

Whistleblowing Policy for employees in Glasspaper

Oslo, 22.02.2024

These whistleblowing procedures apply to all employees, including hired workers in the Glasspaper group. Glasspaper's suppliers and partners are also encouraged to report misconduct.

In Glasspaper, we want to promote an open culture of free speech. It is in Glasspaper's interest that misconduct is uncovered, and whistleblowing can help reduce the risk of undesirable or illegal practices taking place. In addition to Glasspaper's desire to promote an open culture of free speech, the individual employee has a statutory right to report misconduct. Pursuant to the Working Environment Act, the employee's rights to whistleblow shall be carried out in a judicious manner. Employees and hired employees who become aware of misconduct are encouraged to notify in line with these whistleblowing procedures, which are regarded as a prudent procedure for whistleblowing.

All enquiries shall be taken seriously and dealt with immediately. The information provided shall be treated confidentially.

Reporting misconduct will have no negative consequences for whistleblowers. A whistleblower is protected from retaliation in accordance with Section 2A-2 of the Working Environment Act. Retaliation is any unfavourable treatment resulting from the notification, both actions and omissions, for example: threats, harassment, unfair discrimination, social exclusion, warning, change in work tasks, relocation and termination.

Unacceptable violations

Unacceptable violations are matters that the employee becomes aware of through the employment relationship which are, or may be, in violation of Norwegian laws and regulations, the ethical guidelines of the Group and the general perception of what is justifiable or ethically acceptable in society.

Examples of misconduct:

- financial irregularities, such as embezzlement, corruption, fraud or similar
- breach of HSE rules, or other circumstances that may entail safety risks
- breach of confidentiality
- discrimination
- abuse of power
- violation of the Privacy Policy
- other unlawful or unethical conduct

Matters that the employee believes are inexcusable solely on the condition of their own political or ethical convictions are not covered by the whistleblowing section of the Working Environment Act. The same applies to disagreements about professional decisions, personnel conflicts or more general complaints or suggestions for improvements.

Steps to notify and receive notification

Report of misconduct in Glasspaper shall be given to the line manager. If the matter reported includes the line manager, or the line manager has been informed but has not done anything, the manager next in line should be notified. You can also notify the union representative or safety representative who will then follow up the inquiry rightly in the Group.

The report must preferably be in writing but may also be oral. Written notice is sent by e-mail.

The notification shall contain the following information:

- Full Name (may be anonymous)
- Date of reporting
- Time and place of observation
- Description of observation
- Any other witnesses
- Any knowledge of previous cases
- Any suggestions on what should be done/measures

You can notify anonymously, but it is desirable that you state your identity for the sake of the company's need to be able to investigate the matter as thoroughly as possible. The whistleblower's identity will be confidential for the closed group who processes the report.

You always have the right to notify public authorities such as the Norwegian Labour Inspection Authority, the Norwegian Data Protection Authority, Økokrim or the Competition Authority pursuant to Section 2A-1 (2) of the Working Environment Act. It is encouraged to notify internally first, unless there are circumstances in the case that make it not appropriate so that we can rectify the circumstances as quickly as possible.

Glasspaper's suppliers and partners are also encouraged to report misconduct. The notifications can be sent to Ceo Tom-Erik Haug, to tom-erik.haug@glasspaper.no

Further follow-up

The person receiving the report is responsible for ensuring that the report is followed up and processed by the right authority/person in Glasspaper. If the notification is given orally, the recipient shall record the information and send the written record to the whistleblower.

The recipient shall provide the whistleblower with confirmation that the notification has been received within three days.

The Working Environment Act's rules on whistleblowing require the employer to ensure that the notification is adequately investigated within a reasonable time. We will not involve more people in the investigations than is strictly necessary.

When the case is sufficiently investigated, a decision on the outcome of the case shall be made by the person in the Group responsible for the matters to which the report applies. The whistleblower shall be notified of the outcome within three days. Measures shall then also be informed of, if applicable. If the survey takes longer than three days, the whistleblower must be notified of it.

The person or those to whom the report may apply, shall be made aware of the notification and the information provided, and be given the opportunity to present their side of the case. A reluctance is made here for cases where, for the sake of a further investigation, it is important that the person(s) are not made aware of the report until initial investigations have been carried out. When the case has been processed, the person or people notified should be notified immediately, regardless of the outcome of the processing.

If, after initial investigations, the employer can establish with certainty that the notification does not entail correctness, the employer shall consider carefully whether it or those who are reported shall

be notified of the report, based on what it or those it is reported about, and whether the working environment will be served by becoming aware of the report.

The Personal Data Act shall be observed when processing all personal data and the parties shall observe the rules on confidentiality that apply in the activities.

The employer shall ensure the process of the report is organised and clear, by ensuring that all aspects of the processing of the report are verifiable and controllable. This entails, among other things, that the employer shall prepare transcripts from interviews with relevant persons.

Processing of the case must be documented in writing. When it is no longer necessary for the purpose of the whistleblowing case, all documentation from the case shall be deleted pursuant to the Personal Data Act.

glasspaper