

Procedure for external whistleblowing

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1. Introduction

1.1 Purpose and background

The Sparebanken Sør Group 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 the various processes used to handle reports.

If you have reason to suspect censurable conditions in the Sparebanken Sør Group, you are urged to bring the matter to the Sparebanken Sør Group's attention so that we can log the matter and implement any necessary measures. Whistleblowing may have a positive effect by highlighting censurable conditions which can then be rectified.

1.2 Document management

This procedure has been drawn up by Internal Audit and reviewed in collaboration with Compliance, HR, the union representative and AML. Internal Audit is the document owner and administrator.

This document is a level-3 document in the Bank's document structure. Please refer to the policy document "Organisation of Risk Management" for the overarching document structure. If there are discrepancies in the content of this document compared to other documents, the document with the highest level (where 1 is the highest and 4 is the lowest) will have precedence.

This document must be reviewed regularly and revised if necessary.

1.3 Target group

This document applies to external parties: customers, partners or others outside the organisation.

2. Procedure for external whistleblowing

2.1 Application

This procedure applies once an external party reports censurable conditions.

2.2 What is meant by censurable conditions?

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

- Violations of laws and regulations
- Bullying, harassment and 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 the environment
- Abuse of authority
- Inadequate management 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 Group 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.

2.3 Whistleblowing in accordance with the Norwegian Anti-Money Laundering Act

According to Section 37 of the Norwegian Anti-Money Laundering Act, the Bank is obliged to ensure that employees whose task it is to carry out investigations and report to the National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim) are not exposed to threats etc. as a result of whistleblowing¹. Employees can use the whistleblowing channel to report the following:

- Matters that could result in a fear of reprisals from customers who have been subject to customer due diligence or have been reported to Økokrim
- Situations in which employees of the Bank may have acted in breach of the anti-money laundering regulations, for example committed breaches of the prohibition of disclosure, been complicit in money laundering and the financing of terrorism or failed to report suspicious circumstances to Økokrim

Others who learn that the Bank is being used to conduct suspicious transactions are also asked to report this through the Bank's external whistleblowing channel run by BDO.

2.4 How to report censurable conditions ("whistleblow")

The Group 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 those 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 whistleblowing channel (received by BDO)
- Email to BDO at integrity@bdo.no
- Email to Internal Audit at internrevisjonen@sor.no
- Orally or by text message to Internal Audit
- Telephone: +47 47 66 33 31
- Letter sent to postal address:
Sparebanken Sør, Internrevisjonen, Postboks 200, 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.**

¹ RTF-2022-4 section 10.2.1

2.5 Processing of whistleblowing cases

Principles for handling whistleblowing cases:

- All reports must be taken seriously
- All reports must be followed up in a professional, thorough and efficient manner
- 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

2.6 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.

2.7 Processing of notification

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 condition, the report must be processed in line with the whistleblowing rules. If the notification relates to a non-conformance or a personnel 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 Group must reach a decision on 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.

2.8 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 Sparebanken Sør Group must also consider the employee who is the subject of the whistleblowing notification and ensure that they still enjoy reasonable working conditions.

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

2.9 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.

3. Change log

The table shows the most important changes that have been made to this procedure after it has been established, together with the relevant versions:

| Version | Date | Changed by | Main changes |
|---------|-------------------|--------------------------|--|
| 1 | 22 August 2017 | Risk Management Division | |
| 2 | 31 January 2019 | Risk Management Division | |
| 3 | 17 September 2020 | Internal Audit | |
| 4 | 30 June 2023 | Internal Audit | Updated and entered into new template. There are now two separate whistleblowing procedures: <ul style="list-style-type: none">- an internal procedure for Sparebanken Sør, Sørlandets Forsikringsenteret, Sørmeglere AS and Sørmeglere Telemark AS- a procedure for external parties |