

WHISTLEBLOWING POLICY
FOR
INFRONT GROUP COMPANIES

Effective from: 31 January 2023

Zlatko Vucetic, CEO Infront Group

Version 1.0

Date 31 Jan 2023

Review 30 Jan 2024

1. INTRODUCTION

Infront AS (“the **Company**”) has implemented this whistleblowing policy (“the **Policy**”) in order to ensure that all employees, managers and directors can express their concerns in a responsible and effective manner internally if they discover censurable conditions at the Company. The Policy shall also ensure a proper handling of whistleblowing notifications in the Company.

The Policy sets forth routines for internal whistleblowing in accordance with applicable legislation.

All employees and hired-in personnel (jointly referred to as **employees**), managers and directors have a legal right, and in some cases a duty, to report censurable conditions that occur in connection with the business of the Company. We encourage all employees, managers and directors to report censurable conditions that they become aware of in relation to their work.

Whistleblowing is an important method for uncovering illegal conditions and unwanted business conduct of behaviour within the Company. Whistleblowing allows the Company to rectify problems and prevent the problems from growing.

It is a management responsibility to ensure that whistleblowing notifications are handled in a responsible manner. It is also a management responsibility to ensure that employees, managers and directors who make reports (the **whistle-blower**) are protected against all forms of retaliation.

2. WHAT TO REPORT?

2.1 Censurable conditions

All employees, managers and directors are encouraged to report their concerns if they discover any censurable conditions¹ at the Company. Examples of such conditions are:

- Breach of applicable legislation or the Company’s policies
- Danger to life or health
- Danger to climate or environment
- Corruption or other financial crime

¹ Conditions that violate laws and regulations or policies and procedures adopted by the Company or conditions that contravene ethical norms that are widely recognized in the society

- Unjustifiable working environment, including harassment, human and labor rights violations
- Breach of personal data protection regulations
- Suspicion of conflict of interest
- Suspicion of bribery/corruption
- Suspicion of money laundry
- Suspicion of breach of confidentiality

Matters that only applies to the employee's own employment relationship will generally not be considered censurable according to law, unless the matter otherwise is comprised by the definition above. Examples of circumstances that generally are not considered censurable according to law, and thereby may not be dealt with in accordance with this Policy, are:

- Dissatisfaction with salary or other working conditions
- Disagreement with leaders or other colleagues about handling of work assignments, professional inquiries, etc.
- Disagreement with feedback or criticism from a manager if it is within the framework of routines and requirements of the Company and is presented in an objective, constructive and reasonable way.

2.2 Right and duty to report

Employees, managers and directors that become aware of circumstances that they believe are of censurable character as described above, have a legal right to report the matter.

Employees, managers and directors have a legal obligation to report if they become aware of harassment or discrimination in the workplace, or circumstances that may endanger life or health which the employee, managers and directors cannot correct him-/herself.

3. PROCEDURES FOR REPORTING

Any expression and reporting shall be done in a responsible manner. A report in accordance with this Policy is always considered to be made in a responsible way.

Reports can be made vocally or in writing. The receiver of the report shall write down the reporting if it is made vocally.

As a main rule, reports should always be made internally in the Company, and to the whistleblowing committee through the whistleblowing reporting portal as indicate on the Company's Intranet. This committee consists of the Compliance Officer and the head of the HR department ("the **Committee**").

A whistleblowing report may be made anonymously.

The employee, managers and directors may always report externally to relevant public authorities.

Provided that the employee, managers and directors is in good faith regarding the content of the report, the report regards misconduct which has public interest and the employee, managers and directors had tried internal reporting first or has strong and verifiable reasonable grounds to believe that internal reporting will not be appropriate, the employee, managers and directors may report to the media or to the public in general.

Handling and following-up of whistleblowing reports shall be the responsibility of the Committee for handling whistleblowing reports (**Committee**). If the report concerns the Committee the report shall be communicated to the head of the CEO, who will be responsible for the follow-up of the report.

In the event the name of one of the members of the Committee or the name of a Committee member's close relatives is referred to in the report, the Committee member shall not take part in any handling of the report. The same applies if the report otherwise contains information that may undermine the confidence of impartiality of any of the Committee members.

4. PROTECTION AGAINST RETALIATION AND CONFIDENTIALITY

4.1 Non-retaliation

Whistle-blowers that report in a responsible way shall be protected against any adverse act or omission as a consequence of, or a reaction to, reporting the matter (retaliation). This includes becoming subject to:

- threats, harassment, unjust discrimination, social exclusion or other unfair treatment
- warning, unjustified change of work tasks, relocation or degradation; or
- suspension, termination (with notice or by summarily dismissal) or disciplinary punishment.

The Company shall ensure that the whistle-blower has a safe and proper working environment. If necessary, the Company shall implement measures to protect against retaliation against the whistle-blower.

4.2 Confidentiality

All reports made in the Company will be handled with confidentiality. This means that:

- The whistle-blower's identity, in case report hasn't been made anonymously, shall be disclosed strictly on a need-to-know basis, only to those receiving and handling the report. Anyone receiving and handling the report shall keep the whistle-blower's identity confidential to the extent possible and permitted by law.
- The handling of the report is confidential and information about the content of the report is only disclosed to people on a strictly need-to-know basis. The fact that a report has been made, what the report concerns and that it is investigated can be communicated to the organization, the authorities, media or others, if deemed necessary.

5. FOLLOW UP OF WHISTLEBLOWING NOTIFICATIONS

5.1 Routines upon receipt of reports

All reports received by the Committee will be taken seriously. The whistle-blower will receive a written confirmation from the Committee that the report has been received.

The Committee evaluates all received reports on a case-by-case basis. Reports regarding censurable conditions (ref. item 2.1) shall always be subject to appropriate investigation and be handled within reasonable time.

With respect to reports regarding other types of concerns/circumstances that evidently does not concern censurable conditions according to item 2.1, the Committee may close the case without further actions or refer it to be handled by other relevant functions in the Company. The whistle-blower shall nevertheless be notified that the case has been closed/referred to another function, as well as an appropriate explanation of the reason. If the Committee believes that the case should be followed up in another manner (personnel case, etc.) the whistle-blower shall, to an appropriate extent, receive guidance on how he/she can proceed.

5.2 The Committee's handling of whistleblowing reports

The Committee shall assess and examine the report in a competent, objective and independent manner.

The Committee can conduct his/her own investigation and conclude when it deems appropriate to do so based on the facts and proper assessment based on applicable law and internal policies and guidelines. The Committee shall consult the CEO of the Company if in doubt about the handling of a report, or where there is need for more comprehensive investigations and reporting.

Upon consulting with the CEO, the Committee may also engage internal resources or appoint external advisors to handle and investigate a report in the event of more serious or complex matters. If external advisors are engaged, a written mandate for handling further investigations of the report shall be prepared and the external advisor shall provide a written investigation report to the Committee with assessment and recommended actions.

The Committee shall give a preliminary response to the whistle-blower within two weeks from receipt of the report, regardless of whether the report is still under evaluation. To the extent possible, the response should also include an estimate of when the case may be expected to be concluded.

Any conversations or interview with the whistle-blower shall be recorded in minutes. The whistle-blower's identity shall not be stated in any written material, unless approved by the whistle-blower. A copy of the minutes shall be provided to the whistle-blower upon request.

The person(s) being the subject of the report shall, as a principal rule, be made aware of the circumstances that are being investigated and the information that have been revealed. The person concerned shall have the opportunity to comment on the matter before the Committee concludes on follow-up actions (the right of contradiction).

The Committee shall always inform the Infront Management, the managing director of the Company if a report contains information that makes it necessary with immediate measures

like cessation of work or closure of premises, or if the report contains allegations of serious criminal offences. The managing director shall, in accordance with internal crisis management procedures, in a swift matter inform the Chair of the Board, of such received notifications.

5.3 Closing of a whistleblowing case

Based on an assessment and examination of the available facts, the Committee shall reach a decision in the whistleblowing case and, if relevant, determine suitable follow-up actions of the reported concern. The Committee shall document its assessments and conclusions in writing, including the factual and legal basis on which the assessment is based.

Once the case is concluded, the whistle-blower shall be informed about the outcome of the case. The same applies to the extent possible to the person(s) being the subject of the report. Other individuals who have been involved in the case may be informed about closure of the case if deemed appropriate.

The Committee shall provide a reports to the CEO of the Company on a regular basis on how the cases were handled and whether it has brought any disciplinary actions with respect to personnel or revisions of the Company's compliance routines, internal controls etc.

6. The collection and processing of personal information

The employee, managers and directors must be aware that for the purpose of handling a whistleblowing report, personal information might be collected and processed. Whistle-blowing reports are likely to contain personal data. Examples of types of personal data that may be processed are:

- Name, position and contact details of the whistle-blower and the person(s) being the subject
- of the report, as well as any witnesses or other individuals affected.
- Details of the misconduct of the individual(s) concerned.

Any personal data collected via handling of whistleblowing reports will be processed for the purpose of administering and investigating allegations raised, and dealing with discovered misconduct, as described in this policy.

Document and Review History Version	Author	Role	Comment
1.0	Andrej Seidel	General Counsel	First version