

# Guidelines

## Whistleblowing in the Storebrand Group



Adopted by:	Group Chief Executive Officer
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### 1. Purpose

Storebrand wants a good working environment with a low threshold for reporting unacceptable behaviour. Building and maintaining a culture of openness in the workplace demonstrates a healthy corporate culture that benefits both the organisation and its employees. At the same time, criticism and disagreements must be handled in an objective and orderly manner.

We shall facilitate the resolution of problems when they arise and as close as possible to where they occur. This procedure describes how and to whom employees can report matters worthy of criticism. It also describes the procedural rules that apply to the handling of whistleblowing in Storebrand.

Employees' right to whistleblowing and the employer's obligation to facilitate whistleblowing are regulated in chapter 2A of the Working Environment Act. Hired personnel also has the right to report.

Whistleblowing is important for the individual employee, the Group and society, because unacceptable behaviour can be corrected. There are many reasons why it is good to report; it may be ethically correct, it may be necessary based on laws and regulations, or it may weaken Storebrand's reputation if you do not speak up. Employees who are willing to blow the whistle are therefore an important resource for the Group.

The CEO of the individual company, together with his/her management team, has an independent responsibility to assess whether the procedure must be adapted to the nature and scope of the company. Procedures, which

describe operational processes for how the organisation is to be run, must be adopted by the CEO of the individual company.

### 2. Scope of application

This routine applies to whistleblowing, both the actual whistleblowing and the handling of received reports or notifications. Whistleblowing is the raising of unacceptable or potentially unacceptable circumstances with someone inside or outside the organisation who has a role or authority to handle or follow up on the matter. Misconduct means circumstances that are in violation of legal rules, written ethical guidelines in the organisation or ethical norms that are widely supported in society, for example, circumstances that may involve:

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

Statements that only concern the employee's own employment are normally not considered whistleblowing within the meaning of the Working Environment Act. Examples of such matters may include:

- various matters related to the fulfilment of the employment contract
- dissatisfaction with pay, workload and distribution of work tasks
- poor personal chemistry, general co-operation challenges and/or personal conflicts

All employees have the right to report unacceptable behaviour. The individual employee is encouraged to report matters worthy of criticism but is not normally obliged to do so.

Employees who have or become aware of errors or deficiencies that may endanger life or health must imme-

diately notify their employer. Especially when the person in question cannot correct the situation themselves. The same applies if employees become aware that a colleague is being discriminated against or harassed.

### **3. To whom and how can an allegation be made**

#### **To whom**

There are several ways to notify. Notification should be made internally to the immediate manager unless the notification involves the immediate manager. Internally, you can also notify Storebrand's HR function (People, Brand & Communications), the compliance function, the safety representative or employee representatives. The person who receives a non-anonymous report of potentially unacceptable conditions in the organisation shall provide written feedback to the whistleblower that the report has been received.

Storebrand has an external whistleblowing channel. Links to this channel and information about it are available on Storebrand's intranet pages.

#### **How**

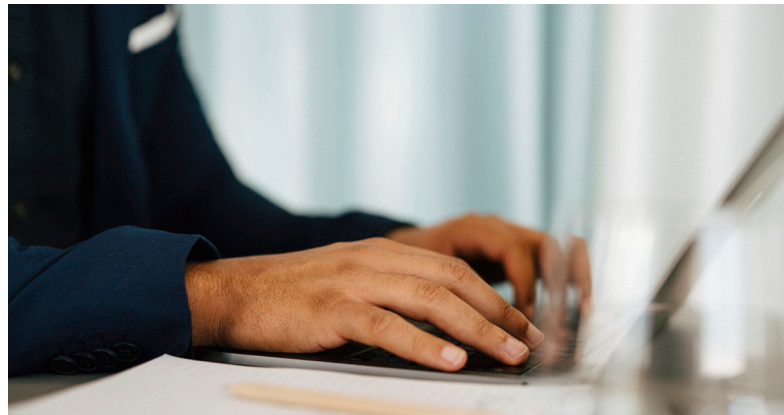
Notification can be made orally or in writing. Written allegations should include the following:

- full name (can be anonymous)
- date of the report
- description of the matter (possible offence or breach of internal guidelines)
- who is involved
- when and where the offence took place or was discovered
- whether it has happened several times
- whether there were witnesses present
- any other circumstances that the whistleblower believes are of importance

In principle, it is desirable that whistleblowing is done openly and with full name because it contributes to the best possible clarification of the case. However, you can choose to report anonymously. Note that anonymous reports can limit the employer's ability to follow up and clarify the content of the report. Anonymous whistleblowing may also limit the employer's ability to provide the whistleblower with feedback on whether the report has been followed up and handled.

### **4. Processing a notification**

All reported notifications are processed by Storebrand's whistleblowing council, which consists of representatives from People, Brand & Communications, the Compliance function and Group Legal. The council's task is to ensure that the whistleblower and, if applicable, the person(s) being notified (re-notified) are treated in accordance with internal and external requirements, and that the CEO and the Board of Directors are informed when necessary. The employer is responsible for ensuring that the report is appropriately investigated within a reasonable timeframe. Once the case has been sufficiently clarified, the employer must reach a conclusion and assess whether any actions are required. There is a separate work description for re-



ceiving, processing, and following up a notification that the council must follow.

### **5. The whistleblower**

The whistleblower shall be safeguarded, and the matter reported shall be taken seriously. Reporting unacceptable conditions, in line with the rules of the Working Environment Act, shall under no circumstances lead to retaliation, sanctions or other unfavourable treatment. Whistleblowing shall be handled confidentially. This means that the identity of the whistleblower and information about the case must not be disclosed to more people than strictly necessary.

The whistleblower shall receive feedback within a reasonable time on how the case has been handled and what the outcome is. This applies as far as possible without revealing confidential information. If it turns out that the criticism is unfounded or based on a misunderstanding, the whistleblower shall, as far as possible, receive an explanation of the matter.

### **6. The person or persons that the notification concerns**

The person who the notification concerns must be taken care of and treated in accordance with the requirements of the Working Environment Act. This means, among other things, that the whistleblower must be made aware of the allegations and the information provided about the matter. The whistleblower shall be given the opportunity to give their version of the case. When the case has been finalised, the person concerned shall be informed of the outcome. If the conclusion is that nothing objectionable has occurred, the whistleblower shall be informed that the case has been closed.

### **7. Notification of public authorities and the media**

Notification may be made to public supervisory authorities or other public authorities.

Notification to the media shall only take place if an attempt has first been made to notify internally or if there is reason to believe that internal notification is not appropriate. In addition, the whistleblower must be in good faith about the content of the report, and it must concern matters worthy of criticism that are of public interest.