

# Warning poster

## **Whistleblowing**

Whistleblowing is reporting improper, illegal or unethical conditions in the company. As long as this does not conflict with other legislation, such as confidentiality obligations.

Whistleblowing is both legal and desirable, as this can help to rectify any improper conditions.

The Olav Thon Group encourages everyone to exercise this right if misconduct is discovered.

## **What are improper, illegal or unethical conditions?**

Such circumstances may be breaches of legislation, internal guidelines or ethical norms/guidelines, such as bullying, sexual harassment, substance abuse, conditions that endanger the lives and health of persons, embezzlement, theft, fraud, corruption, financial infidelity, etc.

## **Who can make an allegation?**

The guidelines apply to all employees of the Olav Thon Group, including hired personnel and external consultants.

External persons without a link to a company in the group are also welcome to report any misconduct.

The guidelines apply to such whistleblowers as far as they are appropriate. A separate reporting centre has been created for use by external persons. The link can be found on our website.

## **Whom can I report to?**

A report must initially be made to the immediate manager or to the manager higher up in the line, or alternatively to the board.

Regardless of the level in the line that is reported to, one can always report to the safety representative and employee representative.

External reporting means reporting to public authorities and supervision of matters relevant to them.

Reporting to the media should only be used when all other channels have been tried without result. Here it is also important that whistleblowers assesses whether this is useful for the case and that other persons' legal protection is safeguarded.

If you do not work in the Olav Thon Group, or if you as an employee prefer to make a report outside of line management, the report centre is used.

## **How do I make a report?**

A report can be made directly to the immediate manager, safety representative or employee representative. Alternatively, the OTG's reporting centre is used, see page two for access.

We have chosen to have an external party as the recipient of the reports so that any desired anonymity is safeguarded. The use of the reporting centre is considered as internal reporting. Internal reporting should be attempted before any external reporting.

## **Once you have made a report**

Management is responsible for following up on cases that have been reported, regardless of how and to whom you have reported.

1. The reported conditions must be rectified. The whistleblower must be notified within 2 weeks of further process/measures.
2. However, if the criticism and report prove to be unfounded, the whistleblower must still receive a proper explanation.

3. The management is responsible for taking care of both the whistleblower and the person who may be affected by the report or criticism.

### **Punishment of the whistleblower is forbidden.**

It is forbidden to punish or sanction employees who have made an allegation. Punishment of whistleblowers will result in liability for the company. This also applies to the punishment of employees who intend to make an allegation, for example when obtaining documentation.

Whistleblowers who experience this, must inform the group management (or chairman), who must immediately deal with the matter.

### **Anonymity and confidentiality**

Reporting can be done anonymously, but transparency will improve proceedings. In any case, the identity of the whistleblower is a matter that must be treated with confidentiality by all parties involved and not made available without the whistleblower's consent.

### **Personal data**

Personal data obtained in connection with a report must be processed in accordance with the provisions of [the Norwegian Personal Data Act](#)

The reporting centre is a supplement to the company's internal and local schemes for reporting of suspected wrongdoing, cf. Section 2A of the Working Environment Act.

The scheme applies to all employees and contract employees in Olav Thon Gruppen AS.

### **How to submit a report:**



Online:

[Click here to link to the reporting form](#)



By letter:

Ernst & Young AS  
Attn: "Forensics", Oslo Atrium  
Postboks 1156 Sentrum  
NO-0107 Oslo  
Norway



By telephone:

0047 24 00 20 14

Working days between 8 am - 4 pm  
(Central European Time)



QR code for web form:

Scan and use a handheld device such as  
mobile phones or tablet

You can submit a report anonymously regardless of which channel you choose. The telephone reception is staffed all working days between 8 am - 4 pm.

The whistleblowing channel is managed by Ernst & Young AS (EY). AS an independent third party, EY receives the report on behalf of Olav Thon Gruppen AS and provides advice on further follow-up.

