

# List of Signatures

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## 2025 Norwegian Transparency Act.pdf

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# Transparency Act Account 2025



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This account has been prepared to comply with the legal requirements of the Norwegian Transparency Act.

The statement is valid for the Wallenius Wilhelmsen ASA group ("the group"). It sets out the steps taken by the group in 2025 to identify and manage adverse impacts on people in our business and supply chain.

Even though not all the entities in the group are required to make transparency statements, we consider the principles of the Act to be basic principles to which the entire group is committed.



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## Section 1:

### General description of the enterprise’s structure and area of operations

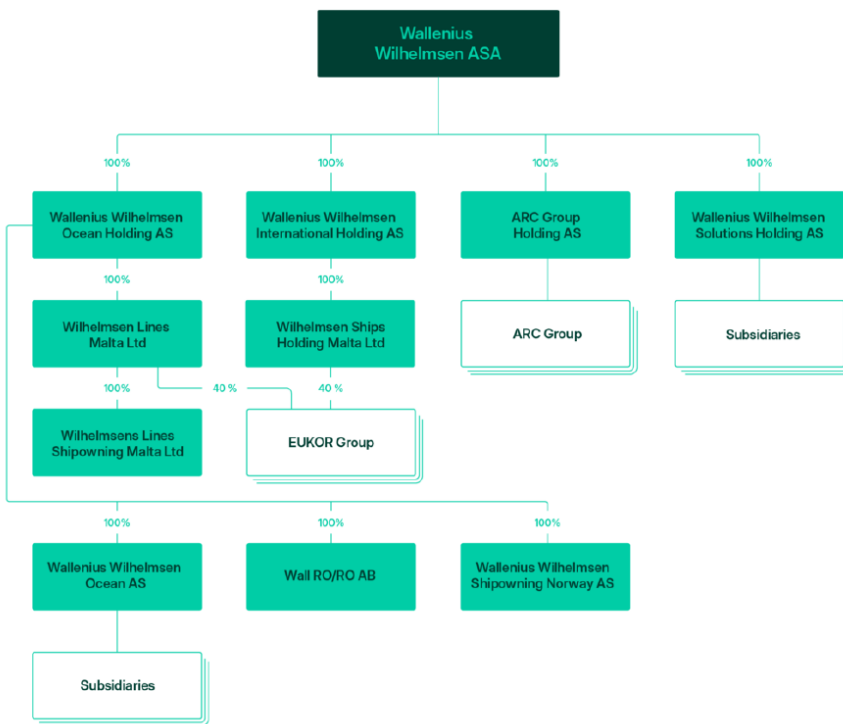
#### 1.1 About Wallenius Wilhelmsen’s corporate structure

Wallenius Wilhelmsen is a global provider of integrated vehicle transportation and logistics, supporting customers across their entire supply chain, from the factory all the way to end-consumers. Our customers include automakers and manufacturers of heavy-duty rolling equipment for construction, agriculture and mining.

We have a fleet of 127 vessels that sail on 15 trade routes, serving six continents. On shore we provide a comprehensive land-based logistics network through eight terminals, 11 inland distribution networks and 70 service and processing centers located in Europe, the Americas, Middle East, and Africa, Asia and Australia. Our operations span 28 countries and employ approximately 12,000 people, including seafarers who are managed by external ship management companies.

The Wallenius Wilhelmsen group is organized as follows:

#### Corporate structure



Wallenius Wilhelmsen has three main services; ocean shipping, logistics, and government services. We create value for our customers by owning and/or operating a comprehensive land-based logistics network of port terminals, inland distribution, and service and processing centers located globally. Our shipping service is comprised of a fleet of 127 vessels uniquely constructed with ramps and



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movable decks for efficiently and safely moving rolling cargo (RoRo) like trucks and cars from one port to another.

## 1.2 Introduction to our value chain

With our global operations, we have a large and complex value chain with several layers of suppliers and sub-suppliers. These suppliers provide us with a broad range of services and products. In addition to ship managers who are contracted to manage our fleet of ocean vessels, our key suppliers include energy providers, shipyards for building, repairing and recycling vessels, manufacturers and sellers of the equipment we use at terminals and processing centers, port authorities who own the terminals we operate, stevedores and labor at our terminals and processing centers, and providers of IT products and services.



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## Section 2:

### Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions

#### 2.1 Policies to address actual and potential adverse impacts

Wallenius Wilhelmsen has established a comprehensive framework for managing actual and potential adverse impacts on fundamental human rights and working conditions. Our code of conduct, human rights and people policies outline our commitments to respect human rights which includes decent working conditions.

Our code of conduct is our employees' guide to making the right decisions and outlines the behaviors expected from them on topics such as human and labor rights, discrimination & harassment and equal opportunities. The code of conduct prohibits any form of workplace bullying, harassment or discrimination and promotes a workplace with equal opportunities.

Our human rights policy is updated annually to reflect the most relevant human rights identified through the HRDD. We require everyone working at Wallenius Wilhelmsen, or on our behalf, to comply with the policy.

The company's human rights policy is approved by the Chief People Officer and outlines commitments to ensuring safe, healthy, and decent working conditions, promoting inclusion and equal opportunities, and maintaining a work environment free of discrimination and harassment.

The people policy was updated in 2025 and sets Wallenius Wilhelmsen's commitment to fostering an inclusive and safe workplace where human rights are respected and diversity is valued. The policy outlines our commitments to:

- Ensure safe, healthy and decent working conditions, including psychological safety.
- Equip our people with growth, development and training opportunities.
- Promote an inclusive workplace culture where all employees are given equal opportunities.
- Promote an inclusive workplace culture where all employees are given equal opportunities, where different perspectives are valued and where it is safe to speak up.
- Provide a work environment that is free of discrimination, harassment, intimidation or coercion.
- Promote work / life balance through reasonable working hours.
- Provide equitable, competitive and sustainable remuneration.
- Respect the human and labor rights of our employees.
- Attract new talent with the necessary competencies to deliver on the company strategy.

The people policy is approved by the Board of Directors, with operational responsibility held by the Chief People and Corporate Affairs Officer.

Our people and human rights policies are guided by relevant regulatory framework including the United Nations Global Compact and Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We respect the internationally recognized UN Universal Declaration of Human Rights



and the International Labor Standards (ILO Declaration on Fundamental Principles and Rights at Work).

The company is committed to avoiding adverse human rights impacts through its own activities, and seeks to prevent or mitigate such impacts that are directly linked to its operations and services or connected to its business relationships. These commitments extend across the supply chain, and expectations are communicated to suppliers, subcontractors, and business partners through the supplier code of conduct.

## 2.2 Introduction to human rights due diligence

Wallenius Wilhelmsen conducts annual human rights due diligence (HRDD) which is aligned with international guidelines, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Our impacts are identified through our double materiality and human rights due diligence (HRDD) assessments. This process combines desktop studies of external trends with stakeholder input from across all regions to assess relevant human rights scenarios. These scenarios are identified by a dedicated human rights task force, representing key functions and geographies.

In 2025, we strengthened our human rights due diligence scoring methodology. A defined threshold for identifying salient human rights risks was introduced, based on both severity and likelihood, to improve prioritization and ensure focus on the most significant actual and potential impacts. In addition, we conducted a gap analysis of our human rights framework against an external benchmark to further strengthen the robustness of our assessment.

The Chief Ethics and Compliance Officer is accountable for ensuring effective human rights due diligence, including handling of relevant risks and impacts. The Compliance Function has a governance and advisory responsibility to facilitate the implementation of necessary governance, processes and procedures.

## 2.3 Raising concerns & procedure for reporting and managing concerns

Wallenius Wilhelmsen has a grievance channel, the Alert Line, for stakeholders including value chain workers to raise concerns including those related to human rights. The Alert Line is accessible via our Intranet and available to all employees, as well as external third parties that may be in contact with our Group.

Any concerns relating to possible violations of our code of conduct, other ethical standards or legal obligations and the process for reporting and handling of such reports are described in our whistleblowing policy. The policy states that all reports are taken seriously, will be processed as quickly as possible, are treated confidentially and that Wallenius Wilhelmsen will support, and never retaliate against, anybody raising concerns in good faith. The Alert Line allow for reports to be submitted anonymously and is managed by an independent third party and depending upon the type of allegation, the concern is investigated by the compliance department, people partner organization or by an external party.



Should Wallenius Wilhelmsen, through its actions, directly cause or contribute to harmful human rights impacts, we will seek to promote access to and/or provide fair remediation.

Like previous years, also in 2025 we have had training and raised awareness of the Alert Line to encourage employees to report any potential breaches and concerns about non-compliance.

We did not identify any cases of non-respect of the internationally recognized instruments in our upstream and downstream supply chain in 2025. Neither did the company receive any Alert Line cases relating to severe human rights issues or incidents. In 2025, Wallenius Wilhelmsen received information requests relating to human rights due diligence in conflict-affected contexts. This inquiry primarily concerned potential downstream human rights risks linked to the transportation of customer products, including situations where such products may be used in conflict-affected or high-risk areas.

In responding to this request, the company explained that such risks typically arise in the downstream value chain, where Wallenius Wilhelmsen does not retain ownership of, or operational control over, products following delivery, and therefore has limited ability to monitor or influence end use. The company's assessment and responses were based on its risk-based human rights and integrity due diligence processes, including customer due diligence, sanctions and adverse media screening, country risk classification, and scenario-based assessments in heightened-risk contexts.

The company further clarified that while it does not systematically monitor end use of customer products after delivery, identified risks are assessed based on severity, leverage, and the company's connection to the potential impact. Where relevant, such matters may be escalated for additional review and consideration of risk-mitigation measures.



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## Section 3:

### Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence

#### 3.1 Human rights risks and impacts identified in 2025

During our human rights due diligence in 2025, Wallenius Wilhelmsen identified the following potential salient risks to human and labor rights within our operations and supply chain.

- **Safety of crew members:** Risk to crew members' safety and fair treatment linked to illegal drug trafficking on vessels, including the risk of being wrongly investigated, detained, or prosecuted.
- **Exploitative working conditions:** Risk of adversely impacting human rights at various locations in the value chain, such as production facilities, on-board vessels, at terminal operations, on dry-docking, new build and recycling yards. To read about our supplier code of conduct including the due diligence process and supplier audits, see page 11.
- **Upholding the right to privacy of those who entrust us with their personal information:** There are risks related to people's privacy if personal information about workers in the value chain is not properly protected by the company, its suppliers, or customers. As digital tools, including AI-enabled solutions, are used in business and HR processes, the company applies established policies and governance frameworks to support responsible use and protection of personal data. We provide all stakeholders information about how we process personal data in our [Privacy Notice](#).
- **Unionization of workers:** There is a risk that workers' rights to organize, join unions, or bargain collectively are not respected in certain regions. To read about how we address this risk, see page 13.
- **The transportation of customer products:** In certain circumstances transportation of customer products may be linked to a risk of facilitating adverse human rights impacts. This risk may be heightened where products are used or deployed in conflict-affected or other high-risk areas. Such risks primarily arise in our downstream value chain, where Wallenius Wilhelmsen does not retain ownership of, or operational control over, customer products following delivery.
- **Migrants picked up at sea and land:** Migrants encountered at sea or on land may face risks of harm, including threats to their safety, dignity, and basic rights. We did not encounter any migrants in distress at sea in 2025. However, this remains a potential risk, and we recognize our duty under international law for ships to assist and, where possible, rescue persons in danger at sea.
- **Working hours for production and office workers:** We have found that fluctuations in workload amongst production workers has led to overtime work which can cause fatigue, and other more serious health & safety risks. This risk especially applies to our logistics operations.

For our office workers, hybrid working conditions and global roles that entail



working across time zones means that the company struggles to monitor working hours in parts of the business. This creates a risk that employees may work overtime, outside of normal working hours and/or that they struggle to balance work and private life. For information on how we work to reduce risks related to overtime work, see page 12.

The following actual salient human rights impacts were identified by Wallenius Wilhelmsen during the human rights due diligence in 2025:

- **Safety:** The safety and well-being, including psychological safety, of our people is at the core of everything we do. However, due to the inherent complexity and multitude of interfaces between equipment and workers, incidents unfortunately occur which impact the safety of our workforce. Our workers regularly encounter heavy moving machinery and equipment, and our seafarers are also exposed to risks such as fires and infectious diseases. To read about how impacts are addressed, see page 10.
- **Stowaways on vessels:** Human traffickers and smugglers can be behind stowaways onboard our vessels and stowaways are at risk of becoming victims of modern slavery upon arrival. We experienced two stowaways in 2025. To read about how we work to reduce the risk of stowaways, see page 12.
- **Contributing to climate change through our operations:** The United Nations has acknowledged “a clean, healthy and sustainable environment” as a human right. Since our vessels’ emission of greenhouse gases is our largest impact on the environment and thereby posing a risk to human health, safety and well-being. To read about our net-zero target, see page 12.
- **Upholding the right to privacy of those who entrust us with their personal information:** In 2025, we identified an isolated information security incident involving unauthorized access to personal data relating to one employee. The incident was limited in scope and highlighted the importance of safeguarding personal information. The incident prompted us to further strengthen our privacy and data protection governance. To read about how we focus on training to reduce risk, see page 13.
- **Officials expecting payment at onshore:** Crew members being threatened, pressured, or intimidated by authorities onshore, including demands for improper payments. The highest risk has been identified in West Africa. To read about how this is addressed, see page 12.



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## Section 4:

### Information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts and the results or expected results of these measures

#### 4.1 Addressing and mitigating human rights risks and impacts

Wallenius Wilhelmsen has implemented several measures to address and mitigate risks and adverse impacts related to human rights. These measures include:

- **Addressing safety risks:** We manage safety risks with Safety1st, our safety management system that is built on the international ISO 45001 safety standard. Worldwide, more than 90% of our land-based operations are now ISO certified and we are working towards certification of our shipping operations and corporate functions.

In 2025, Logistics services advanced the rollout of Dare to Be Aware 2.0, a refreshed safety awareness program reinforcing day-to-day safety behaviors. The Safety 1st safety management system supports hazard identification, risk assessment, and proactive reporting through visual campaigns, toolbox talks, and integration with Way of Working (WoW) dashboards for active monitoring.

In 2024, Shipping Services launched a safety culture program covering approximately 5,000 employees across offices, vessels and sites. The program aims to strengthen a culture where employees feel safe to speak up, report mistakes and raise safety concerns, thereby reducing the risk of serious incidents and accidents. The program is based on eight safety leadership behaviors. In 2025, implementation progressed through the rollout of the first four core behaviors, supported by more than 500 workshops conducted both onshore and onboard vessels. The program was further reinforced through engagement with seafarers and ship management companies at bi-annual officers' conferences.

Effectiveness is monitored through annual employee surveys and lagging indicators, including serious accident statistics. The October 2025 assessment shows improved safety culture maturity compared to 2024, alongside fewer serious accidents, indicating the measures are effective. Together with other safety initiatives in shipping services, Level 3 incidents<sup>1</sup> have declined sharply since the 2023 spike, with an overall reduction of around 93% by 2025, including a further 71% drop from 2024 to 2025.

Another focus area for the Company in 2025 was to raise awareness of and support mental health to promote a healthy, inclusive and psychologically safe work environment. Initiatives included an e-learning module for IT-enabled employees, access to external support such as Employee Assistance Programs and awareness activities linked to World Mental Health Day. Mental health-related questions were included in the 2025 #engage employee

<sup>1</sup> A Level 3 incident is defined as an incident involving one or more fatalities or serious disability resulting from workplace-related accidents; or significant damage to property or a vessel; or major cargo damage; or major oil pollution where national or international assistance is required; or major damage to the company's reputation due to negative media coverage; or serious customer or financial failure.



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survey to assess perceived support and coping, enabling more targeted follow-up actions. The mental health score was 8.5 out of 10 at year-end 2025, an increase of 0.1 compared to June 2025.

- **Training and awareness:** Wallenius Wilhelmsen emphasizes training and awareness to foster a culture of integrity and ensuring a shared understanding of the standards expected of our employees. Mandatory training on the code of conduct, whistleblowing, and other compliance topics is provided to all new employees as part of the onboarding process and refreshers are provided regularly throughout the employment period. In 2024, we relaunched mandatory human rights training for IT-enabled employees to raise awareness of Wallenius Wilhelmsen's commitments, policies, due diligence approach, and key risks through practical scenarios. By 2025, 90% of the target group had completed the training. The expected outcome is increased awareness and consistent understanding of our human rights commitments across the workforce and value chain.

Annually we provide trainings for stevedores on how to handle our cargo and equipment safely. The event takes place at several locations annually. In 2025, safety risks were included to address the increased risk of fires from EVs. The outcome will reduce the safety risks and incidents. Monitoring the LTIF provides an indication of whether the policies and measures implemented across the organization are effective.

- **Supplier code of conduct:** We recognize that our activities may influence and impact human rights and working conditions in our supply chain. As such, we require suppliers to comply with applicable laws, respect internationally recognized human rights, including the right to freedom from slavery, human trafficking, or forced labor. Our Supplier Code of Conduct stipulates our expectation that all our suppliers live up to the UN Universal Declaration of Human Rights and the International Labor Standards (ILO Declaration on Fundamental Principles and Rights at Work). Our supplier code of conduct requires that our suppliers may not use any exploitative, unsafe or discriminating working conditions and practices. The company communicates these expectations to suppliers, subcontractors, and business partners through its procurement policy and supplier code of conduct. By implementing a supplier code of conduct, we expect to raise awareness of human rights within the value chain.
- **Due Diligence process and supplier audits:** The company conducts integrity due diligence on potential new and existing business partners, and human rights are included. Screening is performed on all business partners in high-risk countries. The process involves screening towards relevant sanction lists and adverse media, including attention on potential suppliers' human rights record and working conditions. The business partners are also monitored in our risk scoring tool. This enables us to have a live overview of our high-risk suppliers, and ensures that we identify any negative changes. We have implemented a supplier assessment questionnaire for suppliers with operations in high-risk countries. The questionnaire includes topics on health and safety, environment, business ethics and compliance, human rights and working conditions.

In 2025 we continued to focus on shipyards, since new vessels are our biggest investments and human and labor rights risk have been associated with the ship building industry. While we have several new vessels under order, we conducted ESG due diligence audit of the ship yard during the



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selection process in 2023, and again in 2025. The audits, which were conducted in 2023 and 2025 by external experts, covered human and labor rights such as forced labor. The audit findings are included in the monitoring plan agreed with the shipbuilding yard. The monitoring plan, which includes human and labor rights is regularly followed up during the building period. The monitoring plan will be key to assess the effectiveness of implemented actions from the findings. The outcome is to ensure safer working conditions and respect for human and labor rights at a key supplier.

By 2025, all our time charter vessels contracts include our supplier code of conduct and our key ship managers also reference their code of conduct, including human rights, in the contract with repair yards. We will continue to further operationalize human rights in the procurement process and supplier monitoring, and are currently expanding the ESG clauses in our contracts with one of our key ship managers. These initiatives will enable us to identify high risk suppliers that we can follow.

In 2025 we also initiated heightened due diligence assessment with a specific focus on conflict affected areas.

- **Net Zero 2040 target:** Our near-term and net-zero science-based greenhouse gas emission reduction targets are validated by the Science Based Targets initiative (SBTi) and have been classified as in line with a 1.5c degrees trajectory. We have set ambitious targets to reduce our contributions to climate change, in part because we recognize that climate change is a violation of the right to a healthy planet.
- **Mitigating measure for stowaways:** Human traffickers and smugglers can be behind stowaways onboard our vessels and stowaways are at risk of becoming victims of modern slavery upon arrival. We experienced two stowaways in 2025. When stowaways are found on a vessel after leaving the port of departure, guidelines are in place as prescribed by IMO in Resolution 13 (42): FAL Convention and strictly followed. P&I clubs are consulted to ensure the safety of stowaways when considering potential ports for disembarkation. We also cooperate closely with port and terminals to prevent this illegal activity. Mitigating actions at high-risk areas are ongoing and include clearly visible crew, ID checks, security guards at the entry points of the vessels, CCTV-systems, manual cargo inspections and thermal screening cameras.

Two of the high risk areas identified was Gothenburg and Southampton, as a result all trunks and back seat on cars are checked prior to entering the vessels and dog searches have been conducted. These initiatives aim at reducing the likelihood of stowaways on vessels and terminals.

- **Migrants picked up at sea or land:** Should migrants in distress be picked up at sea, we have implemented a procedure which follow practices as per IMO, including the 1982 UN Convention on the Law of the Sea and the 1974 International Convention for the Safety of Life at Sea and advise from local coast guards.
- **Working hours:** At certain sites, time monitoring systems have been implemented to track and monitor overtime work. We will further work on this as we progress with ISO 45001 certifications.



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- **Unionization of workers:** Global Framework Agreements are established at certain sites, but are not uniform across the organization. In our code of conduct and human rights policy we recognize employees' rights to form and/or join trade unions and collective bargaining without fear of reprisal, intimidation or harassment. In certain parts of our global organization, where our workforce is unionized, we are committed to a constructive dialogue with their freely elected representatives. To address the expectations of our workforce and their representatives, we follow the basic principles of collective bargaining.
- **Protecting employee data:** We protect employee personal information through multi-layered security controls including encryption, access restrictions, and continuous monitoring to prevent unauthorized access and data breaches. In the event of a security incident, we have established breach response protocols for immediate containment and employee notification.

Cyber security training is provided to all IT-enabled employees. In 2025, additional measures were implemented to strengthen employee awareness and behavior related to cyber security, including phishing simulation exercises. New authentication methods were also introduced, this requirement applies to both office-based and production employees. The Employee Data Policy sets out requirements for the management of employee data, including rules for access, visibility, roles and responsibilities, data maintenance, security, and privacy. The policy aims to ensure accuracy and consistency of employee data. Employee data shall be accessed, stored, and maintained securely, in accordance with the group data retention and disposal policy.

- **Upholding the right to privacy of those who entrust us with their personal information:** In 2025, Wallenius Wilhelmsen strengthened its governance for responsible use of digital technologies through the establishment of an AI Policy, which sets clear requirements for the use of AI-enabled solutions, including safeguards related to privacy and data protection. In parallel, the company continued to develop its information security program to further strengthen the protection of personal data across systems and processes. In accordance with the Integrity Due Diligence (IDD) process, any collection or processing of personal data relating to an identified or identifiable natural person is carried out in line with the Norwegian Personal Data Act, the Group Privacy Statement for Employees, the Employee Data Policy, and applicable local legislation.
- **Officials expecting payment onshore:** The risk has been reduced through eliminating the use of physical cash. Instead, captains are issued payment cards for crew-related expenses. Annual anti-corruption training is conducted with staff by Group Legal. Wallenius Wilhelmsen is also a member of the Maritime Anti-Corruption Network (MACN). Together with P&I clubs and MACN, we send letters to high-risk agents clearly stating that we will not provide gifts or cash to officials who board our vessels. Our zero-tolerance approach to facilitation payments is further communicated through onboard signage.



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