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	DOCUMENT TITLE: Whistleblower Policy		
	DOCUMENT NO: HR-Q-GP-0010	REV NO: 002	Date: 2026-05-20

REVISION TRACK SHEET

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Rev.	Date (yyyy.mm.dd)	Page	Sec.	Description of Changes
001	2024.11.01			
002	2026.05.20		1.3 1.4	Policy translated from Norwegian to English and restructured. Responsibilities are updated References are updated

TABLE OF CONTENTS

1 INTRODUCTION4

1.1 PURPOSE4

1.2 SCOPE4

1.3 RESPONSIBILITIES4

1.4 REFERENCES.....4

2 PROCEDURE5

2.1 WHO CAN REPORT5

2.2 WHAT CAN BE EPORTED5

2.3 HOW TO REPORT.....5

2.4 HANDLING OF REPORTS.....5

2.5 CONFIDENTIALITY.....6

2.6 RESPONSIBLE BUSINESS CONDUCT6

	DOCUMENT TITLE: Whistleblower Policy		
	DOCUMENT NO: HR-Q-GP-0010	REV NO: 002	Date: 2026-05-20

1 INTRODUCTION

1.1 Purpose

This whistleblowing procedure ensures that Scanmudring complies with its obligations under the Norwegian Working Environment Act § 2 A-1 regarding employees' and hired personnel's right to report objectionable conditions within the company.

The procedure also supports compliance with other obligations, including the Transparency Act (Åpenhetsloven), in order to better identify and reduce risks related to harm or negative impacts on people, human rights, society, and labor conditions. This applies internally, within our supply chain and value chain, and in offshore/onshore projects, both nationally and internationally.

Scanmudring values openness and encourages all employees to contribute to a safe and responsible working environment by reporting concerns. We are committed to handling reports seriously and taking necessary steps to address concerns in a fair and constructive manner.

1.2 Scope

The procedure defines who can report concerns, what can be reported, and how to report. It also describes how reports are handled and reflects Scanmudring's general encouragement of openness and speaking up.

1.3 Responsibilities

HR Coordinator	Responsible for creating and maintaining this document
HR Lead	Responsible for reviewing this document
CEO	Responsible for approving this document

1.4 References

The documents referred to in this document are listed below:

- HR-Q-GP-0002 Code of Conduct/ Ethical guidelines

	DOCUMENT TITLE: Whistleblower Policy		
	DOCUMENT NO: HR-Q-GP-0010	REV NO: 002	Date: 2026-05-20

2 PROCEDURE

2.1 Who can report

All employees and hired personnel have the right to report objectionable conditions within Scanmudring's operations.

We also encourage business partners, customers, suppliers, and other stakeholders to report concerns via Scanmudring's website.

2.2 What can be reported

Reports may concern objectionable conditions within Scanmudring's operations. This includes matters that violate laws, written ethical guidelines, or widely accepted ethical standards in society, such as:

- Risk to life or health
- Risk to climate or environment
- Corruption or financial crime
- Unsafe working environment / violations of labor regulations
- Breaches of nationally or internationally recognized human rights
- Bullying, harassment, or discrimination
- Social dumping

2.3 How to report

Reports can be submitted in writing or verbally. In the case of verbal reporting, the recipient must document the report.

Employees may report in writing via the HR system or through the whistleblowing portal on Scanmudring's website. Otherwise, the provisions of the Working Environment Act § 2 A-2 apply.

External stakeholders must report through the whistleblowing portal available on Scanmudring's website.

Reports should be as detailed and objective as possible to enable effective investigation and handling.

All reporting channels allow the reporter to remain anonymous.

Reporting may have serious consequences for those involved. However, this should not prevent reporting made in good faith. We ask reporters to exercise caution, particularly in cases involving uncertainty or serious allegations.

2.4 Handling of reports

Within four weeks of receiving a report, information will be provided about how it will be handled and when the reporter can expect a final response.

The handler may engage in an anonymous dialogue with the reporter.

The employer must ensure that the reporter has a safe working environment and take measures to prevent retaliation if necessary.

Retaliation by the employer, the subject of the report, or others is prohibited. Retaliation includes any negative action, practice, or omission in response to a report.

2.5 Confidentiality

Anyone receiving or handling a report must treat the reporter, the subject of the report, and the report's content with strict confidentiality. This also applies to determining who needs access to the information for investigation and follow-up actions.

2.6 Responsible Business Conduct

Scanmudring encourages its employees, contractors, and others acting on our behalf to use this whistleblowing procedure if clear breaches or suspected breaches of human rights or decent working conditions are identified in connection with the execution of projects. This applies where our employees or contractors perform work for Scanmudring onshore, offshore, in Norway, or in other countries.