

# Procedure for whistleblowing at SpareBank 1 Østlandet

The SpareBank 1 Østlandet group aims to conduct its business in accordance with applicable laws and with high ethical standards, as well as in accordance with general requirements for sound business practices.

All employees and external actors can report critical conditions in the group's business, knowing that this will be handled in a safe and predictable manner. This way, we can improve for the benefit of the group and the society we are part of.

## About Whistleblowing

Whistleblowing gives us an opportunity to uncover critical conditions in the group. If it is difficult to speak up or you are not heard, whistleblowing can be a possible method to report.

SpareBank 1 Østlandet is obliged to have routines for whistleblowing and handling reports from employees. The rules on this follow from the Working Environment Act.

As a responsible societal actor, we also want external stakeholders to be able to report critical conditions related to the group's business.

## Right and Duty to Report

All employees and hired persons have a statutory right to report. In case of suspicion of conditions that pose a danger to life and health, or harassment or discrimination, there is a legal duty to report.

## What Can Be Reported?

Whistleblowing often relates to critical conditions of general interest and should be done in good faith.

Examples of conditions that can be reported include matters related to economic crime, violations of the Anti-Money Laundering Act, HSE regulations, abuse of authority, unsafe working environment, and breaches of personal data security.

Conditions that are not illegal or unethical are not considered reportable. The same applies to conditions that employees perceive as critical based on their own political or ethical beliefs. The same applies to professional disagreements or personal contractual relationships. The latter should initially be discussed with the immediate supervisor.

## Protection Against Retaliation

The group shall ensure that the whistleblower maintains a safe working environment. Any form of retaliation from the employer is prohibited.

## Confidentiality and Anonymity

A report will be handled confidentially. This means that the identity of the whistleblower and the information provided in the case will not be known to more people than strictly necessary.

A whistleblower may wish to report anonymously. However, anonymous reporting may limit the group's ability to follow up and clarify the content of the report. Often, more information is needed to follow up on the report. Anonymous reporting can therefore also limit the ability to provide feedback to the whistleblower that the report has been followed up and handled.

## How to Report?

In general, reportable conditions should be resolved at the lowest possible level by addressing the matter with the immediate supervisor. If you find this difficult or have tried to report without success, you can contact HR, the group's whistleblowing group, or use the whistleblowing channel available on INNSIKT and the bank's website.

The group's whistleblowing channel is managed by PwC. Here you can be anonymous or request that PwC does not share your name.

If desired, you can also report via the safety representative or union representative, and you can also report to the relevant authority.

## How Is a Report Followed Up?

You will receive a confirmation when the report is received.

All reports are handled in accordance with the group's whistleblowing routines. These are available to all employees on INNSIKT and to the group's stakeholders on the bank's website.

