

**DHT HOLDINGS, INC.**

**ANTITRUST, COMPETITION & FAIR-DEALING POLICY**

**Introduction**

This Antitrust, Competition & Fair-Dealing Policy (this “Policy”) is intended to ensure that DHT Holdings, Inc. (together with its subsidiaries, the “Company”) avoids all transactions that violate applicable antitrust, competition and fair-dealing laws in all of the markets in which the Company conducts business. It applies to all personnel, including directors, officers and employees, on a worldwide basis.

The Company believes that the welfare of consumers is best served by economic competition and seeks to excel while operating honestly and ethically, never through taking unfair advantage of others. The Company is committed to ensuring the compliance of the Company with all relevant antitrust, competition and fair-dealing laws to the extent that they are applicable, and this Policy reflects that commitment, as well as our core values of integrity, corporate responsibility and transparency in conducting business.

**1. Why is This Policy Required?**

A number of jurisdictions around the world have adopted antitrust, competition and fair-dealing laws, which are designed to protect and promote vigorous competition and the benefits to consumers that flow from such competition. Such laws prohibit collusion between competitors as well as other anticompetitive conduct in dealings with customers, suppliers and distributors and also regulate certain mergers, acquisitions, divestitures and joint ventures among competitors. Certain of these laws apply to the Company and its business. Failure to comply with such laws can result in severe consequences for the Company and its directors, officers and employees, including criminal consequences (both fines and imprisonment), civil penalties and damage to the Company’s reputation and financing arrangements.

**2. Basic Rules for Compliance**

This Policy requires full and complete compliance with all applicable antitrust, competition and fair-dealing laws. Each director, officer and employee of the Company should endeavor to deal fairly with the Company’s customers, suppliers, competitors and other employees, and should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

All directors, officers and employees of the Company are required to observe this Policy. Employees involved in marketing, sales, purchasing or contracts, or in discussions with customers or competitors, have a particular responsibility to ensure

that they understand this Policy and are familiar with applicable antitrust, competition and fair-dealing laws. Because these laws are complex and can vary from one jurisdiction to another, employees should seek guidance as set forth below under the heading “Consultation – Always Seek Guidance” whenever questions arise. Failure to comply with this Policy may subject an individual to disciplinary action by the Company, up to and including immediate dismissal for cause, whether or not the failure to comply with this Policy results in a violation of law.

### **3. Your Obligations**

#### **Red Flags**

Certain circumstances and behaviors should alert Company directors, officers and employees to a violation of this Policy or, at minimum, to an increased risk thereof. If you are contemplating taking any action that involves any such “red flags” then, before proceeding, you should seek guidance as set forth below under the heading “Consultation – Always Seek Guidance”. Red flags include, but are not limited to, the following:

- entering into an agreement with a competitor concerning the price or supply of a product or service, or any other competitive term upon which it is offered (including in the context of a bid or RFP process);
- entering into an agreement with a competitor to divide or allocate markets, business opportunities, territories or customers;
- entering into an agreement with a competitor to exclude competing firms from a market;
- entering into a no-poach or non-solicit agreement with respect to employees; and
- entering into a joint venture, merger, acquisition or disposition transaction with a competitor.

#### **Consultation – Always Seek Guidance**

The above list of red flags is not exhaustive, and includes activities that may be permissible under certain circumstances. If there is doubt about whether an activity could violate this Policy or applicable antitrust, competition or fair-dealing laws, the department head should consult with the President & CEO or CFO. If you do not feel comfortable talking to any of these persons for any reason, the Company has a website where any employee can anonymously submit questions or complaints regarding illegal behavior, including questions or complaints regarding compliance with this Policy. Submissions are confidential and are reviewed by the Chairman of the Audit Committee of the Board.

#### **4. Ongoing Monitoring of Legal and Regulatory Developments**

The Company works with external legal counsel to monitor legal and regulatory developments pertaining to antitrust, competition and fair-dealing. Any material developments will be shared with the appropriate internal stakeholders. When necessary, the Company may update or change internal policies, procedures and controls to reflect these developments.