



13 March 2026, Lade Gaard  
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# WHISTLEBLOWING POLICY FOR REITAN EIENDOM

## 1. Background and purpose

The purpose of this Whistleblowing Policy is to protect the rights of employees and other stakeholders to report improprieties at 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 enterprise. It is important for Reitan Eiendom to ensure that improprieties are reported. The Company wants to know if breaches of the Company's values and 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 Policy 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 and 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 covered by the Whistleblowing Policy, 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 reports

The Company's primary Whistleblowing Policy 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
- HR Director
- Safety delegates/employee representatives

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 EY.

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 EY. Anonymous whistleblowing to EY can be reported via the whistleblowing portal, telephone or by letter. When reporting in person, the whistleblower will not be anonymous vis-à-vis EY, but they can request anonymity vis-à-vis the Company.

Link to whistleblowing portal: [whistleblowing portal](#). See also the user guide for the whistleblowing portal: [user guide for whistleblowing portal](#).

#### Other ways to report improprieties

Mail: Mark the envelope "Confidential report" and send to: Ernst & Young AS, ATT: Forensics and Integrity Services, Stortorvet 7, PO Box 1156 Sentrum, NO-0107 Oslo, Norway

Personal visit: Reporting via a personal visit must be agreed upon in advance with EY's whistleblowing office (see telephone number below).

Telephone: EY's whistleblowing office can be reached all business days between 08:00-16:00 at the following tel. no.: +47 24 00 20 14. This telephone line is anonymised and the whistleblower's telephone number will not be visible to EY's operators.

#### **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 and should normally not be done until these options have been attempted.

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

- Is it reasonable 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. Process**

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 must 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

Whistleblowers do not need to present evidence for an incident in their report. However, the whistleblower must be as clear as possible as regards the factual circumstances that have occurred. The whistleblower must distinguish between what they know and what they suspect. This is important to ensure that the individual receiving the information can review the matter, and consider what can be done to investigate the other circumstances.

Information should be provided as soon as possible after learning of an undesirable incident, ensuring that the impropriety can be prevented, stopped or investigated as quickly as possible.

### **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 reporting improprieties. This means that the employer cannot respond to a report of improprieties 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 Policy. However, the whistleblower must expect 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 this policy will be protected against any unfavourable actions as a potential reaction to what they have reported ("retaliation").

## **6. Handling whistleblowing reports**

### **6.1. Principles for handling whistleblowing reports**

- All reports shall be reviewed within a reasonable timeframe
- 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 provide 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 whistleblowing report**

#### **Reports received via the whistleblowing portal**

Once EY receives a report, EY will send a confirmation to the whistleblower, letting them know that the report has been received. All incidents, claims and complaints reported to EY through the whistleblowing portal are assigned a reference number.

EY shall establish and maintain a log of reports and further processing, ensuring that the whistleblowing cases are traceable. Then EY subjects the report to a risk assessment and quality assurance. The risk assessment involves a review and assessment of the report's potential consequences for Reitan Eiendom, for example reputation, HR issues, operations, finances and potential sanctions, given that the provided information is correct. Quality assurance involves

attempting to establish a dialogue with the whistleblower to obtain detailed information, and potentially obtain necessary information from other sources (public registries, etc.).

The process also includes an assessment of how to best protect the whistleblower. Reports concerning potential improprieties and/or illegalities constitute information of a sensitive nature, which requires an elevated focus on privacy considerations and a need for confidentiality, including principles of independence, objectivity and contradiction. EY will prepare a whistleblowing memo to summarise its assessments, advice and proposed measures (if any), which will serve as Reitan Eiendom's basis for decision-making in additional follow-up of the report. If the incident is not considered to be a breach of laws or rules or a violation of Reitan Eiendom's values, the HR Director or relevant manager at Reitan Eiendom shall close the case and provide a substantiation. Should it turn out, following investigations, that there was no basis for concern (no impropriety), the case shall be closed in a manner that safeguards the individual(s) mentioned in the report, and the whistleblower shall receive feedback about the decision. The whistleblower will receive this feedback from Reitan Eiendom's whistleblowing committee or EY within a reasonable timeframe, depending on the scope and severity of the report.

### **Reports received outside the whistleblowing portal**

If you receive a report of impropriety, this must always be forwarded to the HR Director. In instances where it is considered to be improper to inform the HR Director, the CEO shall be informed. This must be followed by a joint discussion of how to handle the issue. Everyone is encouraged to write down verbal reports as quickly as possible after receiving them. When appropriate, the HR Director shall forward the information in the report to the whistleblowing portal operated by EY, so that the circumstances can be followed up and logged with a reference number.

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

An individual 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/conversations.

### **When a whistleblower case is under review, the following principles apply:**

- All inquiries shall be taken seriously and handled as a whistleblowing report, including anonymous reports
- The choice of whistleblowing method shall be of no significance for how the case is handled
- All inquiries shall be reviewed
- The individual(s) mentioned in the report have a right to make statements – contradiction
- Confidentiality shall be ensured for both the whistleblower and the individual(s) mentioned in the report
- Retaliation is prohibited
- Focus on the issue, not the individual(s)
- There shall be no investigations to identify anonymous whistleblowers

### **Further follow-up of reports**

Should a received report result in a need to map the facts (investigation), and this is considered to be appropriate, the investigation shall be led and conducted by Reitan Eiendom, or by EY according to a detailed mandate issued by Reitan Eiendom's whistleblowing committee. The investigations will be carried out according to recognised principles of due process and in a manner which ensures that all affected parties have the opportunity to give their view of the specific case. If EY conducts the investigations, Reitan Eiendom's whistleblowing committee shall receive continuous updates on the status and progress.

The administrative process shall be in accordance with the provisions of the Personal Data Act and the (Norwegian) Public Administration Act's general rules concerning administrative procedure. The

due process rights of both the whistleblower and mentioned individual(s) shall be protected. This also involves ongoing assessments of the timing of information, involvement and contradiction for all parties.

The whistleblower's identity will always be treated as confidential information. The privacy of both the whistleblower and mentioned individual(s) shall be preserved. According to the Personal Data Act, the mentioned individual(s) are entitled to information and access to information about themselves and how the information is processed.

Despite treating the identity of the whistleblower and mentioned individual(s) confidentially, it may be necessary to reveal both the content of the case and the identity of the whistleblower to other affected parties. Should a report result in a subsequent duty to testify in court or vis-à-vis another public authority, the duty to testify will supersede the principle of confidentiality. The head of the investigation shall, along with the Reitan Eiendom whistleblowing committee, ensure that the need for legal advice is assessed on an ongoing basis throughout the investigation. The need to inform others in the company (e.g. chair, communication officer) should also be assessed on an ongoing basis.

Once a mapping is complete, and depending on the outcome of the investigation, a recommendation shall be provided to all relevant parties involved in the incident to ensure adequate follow-up.

If there is reason to believe that the reported incident may indicate a criminal act that would normally form the basis for public prosecution, the result of the investigations shall be reported to the Board. The Board will determine whether or not to report the matter to the relevant authorities. In such cases, all measures shall be approved by the Board.

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.

The recipient of a report can always, regardless of confidentiality, contact and confer with the HR Director or the whistleblowing office at EY. All follow-up of the report must be documented in writing leading up to the final conclusion.

#### **6.4. Completing/closing whistleblowing cases**

If it is concluded that the whistleblowing report is baseless, the case shall be closed with no further follow-up. The whistleblower shall be informed that the case is being closed.

If the report concerns the actions or omissions of specific individuals, and the issue has been addressed and concluded, the mentioned individual(s) shall be informed immediately.

The individual 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 (e.g. the Personal Data Act). All investigations shall be concluded with a report describing the content of the whistleblowing report, the administrative procedure, conclusion and any measures. The assessment and final report from Reitan Eiendom's whistleblowing committee or EY will form the basis for considering further relevant measures, or potentially closing the case if there is no basis for additional measures.

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 individuals, 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 report ultimately leads to a police report, this must be handled by the HR Director, who is responsible for ensuring that the police receive sufficient information about the case. Documentation concerning the internal process must be archived until a legal decision has been made.

## 7. Data privacy

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

Personal data shall be processed in line with the Personal Data Act and the Regulations relating to processing of personal data, as well as the Working Environment Act and internal governing documents. The CEO of the enterprise covered by the report will be responsible for ensuring compliance. EY operates as a data processor [through a Whistleblowing Framework Agreement](#) when it receives whistleblower reports, in line with the signed Data Processing Agreement. EY will also serve as data processor when investigations are requested. This will be evident from the framework agreement in connection with a concrete investigation with a separate mandate. The relevant company under Reitan Eiendom is responsible for carrying out internal controls and information security measures based on a documented privacy risk assessment. Such risk assessments are conducted regularly to ensure that personal data is processed in a compliant way when whistleblowing cases are handled.

The log and all other items shall be stored electronically with restricted access, and otherwise maintained in a secure and confidential manner. All physical documents shall be locked in cabinets. Documents and information shall not be transferred to HR files or other archive/administrative systems. All Reitan Eiendom employees are required to comply with confidentiality rules for sensitive information and shall sign a non-disclosure statement if this is deemed necessary by the CEO.

Reference is also made to EY's [privacy policy](#).

## 8. Approval and revision

This policy was adopted by the board on 13 March 2026. The policy will be reviewed for potential revisions and adjustments every two years.