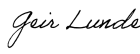

Speak Up and Whistleblowing Policy

Document No.: CON-001-MGM-PH-009

Document Owner: HSEQ Manager

The signatures below certify that this document has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision

	Signature	Position
Prepared by	Øystein Eliassen  Øystein Eliassen (Aug 26, 2026 15:57:01 GMT+2)	HSEQ Manager
Reviewed by	Geir Lunde 	Managing Director
Approved by	Torstein Sanness  Torstein Sanness (Aug 26, 2026 19:11:54 GMT+2)	Chairman of the Board

COMPANY PROPRIETARY INFORMATION

This document is an uncontrolled copy of a controlled document held by the Concedo AS Management System. Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request changes, submit a Document Change Request to the Document Control Representative.

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

Revision History

Rev	Date	Reason for Issue	Prepared	Checked	Approved
01	01.09.2026	First issue	Øystein Eliassen	Geir Lunde	Torstein Sanness

Revision Control

Revision:	Paragraph /Section	Change Description

This sheet must be completed in detail, at each revision once this document has been approved. Details must include revision number, description and indication of which pages and paragraphs have been revised, date of revision approval and approval indication.

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

Content

1	Introduction and Purpose.....	4
2	Application and Scope	4
3	Roles and Responsibilities.....	4
4	Acronyms, Abbreviations and Definitions	4
5	Statutory Requirements	5
6	Standards, Guidelines and Recommended Practises	5
7	Deviation from this Document.....	5
8	Policy Statement	6
9	Key Principles	6
9.1	What Should Be Reported	6
9.2	Reporting Concerns.....	6
9.3	Confidentiality and Protection	6
9.4	Reporting Channels.....	6
9.5	Investigation and Follow-Up.....	7
9.6	Monitoring and Review	7

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

1 Introduction and Purpose

The purpose of this Speak Up and Whistleblowing Policy is to promote an open, ethical, and transparent working environment where employees and external stakeholders feel confident raising concerns regarding actual or suspected misconduct.

The Company encourages the reporting of concerns in good faith and is committed to ensuring that individuals who raise concerns are treated fairly and protected against retaliation.

2 Application and Scope

This policy applies to

- Members of the Board of Directors
- Managers and executive leadership
- All employees (permanent and temporary)
- Consultants, contractors, and subcontractors
- Suppliers and business partners acting on behalf of Concedo AS
- Other stakeholders interacting with the Company

3 Roles and Responsibilities

Role	Responsibility
Board of Directors	Ultimate responsibility for the Policy
Managing Director and Executive Management	Ensure leadership and support
HSEQ Manager	Acts as Chief Compliance Officer, maintain and monitor Policy implementation and training
Managers	Model behaviour, provide training, and support open dialogue
All Employees	Read, understand, and always comply with the Policy

4 Acronyms, Abbreviations and Definitions

Acronym/Abbreviation	Term / Word	Definitions
	Whistleblower	A person who, in good faith, reports suspected or actual misconduct, unlawful activities, breaches of laws or regulations, unethical behaviour, or other serious wrongdoing within or

COMPANY PROPRIETARY INFORMATION

This document is an uncontrolled copy of a controlled document held by the Concedo AS Management System. Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request changes, submit a Document Change Request to the Document Control Representative.

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

Acronym/ Abbreviation	Term / Word	Definitions
		related to the Company. The whistleblower may be an employee, contractor, consultant, supplier, business partner, or other person with a legitimate connection to the Company

5 Statutory Requirements

All statutory requirements relevant to the activities outlined in this Manual will prevail and take precedence in case of conflicts between statements in documents referred to in this document.

This policy is based on applicable Norwegian legislation, including the Norwegian Working [Environment Act, Chapter 2 A](#) relating to whistleblowing and protection against retaliation, the [Equality and Anti-Discrimination Act](#), and applicable data protection legislation, including the [Personal Data Act](#).

6 Standards, Guidelines and Recommended Practises

The policy also reflects internationally recognized principles for ethical business conduct, transparency, and responsible corporate governance.

7 Deviation from this Document

Exemption from requirements in this document is only acceptable after approval of an exemption application, which must be handled in Concedo's quality system; see:

- CON-001-HSE-QA-003 Report and Handle Nonconformities, Incidents and Improvement Proposals

The process for an exemption classified as 'minor' is quite simple, but an exemption classified as 'major' trigger a Management of Change (MoC) process which requires more analyses and more documentation. 'Minor' change in this context means that the likelihood and impact both have a value of 2 or less.

A deviation from a requirement in this document (i.e. identified after the activity has been performed) is classified as a non-conformity and must be handled accordingly; see the same process.

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

8 Policy Statement

The Company is committed to maintaining the highest standards of integrity, ethics, and compliance in all business activities.

Employees and external stakeholders are encouraged to report concerns regarding actual or suspected misconduct, without fear of retaliation.

All reports made in good faith will be treated confidentially and handled fairly and appropriately.

9 Key Principles

9.1 What Should Be Reported

Concerns may include, but are not limited to:

- Violations of laws or regulations
- Fraud, corruption, bribery, or financial misconduct
- Breaches of internal policies or ethical standards
- Harassment, discrimination, or unsafe working conditions
- Conflicts of interest
- Environmental or safety violations
- Serious misconduct or unethical behaviour

9.2 Reporting Concerns

Concerns may be reported through the Company's designated reporting channels, including management, HR, compliance functions, or external reporting mechanisms where available.

Reports should be made in good faith and include relevant information to support appropriate review and follow-up.

9.3 Confidentiality and Protection

The Company will treat reports confidentially to the extent reasonably possible and in accordance with applicable laws and regulations.

Retaliation against any person who reports a concern in good faith, participates in an investigation, or assists in resolving a matter is strictly prohibited.

9.4 Reporting Channels

Relevant internal procedures are described in CON-001-HRM-HA-001 Personnel Handbook.

External stakeholders should raise concerns with the Managing Director or use [Concedo's external Whistleblower Channel](#).

COMPANY PROPRIETARY INFORMATION

This document is an uncontrolled copy of a controlled document held by the Concedo AS Management System. Prior to use, ensure this document is the most recent revision by checking the Master Document List. To request changes, submit a Document Change Request to the Document Control Representative.

Concedo Management System Document		CON-001-MGM-PH-009	
	SPEAK UP AND WHISTLEBLOWING POLICY	Date:	01.09.2026
		Rev.:	01

9.5 Investigation and Follow-Up

Reported concerns will be reviewed and handled appropriately, fairly, and without undue delay. Where necessary, investigations may be conducted by internal or external resources.

Appropriate corrective actions will be taken where misconduct or non-compliance is identified.

9.6 Monitoring and Review

This Policy shall be reviewed regularly and updated as necessary to ensure continued suitability and effectiveness. Updates will be communicated to all staff.

CON-001-MGM-PH-009 Speak Up and Whistleblowing Policy

Final Audit Report

2026-08-26

Created:	2026-08-26
By:	Øystein Eliassen (oystein.eliasen@concedo.no)
Status:	Signed
Transaction ID:	CBJCHBCAABAAfzJHm1IPX30_ujvW54z5AVruAy1as5Dg

"CON-001-MGM-PH-009 Speak Up and Whistleblowing Policy" History

-  Document created by Øystein Eliassen (oystein.eliasen@concedo.no)
2026-08-26 - 1:55:49 PM GMT
-  Document e-signed by Øystein Eliassen (oystein.eliasen@concedo.no)
Signature Date: 2026-08-26 - 1:57:01 PM GMT - Time Source: server - Signature Appearance Selected: TYPE
-  Document emailed to Geir Lunde (geir.lunde@concedo.no) for signature
2026-08-26 - 1:57:03 PM GMT
-  Email viewed by Geir Lunde (geir.lunde@concedo.no)
2026-08-26 - 2:19:46 PM GMT
-  Document e-signed by Geir Lunde (geir.lunde@concedo.no)
Signature Date: 2026-08-26 - 2:19:58 PM GMT - Time Source: server - Signature Appearance Selected: MOBILE_IMAGE
-  Document emailed to sanness@sf-nett.no for signature
2026-08-26 - 2:20:00 PM GMT
-  Email viewed by sanness@sf-nett.no
2026-08-26 - 5:08:46 PM GMT
-  Signer sanness@sf-nett.no entered name at signing as Torstein Sanness
2026-08-26 - 5:11:52 PM GMT
-  Document e-signed by Torstein Sanness (sanness@sf-nett.no)
Signature Date: 2026-08-26 - 5:11:54 PM GMT - Time Source: server - Signature Appearance Selected: MOBILE_TYPE
-  Agreement completed.
2026-08-26 - 5:11:54 PM GMT