's own wrongdoing; however, a person's self-disclosure of wrongdoing that is not independently discovered through investigation shall be taken into account when considering the consequences to such person.

## **9. RESPONSIBILITY OF THE MANAGEMENT BOARD**

The Management Board is responsible for ensuring all personnel are aware of this Policy and procedures. They will provide the necessary information to all new employees and require ongoing information dispersion. This policy and how to report will be available on Euronav's Intranet and website. The Management Board has tasked the Internal Control Department with implementing and overseeing the whistleblowing service provider.

## **10. POLICY REVIEW**

This policy will be reviewed periodically by the Audit and Risk Committee. In addition, the Supervisory Board will ratify this policy periodically based upon recommendation of the Audit and Risk Committee, with such amendments as are deemed appropriate.

## **11. QUESTIONS**

Any questions in relation to this policy, the procedure or the handling of Complaints in general can be addressed to the Head of Internal Audit of the Company. These questions cannot relate to any specific Complaint.