

## 1 INTRODUCTION & PURPOSE

Seagems Group and its subsidiaries (hereafter “Seagems” or “Company”) wish to provide a comfortable, productive, legal, and ethical work environment. This requires an open expression culture, which is important for the general working environment and the employees’ well-being.

In addition to the need of having an open expression culture, the individual employee and hired workers have a statutory right to whistle blow, cf. the Working Environment Act, chapter 2 A. Employees and hired workers must also be protected against retaliation as a result of such whistleblowing. However, a basic rule according to the Working Environment Act is that the employee's notification must be done in a responsible manner.

To this end, the company wants you to whistleblow or bring any grievances you have about the workplace to the attention of your supervisor and, if necessary, to upper-level management. Based on this, we have developed guidelines in this policy.

In special cases, whistleblowing may take place in a different way and/or to other persons/bodies than what appears in these guidelines. Whistleblowing to persons outside the company - other than public authorities - will normally constitute a breach of the individual's duty of confidentiality under the employment contract if the guidelines for internal notification have not been followed.

## 2 DEFINITIONS

“**Grievances**” are typically issuing about how you exclusively are being treated and not the treatment of others.

“**Whistleblowing**” is about raising concerns relating to wrongdoing risk or malpractice that you witness in the workplace. This in accordance with the Working Environment Act chapter 2 A.

## 3 SCOPE

This policy applies to all full-time, part-time and temporary employees in Seagems, as well as hired workers, consultants, vendors and visitors to Seagems.

## 4 GENERAL PRINCIPLES

### 4.1 Grievance

If you feel that there is an inappropriate conduct or activity on the part of the company, management, its employees, suppliers, customers, or any other persons or entities related to the company, we request that you bring this concern to the immediate attention of your supervisor.

### 4.2 Whistleblowing

If you have reason to believe that there are objectionable circumstances relating to the company/the workplace, you should, and are encouraged to, report this.

The term objectionable condition is defined in § 2 A-1 of the Working Environment Act as *“conditions that are in conflict with legal rules, ethical guidelines in the business or ethical norms that are widely accepted in society, for example conditions that may involve:*

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- a) *Price for health or life*
- b) *Price for climate or environment*
- c) *Corruption or other financial crime*
- d) *Abuse of authority*
- e) *Unsafe working environment*
- f) *Breach of personal data security*

Examples of conditions that are described as "*unsafe working environment*" are violations of rules on the working environment, working hours, social dumping, bullying, danger to life or health and harassment, including sexual harassment and discrimination.

In addition to having the right to notify, it may follow from an individual's position or employment contract that one has a duty to notify. Employees may also have a duty to notify under the Working Environment Act and/or the Equality Act, among other things if you become aware that harassment, including sexual harassment or discrimination is taking place in the workplace, and if you become aware of errors or deficiencies that may cause danger to life and health, and the person in question cannot correct the relationship himself.

## 5 HOW TO MAKE A GRIEVANCE/WHISTLEBLOW

### 5.1 Make a grievance

Please try to approach your supervisor at a time and place that will allow the supervisor to properly listen to your concerns. If you have discussed this matter with your supervisor previously and you do not believe that you have received a sufficient response, we request that you present your concerns to your supervisor in writing. Please indicate what the problem is, those people involved in the problem, and any suggested solution you may have to the problem.

It is the purpose of this grievance procedure to help maintain a positive work environment with respect and responsibility towards each other. The grievance procedure is also intended to avoid unnecessary employee claims and company legal exposure. The company cannot promise that your specific grievance or complaint will result in the action you request or that you will be satisfied with the outcome of the grievance procedure.

If you do not receive a sufficient response to your written complaint within 5 working days from providing it to your supervisor, or if your supervisor is the problem, you should contact the next level of supervision, and so on. If you consider the matter an emergency, legal, ethical or safety issue, use your best judgement to expedite the complaint process. The company may have a conference with you and your supervisor or with both of you individually. If the matter is not resolved after that conference, and you believe it still merits attention, it is requested that you immediately place your concerns in writing and bring the matter forward to upper-level management.

### 5.2 Whistleblow

Notification must be made to the supervisor. If this is inappropriate, notification can be made directly to the company's contact person for notification, who is Dag Osborg.

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Notification can also be made to the occupational health service, at Medi3. Employees in the occupational health service have a statutory duty of confidentiality. Notification can also be made to the safety representative.

Notification can be made verbally or by written inquiry (letter, e-mail or similar).

If the whistleblower has not received satisfactory feedback within a reasonable time after reporting a matter covered by these guidelines, he/she must report directly to the General Manager or CEO of the company.

## 6 PROCESSING OF THE NOTIFICATION - WHISTLEBLOWING

The person/those who are responsible for processing the notification have a duty to investigate the notification to a sufficient extent.

The person responsible for processing the notification must draw up a plan for handling the notification, including who will carry out the necessary investigations, which measures will be implemented and by which deadlines. If necessary, consideration should be given to engaging external assistance for the investigation.

The person/those responsible for processing the notification must ensure that the whistleblower has a fully responsible working environment, also during the notification process. If necessary, measures must be taken to safeguard the whistleblower.

As far as possible, the whistleblower must be informed in writing about the further processing of the notification.

After the case has been well informed, a decision on the outcome must be taken by the person in the business responsible for the relationship to which the notification relates. It must always be assessed whether the individual notification case provides a basis for general measures in the business. When a decision in the case has been made, the person who notified must be informed of the decision as far as this is not contrary to the law.

Regardless of the outcome of the case, the person/s who have dealt with the notification must draw up an internal memo regarding the case.

The management is responsible for safeguarding the whistleblower and the person exposed to allegations of objectionable circumstances and must, if necessary, ensure this.

## 7 CONFIDENTIALITY

The purpose of a well-thought-out whistleblowing and grievance routine is to provide a safe framework for notifying, and in that context, it is central that the notifier is given a high degree of confidentiality. This causes notifications to be known only to a limited group, i.e., manager, safety representative and/or elected representative and possibly a specially appointed contact person.

Employees and/or hired workers also have the right to report anonymously. It is nevertheless noted that anonymity can result in longer processing times and insufficient information about the case.

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Normally, transparency will ensure better proceedings and a better result for the parties involved. Even if you provide your name, you still have a right that the matter is to be treated in strict confidence.

In these types of cases, which typically concern sensitive information, it is particularly important to observe the company's current rules on confidentiality. Furthermore, the Personal Data Act must be observed when processing all personal data.

## 8 PROTECTION AGAINST RETALITATION

The person who has notified in accordance with the Working Environment Act § 2 A-1 and these guidelines must be protected against any unfavorable treatment that is a reaction to having been notified ("retaliation").

The same applies to notification to supervisory authorities or other public authorities.

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