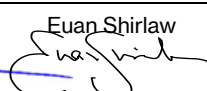


# BlueNord

## Whistleblowing procedure

Rev	Date	Description of revision	Prepared By	Checked By	Approved By
5	03.04.2024	Update of Company name and wording related to new legislation	Hege Hayden/PwC	Hege Hayden	Euan Shirlaw 
4	16.04.2021	Adjusted to reflect integrity channel provided and operated by PwC, including evaluation and initial response	Hege Hayden/PwC	Hege Hayden	David B. Cook
3	18.03.2020	Updated to reflect the integrity channel provided by WhistleB	Hege Hayden/BAHR	Hege Hayden	Atle Sonesen
2	28.01.2020	Simplifying to make more readable	Hege Hayden/BAHR	Hege Hayden	Atle Sonesen
1	30.12.2019	First version	Hege Hayden/BAHR	Hege Hayden	Atle Sonesen
Process area: Governance. Document Owner: EVP People & Capability					

## 1 Purpose and introduction

BlueNord ASA (the “**Company**”) and its subsidiaries (together the “**Group**” or “**BlueNord**”) believes that openness and good communication throughout the organisation promotes a better work culture. We have therefore implemented this whistleblowing procedure (the “**Procedure**”) to ensure that employees, hired-ins and third parties (as defined below) may inform the Company of any criticisable conditions relating to the Company and/or any of the subsidiaries in the Group.

The Company handles whistleblowing in accordance with this Procedure on behalf of its subsidiaries. The management of each subsidiary is responsible for the implementation of the Procedure including effective communication to all employees making sure all staff have the proper knowledge of the Procedure.

The Procedure sets forth routines for whistleblowing and is based on the Norwegian whistleblowing legislation and EU Whistleblower Directive. Handling of reports will be done in accordance with internal governing documents and applicable local laws and regulation. Further information and guidance on whistleblowing in general may be found in *the Norwegian Labour Inspection Authority’s Guideline on Whistleblowing (Nw. Arbeidstilsynet)* or the relevant legislation in the country in which you are based.

This policy applies to reporting from external parties insofar as they are applicable.

## 2 Scope

All staff that are employees, hired-in consultants, persons in training or participants in labour- market-training or personnel that is associated with, acting on behalf of and are under the instruction of any of the entities within the Group (“**Employee**”, together referred to as “**Employees**”), have the right to report any criticisable conditions that occur at the workplace. In addition, suppliers, customers and other third parties may also report any circumstances they find unacceptable.

If Employees uncover criticisable conditions, we encourage the Employees to report such to the Company. Such reporting is often referred to as whistleblowing. It is important that the Employees are aware of the fact that they hold a legal right to whistleblow, have a duty to report about criminal offences and circumstances where life or health is endangered, and that they know to whom they should whistleblow. It is equally important that the whistleblowing is received and dealt with in a proper manner by a representative of the Company.

This Procedure shall not restrict the Employee’s legal right to use any external means of whistleblowing (e.g. to an attorney, governmental regulatory authority, or other official body). However, the Company encourages the Employees to report any criticisable conditions internally prior to conducting any external whistleblowing, as this will enable the Company to initiate the necessary investigations and follow-ups in order to handle the relevant situation.

## 3 What is whistleblowing?

Whistleblowing is defined as reporting of “censurable conditions” (Norwegian. “kritikkverdige forhold”) within the Company (the “**Notification**”). Such Notification makes the Company aware of issues, illegal or unwanted behaviour within the Group and enables the Company to take remediate actions to prevent issues from escalating.

All Employees are encouraged to express their concerns if they suspect or discover any criticisable conditions. “Criticisable Conditions” in this context means any conditions in breach of applicable legislation, the Group’s written ethical guidelines, ethical standards accepted by society in general or any behaviour or wrongdoing that may threaten the life or health of individuals.

Examples of criticisable conditions include (but are not limited to):

- Danger to life or health;
- Danger to climate or environment;
- Corruption or other financial crime;
- Breach of sanctions;
- Abuse of authority;
- Unsound working environment (e.g. physical and/or physiological working environment, harassment, bullying, sexual harassment, discrimination, racism etc);

- Breach of personal data security;
- Other breaches to our Code of Conduct and other applicable policies or guidelines.

This Procedure does not apply to Notifications on matters that only concerns the individual's own working conditions, such as salary, workload, collaboration challenges etc., unless they also relate to matters as exemplified above.

#### 4 To whom do you whistleblow?

BlueNord strives for a safe and healthy workplace for all its Employees with a culture and working environment where everyone finds they can thrive, are taken well care of and our teamwork brings out the best in each individual.

Thus, BlueNord encourages all Employees to express their concern if wrong is suspected or experienced, or there might be grounds for complaint. Often most concerns and complaints can be resolved quickly and informally through open discussion with immediate superior or any other leader. Leaders at BlueNord are expected to be accessible and responsive if and when Employees raise their concerns.

If an Employee feels the need or deems it necessary to raise a concern or a complaint on a more formal basis, the "Handle Grievance" process is established in the Management System to handle such written notifications. Just for the sake of clarity, this process is not applicable to complain about any dismissal or disciplinary actions.

If these channels are deemed inappropriate due to the individual's involvement or the severity of the breach in question, an Employee may choose to whistleblow through the Company's integrity channel for whistleblowing linked on the corporate website [www.bluenord.com](http://www.bluenord.com) and on the BlueNord intranet, and where relevant on the subsidiary's own intranet. The Whistleblower channel is operated by Advokatfirmaet PricewaterhouseCoopers (PwC). The Employee may also choose to whistleblow externally to a public supervisory authority or other public authority.

The whistleblower can in certain instances report to the media or public, limited to situations when it is done in good faith, the concern has public interest and internal whistleblowing has been exhausted or been deemed not suitable.

#### How to whistleblow?

It is preferred that the Employees notify in writing. The whistleblower decides what information is to be provided. However, to ensure sufficient information to be able to perform adequate follow-up actions, the Notification should include as many details as possible and available supporting evidence.

Notifications through the Company's integrity channel may be submitted by following the instructions in the form on the webpage.

The whistleblower may report anonymously. However, it is generally preferred that the whistleblower provides their identity in order for the Company to investigate and ensure that follow-up questions can be answered with the purpose of fact-finding and solving the criticisable conditions. In some cases, proper investigation may prove difficult if the information provided cannot be tested or verified and the investigator is unable to obtain further information from the whistleblower. It is also possible for the whistleblower to remain anonymous towards BlueNord while providing their identity to PwC.

The Company's integrity channel is separate from BlueNord's IT environment and does not track IP addresses or other data that could identify a person sending a message. The communication channel is encrypted, and password protected, and messages will be received and decrypted by authorised personnel in PwC only.

If it is not possible to submit the Notification through the Company's integrity channel (e.g. due to technical issues or similar), any criticisable conditions may be brought to the Company's attention by reporting directly to PwC

- by e-mail: [marianne.pilgaard@pwc.com](mailto:marianne.pilgaard@pwc.com); or
- by phone at +47 93 00 99 77

If whistleblowing is done verbally, PwC will document the whistleblow in an agreed written version.

To ensure that any reporting is done in a responsible manner, the Employee should consider the following:

- Do I have a reasonable suspicion, knowledge or proof for the complaint or incident and have ensured that the information is correct?
- How should I proceed?
- To whom to I whistleblow?

## 5 Content

The whistleblow should include a reasonable, objective, and concrete presentation of the possible criticisable conditions. The following information should to the extent possible be included:

- What has happened? (a detailed description of the matter/the observation, and if possible, an assessment of applicable law, internal routines, or general social/ethical guidelines)
- Where did it happen?
- When did it happen?
- Who might be involved?
- The scope (e.g. information on the severability of the criticisable conditions and whether the criticisable conditions are continuing)
- Witnesses and documentation that can support the information provided with respect to the criticisable conditions.

## 6 Protection from retaliation

All Employees' that whistleblow in accordance with this Procedure shall be protected from retaliation. "Retaliation" means any disadvantageous act, practice, or omission as a consequence and/or reaction to the Employee's whistleblowing.<sup>1</sup>

The Company shall to this effect ensure that the whistleblower has and maintains a fully satisfactory working environment. This includes following the use of the whistleblowing channel according to this procedure. If deemed necessary, the Company shall provide measures suited to prevent any retaliation.

## 7 The Company's processing and principles for handling a Notification

The Company shall endeavour to process a Notification in accordance with the following principles:

- All reports are taken seriously and will be handled confidentiality;
- All reports will be sufficiently investigated within reasonable time in a fair, open minded and objective manner;
- Acts of wrongdoing must be dealt with;
- The Employee submitting a Notification shall (if the identity is known to the PwC) get a confirmation that the Notification has been received within reasonable time, no later than 7 days;
- PwC will conduct a preliminary evaluation and quality assurance of all whistleblowing notifications received;
- If the Notification is not classified as a whistleblow, the Employee will be notified of such and be advised by PwC;
- PwC will submit a summary report to the Company – represented by the EVP People & Capability as a focal point of contact;
- If classified as a whistleblow, the EVP People & Capability will, if appropriate, involve the Managing Director of the relevant legal identity and/or the Company's CEO for further handling of the Notification;
- Depending on the subject of the Notification, the relevant company's safety representative

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<sup>1</sup> Examples of "retributions": (i) threats, harassment, unfair discrimination, social excluding or other improper behaviour, (ii) warning, change of assignments, relocation or degrading, and (iii) suspension, dismissal, resignation or disciplinary action.

may be informed and if relevant, be involved;

- If the Company is of the opinion that the criticism is not justified, the whistleblower shall receive an explanation – prerequisite that the identity of the whistleblower is known. If the whistleblower is anonymous, PwC will be notified to communicate decision made through the integrity channel;
- If the report reveals conditions that require investigation, an investigation team will be appointed. External advisors or internal resources may be used to conduct the investigation. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation. The Managing Director is to determine whether the whistleblow is of such a character that the entity’s Board of Directors have to be informed; the Group’s CEO determines if the BlueNord ASA’s Board of Directors have to be informed;
- If the whistleblowing has been done anonymously or have requested to be treated anonymously, the name of the Employee submitting the Notification and the subject of the whistleblowing shall be treated as confidential during the investigation;
- Non-anonymous whistleblowers will get timely feedback and information about the process.
- Depending on the specific whistleblowing incident, the person or persons affected by the Notification shall have the right to information relating to the relevant incident, the criticisable conditions, the nature and cause of the accusation and the personal data that has been collected as part of the right to contradiction;
- When follow-up of the whistleblowing has been concluded, the person that was responsible for case management shall provide a report on the whistleblowing, hereunder whether the whistleblowing has brought about any changes, to the EVP People & Capability, including the CEO of the Company and the Managing Director of the relevant subsidiary or to any other person appointed by the CEO if relevant;
- Information received in connection with a whistleblowing incident shall not be misused or used for a purpose incompatible with its original purpose;
- When the whistleblow is appropriately dealt with, the whistleblower shall be informed about who is familiar with the whistleblower’s identity - if disclosed, and at which level the Notification has been handled;
- The Company shall ensure that an Employee who has provided a Notification in accordance with this Procedure has and maintains a fully satisfactory working environment. If deemed necessary, the Company shall take such measures as deemed required to prevent any retaliation.

## 8 Collection and processing of personal data

The Employees must be aware that for the purpose of verifying the content of the whistleblow, personal data regarding the misconduct may be collected and processed (e.g., what work was completed and the whereabouts of an Employee at a certain time, etc.). The Company may conclude the initial investigation on its own initiative prior to informing any affected Employees.

Personal data shall be treated in accordance with the European General Data Protection Regulation (“GDPR”) and applicable local laws and regulations. The Company shall ensure that any person reporting an incident or being accused of violation receives the information set out in GDPR Art. 13 and Art. 14. This applies regardless of whether the personal data is collected from the person itself or from others unless an exemption set out in the GDPR applies.

Any personal data collected in connection with this Procedure shall be handled in accordance with the Group’s internal procedures related to GDPR.

An employee may address any questions related to the collection, processing and/or distribution of personal data to the Company’s EVP People & Capabilities.

Personal information may be transferred to the relevant authorities (i.e. Police, Financial Supervisory Authorities, etc.) if necessary due to the nature and content of the whistleblow. In that case, personal information will be deleted after an investigation has been conducted.

Any personal data recorded in relation to whistleblowing that is deemed to be unfounded or any information unrelated to the whistleblowing condition shall be deleted as soon as such conclusion has been made.

## **9 Implementation and revision**

This procedure will be updated and distributed according to the Group's policies. It will be accessible on the Group's intranet or, if necessary, on a subsidiary's intranet. Where relevant, it will be shared through the appropriate HR system for employees to confirm they have read the procedure.