



21 March 2023, Lade Gaard  
Chief ESG Officer, Reitan Eiendom

# WHISTLEBLOWING PROCEDURE FOR REITAN EIENDOM

## 1. Background and purpose

The purpose of this whistleblowing procedure is to protect the rights of employees and other stakeholders to report improprieties in Reitan Eiendom (or the Company). The employee's right to report is governed by Chapter 2 A of the (Norwegian) Working Environment Act. Contracted employees also have a right to report improprieties in the contracting employer's activities. It is important for Reitan Eiendom to ensure that improprieties are reported. The Company wants to know if breaches of the Company's guidelines have occurred, so that measures can be implemented. This also creates a safer environment for all employees and greater confidence for the Company's partners. The whistleblowing procedure applies for all employees, board members, suppliers and other stakeholders.

## 2. What are improprieties?

Improprieties means circumstances that violate legal rules, written guidelines in the enterprise or ethical norms that are broadly accepted in society, for example circumstances which could entail:

- A risk to life or health
- A risk to the climate or environment
- Corruption or other financial crimes
- Abuse of authority
- An irresponsible working environment
- Harassment or discrimination
- Personal data or privacy breaches (GDPR)
- Significant breaches of, and/or deficient compliance with, the Company's values and Code of Conduct, as well as deficient compliance with the Company's policies and guidelines.

Speaking up about circumstances that only concern the employee's own working conditions is not included under the whistleblowing procedure, unless the circumstance is covered by the list above. Reitan Eiendom encourages whistleblowers to provide the most detailed descriptions possible in connection with reports, thus ensuring maximum effectiveness in the follow-up.

### 3. Right and duty to report improprieties

Employees have a right to report potential improprieties in the enterprise, and it is important that employees exercise this right.

In certain instances, employees have a duty to speak up. As soon as an employee becomes familiar with the following circumstances, employees have a duty to report this to their employer and safety delegate:

- Errors or deficiencies that could entail a risk to life or health
- Harassment or discrimination
- Injuries and/or illness caused by the work or circumstances at the work site

Whistleblowers are entitled to report anonymously, either in writing or verbally.

The Company's other stakeholders, such as suppliers, partners or the public, also have the opportunity to report potential improprieties. They can use the same whistleblowing channels as employees.

### 4. Who can you report to?

#### 4.1. Internal whistleblowing

The Company's primary whistleblowing procedure is for employees to report through their immediate supervisor.

Alternatively, whistleblowers can report to other contacts in the Company who can make an impact, have the authority to make decisions or have responsibility for the issues in question.

If the report concerns employees and supervisors, you have the following alternatives:

- Next level of management
- CFO
- Safety delegate/employee representative

However, be aware that when you report to your safety delegate or employee representative, the employer's obligations will only be triggered if the safety delegate or employee representative chooses to forward the report to the employer's representatives.

If the report involves the CEO, a CEO of one of the subsidiaries, or board members, you can report to the chair of the board of the respective company.

#### 4.2. Whistleblowing portal

Whistleblowers can also use Reitan Eiendom's external, web-based whistleblowing portal hosted by PwC. The Company's contact for PwC is the Chief Financial Officer. The whistleblowing portal provides the option of full anonymity vis-à-vis the Company. This means that the Company's contacts will not receive information about who submitted the report. You can also choose to be anonymous vis-à-vis PwC. Anonymous whistleblowing to PwC can be reported via the whistleblowing portal, telephone or by letter. Anonymity will not be an option if the whistleblowing takes place via email to PwC, but as mentioned, you can request to remain anonymous vis-à-vis the Company.

Link to the whistleblowing portal, which is the primary channel for whistleblowing:

<https://trustcom.pwc.no/reitaneiendom>

Regular whistleblowing options, without anonymity:

E-mail: [marianne.pilgaard@pwc.com](mailto:marianne.pilgaard@pwc.com)

Postal address: PO Box 748, Sentrum, NO-0106 Oslo, Norway

Reporting in person: Dronning Eufemias gate 71, 0191 Oslo  
Telephone +47 93 00 99 77

#### **4.3. Reporting to public authorities**

Employees are entitled to report improprieties to regulatory authorities or other public authorities. Examples of such authorities include the Norwegian Labour Inspection Authority, the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime, the Norwegian Competition Authority, the Norwegian Data Protection Authority, the Norwegian Board of Health Supervision and others.

#### **4.4. Reporting improprieties to the public**

The risk of harming the Company and/or employees is normally much greater if improprieties are reported to the public. The threshold for reporting improprieties to the public must therefore be higher than for internal and external reporting. Under normal circumstances, these options should be exhausted before public reporting is considered.

Whistleblowers should carefully consider the following three factors if they are reporting improprieties to the public:

- Is there reason to believe that improprieties have actually taken place? The employee and other whistleblowers should investigate the actual circumstances as thoroughly as possible.
- Consider whether internal reporting or reporting to a public regulatory authority has had the desired effect.
- Consider whether others outside the Company have a legitimate (public) interest in learning about the matter in question.

## **5. How should improprieties be reported?**

### **5.1. Procedure**

Improprieties can be reported in writing or verbally. The report should be made in a reasonable and balanced manner. The report should be accompanied by documentation to the extent this is available. Reports should always be filed in good faith, and only if the whistleblower believes that improprieties have occurred.

### **5.2. What should the report contain?**

- Full name (anonymity is an option)
- Whistleblower's place of work (anonymity is an option)
- Report date
- Period of time, potentially date and time of observation/incident/issue
- Specific description of what you have observed
- Where the observation/incident/issue took place
- Any other witnesses
- Any other documentation
- Potential familiarity with previous issues of relevance for the report

### **5.3. Concerning the duty of confidentiality, etc. – restrictions on whistleblowing**

Rules regarding confidentiality, defamation, etc. in other legislation may restrict your freedom of speech. Such rules apply regardless of the right to report pursuant to Section 2 (A-1) of the Working Environment Act.

### **5.4. Prohibition against retaliation**

Section 2 (A-4) of the Working Environment Act protects employees against any and all retaliation, practice or omission as a result of or reaction to an employee's whistleblowing. This means that the employer cannot respond to whistleblowing with termination, dismissal, suspension, disciplinary action, threats, harassment, social exclusion, change in work tasks, unfair discrimination, reassignment or other negative reactions that may be characterised as punishment or sanctions, if the whistleblower has acted in line with Section 2 (A-1) of the Working Environment Act and this whistleblowing procedure. However, the whistleblower must be able to address factual counter-arguments or counter-evidence associated with the alleged improprieties.

Employees who have reported improprieties in line with Section 2 (A-1) of the Working Environment Act and these guidelines will be protected against any unfavourable actions as a potential reaction to the whistleblowing ("retaliation").

## **6. Handling reports of improprieties**

### **6.1. Guidelines for handling reports of improprieties**

- All reports must be addressed within a reasonable timeline.
- Anonymity is an option.
- The different reporting methods must be valued equally.
- All reports must be handled confidentially.
- It must be possible to report improprieties without fear of consequences.
- Whistleblowers must receive feedback within a reasonable timeframe.

### **6.2. Confidentiality requirements**

All whistleblowers have the opportunity to report anonymously, in writing or verbally. If whistleblowers report openly, their identity and the information they've provided will only be shared with those responsible for resolving the issue on a need-to-know basis. Whistleblowers must receive feedback on how the report is followed up, presuming that their identity is known, and that such feedback does not violate current regulations (e.g. the Personal Data Act).

### **6.3. Following up/handling a report**

If you receive a report of impropriety, this must always be forwarded to the Chief Financial Officer. This must be followed by a discussion of how to handle the issue.

An assessment must be made of who should be involved in handling the issue moving forward and which measures should be implemented, all depending on the specific case and the target of the report.

A person with relevant legitimacy, expertise and objectivity will be tasked with examining the issue. The facts of the case will be mapped by reviewing documentation and/or through interviews.

If the report concerns the actions or omissions of specific persons, the individual(s) in question must generally be made aware of this report and its content. This will allow the individual(s) to state their version of the case and to ensure maximum information and clarification of the issue. The whistleblower's identity will be withheld.

The Company must ensure that the working environment of employees who file such reports is not impacted by such whistleblowing. If necessary, the Company must ensure that measures are implemented in an effort to prevent retaliation.

All follow-up of the report must be documented in writing leading up to the final conclusion.

### **6.4. Completing/closing reports of concerns**

If the report concerns the actions or omissions of specific persons, and the issue has been addressed and concluded, the person named in the report must be informed immediately.

The person that filed the report will receive feedback on the result, presuming that the report was not anonymous, and that such feedback does not run counter to current regulations (for example the Personal Data Act).

Documentation and personal data must be handled according to the conclusion on the matter:

- If investigations show that improprieties have not occurred or that a conclusion cannot be reached, only anonymised documentation regarding the issue may be stored for statistical purposes.
- Should investigations reveal that improprieties have occurred, relevant parts of the documentation must be archived. Insofar as possible, the archived documentation must not contain personal data.
- If the report is aimed at the actions or omissions of specific persons, and if investigations do not lead to the clarification of factual circumstances, relevant documentation must be archived for up to one year.
- If the report results in a sanction vis-à-vis an employee, relevant documentation will generally be archived for up to five years. However, the severity must be considered in each individual instance.
- If the whistleblowing notification ultimately leads to a police report, this must be handled by the Chief Financial Officer, who is responsible for ensuring that the police receive sufficient information about the issue. Documentation concerning the internal process must be archived until a legal decision has been made.

## **7. Data protection**

Reitan Eiendom will handle all information received under this whistleblowing procedure in strict confidence. We will protect the privacy of both the whistleblower and the subject(s) of the report. Information will only be shared if this is absolutely necessary.

## **8. Approval and revision**

This procedure was adopted by the Board on 21 March 2023. The procedure will be reviewed for potential revisions and adjustments every two years.