

Whistleblower Policy

Multiconsult is strongly committed to fostering a culture where you feel safe to speak up about matters that concern you. As part of Multiconsult's culture of openness, integrity and accountability, we encourage you to speak up if you observe or suspect any improper conduct. This Whistleblower Policy (the Policy) outlines how you can make a report, how we investigate and deal with improper conduct, and how we will support and protect you throughout this process.

For the purposes of this Policy, improper conduct is the conduct of anyone connected with Multiconsult Group which in your reasonable view may amount to misconduct, wrongdoing, or improper behaviour. Please see Multiconsult's Code of Conduct for more information.

Reporting improper conduct

Who can report improper conduct?

Anyone directly or indirectly involved in Multiconsult's business wherever we operate in the world and where Multiconsult has a direct or indirect responsibility of the activity in question.

The protections under this Policy will also apply to you if you have reported any improper misconduct to a legal practitioner to obtain legal advice or representation in relation to whistleblower protection laws.

What reports or disclosures are not covered?

Personal work-related grievances

This Policy does not apply to any personal work-related grievances. A personal work-related grievance is a grievance about any matter in relation to your employment or former employment having (or tending to have) implications for you personally, which may include:

- an interpersonal conflict between you and another employee;
- a decision relating to your engagement, transfer or promotion;
- a decision relating to the terms and conditions of your engagement; and
- a decision to discipline you or to suspend or terminate your engagement due to the way you performed your role.

Personal work-related grievance concerns should be directed to your line manager or Human Resources business partner.

False disclosures

This Policy will only apply to genuine claims and reports. Multiconsult takes deliberate or malicious false reports very seriously and disciplinary action may follow.

Internal reporting for employees

You may report improper misconduct and raise your concerns internally. You are protected by this policy even though your reporting is not done through the Whistleblower Portal. Reporting can be done by contacting:

- Your line manager or manager above
- Local Compliance Officer (LCO) or Group Compliance Officer (GCO) for business ethics and violation of laws and regulations
- Local Safety Representative or HSE Manager
- Local HR Business Partner or equivalent
- For Information Security issues, to local IT department or Helpdesk channel
- External auditor in case of financial audit issues

External reporting

If you do not feel comfortable reporting the matter internally, or where you have previously reported an issue and believe that no action has been taken, or if you wish to remain anonymous, you may use our Whistleblower Portal.

We will keep all information contained in reported cases as confidential, except where we are required by law or where we are required to disclose to regulatory authorities, law enforcement agencies or our professional advisers.

Anonymous reporting

If requested, each whistleblower who uses the Whistleblower Portal will be provided with a confidential reference number to facilitate subsequent communication on an anonymous basis.

External reports made in this way may be made anonymously. In cases where you have not consented to the disclosure of your identity, the matter may still be referred for investigation, in which case the investigator will take all reasonable steps to reduce the risk that you will be identified.

Investigations

How reported matters will be handled

Multiconsult will investigate improper conduct that has been reported under this Policy and determine what action will be taken (this may involve an internal enquiry or a more formal investigation). You will be told who is handling the matter, how you can contact and whether any further assistance is required from you. We will do our best to keep you updated on the progress of an investigation if we are able to in the circumstances.

Fair treatment

Where an investigation is undertaken, it will incorporate the following principles of procedural fairness:

- Prompt action and transparent communication in relation to the investigation and subsequent decisions
- Support for the accused should they choose to respond to the allegations in person
- Investigator and ultimate decision maker shall have no direct involvement in the alleged incident
- Confidential information regarding the investigation should only be communicated on a need to-know basis and all efforts should be made to ensure such details remain confidential
- Records will be maintained of meetings and interviews (and kept secure, with access by only authorized personnel), including details of those who attended and the agreed outcomes
- All relevant evidence will be lawfully obtained and carefully considered

- Investigation findings and recommendations will be documented

If concerns are raised about you

Each named individual will be given the opportunity to be part of the investigation and to respond to any allegations made against them, prior to any decisions being made internally.

Investigation findings

The investigation may conclude with a report from the GCO/LCO/legal representative or another investigator. The report will include findings on the allegations and a summary of reviewed evidence. If permitted by law, the GCO/LCO/legal representative may inform the individual(s) against whom allegations have been made of the findings. All reports and meeting records will remain the property of Multiconsult and will not be shared with you or any person against whom allegations have been made.

Protections

You will not be personally disadvantaged by raising a report under this Policy, but this protection will not apply to the extent you yourself have taken part in any improper activities. Being personally disadvantaged includes, but is not limited to:

- dismissal, suspension or demotion;
- any form of harassment or victimisation, including being threatened; and
- discrimination

Any employee or contractor found to have engaged in such activities will be in breach of this Policy and will be subject to disciplinary action, which may include termination of employment.

Confidentiality

All information we receive from you under this Policy will be treated as confidential. Multiconsult will not disclose this information without your express consent unless it is:

- as part of the investigation process;
- required by law
- to a legal practitioner for the purposes of obtaining legal advice or representation;

Our people are prohibited from revealing your identity or revealing details that could lead to you being identified, unless they have obtained your express consent. All reasonable steps will be taken to reduce the risk of identifying you without your permission. Should your identity, or information leading to your identity be disclosed during an investigation, it is expected that it is kept confidential by all parties.

If you have reported improper conduct under this Policy and consider that action has been taken either against you, your colleagues, or your relatives which results in you or the individual(s) becoming personally disadvantaged, please contact the GCO/LCO.

Support when raising concerns

Employees will have access to the following support in addition to your protections under this Policy:

- assistance from your HR Business Partner or local equivalent or an independently appointed member of the human resources team to deal with any ongoing concerns
- psychologist can be considered if the reported case in question requires such assistance

Breaches

Any breach of this Policy will be taken very seriously and may result in disciplinary action, which may include termination of employment. If a breach of this Policy also breaches the law, the individual(s) involved and the company may also be liable for penalties including significant fines and/or imprisonment. Multiconsult is unable to ensure immunity of any individual from prosecution in the criminal jurisdiction.



Grethe Bergly
Chief Executive Officer
December 2021