

Whistleblower Policy

June 2023

Whistleblowing is an important aspect of transparency and accountability. Our organization is committed to maintaining high standards of ethics, integrity, and corporate governance. This policy outlines our commitment to encourage and enable individuals, both internal and external to the organization, to come forward with information regarding any form of malpractice, misconduct, or wrongdoing, without fear of retaliation.

What is whistleblowing?

Whistleblowing is the notification of “censurable conditions” (Nw. “kritikkverdige forhold”) within an organization.

Censurable conditions are any violation of applicable laws and regulations in the countries in which Saferoad operates. It also includes breaches of company policies or commonly approved ethical norms.

Examples of violations include, but is not limited to:

- Circumstances that endanger employees’ lives or health
- Damage to the climate or environment (hazardous products, pollution etc.)
- Corruption or other economic crimes (such as embezzlement, theft, fraud, etc.)
- Breach of Sanctions
- Abuse of authority
- Unsound working environment (harassment, bullying, sexual harassment, discrimination, racism, etc)
- Breaches of Personal Data Protection legislation
- Other violations of the Code of Conduct, Supplier Code of Conduct, this Whistleblower Policy, Anti-Bribery Manual and other applicable policies or guidelines

Issues that only relate to the employee's own working conditions or typical HR related problems such as internal conflicts between personnel, will normally not be considered as a violation relevant for whistleblowing.

Who can whistleblow?

These guidelines apply to all employees in Saferoad, including permanent, temporary and hired personnel. Workers hired from temporary-work agencies also have a right to report breaches at the hirer's undertaking.

Reports in accordance with this Whistleblower Policy may also be made by any person affiliated with Saferoad, including business partners, suppliers etc. External persons who have no connection with Saferoad may also report any circumstances they find unacceptable. In such cases these guidelines apply insofar as they are applicable.

Right and duty to report

Any person who becomes aware of potential criminal offenses and circumstances where life or health is endangered, and breaches of the Code of Conduct or Anti-Bribery Manual have a duty to report.

Questions relating to the interpretation of the '[Code of Conduct](#)' and '[Anti-Bribery Manual](#)' or their practical application should be addressed to the CEO.

Anyone reporting concerns in good faith can do so without fear of reprisals.

We encourage to make whistleblowing reports without undue delay from the incident occurring, so that the violation can be halted or investigated as soon as possible.

How to report concerns?

Saferoad has established an electronic whistleblowing channel that can be found at <https://report.whistleb.com/en/Saferoad>, where both anonymous and open reporting is possible.

However, at Saferoad a whistleblower report can always be forwarded by letter, email, phone call or in person, openly or anonymously. There are no requirements as to the form of the report, but Saferoad encourages to whistleblow in writing and through the electronic whistleblower channel, due to notoriety. The whistleblower decides what information is to be provided. However, to ensure sufficient information to be able to perform adequate follow-up actions, the report should include as many details as possible and available supporting evidence, such as:

- The period, and date and time if applicable, of the circumstances concerned
- The employees' observations
- The place where the incident occurred
- Other witnesses
- Any supporting documentation

Internal whistleblowing

At Saferoad we foster an open door policy and encourage employees to share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's line manager is in the best position to address an area of concern. If this reporting channel is deemed inappropriate due to the individual's involvement or the severity of the breach in question, Saferoad encourages to whistleblow in writing and through the electronic whistleblower channel.

Whistleblowing to supervisory body or public authority

Saferoad's aim is to arrange its procedures so that whistleblowing will always be sufficient. However, the whistleblower always has the right to whistleblow to a supervisory body or other public authority (for example the Norwegian Labour Inspection Authority, the Data Inspectorate or the Police). The whistleblower can in certain instances report to the media or public, limited to situations when it is done in

good faith, the concern has public interest and internal whistleblowing has been exhausted or been deemed not suitable.

Anonymous whistleblowing

The whistleblower may report **anonymously** but must be aware that the receiver may not give feedback when doing so. Furthermore, proper investigation may prove difficult if the information provided cannot be tested or verified and the investigator is unable to obtain further information from the whistleblower.

Ground principles for handling concerns

Saferoad's basic principles for handling reports are:

- All reports are taken seriously
- All reports will be sufficiently investigated within reasonable time in a fair, open minded and objective manner
- Confidentiality and information security
- Protection of whistleblowers
- Whistleblowers reporting in good faith will not be subject to reprisals
- Non-anonymous whistleblowers will get timely feedback and information about the process
- Right to be informed of the nature and cause of the accusation against oneself and to be heard (contradiction)
- Process to be documented in writing (notoriety)

Below is a summary of the main steps in handling whistleblower reports received. More details about the standard procedure, including guidance, are found in Saferoad's procedures for handling reported issues of concerns.

Saferoad will conduct a preliminary evaluation and quality assurance of all whistleblower reports received. If the report reveals conditions that require investigation, an investigation team will be appointed. External advisors or internal resources may be used to conduct the investigation. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation.

The Whistleblower, unless chosen to remain anonymous, and the person who has been reported on shall as a minimum receive information that the case is considered and concluded, also in the case that no irregularities or issues of non-compliance are found in the investigation. Whistleblowers that are not parties to the case are in principle not entitled to any information about the execution of the investigation or to the conclusion in the summary report, and information provided will be decided on a case to case basis.

A summary report with the final results of the investigation will be completed within a reasonable time, and will be reviewed by the CEO, Chairman or external as appropriate, as initially decided. The summary report shall be filed according to the internal archive routine and data protection acts.

Based on the outcome of such investigation, VP Legal, CEO or Chairman of the Board shall take any such action and/or impose such sanctions as are deemed appropriate and/or necessary, including any preventative measures, disciplinary sanctions or termination of supplier contract etc. For employees,

consequences may involve verbal or written warnings or, if the matter is very serious, termination of or summary dismissal from their employment. An employee who deliberately makes a false report may also be subject to disciplinary action.

Protection of whistleblowers

It is as important for Saferoad to provide a mechanism to safely report illegal activities and/or serious misconduct, as it is for the company to protect and to avoid damage to the reputation of innocent employees or board members who are the subject of a reported violation.

For these reasons, Saferoad will conduct its investigations of any reported violation as discreetly as possible and in a confidential manner to the greatest extent possible commensurate with carrying out a thorough and adequate investigation. Furthermore, to the extent possible, all reasonable efforts will be made to treat the whistleblower's identity as confidential, unless permission in writing (including email) has been obtained from the whistleblower. The protection of identity shall also be taken into consideration during the initial evaluation and the subsequent risk assessment when scoping the investigation, hereunder the existing level of risk exposure without disclosing the name of the whistleblower. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Saferoad prohibits any retaliation against whistleblowers and will provide adequate measures to prevent retaliation within the organization. Retaliation is in itself a breach of the company's policy and any such acts may lead to appropriate sanctions as described above. Retaliation is any negative action, practice, or neglect as a consequence of or reaction to the whistleblow, e.g., victimization, threats, harassment, discrimination, social exclusion, warnings, deprivation of work tasks, groundless relocation, degradation, poor wage development, suspension, dismissal, summary dismissal and/or disciplinary punishment.

Anyone who experiences retaliation must report this according to this policy.

Personal data

Handling of reports of concerns will be done in accordance with applicable local laws and regulations and internal Saferoad governing documents, hereunder:

- the Norwegian Personal Data Act of 15 June 2018
- the German Federal Data Protection Act of 30 June 2017
- the Swedish Data Protection Act (2018:218)
- the Danish Data Protection Act of 23 May 2018
- the Norwegian Working Environment Act of 17 June 2005
- the EU Directive 2019/1937 on the protection of persons who report breaches of Union law