

# External reporting channel for Olav Thon Gruppen AS

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

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

## **Whistleblowing**

Whistleblowing means reporting improper, illegal or unethical conditions in a 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.

## **Who do I report to?**

A report must initially be made to the immediate superior or manager higher up in the line, or alternatively, to the executive management of the company.

Regardless of the level in the line that is reported to, reporting can always be done to the safety representative or employee representative.

External reporting means reporting to public authorities and supervisory body about matters relevant to them.

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

If you do not work in the Olav Thon Group or if you are an employee and prefer to make a report outside of line management, the reporting centre can be 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 can be 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 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 two 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. 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 deal with the matter immediately.

### **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 suspected wrongdoing in accordance with Section 2A of the Working Environment Act. The scheme applies to all employees and contract employees of 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', Stortorvet 7  
Postboks 1156 Sentrum  
NO-0107 Oslo  
Norway



By phone:  
24 00 20 14

Weekdays from 8 am - 4 pm  
(Central European Time)



QR code for online form:  
Scan and use a handheld device such as a  
mobile phone or tablet

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

The reporting 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.

