

ISSUED BY: JT	APPROVED BY: JP	DATE: 02.12.20	REV NO: 1.2
SECTION: 7.2	TITLE: Whistleblowing Policy		

1. Purpose

This procedure is intended to ensure the employees' rights to notify and report any misconduct or improper activity within the Company. Sincerity and good communication within the Company will help employees report about any suspected misconduct or any breach of laws or regulation that may adversely impact the Company. *Conditions worthy to report are matters that conflict with legal rules, written ethical guidelines in the company or ethical norms to which there is broad support in society.* It's in the interest of the Company that critical matters are revealed. Notifications can help reduce the risk of unwanted or illegal practices taking place.

2. Scope

This procedure involves employees and contracted personnel in the company.

3. Responsibility and authority

The management is responsible for encouraging notifications and making the procedure known. Everyone has the responsibility and duty to notify any misconduct or improper activity. The alerted part is responsible for including personnel who can handle the extent of the notification.

Retaliation against anyone who notifies in accordance with this procedure is prohibited.

4. Procedure Description

a. Approach

The notification shall be made in a proper manner and may be conducted verbally and / or in writing. The notice must state the content of the relation. It is possible to notify anonymously and request anonymity when the case is being handled.

Notification internally can be addressed to management or safety delegates.

Employees have the right to report externally to the supervisory or control authorities, such as the Labor Inspection Authority, the Environment Directorate, and the Tax Administration.

In order to notify the public through the media, the following conditions must be met for the provisions of the Working Environment Act to protect against retaliation:

- The management shall be informed of the incident and had the opportunity to rectify it.
- The purpose must be to rectify the circumstances, not make the public aware of the relation and the progress of the case.
- The involved parties in the notification case are obliged to handle the case confidentially.

b. Receipt, processing and follow-up of notification

The alerted part shall initiate a case and ensure that the case is documented in writing. The Managing Director and the required personnel shall be involved in handling the matter. The alerted part shall document the following:

- The content of the case
- Who has reported, or if it's done anonymous
- Name of the alerted part
- Date of notification
- Plan for implementation of actions

The person who has reported the incident shall receive continuous feedback during the handling of the matter. *The employer must ensure that the person who has notified the blameworthy conditions has a fully safe working environment. If necessary, measures must be taken that are suitable for preventing retaliation. Retaliation means any unfavorable act, practice or omission that is a consequence of or a reaction to an employee's notice.* The outcome of the case shall be reported to the involved parties regardless of the result.

5. References

- Working Environment Act, Section 2A Notification
- Form for notification of critical issues
- The Labor Inspectorate's fact page on notification of criticism-worthy conditions

<https://www.arbeidstilsynet.no/tema/varsling>