



Whistleblowing Guide for the Olympic Group

Whistleblowing Guide

Unacceptable circumstances may arise in any business. Employees in the business are often the first to discover this. The purpose of this whistleblowing guide is to inform about the procedures for whistleblowing in the Olympic Group. In addition, the whistleblowing guide shall contribute to forming the basis for a healthy and transparent corporate culture where unacceptable and illegal actions are not tolerated but shall be dealt with should they arise.

Our ethical guidelines are described in the Total Management System Unisea – QA Module. Amongst other things, this makes clear what is expected of you as an employee in terms of conduct in various situations.

The rules of conduct and whistleblowing guide are important documents that you must familiarize yourself with.

We want all employees who become aware of illegal acts or breaches of regulations, generally accepted ethical norms, other external obligations, or breaches of the Olympic Group's procedures, to notify us so that the situation can be remedied. Together, we can ensure that we continue to be the industry's leading and most sustainable company.

Tonny Sjørdal
Chief Quality, Health, Safety, Environment & Crewing Officer, CQCRO.
Designated Person Ashore - DPA

May 2023

What is whistleblowing in the legal sense?

Whistleblowing means reporting unacceptable circumstances in the business to someone who can do something about it.

Unacceptable circumstances are the breach of laws, rules, generally accepted ethical norms, other external obligations or the Olympic Group's Code of Conduct.

Examples of unacceptable circumstances can include:

- Circumstances that could represent a danger to life or health
- Illegal pollution
- Embezzlement, theft, or other forms of financial crime
- Violation of safety rules
- Inappropriate gifts or bonuses
- Bullying, discrimination and harassment
- Disloyalty
- Breach of competition rules
- Breach of personal data security
- Inappropriate behavior

Statements about matters that only apply to the employee's own working conditions are not considered notification and this means that the notification rules do not normally apply to professional or political disagreements, staff disputes and disagreements about the implementation of the employment contract.

Employees are entitled to notify the authorities, provided that it is in good faith about the content of the notification and that the matter worthy of criticism is of public interest. These should be reported internally first, if possible.

It is not acceptable for employees to whistleblow externally by notifying people outside the business by going to the social media (e.g. blogging, Facebook or otherwise).

Unacceptable circumstances may arise in any business.

Employees are often the first to discover such circumstances. We therefore facilitate and provide information about the right to whistleblow. In this way unacceptable circumstances can be made visible and corrected by the management.

The right to report internally

As an employer, the Olympic Group is obliged to facilitate whistleblowing.

There are provisions in the Norwegian Working Environment Act that legally establish the right to whistleblow internally about unacceptable circumstances in the business. The Norwegian Working Environment Act gives employees protection against retaliation.

An employee or hired employee who whistleblows in line with the Olympic Group's procedures will always have given notification in an appropriate manner.

Normally, reporting should be done in the TMS system Unisea. But if whistleblower want to be anonymous, reporting on the webpage is possible.

However, the employee must have reasonable grounds for the criticism. The employee's criticism must not be based purely on gossip or unfounded allegations. The employer has the burden of proving that the notification took place in violation of court rules

Retaliation against an employee who whistleblows in accordance with the Olympic Group's procedures pursuant to the requirements of the Norwegian Working Environment Act will be prohibited. The aim is to ensure a safe environment for the whistleblower. For example, retaliation includes threats, harassment, unreasonable discrimination, groundless relocation, poorer pay growth, removal of duties, dismissal, discharge etc. If an employee has not followed the procedures or if the whistleblowing is not justifiable for other reasons, the legal protection against retaliation does not apply.

The Working Environment Act has the following provisions relating to an employee's right to whistleblow on unacceptable circumstances:

Section 2 A-1. The right to notify censurable conditions at the undertaking

Section 2 A-2. Procedure in connection with notification

Section 2 A-3. The employer's activity duty in connection with notification

Section 2 A-4. Prohibition against retaliation

Section 2 A-5. Redress and compensation on breach of the prohibition against retaliation

Section 2 A-6. Obligation to prepare procedures for internal notification

Link: <https://lovdata.no/dokument/NLE/lov/2005-06-17-62>

The Ship Labour Act has the following provisions relating to an employee's right to whistleblow on unacceptable circumstances:

Section 2 - 6. Notification concerning censurable conditions

Section 2 - 7. Protection against retaliation in connection with notification

Link: <https://www.sdir.no/contentassets/e2109922eca44281ade9fffcbe891e37/21-june-2013-no.-102-ship-labour-act.pdf?t=1686557251438>

Notification procedures

A whistleblowing notification can be given to the immediate manager, vessel Master, to the Designated Person Ashore (DPA) or by using the whistleblowing channel on the Olympic Group's website.

Whistleblowing can be done openly or anonymously. In all cases the notification shall be handled confidentially. The whistleblower shall be protected.

Normally, transparency will make the process easier and ensure a better outcome for all the parties involved. Anonymous whistleblowing present challenges since no one has taken responsibility for the allegations. It is always more difficult to investigate a matter further without knowing the whistleblower. In some cases, an anonymous notification can lead to the case being dropped because incomplete information has been provided which makes it impossible to perform further investigations. In any event, all whistleblowing notifications shall be dealt with confidentially, and the whistleblower's identity is confidential information. The use of the whistleblower's identity in the follow-up of the case must always be clarified with the whistleblower in advance.

Who shall receive the whistleblow?

If an employee or hired employee become aware of illegal acts or breaches of the Olympic Group's procedures etc., he/she shall whistleblow about this through one of the following channels:

Unisea HSE Module

Report directly into the Total Management System - Unisea HSE module. Report will be received by the DPA.

Department Leader or vessel Master

Whistleblowing can be done in writing, via email or verbally. If it is done orally, it is important that the person being notified records everything that is being said.

If an employee or hired employee feels that it is difficult to notify the manager, he/she may turn directly to the Designated Person Ashore (DPA), or use the Olympic Group's whistleblowing channel on the internet, see below.

Designated Person Ashore

Designated Person Ashore DPA, is independent of the line organization and reports directly to the CEO and in necessary cases directly to the Chairman of the Board.

Designated Person Ashore, DPA, can be contacted on the following email address or phone number:

tonny.sordal@olympic.no, Mobile (+47) 90 57 66 68.

The Olympic Group's whistleblowing channel on the Internet

Forms for whistleblowing are available at the following address: <https://www.olympic.no/whistleblowing>

The whistleblowing channel is operated by an external partner and is prepared for encrypted an anonymous whistleblowing.

Following up on whistleblowing

Managers or vessel Captain who receive a whistleblowing notification shall immediately contact the Designated Person Ashore, DPA, in order to discuss how the matter shall be handled going forward. If necessary, the "Compliance Force" is implemented, see the separate fact box.

Employer's activity obligation

A whistleblowing notification shall be sufficient to investigate, and the whistleblower is entitled to feedback within reasonable time after the whistleblowing has taken place. Within a week the relevant manager or participant shall give the whistleblower preliminary feedback on what will happen next.

If it turns out that the criticism is unjustified or based on a misunderstanding, the whistleblower shall be given a proper explanation. The management is also responsible for taking care of anyone who has been subject to any unjustified criticism or is affected by misguided allegations.

Olympic Group has a procedure to follow up on whistleblowing. This procedure is available in the Olympic Group's quality management system.

The whistleblower shall not be penalized

All whistleblowing reports shall be taken seriously and investigated properly. We do not accept any form of reprisal against whistleblowers.

Therefore, an employee who whistleblows in accordance with these procedures shall not be penalized. A whistleblower who experiences reprisals must inform the immediate Designated Person Ashore, DPA, who will immediately deal with, and possibly correct, such a situation.

Designated Person Ashore (DPA)

Whistleblowing notifications that require smaller-scale investigations, **DPA** may assign the task to one single employee, who will carry out the investigations on behalf of **DPA**. Is there a need for more comprehensive investigations, CCO will call in the "Investigation Group", which has the following function:

- Take responsibility for managing and coordinating the work when irregularities or suspected irregularities are uncovered.
- Decide on sanctions, reporting and any use of external resources.

"Investigation Group" is created by **DPA** and consists of two or more people. The group is put together based on criteria such as competence, capacity, independence and impartiality.

The CEO can participate in "Investigation Group" if it is necessary for the case or to secure arm's length distance.

The whistleblowing poster for the Olympic Group

What is whistleblowing?

Whistleblowing means reporting unacceptable circumstances to someone who can do something about it.

Unacceptable circumstances are breaches of laws, rules, generally accepted ethical norms, other external obligations or the Olympic Group's procedures.

Whistleblowing is positive

Whistleblowing is positive for both the company and society because it means unacceptable situations can be remedied. People who are willing to whistleblow are an important resource for the Olympic Group.

Right and obligation to whistleblow

The individual employee is encouraged to report unacceptable circumstances because this can help the Group develop positively. Normally, employees do not have an obligation to whistleblow. However, it shall always take place if criminal situations and circumstances that may put lives or health at risk are discovered or suspected.

Who should you whistleblow to?

If an employee becomes aware of illegal acts or breaches of the Olympic Group's procedures, he/she shall notify the:

Department Leaders or vessel Captain

Whistleblowing notification can be done in writing, via email or verbally. If it is provided verbally, it is important that the person who receives the notification writes down everything that is said. If an employee feels that it is difficult to notify the leader, he/she may turn to the Designated Person Ashore, DPA.

Designated Person Ashore, DPA.

The DPA reports directly to the CEO and in necessary cases directly to the Chairman of the Board.

The DPA can be contacted on the following email address or phone number: tonny.sordal@olympic.no, Mobile (+47) 90 57 66 68.

The Olympic Group Whistleblowing Channel

The whistleblowing channel is available both internally and externally on the Internet. Forms for whistleblowing are

available at the following address:

<https://www.olympic.no/whistleblowing>

The whistleblowing channel is operated by an external partner and is prepared for encrypted and anonymous whistleblowing.

The Group's whistleblowing service:

Internet: <https://www.olympic.no/whistleblowing>

Email: tonny.sordal@olympic.no

Telephone: (+47) 90 57 66 68

Anonymity and confidentiality

Whistleblowing can be done anonymously, but, normally, transparency will make the process easier and ensure a better outcome for all the parties involved. The whistleblower's identity is confidential information, and any use of the whistleblower's identity must always be clarified with the whistleblower in advance.

Following up notification

- All whistleblowing reports shall be taken seriously and properly investigated.
- Leaders who receive a whistleblowing notification shall immediately contact DPA. If necessary, measures shall be implemented in accordance with the "Investigation Group".
- The whistleblower shall receive preliminary feedback within one week after the notification has been received.
- If it turns out that the criticism is unjustified or based on a misunderstanding, the whistleblower shall be provided with a proper explanation.
- The management is also responsible for taking care of those who have been subject to unjustified criticism.

The whistleblower must not be penalized

An employee who whistleblows in accordance with these procedures shall not be penalized. A whistleblower who experiences reprisals must turn to a manager or DPA, who will promptly deal with and potentially correct any such situation.

Review of whistleblowing procedures

All employees shall receive regular training in the whistleblowing routines through the ongoing training in Olympic Group's procedures.

In the folder "Whistleblowing Guidelines" or in Unisea QA, you will find more information about the Olympic Group's whistleblowing service.

