

# WHISTLEBLOWER POLICY

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## Introduction

This Whistleblower Policy forms an integral part of the Code of Conduct and provides a detailed guidance for employees, management, and executives regarding the Whistleblowing system in place at Kongsberg Precision Cutting Systems and MultiCam.

Whistleblowing is a practice of encouraging employees, contractors and associates of reporting possible misconduct, threats or harm to the public interest in certain areas of our business.

We at Kongsberg Precision Cutting Systems and MultiCam value the input provided by our current, former and prospective employees, contractors and associates and actively utilize it to constantly improve our business in all its aspects. We spare no effort to make sure that we follow latest requirements regarding not only environment, health, and safety, but also strive to stand up to societal challenges.

This Whistleblower Policy establishes a formal guidance for employees, contractors and associates on how to address challenges we might face in our daily business activities. Kongsberg Precision Cutting Systems and MultiCam have always encouraged an environment of trust and partnership among its employees, management, contractors and associates; and appreciated informal channels of communication existing alongside formal processes established by this Whistleblower Policy.

This Whistleblower Policy introduces rules established by Directive (EU) 2019/1937 of the European parliament and of the Council of 23<sup>rd</sup> October 2019 on the protection of persons who report breaches on Union law.

## What is whistleblowing?

Whistleblowing is a practice of encouraging employees, contractors and associates of reporting possible misconduct, threats or harm to the public interest in certain areas of our business.

The Whistleblowing Policy guarantees, that those who decide to report an alleged misconduct, threat, or harm to public interest in relevant areas of our business, are provided with secure and anonymous communication channels to disclose their report.

Whistleblowers also benefit from a secure and anonymous approach to investigating their report and have guarantees that relevant action will be taken by Kongsberg Precision Cutting Systems and MultiCam. Furthermore, whistleblowers enjoy strong protection so that they are not a target to any retaliatory measures.

Whistleblowing mainly concerns with misconduct, threats or harm to public interest in the area of

- Public procurement
- Financial services, products and markets, and prevention of money laundering and terrorist financing,
- Product safety and compliance,

- Transport safety,
- Protection of the environment,
- Radiation protection and nuclear safety,
- Food and feed safety, animal health and welfare,
- Public health
- Consumer protection
- Protection of privacy and personal data, and security of network and information systems

Reports regarding activities in other areas are not considered whistleblowing by relevant legislation.

## Who is a whistleblower?

Whistleblowers can recruit from a wide variety of positions both within and out of Kongsberg Precision Cutting Systems and MultiCam, such as current, former and prospective employees, contractors, volunteers, paid and unpaid trainees, agency employees and management. Reports from all these whistleblowers shall be investigated thoroughly and considered equally.

Whistleblowers enjoy strong legal protection. We at Kongsberg Precision Cutting Systems and MultiCam welcome all reports from whistleblowers as we understand their activity as an attempt to help further improve our business and provide valuable feedback. Any kind of retaliatory measures is strictly prohibited and has no place at Kongsberg Precision Cutting Systems and MultiCam.

Reports made by whistleblowers enjoy a confidential status (unless expressly stated by the whistleblower) and are available to a strictly limited number of people. Providing a report by a whistleblower is not considered breach of their confidential obligations. Kongsberg Precision Cutting Systems and MultiCam might be asked to disclose such report by national authorities or judicial proceedings. In such case, the designated person will work closely with the whistleblower to ensure their protection.

## How to report?

At Kongsberg Precision Cutting Systems and MultiCam we made special, confidential channels available for whistleblowers to file their reports.

These channels include a dedicated web application accessible through our HR platform Globe and a dedicated phone line, number also available in Globe. A personal disclosure might be arranged in case the whistleblower expressly requests it. A confidentiality status of the report and the whistleblowers' identity are always secure.

The report might be provided in any form. Reports need to clearly state what conduct at Kongsberg Precision Cutting Systems or MultiCam is deemed relevant, when and where it happened and who was involved in it. Such reports make further investigations easier and allow us for a better targeted remedial action.

A whistleblower may express their wish to keep communicating in an anonymous fashion regarding their report. That might be arranged by any means available and preferred by the whistleblower. We at Kongsberg and MultiCam will do our best to ensure that the whistleblower can communicate concerns safely and comfortably.

The reports are received by the Designated person: a trained employee at Kongsberg Precision Cutting Systems and MultiCam who is responsible for the investigation of the report.

## How do we handle whistleblower reports?

Once the report is received by the Designated person, the receipt is confirmed without delay, but no later than 7 days after the report has been filed.

The Designated person will make their best efforts to investigate the situation described in the report. The Designated person is provided with the means and access necessary to make sure that all reports are investigated thoroughly.

When the investigation requires more time, the Designated person will inform the whistleblower that more time is needed and will provide brief information on the actions already taken (unless the whistleblower chooses to remain anonymous).

The investigation shall be finalized in 30 days after the receipt of the report (this period might be extended twice by 30 days).

The Designated person shall propose measures to be taken to remedy the situation described in the report and confirmed in their investigation. Kongsberg Precision Cutting Systems and MultiCam management is provided with these proposals and shall decide on action to be taken.

During this time, the Designated person is open to new information, suggestions or evidence from the Whistleblower.

With these actions complete, the Designated person informs the whistleblower on the whole issue.

All information on the report and the actions taken will be archived and stored in a secure manner.

Kongsberg Precision Cutting Systems and MultiCam take pride in ensuring whistleblower protection and learning from employee feedback regardless of its form. Reports from all Kongsberg Precision Cutting Systems and MultiCam entities around the globe are welcome and will be treated with care and openness, regardless whether the relevant EU legislation applies to such entity or not. Reports from Kongsberg Precision Cutting Systems and MultiCam entities, that do not fall under the scope of the EU Whistleblower directive might be handled through a simplified procedure, but always shall provide a similar level of protection for all whistleblowers.

Please do not provide reports that are false or deceptive – such conduct is not protected under this policy.