

External whistleblowing procedure



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WHISTLEBLOWING PROCEDURE FOR EXTERNAL PARTIES

Purpose of the procedure

The Bank wishes to facilitate a culture of freedom of expression and has established these guidelines to prevent, identify and rectify censurable conditions. Our whistleblowing procedures describe how our customers, partners and other external parties can report censurable conditions and how report should be handled to ensure sound processes.

If you have reason to suspect censurable conditions at the Bank, you are urged to bring the matter to Sparebanken Sør's attention so that we become aware of the matter and necessary measures can be implemented. Whistleblowing may have a positive effect by highlighting censurable conditions which can then be rectified.

Target group

This procedure is aimed at external parties: customers, partners or others outside the organisation.

What is meant by censurable conditions?

Censurable conditions are matters that contravene rules of law, written ethical guidelines or generally accepted ethical standards.

- Violations of laws and regulations
- Bullying, harassment or discrimination
- Serious breaches of governing documents or procedures
- Embezzlement, theft or corruption
- Breaches of ethical standards
- Breaches of a duty of confidentiality
- Censurable management/governance

Censurable conditions can result in:

- A risk to life or health, the climate or environment
- Abuse of authority
- inadequate handling of conflicts of interest
- Breaches of privacy

The list above only includes examples of situations that could be reported and is not intended to be exhaustive.

The Bank has a separate procedure for following up complaints. If you are unhappy with the service you have received or the Bank's actions, you can make a complaint. Whistleblowing is for more serious matters.

How to report censurable conditions (“whistleblow”)

The Bank wishes censurable conditions to be reported. How reports are submitted and the channels used are important. Reports must be submitted in a professional and objective manner, with respect for the parties involved.

Written reports should describe:

- What has happened (illegal activity or violation of internal guidelines)
- Who is involved
- When and where the event occurred/was discovered

- Whether it has happened more than once
- Whether there were any witnesses
- Any other matters you believe are important

Wherever possible, reports should not be anonymous since this will enable us to gain as much information as possible about the case. However, the whistleblower's identity is confidential information, and you can report anonymously if you wish. If you wish to report anonymously and keep your identity secret, we recommend using BDO's whistleblowing channel or sending a letter.

Notification options:

- Via the Bank's whistleblowing channel (received by BDO)
- E-mail to BDO at integrity@bdo.no
- E-mail to Internal Audit at internrevisjonen@sor.no
- Orally or by text message to Internal Audit
Telephone: +47 406 34 446
- Letter sent to postal address:
Sparebanken Sør, Internrevisjonen, Postboks 200, NO-4662 Kristiansand, Norway

Reports received via media other than the whistleblowing channel must subsequently be registered in the whistleblowing channel by the recipient. **All reports must be treated confidentially.**

Processing whistleblowing cases

Principles for processing whistleblowing cases:

- All reports must be taken seriously
- All reports must be followed up in a sound, thorough and efficient manner.
- Reports may be made anonymously.
- The case must be handled confidentially
- Reports may be made anonymously.
- The case must be processed confidentially
- Sufficient information must be obtained and all aspects of the case must be investigated.
- The whistleblower's identity is confidential and should therefore, wherever possible, not be disclosed to the subject of the notification
- It must be possible to use the whistleblowing system without fear of reprisals.

Receipt and confirmation

The party who receives the notification must without undue delay forward the notification through the whistleblowing channel. If a report is made orally, the recipient must document the content before forwarding it.

The contact person and the report recipient are responsible for following up and ensuring that the case is processed.

All whistleblowers will be assigned a case number through the whistleblowing channel. This will enable whistleblowers to track their case and communicate during the processing.

Processing notifications

The duration and scope of the investigation will depend on the seriousness and complexity of the report. If the investigations confirm the existence of a censurable conditions, the report must be processed in line with the whistleblowing rules. If the report relates to a non-conformance or an HR

issue, the employer must ensure that the case is followed up in line with the procedures and rules for such cases.

Once sufficient information has been obtained, the employer must make a decision on the outcome of the case. The whistleblower must be informed of the decision, provided this is not in contravention of the law. This feedback should also confirm that the alleged censurable conditions have been investigated. Provided it is possible and a duty of confidentiality or other matters do not prevent it, the whistleblower must also be informed of the outcome of the investigations.

If the report and/or the investigation reveal violations of laws, the case must be referred to the appropriate supervisory authority.

The Bank's responsibility in relation to the whistleblower and subject of the notification

Provided that a report has been made in line with these guidelines, you are protected against any prejudicial treatment as a reaction to the report (reprisals). If considered necessary, measures must be taken to prevent reprisals.

The employer must also consider the employee who is the subject of the whistleblowing report and ensure that they still enjoy a sound working environment.

Once a final decision has been made, the subject of the report must be immediately informed, regardless of the outcome.

Processing of personal data

Reports of censurable conditions may involve the processing of personal data. Data may also be processed when following up reports in order to clarify actual conditions and take necessary measures.

As whistleblower you must be informed which of your personal details we process. Information about your identity will be kept confidential throughout the process. However, this does not preclude disclosure of such information under other laws, for example in the event of a police investigation or legal proceedings.

The subject of the whistleblowing report generally has the right to learn about the allegation and its justification as soon as possible. The subject of the report also has the right to access all their personal data that is processed in connection with the whistleblowing case. Exemptions from the right to information and access are regulated in Section 16 of the Norwegian Personal Data Act. Exemptions must be assessed on a case-by-case basis.

Personal data must not be stored for longer than is necessary. Information that is processed in connection with a report must be deleted as soon as possible after the case has been closed.