

# Whistleblowing Guidelines

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# 1. Purpose

Storebrand aims to foster a positive working environment where it is easy to speak up about issues that warrant criticism. Building and maintaining a culture of openness in the workplace benefits both the business and its employees. This is also important to ensure that criticism and disagreement are handled in a fair and orderly manner.

We shall ensure that problems are resolved as they arise, and as close as possible to where they occur. This procedure describes how, and to whom, employees can report matters of concern. It also describes the procedural rules that apply to the handling of whistleblowing at Storebrand.

Employees' right to report concerns and the employer's duty to facilitate such reporting are regulated in Chapter 2A of the Working Environment Act. Temporary workers also have the right to report matters of concern.

There are many reasons why it is good to report; it may be ethically right, it may be necessary under laws and regulations, or Storebrand's reputation may be damaged if issues are not raised. Employees who are willing to report are therefore an important resource for the Group.

The Chief Executive Officer of each company, together with their management team, has an independent responsibility to assess whether these guidelines need to be adapted to the nature and scale of the company.

# 2. Scope of application

This guideline applies to whistleblowing, both the act of reporting itself and the handling of reports received. Whistleblowing involves raising matters that are, or may be, of a reprehensible nature with someone within or outside the organization who has the role or authority to address them or follow them up further. Criticizable matters are defined as matters that contravene legal rules, the organization's written ethical guidelines or ethical standards widely accepted in society, for example matters that may involve:

- a risk to life or health
- a threat to the climate or the environment
- corruption or other financial crime
- abuse of authority
- unacceptable working conditions
- breaches of personal data security

Statements that relate solely to the employee's own employment relationship are not normally considered whistleblowing within the meaning of the Working Environment Act and therefore fall outside the scope of this procedure. Such matters may nevertheless be raised with the immediate manager or PB&C through the usual channels for dialogue and follow-up. Examples of such matters include:

- various issues relating to the implementation of the employment contract
- dissatisfaction with pay, workload and the distribution of tasks
- poor personal chemistry, general collaboration challenges and/or interpersonal conflicts

All employees have the right to report matters of concern. Individual employees are encouraged to report matters of concern but are not normally obliged to do so.

Employees who are aware of, or become aware of, faults or deficiencies that may pose a risk to life or health must immediately inform their employer. This is particularly important if the employee cannot rectify the situation

themselves. The same applies if employees become aware that a colleague is being discriminated against or harassed.

### 3. To whom and how a report can be made

#### To whom

There are several ways to report concerns. Reports should be made internally to your immediate manager unless the report concerns your immediate manager. Internally, you can also report to Storebrand's HR function (People, Brand & Communications), GRC, the safety representative or employee representatives.

Storebrand has an external whistleblowing channel. Links to this channel and information about it are available on Storebrand's intranet pages. The person making the report shall be given written confirmation that the report has been received, unless it is made anonymously. Confirmation is sent automatically when using the external reporting channel. When reports are made via other channels, the Whistleblowing Board must confirm receipt of the report to non-anonymous whistleblowers.

#### How

Reports may be made verbally or in writing. Written reports should include:

- full name (may be anonymous)
- date of the report
- a description of the matter (possible breaches of the law, breaches of internal guidelines or other standards)
- who is involved
- when and where the incident took place or was discovered
- whether it has happened on multiple occasions
- whether there were any witnesses present
- any other circumstances the whistleblower considers relevant

In principle, it is preferable for reports to be made openly and using your full name, as this helps to ensure the best possible investigation of the matter. You may choose to report anonymously. Please note, however, that anonymous reporting may limit the employer's ability to follow up on or clarify the content of the report. Anonymous reporting may also limit the employer's ability to provide the whistleblower with feedback on whether the report has been followed up.

### 4. Handling of reports

All reported concerns are handled by Storebrand's Whistleblowing Committee, which consists of representatives from People, Brand & Communications, GRC and Group Legal. The Committee's role is to ensure that concerns and, where applicable, the person or persons concerned (the subject of the report) are dealt with in accordance with internal and external requirements, and that the CEO and the Board are informed where necessary. The employer must ensure that the report is adequately investigated within a reasonable time. Once the matter has been sufficiently clarified, the employer must reach a conclusion and consider any necessary measures. There is a specific procedure for the receipt, handling and follow-up of reports which the Whistleblowing Committee must follow.

## **5. The whistleblower**

The whistleblower must be protected and the matter reported must be taken seriously. Reporting of reprehensible circumstances, in accordance with the provisions of the Working Environment Act, must under no circumstances lead to retaliation, sanctions or other unfavourable treatment. Whistleblowing must be handled confidentially. This means that the identity of the whistleblower and details of the case must not be disclosed to anyone other than those strictly necessary.

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

## **6. The person or persons subject to the report**

The person subject to the report shall be treated in accordance with the requirements of the Working Environment Act. This means, among other things, that the person subject to the report should be made aware of the allegations and of the information provided regarding the matter. The person subject to the report shall be given the opportunity to present their version of events. Once the matter has been fully investigated, the person concerned should be informed of the outcome. If the conclusion is that no reprehensible conduct has taken place, the person subject to the report must be informed that the matter has been closed.

## **7. Reporting to public authorities and the media**

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

Reports to the media shall only be made if an attempt has first been made to report the matter internally or if there is reason to believe that internal reporting is not appropriate. In addition, the whistleblower must act in good faith regarding the content of the report, and it must concern reprehensible circumstances that are of public interest.