

Guidelines

Whistleblowing for the Storebrand Group



In effect for:	All employees, as well as contract employees, substitutes, students, persons employed in training or labour-market programmes, future employees
Adopted by:	Group Compliance
Approved:	12.3.2019
Last edited:	15.06.2021
Document owner:	Group Compliance

1. Purpose

Storebrand wants to ensure a healthy working environment with a low threshold for misconduct. An open culture of free speech in the workplace attests a healthy corporate culture which benefits the business and employees alike. At the same time, criticism and disagreement must be processed in an orderly, facts-based manner.

We must lay the groundwork for resolving problems when they arise and as close as possible to where they arise. The Whistleblowing Guidelines make employees aware of how and to whom misconduct can be reported.

Employees' whistleblowing right and the employer's obligation to encourage whistleblowing are governed by Chapter 2A of the Norwegian Working Environment Act.

These guidelines describe how all employees can file an allegation, and they specify the allegation-processing rules in effect for the processing of allegations within Storebrand.

2. What is whistleblowing?

Whistleblowing is an allegation of misconduct or possible misconduct that is given to someone empowered to do something about it. Misconduct is defined as circumstances,

situations or behaviour that is in contravention of the rule of law, written ethical business or ethical norms that are broadly adhered to in society. Examples include:

- danger to life or health
- danger to the climate or the environment
- corruption or other financial misconduct or crime
- abuse of power
- reckless working environment
- breach of personal data security

As a rule, remarks that apply solely to an employee's own employment relationship are not considered whistleblowing under the Working Environment Act. This means that whistleblowing rules do not apply to staff conflicts or disagreements about the implementation of an employment agreement.

Whistleblowing is important for the Group and society in general because it enables misconduct to be rectified. There are many reasons for speaking up: it may be ethically correct or required by law to do so and Storebrand's reputation may be undermined if someone fails to speak up. Employees who are willing to report an allegation are therefore important resources for Storebrand.

All employees have the right to report misconduct. The individual employee is urged to report the misconduct but is usually under no obligation to do so.

However, an employee must notify his/her employer immediately if he/she becomes aware of faults or shortcomings that could endanger life or health, and he/she is unable to rectify the situation alone, cf. Section 2-3(2b) of the Working Environment Act.

In addition to internal guidelines and rules, Chapter 2A of the Working Environment Act sets out a general whistleblowing framework.

3. To whom and how can an allegation be made

To whom

There are several ways to make an allegation. An allegation of misconduct should be filed internally with one's immediate manager, unless the allegation involves the immediate manager himself/herself. Internally, it is also possible to file the allegation with People (Storebrand's HR function), Compliance or a safety representative/union representative. The person receiving an allegation of misconduct within the undertaking must notify the whistleblower in writing that the allegation has been received. All allegations received through internal and external channels must be forwarded to Group Compliance.

Storebrand has an external whistleblowing channel. Links to this channel are available in multiple places on Storebrand's intranet pages. Storebrand's Compliance function is informed of allegations sent via an external channel.

How

Allegations can be made orally or in writing. Written allegations should include the following:

- full name (anonymity is acceptable)
- date of the reporting
- description of the matter (violation of the law or internal guidelines)
- the person or persons involved
- when and where the incident took place/was discovered
- whether this has happened more than once
- whether witnesses were present
- any other matters that you think are important



It is initially preferable for allegations to be made openly using the whistleblower's full name as this will help us shed light on the matter in the best possible way. Even so, the whistleblower's identity is confidential. It is also possible to make an allegation anonymously, however.

4. Processing a whistleblowing allegation

Misconduct should as be discussed with one's manager wherever possible. If it is not possible to agree on satisfactory solutions to unacceptable behaviour or misconduct within a reasonable time, the whistleblowing allegation should be filed either with one's immediate manager or with the immediate manager's manager.

Allegations are to be processed by Storebrand's Whistleblowing Council, comprising representatives from People, Compliance and Group Legal. The Council is charged with ensuring that the whistleblower and, if applicable, the accused, are treated correctly, and with ensuring that the CEO and the Board are informed whenever necessary. A separate procedure has been set up for receiving, processing and following up on an allegation.

5. Whistleblowers must not be retaliated against

Whistleblowers must be protected, and allegations must be taken seriously. In accordance with our Whistleblowing Guidelines and the provisions of the Working Environment Act, properly filed allegations of misconduct concerning our undertaking must under no circumstance be met with any form of retaliation, sanctions or other detrimental treatment, neither directly nor indirectly. The whistleblower's identity must be kept confidential at all times. If it is necessary to name the whistleblower, this must be approved by the whistleblower himself/herself.

The whistleblower must receive a response on how the matter is being dealt with and its outcome within a reasonable time, without disclosing confidential information wherever possible. If it turns out that the allegation is unfounded or based on a misunderstanding, this must be properly explained to the whistleblower wherever possible.

The person accused in the allegation is also entitled to receive proper treatment. Normally, this means that the accused is made aware of the accusations and of any information provided about the matter. The accused must be given the opportunity to give his/her version of the matter. When the processing of the allegation is completed, the whistleblower and the accused must be notified of the outcome. If it is concluded that misconduct did not occur, it is important to notify both the whistleblower and the accused that the matter has been closed. Knowing that an unfounded accusation has been made can be enormously stressful. People partners are particularly responsible for taking care of anyone subjected to unfounded accusations or criticism.

6. Notification of public authorities and the media

An allegation can also be filed with a supervisory public authority or other public authority.

Allegations must only be given to the media after an attempt has been made to file the allegation internally or if there is reason to believe that internal whistleblowing is not expedient. In addition, the whistleblower must act in good faith regarding its content, which must apply to misconduct that has public interest as well.