


FRONTLINE

REPORT

**ENVIRONMENTAL
SOCIAL
GOVERNANCE**

2020

THIS REPORT HAS BEEN PREPARED
BASED ON THE REQUIREMENTS OF
THE SUSTAINABILITY ACCOUNTING
STANDARDS BOARD



11 913 261
DEADWEIGHT
TONNAGE

1 202
NUMBER OF SHIPBOARD
PERSONNEL

21 822
OPERATING
DAYS

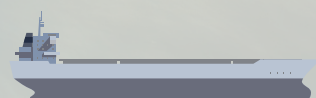
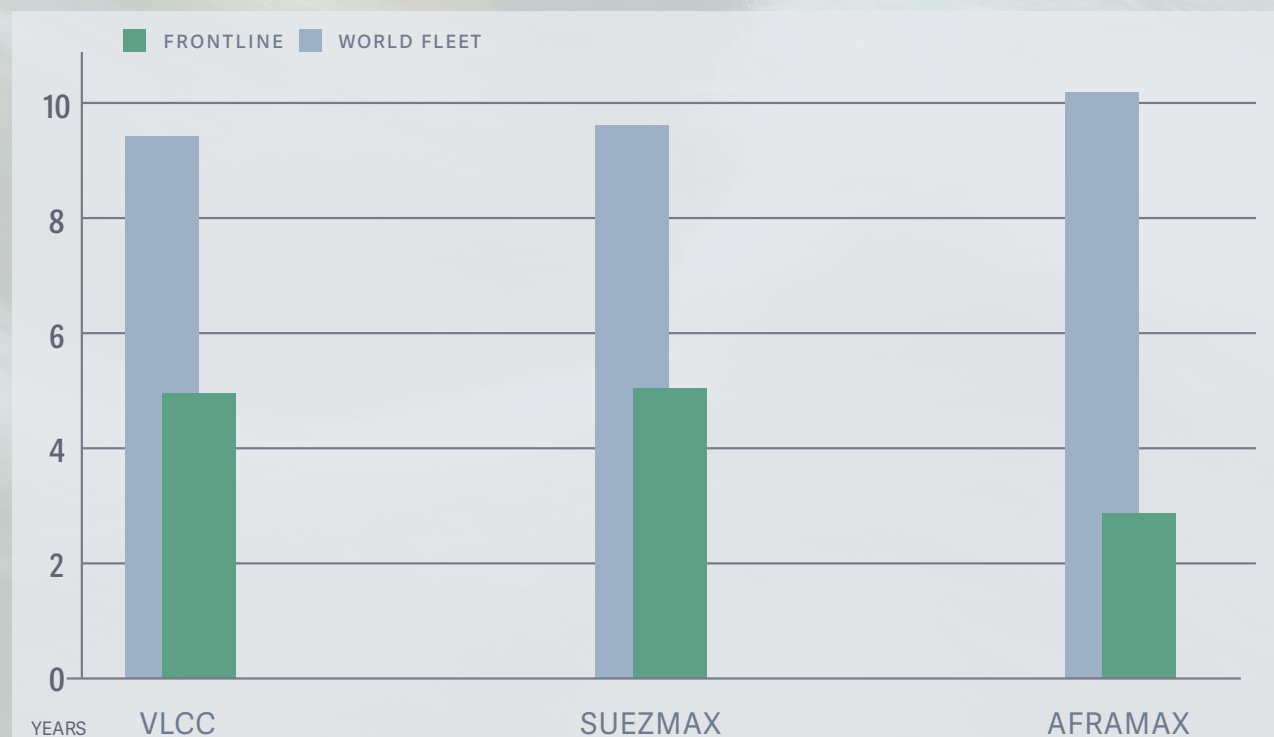
64
NUMBER OF ASSETS
IN FLEET

3 742 403
TOTAL DISTANCE TRAVELLED
BY VESSELS NAUTICAL MILES (NM)*

1 594
NUMBER OF VESSEL
PORT CALLS

Frontline Ltd. ("Frontline") is a world leader in the seaborne transportation of crude oil and refined products, with one of the largest tanker fleets in the industry. Our industry-leading modern and fuel-efficient fleet consists of Very Large Crude Carriers (VLCCs), Suezmaxes and "LR"/Aframaxes. Frontline is listed on both the New York and Oslo Stock Exchanges ("FRO").

A MODERN FLEET



1. INTRODUCTION

Over the past year we have increased our efforts to identify and address environmental, social and governance (ESG) issues. Our 2020 ESG report presents our performance and management approach to those issues.

While environmental issues have dominated ESG discussions in the shipping industry the global outbreak of the Covid-19 pandemic in 2020 seriously tested our company's ability to manage the risks (i.e. health and safety) facing our ship crew members and the societies we serve. Frontline Management had personnel and vessels in China at the beginning of the pandemic. By January 2020 we had established an Emergency Response Team to deal with the challenges of the pandemic, holding daily meetings to mitigate the direct risks arising to our people and business.

Frontline Management developed a robust procedure for safe crew transfer to prevent the virus from being brought onboard our vessels with the health risks that would entail. Furthermore, we established an Outbreak Management Plan to reduce the spread of the virus in the event of an infection, a procedure that has prevented single instances of infection from becoming large scale outbreaks. Frontline has signed the Neptune Declaration on seafarers' well-being and crew change, together with our affiliated companies Golden Ocean, Flex LNG, SFL and Avance Gas, joining approximately 700 maritime companies in efforts to ensure the health and safety of seafarers.

In our 2019 ESG report we stated that we planned to implement a digital platform to enhance our ESG management system during 2020. As planned, we rolled out our Veracity Digital Platform last year, providing us with a system that allows us to monitor, manage and report more efficiently and accurately on ESG issues. Among other things, the Veracity platform includes dashboards for environmental KPIs on carbon intensity performance*, enabling us to track "real-time" fuel efficiency and accordingly, emissions to air.

Frontline is committed to supporting the IMO's 2030 and 2050 targets for reducing GHG emissions in the shipping industry.

We have initiated an energy efficiency project – "Decarbonization journey towards IMO 2030-2050" – to provide us with a solid understanding of our options, both now and in the near future, on how to further optimize our fleet operations. DNV GL has been appointed to assist Frontline throughout the decarbonization project.

At Frontline we realize that one way or another, the cost of emitting CO₂ will rise, impacting all businesses. The drive for increased fuel-efficiency and the quest for lower-carbon and alternative fuels in shipping will accelerate. TFG Marine, a joint venture bunker company launched by Trafigura, Frontline, and Golden Ocean, conducted successful trials of a low-carbon marine biofuel in 2020. TFG recently announced that it will start offering a wide range of advanced marine biofuels from the first quarter of 2021, in the ports of Amsterdam, Rotterdam and Flushing. Our direct involvement in this venture is part of our approach to address climate-related risks. Frontline intends to remain at the forefront in pursuit of alternative fuels for the shipping sector, which is in the best interests of both our company and the planet.


The disclosures in this report aim to provide analysts and other stakeholders with material ESG information. Our report is prepared in accordance with the Marine Transportation Standard (2018) established by the Sustainability Accounting Standards Board (SASB). We have also incorporated the disclosure requirements of the UN Global compact. The report and data cover the period 1 January to 31 December 2020.





Lars H. Barstad
Interim CEO
Frontline Management AS

*Carbon intensity performance indicators include AER (Average Efficiency Ratio), EEOI (Energy Efficiency Operational Indicator), EEXI (Energy Efficiency Existing Ship Index) and EEDI (Energy Efficiency Design Index).

2. SUSTAINABILITY ACCOUNTING STANDARD DISCLOSURES

TOPIC	ACCOUNTING METRIC	UNIT OF MEASURE	DATA 2019	DATA 2020	CODE
<div></div> <div>GREENHOUSE GAS EMISSIONS</div>	CO ₂ EMISSIONS				
	Gross global Scope 1 emis- sions: Financial control ^a	Metric tons (t) CO ₂ -e	1 328 550	1849822	TR-MT-110a.1
	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of perfor- mance against those targets	See page 11-12			TR-MT-110a.2
	Scope 2 emissions: purchased electricity ^b	Metric tons (t) CO ₂ -e	Not reported	5.1	Additional
	ENERGY CONSUMED				
	(1) total energy consumed	Gigajoules (GJ), Percentage (%)	20 387 685 100%	24 200 992 100%	TR-MT-110a.3
	(2) percentage heavy fuel oil	Gigajoules (GJ), Percentage (%)	19 100 688 94%	9922 407 41%^a	
	EEDI				
	Average Energy Efficiency Design Index (EEDI) for new ships ^c	Grammes of CO ₂ per ton-nautical mile	2.2	Average for new vessels: 2.43 Fleet average: 2.77	TR-MT-110a.4
	AER				
	Annual Efficiency Ratio (AER)	Grammes of CO ₂ /DWTnm	3.5	Aframax: 4.24 Suezmax: 2.89 VLCC: 2.12	Non-SASB: Optional
AIR QUALITY	OTHER EMISSIONS TO AIR				
	(1) NO _x (excluding N ₂ O) ^d	Metric tonnes (t)	40 258	48 188	TR-MT-120a.1
	(2) SO _x ^d	Metric tonnes (t)	24 795	5 302	
	(3) particulate matter ^d	Metric tonnes (t)	3 216	2 325	
ECOLOGICAL IMPACTS	MARINE PROTECTED AREAS				
	Shipping duration in marine protected areas or areas of protected conservation status ^e	Number of travel days	945	218	TR-MT-160a.1
	IMPLEMENTED BALLAST WATER				
	(1) exchange ^f	Percentage (%)	79%	11%	TR-MT-160a.2
	(2) treatment ^f	Percentage (%)	75%	89%	
	SPILLS AND RELEASES TO THE ENVIRONMENT				
	(1) number ^g	Number	0	0^g	TR-MT-160a.3
	(2) aggregate volume ^g	Cubic meters (m ³)	0	0	

TOPIC	ACCOUNTING METRIC	UNIT OF MEASURE	DATA 2019	DATA 2020	CODE
 BUSINESS ETHICS	CORRUPTION INDEX				
	Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index ^h	Number	295	265	TR-MT-510a.1
	CORRUPTION				
	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	Reporting currency	0	0	TR-MT-510a.2
	FACILITATION PAYMENTS				
	Number of incidents where bribes have been requested	Number	Not reported	0	Additional
	FINES AND SANCTIONS				
	Number of fines and total monetary value of fines	Number and reporting currency	Not reported	0	Additional
Non-monetary sanctions for non-compliance with laws and/or regulations	Number	Not reported	0	Additional	
EMPLOYEE HEALTH & SAFETY	LOST TIME INCIDENT RATE				
	Lost time incident rate (LTIR)	Rate	0.65	0.50	TR-MT-320a.1
 ACCIDENT & SAFETY MANAGEMENT	MARINE CASUALTIES				
	Incidents ⁱ	Number	1	1	TR-MT-540a.1
	Very serious marine casualties ^k	Percentage (%)	0	0	
	CONDITIONS OF CLASS				
	Number of Conditions of Class or Recommendations ^l	Number	0	0 ^k	TR-MT-320a.1
	PORT STATE CONTROL				
	(1) deficiencies ^m	Rate	0.48	0.28	TR-MT-540a.3
	(2) detentions ^m	Number	0	0	
DIVERSITY	GENDER DIVERSITY				
	Number of individuals in the organization's governance bodies by gender	Number	Not reported	Male: 4 Female: 0	Additional
	Number of employees by gender [not shipboard personnel]	Number	Not reported	Male: 54 Female: 27	

SASB ACTIVITY METRIC	UNIT OF MEASURE	DATA 2019	DATA 2020	CODE
Number of shipboard employees ^a	Number	1 236	1 202	TR-MT-000.A
Total distance travelled by vessels ^a	Nautical miles (nm)	2 982 899	3 742 403	TR-MT-000.B
Operating days ^a	Days	17 664	21 822	TR-MT-000.C
Deadweight tonnage	Deadweight tons	9 954.085	11 913.261	TR-MT-000.D
Number of vessels in total shipping fleet ^a	Number	52	64	TR-MT-000.E
Number of vessel port calls ^a	Number	1 281	1 594	TR-MT-000.F
Twenty-foot equivalent unit (TEU) capacity	TEU	Not applicable	Not applicable	TR-MT-000.G

Please see chapter 7 for assumptions regarding the SASB disclosures, and specific comments referred to above

“We currently run one of the youngest and most energy efficient fleets in the industry.”

Lars H. Barstad,
Interim CEO, Frontline Management AS



3. SUSTAINABILITY GOVERNANCE

To Frontline, clear guidance and robust control mechanisms are essential to safeguard the proper handling of risks related to sustainability, e.g. emissions, spills, health & safety and corruption in our daily operations. We have established policies and control processes to manage our employees and partners, to ensure compliance with all applicable international and local laws and regulations.

Our digital ESG management module, Veracity, was implemented in 2020. The module allows for closer monitoring, management and reporting on ESG issues in an effective and accurate manner. By using the insights and support functions within the Veracity platform, we are able to effectively communicate on ESG topics, both internally and externally with our ship management companies. This has enabled the full integration of ESG management within our business.

By the end of 2021, Frontline aims to have captured all our ship performance data in our digital ESG management system. This work will lay the foundation for setting targets with associated KPIs on energy efficiency, for the short-, medium and long term. Frontline will also establish a strategy on the use of alternative fuels.

In March 2021, the Securities and Exchange Commission (SEC) announced the creation of a Climate and ESG task force, signaling its intention to increase its focus on ESG matters. The initial focus of the task force includes potential material gaps or misstatements in issuers’ disclosure of climate risks under existing rules. Frontline actively monitors these developments: We are reporting on our material ESG topics as defined by SASB, highlighting climate-related risks, both physical and transition risks, and potential impacts on our operations.

GOVERNANCE AND COMPLIANCE

The Board of Directors (BoD) is responsible for our Code of Conduct and oversees Frontline’s ESG strategy. The BoD is responsible for ensuring that appropriate and effective ESG related risk management and internal control systems are in place, and that our corporate governance framework is reviewed annually. In line with the Norwegian Corporate Governance Code, the BoD has throughout the year considered important ESG matters and has reviewed our annual ESG report.

The Chief Executive Officer (CEO) carries the responsibility for all activities of Frontline, while our technical managers are the first in line to handle incidents. Our subsidiary Frontline Management AS is our fleet manager and outsources crewing and ship management to several leading third-party ship management companies. The third-party managers are supervised, closely monitored and assessed by the fleet managers at Frontline Management AS. Our fleet managers host trainings and seminars regularly throughout the year to ensure that our staff and crew are equipped to carry out their work in a diligent and safe manner.

In August 2020, Frontline onboarded a dedicated Compliance Officer, responsible for implementing and maintaining the companies’ Compliance Programmes. This includes implementing policies and procedures mitigating the risks of our industry and operations, annual risk assessments, training of employees and management, third party audits, internal systems and controls, remediation and investigations. We updated all our policies and procedures in 2020, some of which were minor adjustments in exiting policies and some new policies were implemented such as the Sanctions Policy and the Know Your Business Partner Policy.

All our employees are to abide by the established policies to guide them in conducting their daily assignments for Frontline. The Audit Committee monitors reports and complaints received by the company relating to internal controls and compliance. All incidents are reported to the BoD in an annual review. Substantial impact cases are reported directly to the BoD as instructed in our Code of Conduct.

COOPERATION INITIATIVES

In 2020, Frontline, together with Avance Gas, Flex LNG, Golden Ocean and SFL established an ESG forum. Its purpose is to share best business practice regarding ESG issues, and collaborate to implement standards that allow for better decision making at management and board level. We believe that complex sustainability challenges require joint action from several stakeholders - including industry and regulatory authorities. To this end, we support The Neptune Declaration, the Maritime Anti-Corruption Network (MACN), the Clean Shipping Alliance, and the International Association of Independent Tanker Owners (Intertanko). We also comply with the requirements of Oil Companies International Marine (OCIMF).

MATERIAL ISSUE	INTERNAL GOVERNANCE DOCUMENTS	INTERNATIONAL STANDARDS AND REFERENCES
Climate change	Environmental Policy	The Paris Agreement The Intergovernmental Panel on Climate Change (IPCC) Initial IMO Strategy on Reduction of GHG Emissions from Ships
Air emissions	Environmental Policy	IMO MARPOL Convention Annex VI EU Sulphur Directive 2016/802 UNCLOS
Ecological impact	Environmental Policy Ship Recycling Policy	UN Global Compact IMO MARPOL Convention Annex VI IMO Ballast Water Management Convention Hong Kong Convention
Anti-Corruption	Corporate Code of Business Ethics and Conduct Financial Crime Policy Know Your Business Partner Policy Sanction Policy	UN Global Compact The US Foreign Corrupt Practices Act and the UK Bribery Act
Sanctions	Sanction Policy	US, UN, UK and EU sanctions
Employee Health & Safety	Corporate Code of Business Ethics and Conduct Ship Recycling Policy	UN Global Compact ILO Conventions Maritime Labour Convention, 2006 (MLC, 2006) International Management Code for the Safe Operation of Ships and for Pollution Prevention (The ISM Code) Hong Kong Convention Marine Crew Resource Management
Accident & Safety Management	Corporate Code of Business Ethics and Conduct Know Your Business Partner Policy	International Management Code for the Safe Operation of Ships and for Pollution Prevention (The ISM Code) Marine Crew Resource Management



As part of addressing sustainability in a broader perspective, we have identified three of the UN Sustainable Development Goals (SDGs) where we believe Frontline can contribute: We have selected SDG 13, 14 and 16 as these goals are closely tied to the industry we are a part of and they represent material issues that we monitor – please see sections four and six for more information. Contributing to the broader global agenda of achieving the SDGs is in our interest as they affect our business, customers, suppliers, investors and regulators who we depend on.





4. ENVIRONMENT

For the shipping industry, emissions, as well as any discharges and spills, present environmental and ecological risks which must be managed carefully. These factors have potentially significant implications for air and water quality, and marine biodiversity, if precautionary measures are not taken. At Frontline, we recognise our responsibility to manage our environmental impact. Our diligent monitoring and management of such risks are vital for protecting the environment, as well as being fundamental to the success of our business.

GREENHOUSE GAS EMISSIONS AND AIR QUALITY

Attention to climate change and air quality continued to grow in 2020. This was also reflected in emerging requirements from the financial community and strengthened regulations. Based on the importance of the shipping industry in world trade and its effect on global social and economic development, the sector is seen as an essential contributor to sustainable development. The Covid-19 pandemic caused significant changes to our sailing patterns, e.g. due to off-schedule crew changes, and our carbon foot print was negatively affected by this.

Frontline continues to invest in the expansion and modernisation of our fleet, and we own 17.3 percent of the company Clean Marine, a world class supplier of exhaust gas cleaning systems for the shipping industry. Securing access to leading technology in the field has played an important role in achieving the IMO 2020 Sulphur compliance. Last year, scrubber instalments covered 47 percent of our fleet.

Frontline intends to contribute to the IMO 2030 Strategy aiming to reduce CO₂ emissions per transport work by at least 40 percent by 2030, compared to 2008 levels. Emissions are directly linked to fuel consumption, and our focus has therefore been on:

- hulls designed for reduced resistance
- improving vessel fuels
- cleaning systems (hull, propellers)
- voyage efficiency
- engine technology and optimisation

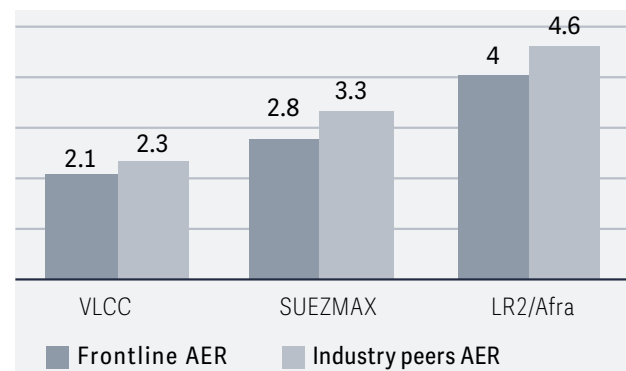
Due to the pandemic, Frontline actively deviated numerous vessels off-course to repatriate its crew members and perform crew changes. This negatively contributed to our fuel efficiency and increased our CO₂ emissions.

We see ESG management as fundamental to ensure actual progress. In 2020, we implemented a digital platform to track vessel fuel efficiency. First-hand tracking of each of our vessels' emissions and energy consumption are an important tool to monitor efficiency and emissions in accordance with regulations and our own targets.

During the last year, we initiated our energy efficiency project: "Decarbonization journey towards IMO 2030-2050". The purpose of this project is to provide Frontline with a solid understanding of our options, both now and in the near future, on how to further optimize our operations and fleet towards more energy efficient and sustainable operations applying a systematic approach. DNV GL has been appointed to assist us throughout this project. By end 2021, we intend to have:

- fully digitalized our ship performance data into our digital monitoring platform, Veracity
- set targets with associated KPIs on energy efficiency both for short and long term
- established a strategy on the implementation of alternative fuels.

The oil tankers we own are on average less than 5.5 years old, this indicates that we are operating one of the youngest and most energy efficient fleets in the industry.¹ We will continue to enhance and develop energy efficiency measures – this is in line with our overall company strategy, as reducing fuel consumption is both environmentally and financially beneficial. Through our ESG management platform, Veracity, we monitor environmental KPIs including AER, EEOI, EEXI and EEDI. In 2020, Frontline's average annual efficiency ratio (AER) was lower than industry peers for all three vessel segments (LR2, Suezmax and VLCC).²



Through our efforts to lower our fleet's CO₂ emissions by increasing efficiency and upgrading engine technology, Frontline supports UN SDG 13 – targeting the global fight against climate change, which is the basis for the IMO 2030 strategy.



ECOLOGICAL IMPACTS

Emissions, discharges and potential spills present environmental impact risks and reputational and operating risks for Frontline. Our ability to manage these risks is critical to our environmental performance and licence to operate.

Frontline reviews all identified environmental risks, allowing us to establish appropriate safeguards. We have monitoring and management tools in place to minimise the environmental impact of our activities, in accordance with international and local regulations. Our fleet managers formally supervise the third-party ship managers through quarterly performance review meetings to ensure compliance and to follow up on any corrective measures that are imposed on them. An annual audit is performed by the ship's Classification Society according to the ISM Code and where appropriate ISO 9001 and ISO 14001.

Oil spills may have serious and long-lasting negative impacts on the ecosystem. Frontline has preventive measures and procedures in place to reduce the risk of spills. Frontline experienced zero oil spills or other types of releases to the environment in 2020.

The process of loading and unloading untreated ballast water poses serious ecological, economic and health risks, as ships become a vector for the transfer of organisms between ecosystems. Frontline treats its ecological risks seriously, and as at 31 December 2020, 89 percent of our vessels have installed ballast water treatment systems (BWTS). We are following a BWTS instalment plan in line with the IMO Ballast Water Management Convention³, which covers our entire fleet.

A ship may contain potential hazardous waste which must be recycled under safe conditions with respect to human health, safety and the environment. The Hong Kong Convention aims to ensure that ships, when recycled after reaching the end of their operational lives, do not pose a risk to safety of workers or to the environment. As mentioned previously, Frontline has a young fleet. Recycling of vessels is therefore not currently relevant. However, Frontline has developed a Ship Recycling Policy to ensure that future recycling of Frontline's ships may only take place at an approved yard compliant with the Hong Kong Convention and in alignment with the 10 UN Global Compact principles.

We have identified SDG 14 – Life below water – as relevant for our operations, and target 14.C is aimed at enhancing the conservation and sustainable use of oceans and their resources by implementing international law. Our crew members are trained in and must follow our stringent rules for avoiding spills at any time.



ACCOUNTING METRIC	UNIT OF MEASURE	DATA 2020
CO ₂ EMISSIONS		
Gross global Scope 1 emissions	Metric tonnes (t) CO ₂ -e	1 849 822
ENERGY CONSUMED		
(1) total energy consumed	Gigajoules (GJ), Percentage (%)	24 200 992 100%
(2) percentage heavy fuel oil	Gigajoules (GJ), Percentage (%)	9 922 407 41%
EEDI		
Average Energy Efficiency Design Index (EEDI) for new ships	Grammes of CO ₂ per ton-nautical mile	Average for new vessels: 2.43 Fleet average: 2.77
OTHER EMISSIONS TO AIR		
1) NO _x (excluding N ₂ O)	Metric tonnes (t)	48 188
(2) SO _x	Metric tonnes (t)	5 302
(3) particulate matter	Metric tonnes (t)	2 325
MARINE PROTECTED AREAS		
Shipping duration in marine protected areas or areas of protected conservation status	Number of travel days	218
IMPLEMENTED BALLAST WATER		
(1) exchange	Percentage (%)	11 %
(2) treatment	Percentage (%)	89 %
SPILLS AND RELEASES TO THE ENVIRONMENT		
(1) number	Number	0
(1) aggregate volume	Cubic meters (m ³)	0

¹ World average age of oil tankers is 18.77: https://unctad.org/system/files/official-document/rmt2020_en.pdf
² "FL" figures retrieved from Veracity, Industry average as presented in the DNV phase 1 report
³ [http://www.imo.org/en/About/Conventions/ListOfConventions/Pages/International-Convention-for-the-Control-and-Management-of-Ships'-Ballast-Water-and-Sediments-\(BWM\).aspx](http://www.imo.org/en/About/Conventions/ListOfConventions/Pages/International-Convention-for-the-Control-and-Management-of-Ships'-Ballast-Water-and-Sediments-(BWM).aspx)



5. HEALTH & SAFETY

At Frontline, the safety of our employees is our number one priority. A strong emphasis on health and safety, both onshore and offshore, positively affects the long-term performance of our company.

COVID-19 PANDEMIC

The past year has been challenging due to the Covid-19 pandemic, which has highlighted the importance of solid procedures and management systems. Varied infection control regulations and procedures between jurisdictions has made crew changes difficult for the entire sector, leaving many stranded seafarers working aboard ships beyond the expiry of their contracts. The potential implications of this situation include negative consequences for both mental and physical health of seafarers.

Recognising our responsibility to improve the situation, Frontline signed the Neptune Declaration on Seafarer Wellbeing and Crew Change.⁴ The declaration defines four main actions to address the challenges faced by the pandemic:

- recognise seafarers as key workers and give them priority access to Covid-19 vaccines
- establish and implement gold standard health protocols based on existing best practice
- increase collaboration between ship operators and charterers to facilitate crew changes
- ensure air connectivity between key maritime hubs for seafarers.



**The Neptune Declaration
on Seafarer Wellbeing
and Crew Change**

Frontline Management had personnel and vessels in China at the beginning of the pandemic, and by January 2020 the company's Emergency Response Team (ERT) was assembled. Daily ERT meetings ensured that the challenges of the pandemic were dealt with in a timely manner. The overriding challenge in the pandemic has been the issues related to safe crew transfer. To handle these Frontline Management set up a CEO's forum to address the challenges strategically and at the right levels.

We have been able to keep our offices open at all time and with a rotational routine amongst employees to manage the risk of anyone being infected by Covid-19. Strict routines for hygiene are implemented and all external visitors are prohibited. Although the pandemic has proven to be challenging, Frontline Management has shown it is able to respond swiftly to crises and can adapt working practices as well as priorities. The duration of the pandemic also means that we have

been able to turn crisis management into a new normal, establishing robust new working practices and procedures to handle the more uncertain working environment we now live in.

We have successfully managed to establish remote communication links to all colleagues, within our company as well as within all ship managers. During the pandemic, we

have carried out Class & Flag and Ship Inspection Report Programmes (SIRE) remotely. Frontline increased the broadband capabilities to make this possible, and this also enhanced our crew members' access to communicate with their families at home.

⁴ <https://www.globalmaritimeforum.org/neptune-declaration/>





HEALTH AND SAFETY

There are inherent safety and security risks related to operations at sea that must be managed carefully to safeguard crew, vessel, the cargo and the environment. Frontline has a zero-accident ambition and operates according to the ISM Code.

Frontline Management is a committed member of Maritime Partners in Safety and requires that all ship managers commit to and follow the programme. The comprehensive programme has content for crew, shore and management and aims to support a strong safety culture. Frontline Management also supports the managers in their individual campaigns on HSE, wellbeing and mental health.

We have implemented risk assessment systems to review all identified health and safety risks to our ships and personnel, establishing appropriate procedures. Our fleet managers formally supervise our third-party ship managers through quarterly performance review meetings where all performance criteria, including safety matters, are assessed to ensure compliance. Every month we bring all third-party ship managers together for thematic seminars to facilitate knowledge sharing and training. Furthermore, representatives from our fleet manager’s technical team meet with all third-party ship managers on a monthly basis to review all incidents related to safety.

All accidents, incidents and near misses are reported and proactive measures are taken to ensure that we encourage our crew to report these with no hesitation and with support of their managers. Our third-party ship managers are regularly supervised and formally audited annually.

Regrettably, on the 13th of January 2020, Frontline was notified that a person was missing from Front Clipper. The vessel performed ‘Man over Board’ procedures as part of a rescue attempt to locate and retrieve the person. It was with great sadness we learned that these efforts were unsuccessful. A thorough investigation was undertaken, and evidence indicates that the person took his own life.

The tragic incident on Front Clipper, taking place in early January, was unrelated to the pandemic but served as a reminder of the pressures some feel whilst at sea, and the importance of providing crew with services they can utilise whilst onboard. As the pandemic evolved in 2020 we therefore worked with our Ship Managers to strengthen initiatives aimed at supporting crew mental health and we ensured that all crew had access to mental health hotlines. Our work in this area will continue in 2021.



A detailed analysis of accidents and incidents for the entire fleet is prepared for Frontline by SeaTech Safety in accordance with the OCIMF guidelines on Lost Time Incidents (see LTIR in the table) and Total Recordable Cases and Frequency (TRC and TRCF). The reports allow us to identify the root causes of these reported incidents, and functions as a tool for future improvement of our operations. Our Lost Time Incident Rate was 0.5 in 2020, down from 0.65 in 2019.

HUMAN RESOURCES AND DIVERSITY

Our employees are to abide by the values and guidelines set out in our Corporate Code of Business Ethics and Conduct. Frontline prohibits discrimination against any employee or any other person on the basis of sex, race, colour, age, religion, sexual preference, marital status, national origin, disability, ancestry, political opinion, or any other basis. We take any deviation from external regulations or our own guidelines seriously. Any deviation, or suspicion of deviation, is encouraged to be reported directly to the closest manager or through our telephone or web-based compliance hotline – the latter is described in our Complaints Procedure.

HUMAN RIGHTS

We are dedicated to respecting internationally recognised human rights as laid out in the UN Guiding Principles on Business and Human Rights (UNGP). Respect for human rights is rooted in our values and key to our license to operate from

employees, customers, investors, communities, governments and other stakeholders. As an international company working with suppliers all over the world we take our responsibility seriously, and in 2020 we developed and implemented a Know Your Business Partner Policy to address human rights related issues in a more targeted manner.

EMPLOYEE HEALTH & SAFETY	UNIT OF MEASURE	DATA 2020
LOST TIME INCIDENT RATE		
Lost time incident rate (LTIR)	Rate	0.50
MARINE CASUALTIES		
Incidents	Number	1
Very serious marine casualties	Percentage (%)	0
CONDITIONS OF CLASS		
Number of Conditions of Class or Recommendations	Number	0
PORT STATE CONTROL		
(1) deficiencies	Rate	0.28
(2) detentions	Number	0



6. ANTI-CORRUPTION AND BUSINESS ETHICS

Frontline is determined to continue to conduct our business in an honest and ethical manner. Our commitment is outlined in our Corporate Code of Business Ethics and Conduct. Our Financial Crime Policy further commits us to the most stringent rules and regulations and is aligned with NYSE's guidelines.

The effects of corruption are profound. It undermines economic and social development and impedes sustainable progress. For companies in the shipping industry, corruption is potentially threatening the safety of the crew, poses legal and reputational risks while also leading to increased costs. Frontline has a zero-tolerance policy towards bribery as stated in our Corporate Code of Business Ethics and Conduct and our Financial Crime Policy. Our anti-corruption and money laundering policies are modelled on the UK Bribery Act and US Foreign Corrupt Practices Act (FCPA). The policies apply to all entities controlled by Frontline's officers, directors, employees as well as workers and third-party consultants, wherever they are located. Assessing and monitoring business processes, training and controls are fundamental tools in implementing our anti-corruption policy.

Our Corporate Code of Business Ethics and Conduct describes our requirements and expectations relating to: Compliance with Laws and Regulations; Honest and Fair Dealing; Conflict of Interest and Corporate Opportunity; Anticorruption; Confidentiality and Privacy; Proper use of Company assets; Anti-discrimination and Harassment; and Integrity of corporate records. The Code obliges employees who observe or become aware of a situation they believe to be in violation of the Code to promptly notify their manager and specifies how violations are managed. Frontline was not involved in any legal proceedings associated with bribery, corruption or anti-competition in 2020.

As part of our Financial Crime Policy and associated compliance procedures, appropriate risk-based communication and training is provided to employees as part of their onboarding and ongoing development. Suspected deviations from our policy are to be reported to the line manager or by making use of our compliance hotline as outlined in our Complaints Procedure.



Tackling systemic integrity challenges requires collective action. Through the Marine Anti-Corruption Network (MACN), Frontline has joined forces with other members of the shipping industry to share information and approaches, but also to engage with authorities and civil society. The core of the MACN collective approach is that successful, lasting changes in the operating environment will take effect only if they are enabled and supported by, and beneficial to, key stakeholders.



Through joint action, MACN members collaborate with local authorities to develop solutions that are beneficial to all parties and realistic to implement. In MACN collective action projects, member companies unite with stakeholders including port and customs authorities, NGOs, and local governments to undertake root cause analyses and then implement a range of 'recommended actions' that tackle corruption in ports and across the maritime supply chain.



BUSINESS ETHICS	UNIT OF MEASURE	DATA
CORRUPTION INDEX		
Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Number	265
CORRUPTION		
Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	Reporting currency	0



All Frontline’s ships are registered with The Environmental Ship Index (ESI) supported by the World Ports Sustainability Program. The ESI is a voluntary system designed to improve the environmental performance of sea going vessels and gives a numerical representation of the environmental performance of ships regarding air pollutants and CO₂ emissions. The index only scores ships that perform better in reducing air emissions than required by the current emission standards of the IMO and includes a reporting scheme on greenhouse gas emissions. The platform enables ports and other interested parties to stimulate ships to improve their environmental performance. Increasingly, ESI rated ships are rewarded with port fee rebates.



7. DISCLAIMER AND ASSUMPTIONS FOR THE SASB REPORTING

The information provided is based on the best data available at the time of reporting. The ESG disclosures should be used to understand the overall risk management of sustainability related issues, however, in some areas data are based on estimates, please see comments below.

^aCO2 emissions: Based on IMO emission factors. The “financial control” approach defined by the GHG Protocol has been applied. Scope 1: Owned vessels, based on fuel consumption for the year. The share of HFO is lower in 2020 due to the introduction of ULSFO/VLSFO.

^bScope 2 emissions: Only included where there is a minimum consumption of 50,000 kwh per site per year. Emissions are calculated using emission factor from NVE “Electricity disclosure 2020”.

^cAverage Energy Efficiency Design Index (EEDI) for new ships: New ships average EEDI is based on new ships entering the fleet in 2020. Fleet average EEDI is based on all newer ships in fleet (keep laid after July 2013).

^dParticulate matter (PM), NOx, SOx emissions: Deviations from 2019 numbers are highly influenced by the IMO 2020 requirements entry into force and may partly also be partly influenced by our updated reporting methodology. The updated methodology has been developed with support from DNV.

^eShipping duration in marine protected areas or areas of protected conservation status: A marine protected area as defined by the International Union for Conservation of Nature (IUCN). However, the reported number does not necessarily include all Marine protected areas internationally established and regulated in International the Marine Organization (IMO) Conventions and areas established nationally by member states. Shipping duration is the sum of the travel days (24-hour periods).

^fPercentage of fleet implementing ballast water exchange and treatment: Only ships performing ballast water exchange with an efficiency of at least 95 percent volumetric exchange of ballast water have been included. When it comes to treatment, approved systems must discharge (a) less than 10 viable organisms per cubic meter that are greater than or equal to 50 micrometres in minimum dimension and (b) less than 10 viable organisms per millilitre that are less than 50 micrometres in minimum dimension and greater than or equal to 10 micrometres in minimum dimension.

^gSpills and releases to the environment (Number, Cubic meters (m3)): The total number of oil spills to the environment (overboard), excluding contained spills.

^hNumber of calls at ports in countries that have the 20 lowest rankings in Transparency International’s Corruption Perception Index (CPI): In the event that two or more countries share the 20th lowest ranking, all have been included in the scope of disclosure. The list is based on the CPI for 2020.

ⁱLost time incident rate (LTIR): A lost time incident is an incident that results in absence from work beyond the date or shift when it occurred. Lost time incidents are Fatalities, Permanent Total Disabilities, Permanent Partial Disabilities and Lost Workday Cases. The rate is based on lost time incidents / 1,000,000 hours worked.

^jMarine Casualties: Regarding SASB TR-MT-540a.1, the reporting is in accordance with the standard, however injuries to personnel as described in section 1.1.1 is reported as part of Health & Safety statistics (LTIR). The threshold for reporting on material damages as outlined in 1.1.4 and 1.1.6 is defined as USD 1 000 000. Section 1.1.7 “Severe damage to the environment” is reported under ‘Ecological Impacts’ and/or “Very serious marine casualties”. Incidents concerned with oil spills, re SASB 1.1.7 “Severe damage to the environment” is covered under “ecological impact”. For an event to be reported as a marine casualty, one or several out of the below criteria must be true: (1) the loss of a person from a ship, (2) the loss, presumed loss, or abandonment of a ship, (3) the stranding or disabling of a ship that triggered a Lloyds Open Form Salvage or the involvement of a ship in a collision that would seriously endanger the safety of life or property. (4) material damage to marine infrastructure external to a ship, that could seriously endanger the safety of the ship, another ship or an individual.

^kVery Serious Marine Casualties: A marine casualty involving the total loss of the ship, a death, or severe damage to the environment that is not related to oil spill. Any deaths shall be reported. If the death is decisively concluded not to have anything to do with a marine (very serious) casualty such as latent and unknown illness shall be addressed separately for a case-by-case discussion. Severe damage to the environment that is not related to oil spill is covered by “Very serious marine casualties”.

^lNumber of Conditions of Class or Recommendations: Those conditions/recommendations of class that has led to withdrawal of vessel certificates of otherwise has invalidates the ship’s compliance are included in this figure.

^mNumber of port state control (1) deficiencies and (2) detentions: Number of port state control deficiencies and detentions. Practices of port state controls reporting on deficiencies do not follow an entirely harmonized methodology making it less useful for reporting purposes without further explanations, hence we have chosen to report this number as a rate: number of deficiencies per Port State Control Inspection. Detentions are reported in number of actual cases. The figure represents number of detentions received from regional PSC organizations.

ⁿNumber of shipboard employees: Only the number of employees on board ships at any time are recorded, this does not reflect the aggregate number of shipboard employees during the year.

^oTotal distance travelled by vessels: The distance (in nautical miles) travelled by all vessels during the reporting period.

^pOperating days: Total operating days, i.e., total number of vessel-days for active vessels during the reporting year. Active vessels are referring to vessel(s) which were in possession of the shipowner during the reporting year.

^qNumber of vessels in total shipping fleet: Reported number of active vessels during the reporting year. Active vessels are referring to vessel(s) which were in possession of the shipowner during the reporting year.

^rNumber of vessels port calls: Total number of port calls for the entire fleet during the reporting period.

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