

Policy for whistleblowing

Document owner:	Head of Governance, Risk and Compliance (GRC)
Document approver:	CEO BAMA Gruppen AS
Rev. date:	27. June 2024
Rev. no:	1.0

Table of content

- 1. Purpose and scope 3
- 2. Roles and responsibilities 3
- 3. General principles 5
 - 3.1 Independent and objective investigation 5
 - 3.2 Contradiction 5
 - 3.3 Confidentiality 5
 - 3.4 Anonymity 6
 - 3.5 Information security 6
 - 3.6 Retaliation 6
- 4. Ownership and maintenance 7
- 5. Dispensations and non-compliance 7
- 6. References 7
- 7. Revisions of this document 7

1. Purpose and scope

BAMA encourages you to speak up about issues of concern. We believe that openness and good communication throughout the organization promotes a better work culture contributing to a culture of transparency and ethical behavior. BAMA's Code of Ethics and Business Conduct reflects our continued commitment to applying ethical business practices and compliance throughout our organization. As a part of this responsibility, each employee should speak up promptly about ethical issues and suspected violations.

The purpose of this policy is to clarify and describe the right of employees and other stakeholders to Speak Up on issues of concern, and to protect individuals who do so. BAMA's whistleblowing regime shall be in compliance with applicable laws and regulations, and proper and timely addressing issues shall ultimately contribute to the long-term success and sustainability of the business.

The Policy applies to BAMA Gruppen AS and subsidiaries, hereafter referred to as BAMA. The content of this policy applies to all BAMA employees, hired personnel, all persons acting on our behalf, other business partners and external stakeholders.

2. Roles and responsibilities

Role/function	Responsibility
Whistleblowing Committee (WBC)	<p>The Whistleblowing Committee (hereafter WBC) is responsible for ensuring that reported issues of concerns are responsibly handled in BAMA according to key principles and procedures. The Committee consists of:</p> <ul style="list-style-type: none"> ● Head of Governance, Risk and Compliance GRC (Chair/Leader) ● Head of Legal (Deputy Chair/Leader) ● Executive Vice President People and Culture ● Head of Security <p>Resources from the line and/or supporting functions are required to support the WBC as needed on an ad-hoc basis.</p> <p>The WBC responsibilities are described in more detail in the WBC mandate. Key responsibilities are:</p> <ul style="list-style-type: none"> ● Overseeing handling of issues of concern ● Assigning Case Managers to each issue ● Investigation of complex or particularly sensitive cases ● Involving external advisors if needed ● Advice, inform and assist the organization on investigations of reported incidents. ● Proposing or approving necessary measures/disciplinary actions, to ensure equal treatment across business units.

Line Management	<p>Responsible for:</p> <ul style="list-style-type: none"> ● Sending received issues of concern to the WBC for assessment on further actions to be taken. ● Providing guidance to employees who report issues of concern. ● Ensuring duty of care and appropriate follow-up of an employee who has reported an issue of concern as well as employees accused of any misconduct. ● Implementing disciplinary actions if needed.
Governance, Risk and Compliance (GRC)	<p>Responsible for:</p> <ul style="list-style-type: none"> ● the Whistleblowing institute in BAMA (see GRC-mandate for details) <ul style="list-style-type: none"> ○ Whistleblowing framework, Policy and Procedures ○ Process for reporting and handling reported issues of concern ○ Periodic reporting to CEO ○ Ensuring communication, training and awareness ● Leading the WBC (see WBC Mandate for details) ● Managing the BAMA online Whistleblowing Channel, “Speak Up” (“Si Fra”)
HR	<p>Responsible for:</p> <ul style="list-style-type: none"> ● Sending received issues of concern to the WBC for assessment on further actions to be taken ● Supporting and follow-up employees who have reported an issue of concern, as well as employees accused of any misconduct. ● Supporting or conducting investigations into allegations of harassment and discrimination, if delegated from the WBC ● Supporting investigations where records and data regarding employees are necessary for the Investigation. ● Providing support to interviewees in investigative interviews. ● Supporting management in considerations of disciplinary actions and dismissals, ensuring fair treatment ● Supporting implementation of necessary measures/disciplinary actions and dismissals related to employees
Legal Department	<p>Responsible for:</p> <ul style="list-style-type: none"> ● Supporting or conducting investigations involving potential violations of laws and regulations and evaluate need for reporting to external authorities.
Security Department	<p>Responsible for:</p> <ul style="list-style-type: none"> ● Supporting or conducting investigations in their area of expertise, depending on assignment from WBC.
Employee representatives and Safety representatives	<p>Responsible for:</p> <ul style="list-style-type: none"> ● Sending received issues of concern to the WBC for assessment on further actions to be taken ● If requested by an employee, may participate as an observer to ensure good processes. ● Must not have an active role in handling the reported issues of concern, as this would create a possible conflict of interest

3. General principles

In BAMA, there are some fundamental principles that apply when receiving and handling issues of concern, as described in the sections below.

Many issues may be resolved at the level close to you, and you may report your concerns to your manager, to your safety representative, or to your employee representative. You may also contact HR, Security, Legal or Compliance, and we encourage you to use the online Whistleblower channel SPEAK UP (SI FRA). SPEAK UP is handled by an external law firm, and through the channel we ensure the secure handling according to the principles below.

Further details regarding how to report issues of concern or details regarding how BAMA handles the reported issues of concern are available on bama.no/om-bama/varsling/ including our Whistleblowing Committee Mandate. You can also contact compliance@bama.no for questions.

3.1 Independent and objective investigation

All issues of concern shall be taken seriously and handled fairly, with objectivity and professional discretion and within reasonable time. The Investigator should avoid improper influence from individuals who have a direct or indirect interest in an alleged violation. It is important that the handling of issues of concern is independent and impartial, and also that it is perceived to be so.

3.2 Contradiction

All parties accused of wrongdoing have the fundamental right to be informed of the nature and cause of the accusation against themselves and to be heard. As a main rule, parties involved shall receive sufficient information to secure their rights, including argue in favor of their opinions, present evidence and counter arguments of claims deviating substantially from their own opinions.

- the right to contradict, i.e. to comment and suggest alterations to the minutes from their own interviews,
- the right to contradict the factual parts of the summary draft report that concerns them.

The parties concerned are not entitled to information about the Reporter's identity.

3.3 Confidentiality

Anyone that receives a reported issue of concern shall handle it with necessary confidentiality and in accordance with this procedure, ensuring that the identity of every reporting person, person concerned, and third persons referred to in the report, for example witnesses or colleagues, is protected at all stages of the process.

Regardless of whether the Reporter is anonymous or not, the issue of concern and all related information must be treated confidentially throughout the Investigation. Persons involved in the process shall only

disclose the identity of the Reporter to the extent it is absolutely necessary, unless when the Reporter has given explicit permission to do so.

Furthermore, the number of people who receive information and documentation should be restricted on a need-to-know basis at the discretion of the Investigator appointed by the WBC. Information to respective Line Managers of a person accused of a wrongdoing or of a Reporter shall also be restricted to a need-to-know basis.

3.4 Anonymity

Issues of concern can be reported anonymously in BAMA by using the online whistleblowing channel Speak-Up. The reporting channel also allows for anonymous communication and follow up between the Reporter and the Case Manager. However, conducting a potential investigation and other follow-up activities will more likely be successful if the person reporting the issue of concern provides their identity.

For issues of concern reported through other channels (i.e. in person, via telephone, email), the Recipient could face a situation where the Reporter's identity is known, but the Recipient is asked not to reveal it to anyone else. In these situations, it is important to assess what impact follow-up activities could have on the Reporter's anonymity. For certain issues of concern, the Reporter cannot remain anonymous due to regulatory requirements. For example, anonymity cannot hinder the Subject's right to contradict allegations. Furthermore, if the issue of concern could lead to prosecution, the court could require the Reporters' identity to be revealed. A Recipient should therefore never promise full anonymity to the Reporter without consulting with the WBC.

3.5 Information security

All electronic information obtained as part of handling the reported issue of concern shall be stored on restricted access folders.

All sensitive information shall be handled on a strict "need to know" basis and in accordance with the applicable Data Protection Acts and regulations and guidelines. All personal data collected during the handling of the reported issue of concern, except the final summary report, shall be deleted as soon as the handling of the reported issue of concern is concluded, unless legal proceedings are expected to take place. If so, personal data can be stored until the legal proceedings have been finalized.

3.6 Retaliation

BAMA will do its utmost to take the necessary steps to ensure that no retaliation will take place, and that there will be no negative impact on the professional career of any person for reporting possible violations. Anyone who experiences retaliations must report this to the WBC.

Whistleblowers who report in good faith, will not face any retaliation or other unfavorable treatment, even if it is later discovered that they were mistaken. Disciplinary action can be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue.

The Investigator should follow up with the whistleblower that no retaliation has taken place by the time of the conclusion of the investigations and again some months after the conclusion.

4. Ownership and maintenance

This policy is owned and implemented by the Head of Governance, Risk and Compliance (GRC), who is also responsible for updating, communicating, and monitoring the operational effectiveness of this policy. Any questions should be submitted to the Head of GRC.

This policy is approved by the CEO of BAMA Gruppen AS.

5. Dispensations and non-compliance

All dispensations and non-compliance to this policy shall be handled and documented in accordance with the principles in Framework for governing documents.

6. References

Please find **references** in the table below.

Document name
Code of Ethics and Business Conduct
Whistleblowing Committee Mandate

7. Revisions of this document

Rev.no	Issue date	Description of updates	Approved by
1.0	27.06.2024	Establishment of document	Bent Andersen, CEO