

Concern Reporting Guidlines

About the Notification Service

The purpose of a notification procedure is to provide a safe framework for reporting concerns. Reporting is a legal right under the Working Environment Act (AML) Chapter 2A §1–7 for all employees in a company, and it applies to all improper or concerning conditions in the workplace. Such conditions may include violations of laws, internal rules, or ethical standards in the workplace.

The company wants to ensure a low threshold for reporting such matters, while at the same time considering that the employer, work environment, and colleagues should not be unnecessarily affected.

The law also provides employees who report concerns with protection against retaliation and requires the employer to facilitate reporting in an appropriate manner.

In addition, the reporting channel is available to external parties, for example in cases related to suspected corruption or other concerning conditions.

What Can Be Reported

All unwanted or inappropriate behaviour can be reported through the company's reporting channel. Examples include:

- Criminal acts
- Breaches of statutory obligations
- Violations of the company's internal guidelines
- · Breaches of ethical standards widely accepted in society

Employees are encouraged to follow the normal chain of command to report concerning matters. Employees may also report through the safety representative or the employee observer to the board. In some cases, attempts may have been made to address the matter without success, making it necessary to use other channels. In such cases, it may be appropriate to use the reporting channel.



How to Report

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Anonymity is important in reporting cases, and if a reporter wishes to remain anonymous, he or she may choose a method that supports this. In such cases, reporting by mail is recommended. When anonymity is less important, the report can be submitted by email or telephone. All inquiries will be taken seriously and handled confidentially.

How Reports Are Handled

When a report is received, the recipient will conduct a fact-finding investigation, prepare proposed measures, and contact the Managing Director. If the Managing Director is the subject of the report, the Chair of the Board must be contacted.

Both the reporter and the person being reported about will have access to the factual basis and the opportunity to provide a response. Further progress will be determined based on the nature of the report.

Anyone who does not report anonymously will, within a reasonable time, receive feedback on how the matter has been investigated and the outcome.