

Stromma Group Whistleblower policy

Purpose

Strömma Turism & Sjöfart AB has established a whistleblower scheme covering the Strömma Group companies ("Stromma").

Stromma is committed to high standards, to continuously improve as an employer, business, and corporate citizen. We are committed to ensure legal and ethical behaviour in everything we do.

The purpose of the whistleblower scheme is to enable former and current employees, suppliers, business partners and other external parties (whistleblowers) to report concerns and reasonable suspicions about actual or potential misconduct or breaches, which occurred or are highly likely to occur in Stromma, and about attempts to conceal such misconduct or breaches. With our whistleblower scheme we will promote dialogue and transparency regarding workplace conduct, values, and ethics with focus on continuous improvement.

Whistleblowers are encouraged to speak up, reporting such suspicions and concerns as soon as possible knowing they are able to do so without fear of intimidation, harassment, retaliation, reprisals, discrimination, or adverse employment consequences. We will support and protect whistleblowers and do not tolerate any type of reprisals or harassment against whistleblowers who make reports in good faith, i.e., reports of a breach, suspicion, or concern which a whistleblower reasonably believes to be true.

Whistleblowers who report suspicions or concerns should be recognized for coming forward and contributing to the detection of serious errors and misconduct and enabling Stromma to correct and, as far as possible, prevent unethical behaviour and irregularities with Stromma's core values, policies, and procedures, as well as any legal misconduct. In this way Stromma can be a responsible employer, business, and corporate citizen, reducing risks to colleagues, the environment, and Stromma's reputation.

Scope

The whistleblower scheme covers reporting of serious matters, including non-compliance and other type of breaches of EU, local and any applicable law or regulations including the following:

- Criminal offences for instance, fraud, manipulation of financial statements, embezzlement, misuse of position or funding, submission of incorrect information, theft, violation of the duty of confidentiality, insider dealing or omission to report according to legislation, regulation, or internal policy.
- Violation of statutory provision, internal rules, and control procedures as well as non-compliance with legislation and obligations.
- Bribery or corruption including conflicts of interests, sponsorships, gifts, facilitation payment, and donations.
- Repeated incidents of bias, mishandling, or omissions.
- Acts committed by the management and/or (local) boards that cannot be reported via the local management channels.
- Non-compliance with competition laws (e.g., price-fixing, exchange of price-sensitive information, collusion with competitors).
- Serious threats to the environment, health, and safety.
- Activities that are otherwise defined in law, treaty or contract as constituting grossly inappropriate conduct (e.g., discrimination, sexual harassment, use of child labour, violation of human rights).
- Other issues of misconduct or inappropriate behaviour, where internal channels have been exhausted.

Other matters, including HR matters, minor breaches of Stromma's internal guidelines, complaints about other employees' behaviour or incompetence, including information on less serious workplace conflicts and disagreements are not covered by the scope of whistleblower scheme. These types of matters must be raised in a dialogue with an immediate manager, local HR manager or local management team.

Roles and responsibilities:

- Stromma: the whistleblower scheme covers the companies in the Stromma Group; Strömma Turism & Sjöfart AB and its subsidiaries.
- PwC: the whistleblower reporting channel is operated by PwC to ensure impartiality and objectivity in the processing of the reports. All reports received through the reporting channel are assessed by PwC in order to determine if the reports fall within the scope of the whistleblower scheme. PwC evaluates who can handle the report and sends the report to an impartial person in Stromma, who is competent to follow up on the report.
- The Group HR Manager: The Group HR Manager of Stromma is responsible for the whistleblower scheme.¹ The Group HR Manager is responsible for deciding whether investigations of whistleblower reports shall be conducted, and, in the affirmative, whether the investigation shall be conducted internally and/or with external assistance. The Group HR Manager is also responsible for:
 - Proper management of the whistleblower scheme
 - Maintaining a whistleblower procedure describing the process for handling whistleblower reports, including internal investigations of whistleblower reports
 - Maintaining an overview of received whistleblower reports.
 - Reporting to the Board of Directors of Stromma annually about the number of reports handled and notifying the Board of Directors in case a whistleblower report concerns matters regarding bribery or corruption.
 - Communication and training regarding Code of Conduct and the Whistleblower scheme.
- Managers: All managers are obliged to lead according to the standards presented in our Stromma Code of Conduct, to ensure knowledge and understanding of the importance of good and ethical conduct, of “speaking up” and the options and responsibilities related to the whistleblower scheme.
- Employees: All employees in Stromma are encourage to speak-up for themselves and on behalf of colleagues and are obliged to collaborate loyally during investigations of whistleblower reports.

Confidentiality and anonymity

All information and the identity of the whistleblower will be safeguarded and kept confidential to the greatest possible extent. The whistleblower has the right to be anonymous.

The personal data processed within the internal whistleblowing reporting channel is retained only for the period necessary to achieve the purposes for which the data are collected unless a legal obligation or another legal ground for longer data retention exists. Personal data will be deleted after the completion of the initial investigation, if it turns out that the whistleblower report is unfounded. If an actual investigation is initiated on the basis of the whistleblower report, personal data will be deleted within two months after the investigation has been completed. Substantiated reports which contain information that may lead to disciplinary, civil or criminal responsibility are kept until the conclusion of the respective proceedings as per the requirements of the applicable law.

Reference: Stromma’s general personal data policy.

¹ Reports concerning the Group HR Manager or a member of the senior management team (other than the CEO and CFO) will be processed by the CEO. Reports concerning the CEO or CFO or members of the Board of Directors (other than the chairman of the Board of Directors) will be processed by PwC in collaboration with the chairman of the Board of Directors. Reports concerning the chairman of the Board of Directors will be processed by PwC in collaboration with the vice-chairman and one other member of the Board of Directors who are impartial in the matter in question.

Disciplinary actions

Serious violations of the law or internal rules and guidelines issued by Stromma are sanctioned in accordance with the law and the applicable rules adopted by Stromma.

False or misleading information must not be knowingly submitted through the whistleblower scheme. If a whistleblower intentionally makes a false report, this may have disciplinary, civil and/or criminal law consequences. Employees who in good faith make a report will not be subject to negative consequences, including consequences of an employment law nature, even if the report proves to be unfounded.

Follow up and risk assessment:

All reports, investigations and their outcomes are basis for learning, improvement, and in some cases a new risk assessment in the area.

The Group HR Manager will present a summary of cases, trends, outcome, and any precautionary actions taken, to the General Management Team on a quarterly basis.

As part of the follow an assessment regarding the risks of repetitions of the incident and provide recommendation for mitigating efforts is conducted and recommendation are shared with relevant parties.

Training and induction:

All new colleagues will as part of their onboarding be introduced to our code of conduct as well as the common responsibility for reporting misconduct. The introduction will also include information about the options and responsibilities in the reporting and whistle blower system.

All managers and employee representation will receive training in how to handle reports and whistle blowers. This includes what can be handled within the line organisation and what needs to be address through the whistleblower scheme.

Compliance officers, Legal Counsel and other chosen as investigators, will receive training on how to conduct investigations in a responsible, respectful, and impartial manner. Compliance officers will also be trained in how to obtain and secure evidence, ensure sufficient and relevant information, while observing GDPR regulations.

Communication:

We will limit communications about individual cases and incidents to an absolute minimum in line with data protection regulation and respect for all involved.

Important learnings and conclusions will be shared in an anonymous form.

When possible and to encourage future reporting, we will in a respectful manner seeking to recognise the important efforts and contributions of colleagues speaking up.

Adopted by the Board of Directors in Strömma Turism & Sjöfart AB

Date:

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