

Document Name	Procedures for notification of censurable conditions including «Whistleblower» routines		Version	2.0
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Procedures for notification of censurable conditions including «Whistleblower» routines

1. Background

The Norwegian Working Environment Act, Chapter 2A regulates an employee's right to notify censurable conditions in the workplace, including whistleblower routines. The objective of the regulations in Chapter 2A is to strengthen the employee's freedom of expression, to make provisions for notification, and to be a means by which to detect corruption and other economic crime.

The rules pertaining to notification entail that

- an employee or hired worker has the right to notify censurable conditions at the employers undertaking without becoming subject to reprisal in the form of formal or informal sanctions.
- the employees are encouraged to notify censurable conditions.
- an employee can always notify internally to the employer, in accordance with this procedure, in accordance with a duty to notify or through a safety representative, union representative or lawyer. The same applies to external notification to supervisory authorities or other public authorities.
- an employee may notify externally to the media or the public only if: a) the employee is in good faith regarding the content of the notification, the notification is regarding censurable conditions of public interest and c) the employee has first notified internally or has reason to believe that internal notification will not be appropriate.
- the employer has the burden of proof that the notification has been made in breach of national legislation.

Based on this, the group company (the employer) has developed these procedures for notification of censurable conditions in Norway.

The group company promotes notification of censurable conditions. Openness contributes to a healthy company culture for the good of the company and its employees. The routines are part of the groups company's systematic health, safety and environment efforts, but the provisions pertaining to notification are also applicable outside HSE matters.

2. Who may notify?

Employees, including temporary employees, may notify censurable conditions in the group company. Hired workers also have a right to notify censurable conditions at the hirer's undertaking.

3. What can be notified – «Censurable conditions»

The phrase «censurable conditions» is a general term set out in the Norwegian Working Environment Act. First of all, the term encompasses information pertaining to criminal acts (i.e., acts punishable by law) and violation of other legal mandates or prohibitions. The term also includes conditions that may involve deviations from relevant laws and regulations, such as non-compliance with administrative decisions from a public authority.

Furthermore, the term encompasses breach of internal guidelines for the group company, including its ethical guidelines, and breach of general ethical standards on which there is broad general consensus in society. Example of censurable conditions are:

- (a) danger to life or health
- (b) climate or environmental hazard
- (c) corruption or other financial crime
- (d) abuse of authority
- (e) unsatisfactory working environment
- (f) personal data breach

Examples of conditions that may warrant notification include working conditions that are in contravention with the requirements of the Norwegian Working Environment Act, improper case processing, bullying and harassment, corruption and other financial irregularities etc. For notification of security breaches other routines apply.

Conditions that the employee finds censurable based on his/her own political or ethical convictions are not encompassed by this provision. Neither will notification on conditions that only applies to the employee's own working conditions be regarded as censurable conditions, unless the condition is covered by the first, second or third sections above.

4. Notification procedure

4.1. Introduction

The employer encourages employees who want to notify censurable conditions to follow this procedure. In conjunction with the non-statutory requirement of loyalty in one's working relationship, the employee is requested to proceed responsibly when making such notification. The notice should be performed in a clear manner, and the title of e.g. an e-mail should be marked accordingly. Internal notification in accordance with this procedure, or notification to supervisory authority or other public authority, will always constitute a responsible notification, unless

- the censurable conditions are addressed in such a manner that unnecessary harm is caused to the company, the working environment or individual persons within the group company, for example by reiterating groundless allegations against the company or one's colleagues.
- the employee was in bad faith with respect to the correctness of the information.

Unsubstantiated notification can result in significant, and in some cases irreparable, harm.

4.2. Procedures for notification in the group company

4.2.1 Notification form

Notification of censurable conditions can be made orally or in writing (letter, email or similar). A written notice should preferably contain the following information:

- Date of notification
- Date and time for observations of censurable conditions
- What, specified, you have experienced or been aware of
- Other potential witnesses
- Similar conditions have occurred recently
- Your name and position. For anonymous notifications, see section 5.

The notice should be given in a clear manner, and the title of e.g. an e-mail should be marked accordingly.

4.2.2 Notification to the immediate superior/the chain of command

The group company wants to maintain a company culture in which the employees find it unproblematic to call attention to censurable conditions up the chain of command, and in which notifications are given proper and serious consideration. The goal is that the employees will perceive the chain of command as the natural place in which to notify censurable conditions.

The primary way to go about notifying, therefore, is to discuss censurable conditions with one's immediate superior.

The immediate superior will handle the case by conducting the necessary investigations/clarifications and by making the relevant decisions. If it is necessary to arrive at a clarification and/or to make a decision in the case, the immediate superior shall take the case to the next level in the chain.

If the notification applies specifically to the immediate superior, notification can be made to the immediate superior's superior, or to the relevant manager if the immediate superior's superior is involved in the censurable conditions in question. Notification that applies to a member of the management group is made to the CEO. If the notification applies to or includes the CEO, notification is made to the chairman of the board or to the HR director.

Otherwise, notification can be made to the responsible manager for the area/function to which the notification applies if it is a question of conditions outside of the employee's department.

In cases in which a manager does not follow up on a notification that is given pursuant to the routines described above, or merely handles the notification in a summary manner, the employee may escalate the case to the manager at the level immediately above that of the manager in question.

4.2.3 Notification to the employee representative, safety representative and/or working environment committee

The group company has an established safety ombudsman apparatus (chief safety representative and safety representative) and a working environment committee, as well as employee representatives for the local trade unions in Norway. These representatives can also be notified of censurable conditions.

In accordance with established routines, the chief safety representative, safety representative and/or employee representative shall review the condition(s) in the case with the chain manager, or with top management in the company, preferably with the director for HR.

If the notification pertains to conditions encompassed by the work area of the working environment committee, the notification is to be handled by the working environment committee.

4.2.4 Questions and feedback to management via hr@globalconnect.no

The group company has established the e-mail addresses hr@globalconnect.no, to which employees are encouraged to send questions and feedback.

Questions and feedback that are sent in will be read by employees in the HR department. These personnel will forward notifications of censurable conditions that come in via e-mail to the HR director.

The HR director will discuss the case with the relevant director whose area of responsibility encompasses the condition reported in the notification. The director will conduct the necessary investigations/clarifying enquiry and will see to that relevant decisions are made. When relevant, the director can delegate the matter downward in the chain of command. If the notification involves the director in question, the notification is to be sent to the CEO.

4.2.5 Notification to the Chair of the Board

If the employee has followed the routines for notification above, and management has not handled the notification or has merely handled the notification in a summary manner, the employee can notify the Chair of the Board directly.

Chair of the Board Per Morten Torvildsen can be contacted by e-mail at pertor@globalconnect.no.

4.2.6 Notification to the statutory auditor

In addition to the internal notification routines stated in sections 4.2.1 - 4.2.4, the external statutory auditor may be notified when necessary.

Notification can be given to the company's auditor Ernst & Young. EY is represented by Åsa Lundvall, at asa.lundvall@se.ey.com.

The routine for notification to the auditor is primarily established for notifications that apply to corruption and other financially motivated crime or conditions pertaining to censurable appropriations that result in financial consequences.

The internal notification routines should generally be used before the auditor is contacted. Cases in which the auditor can be contacted directly include, for example, when an employee is not certain who is involved in a case, the case that is notified relates to decisions in the management group, or the employee has not received feedback concerning a notification after he/she has used one or more of the procedures described under sections 4.2.1 - 4.2.4.

5. Notifier's status – anonymity

The employee can request that the case be handled anonymously.

An anonymous notification should contain adequate information that is sufficiently specific to enable the case to be investigated more closely. When a notification is made anonymously, it may take longer to investigate the matter, and it may result in the case not being able to be pursued because of lack of information.

6. General rules for the employer's handling of the case

6.1. General

The group company shall ensure that the notification is adequately investigated within a reasonable time. After the case has been adequately disclosed, the person responsible for the case must conclude and consider any measures.

The person who notified the company shall normally be informed that the case is concluded.

The group company shall always consider whether the case provides basis for general measures in the business.

Consideration for the person potentially implicated in a notification

If the notification is raised against a person, the principle of hearing both sides of a case shall be duly observed, i.e., the implicated person shall be informed of the content of a notification and shall be given the opportunity to present his/her side in the case.

In addition, the person notified against is, unless any exceptions apply, entitled to access his or her personal data and has a right to correct incorrect information in accordance with privacy and employment legislation.

If the investigations deployed as a result of a notification justify examination of someone's e-mail and computer area, the routines laid down in «Guidelines for use of employees' personal data» apply.

The chief safety ombudsman/representatives and/or employee representative or other advisor shall be involved before decisions are taken if the decision involves measures taken against other employees.

6.2. Special categories of personal data

In notification cases, which may also include special categories of personal data (sensitive data), it is especially important to observe the current policies and procedures of the group company regarding confidentiality and processing of personal data. Group companies may also be subject to statutory confidentiality obligations.

The General Data Protection Regulation applies to all group companies in addition to any local legislation.

6.3. Protection against retaliation

Any employee who notifies the company of censurable conditions, is entitled to a fully satisfactory working environment, and is protected against any adverse treatment that is a reaction to the notification ("retaliation"). The same applies to an employee who has given notice regarding that their right to notification will be used.

In order to prevent retaliation and to secure the notifier's healthy working environment, the company shall make sure that the working environment is fully satisfactory. This includes, but is not limited to, an assessment of the risks and arrangement of arrange follow-up talks with the employee unless he or she does not wish to do so.

7. External notification

7.1. Supervisory authorities

The group company internal routines do not change or limit the employee's opportunity to notify supervisory authorities whose tasks include enforcing, supervising or monitoring the implementation of statutes and regulations, for example, the Labour Inspection Authority, the Data Protection Authority, the National Authority for Investigation and Prosecution of Economic and Environmental Crime, the Board of Health Supervision, the county-level Boards of Health Supervision, the Pollution Control Authority, the Equality and Anti-discrimination ombudsman or the superior ministries of the above. An employee may notify a supervisory authority or other public authority of censurable conditions in accordance with law.

Further handling of notifications made to supervisory agencies will follow these agencies' case-processing procedures.

7.2. Notification to the media or public

The company encourage internal notification of censurable conditions. According to the Norwegian Working Environment Act an employee may notify externally to the media or the public only if: a) the employee is in good faith regarding the content of the

notification, the notification is regarding censurable conditions of public interest and c) the employee has first notified internally or has reason to believe that internal notification will not be appropriate.

8. Information security and personal data

Notifications that contain personal information will be stored, processed, and handled in compliance with the rules pursuant to the EU General data protection regulation (GDPR) and local legislation.

9. Document version history

Version	Approval Date	Changes
1.0	25.3.2019	Initial wording
2.0	23.6.2020	General update