

Whistleblowing Policy

1 Purpose and commitment

Trident Aqua Services (“**Trident**”) promotes a culture of openness and integrity, where employees and other stakeholders are encouraged to speak up about concerns relating to wrongdoing or objectionable conditions without fear of retaliation.

Knowledge of such concerns is essential to identify and address risks at an early stage and to ensure that Trident conducts its business in a lawful, ethical and responsible manner. Trident therefore encourages reporting of concerns in good faith and is committed to handling whistleblowing reports in a safe, confidential and professional manner.

2 Scope of the Policy

This Policy applies to all Trident group companies and covers reports made by employees, former employees, temporary workers, consultants, contractors, suppliers and other business partners, as well as other persons who have obtained information about Trident through a work-related context.

The Policy applies to reports concerning actual or suspected wrongdoing or objectionable conditions relating to Trident’s business or activities. Reports may also concern situations where there is a reasonable risk that wrongdoing may occur.

3 What can be reported?

Whistleblowing reports may concern, without limitation:

- violations of laws or regulations;
- breaches of Trident’s Code of Conduct or other internal policies;
- corruption, bribery, fraud or other financial crime;
- sanctions or trade compliance issues;
- serious breaches of health, safety or environmental requirements;
- human rights violations or breaches of decent working conditions;
- abuse of authority or serious misconduct; or
- other circumstances that may cause significant harm to individuals, Trident, society or the environment.

Personal grievances relating solely to an individual’s own employment situation (such as dissatisfaction with workload, salary or interpersonal conflicts) should normally be addressed through ordinary management or HR channels, unless they involve circumstances covered above.

4 How to report

Concerns may be reported through the following channels:

- Line management
- Legal & Compliance
- Trident's designated whistleblowing channel, available at www.trident.no
- Other reporting channels made available by Trident.

Reports may be submitted in writing or orally and may be made anonymously if the whistleblower so wishes. Anonymous reporting may limit Trident's ability to investigate fully, but all reports will nevertheless be taken seriously and handled in accordance with this Policy.

5 Confidentiality and data protection

All whistleblowing reports will be handled confidentially to the extent reasonably possible and in accordance with applicable law. Information will only be disclosed to persons who have a legitimate need to know in order to assess, investigate or follow up the report.

Personal data shall be processed in accordance with applicable data protection legislation and Trident's *Data Privacy Policy*.

6 Handling and investigations of reports

All reports will be assessed promptly and handled in a fair, objective and proportionate manner. Reports shall be investigated in a thorough, independent and impartial way, without influence from individuals who are, or may be, affected by the report.

Trident follows the Norwegian Labor Inspection Authority's guidelines for handling whistleblowing reports. Where appropriate and legally permissible, the whistleblower will receive confirmation that the report has been received and feedback on the handling of the matter.

7 Protection against retaliation

A fundamental element of this Policy is that Trident does not tolerate any form of retaliation against individuals who report concerns in good faith.

Retaliation is prohibited regardless of whether the report ultimately proves to be substantiated. Any form of retaliation may result in corrective measures and, where applicable, disciplinary action or other legal consequences in accordance with applicable law.

8 Roles, training and review

The Chief Executive Officer has overall responsibility for this Policy, while Legal & Compliance is responsible for its day-to-day implementation and coordination.

Trident shall ensure that relevant information and training on whistleblowing arrangements is made available to employees. This Policy shall be reviewed periodically to ensure continued compliance with applicable law and effective functioning of Trident's whistleblowing arrangements.