

Guidelines on notification (whistleblowing) for the Storebrand Group

| | |
|----------------|--|
| Applies to | All employees, consultants, hired help, partners, external board members, councils and committees. |
| Adopted by | Group Compliance |
| Adopted | 12.3.2019 |
| Document owner | Manager Group Compliance |

Purpose

Storebrand has a goal to be world leading in savings. Trust plays an important role in achieving this goal.

Storebrand wants an open culture, based on respect and cooperation. Openness is a prerequisite for motivation, trust and safety. All employees should feel confident in addressing both small and large issues with the management or others in the Group.

We want the problems solved when they arise and where they occur. The guidelines for notification/whistleblowing make employees aware of how and to whom they can report any censurable incident or behavior.

What is notification (whistleblowing)?

Notification or whistleblowing is to pass information about a censurable or possible censurable incident/circumstance or behavior to someone who is in a position to initiate corrective measures. A censurable incident is an illegal, unacceptable, dangerous or any other act in breach of company regulations.

Notification is important for each employee, for the company and the society because it offers an opportunity to implement corrective action. There are many reasons why it is preferable to report about censurable incidents; because ethically it is the right thing to do, it might be an obligation or necessary according to law and regulations, and if not reported, it can seriously damage the corporation's reputation. A colleague willing to make a report is an important resource to the Group.

Every colleague *has the right* to notify their knowledge of censurable conditions. Each employee is requested to notify regarding censurable conditions, but doesn't normally have a duty to do so. However, every employee is *required* to notify regarding crime and conditions where life or health is in danger.

In addition to internal guidelines and regulations the Working Environment Act (§§ 2-4, 2-5 and 3-6) sets the external frames for notifications.

Examples of situation employees should notify about:

- Breach of legal requirements
- Breach of internal policies
- Breach of ethical guidelines
- Harassment/bullying
- Discrimination
- Abuse of substance (alcohol, narcotics etc.)
- Poor working environment
- Danger to life or health
- Suspicion of corruption, breach of tax requirements, inside trade, economic fraud, embezzlement, theft etc.
- And other serious matters

Who can notify?

All employees can report or notify on their own or others behalf. Employees, hired help, employee representatives, customers and partners can notify. External representatives in the board, councils and committees can notify.

How to notify?

There are several ways to notify. As a start all employees can written or orally notify their managers, HR Partner, employee representatives or compliance

Internal notification can be done by email, phone or orally.

External/anonymous notifications can be done to [Storebrand's external partner BDO](#).

How to handle notifications?

When possible, censurable incidents should be discussed with the nearest manager. If a satisfactory solution to the issue or the situation cannot be found within reasonable time, the issue should escalate to and notified to senior management, HR or Compliance. These units are responsible for handling the matter further. Compliance must always be involved in serious notification cases (whistleblowing) and ensure that the whistleblower and the person(s) that are being reported are treated fair and correctly. Compliance will also ensure that the CEO and the board are informed. Compliance has established a policy for handling, assessing and documenting notification cases.

The follow-up

The whistleblower shall be taken care of and the issue should be addressed seriously. The whistleblowers identity will always be treated confidential. If there is a need to reveal the name of the whistleblower, the whistleblower must give its consent. Within reasonable time the whistleblower shall be given feedback on how the issue is handled and what the result is within the rules of confidentiality. If the result is that the notification is unfounded or based on a misunderstanding, the whistleblower should, as far as possible, get a proper explanation.

The reported person shall also be treated fair and correct. Normally, this means that the person will be informed of the charges set out and of what information is presented in the case. The reported person will be given the chance to tell its side of the story and when the case is handled, he/she will be notified of the outcome. If the conclusion is that nothing unlawful or unacceptable has occurred, the person reported must be informed of the conclusion and that the case is closed. Unfounded accusations can be a huge burden, so the HR Partner has a special responsibility to care for people who have been subjected to unfounded criticism.