

Policy for whistleblowing

Revised 5 September 2024

Protector Forsikring ASA – Policy for whistleblowing

1. Purpose

The purpose of this policy is to encourage employees of Protector Insurance ASA to report any suspected wrongdoing and to protect the whistleblower from any retaliation within Protector.

2. Definition

Whistleblowing refers to the act of reporting suspected wrongdoing, misconduct or illegal activities within the company. A whistleblower is a person who reports suspected practices in the employer's business.

3. Scope

This policy applies to all employees of Protector Insurance ASA and its branches, as well as everyone that's acting on behalf of the company. Everyone shall make sure that they understand and comply with the content of this policy.

4. Legislation

This document shall comply with the following legislation:

- Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.
- The Norwegian Working Environment Act, Chapter 2 A (Arbeidsmiljøloven kapittel 2 A)
- The UK Financial Conduct Authority (FCA) - Handbook - SYSC 18.
- European Sustainability Reporting Standards (ESRS) G1-1. Protector shall be in compliance with the OECD's guidelines for Multinational Enterprises on Responsible Business Conduct.

5. Whistleblowing channel

Whistleblowing channel is a confidential platform for employees to safely report concerns and promote ethical behaviour and accountability. The platform is included in the company's HR system.

The channel includes numerous categories of whistleblowing, such as:

- Breaches related to environment or climate
- Breaches that could endanger health or cause death
- Financial or economic related crime such as corruption, tax evasion, manipulation, insider dealing or fraud
- Protection of personal data, security of network and information systems
- Breaches related to insurance regulation (Such as Solvency II and IDD) including conduct breaches and internal requirements

6. Reporting procedures

Employees are encouraged to report wrongdoing within the company's business.

Employees have a duty to notify, in cases regarding criminal offenses, situations where life and health are endangered, violations of laws and regulations, criminal offences, violations of the company's ethical and internal guidelines, employees neglecting their duties, and environmental damage.



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The notification can be done in a written or oral form.

The receiver of the notification may reply requesting any necessary additional information from the notifications, as well as provide feedback on handling the case, regardless of whether the notification is named or anonymous.

The whistleblower shall be followed up and informed regarding how the case is progressing.

7. Documentation

All notifications and their content shall be stored and processed in accordance with the GDPR, the Regulations on Information Security and relevant legislation. Any exchange or transmission of personal data by competent authorities, shall be carried out in accordance with Regulation (EU) 2016/679 and Directive (EU) 2016/680.

No other than authorized staff shall have access to any documentation regarding whistleblowing notifications.

8. Prohibition of retaliation

Protector is committed to effective protection to whistleblowers from retaliation. Any form of retaliation against whistleblowers are prohibited. All employers shall be able to raise concerns and be protected against any negative consequences of doing so.

Retaliation is any unfavourable actions, practice or omission which is a consequence of or a reaction to the employee having notified.

9. Confidentiality

Everyone who's involved in the handling of a case has a duty of confidentiality.

All notifications issued in the platform, are by default anonymous. The identity of the whistleblower shall not be revealed unless the whistleblower sends their written identity to the receiver.

10. Sanctions

Protector shall provide for effective, proportionate and dissuasive sanctions applicable to persons that:

- retaliate or bring vexatious proceedings against whistleblowers
- hinder or attempt to hinder notifications
- breach the duty of maintaining the confidentiality of the identity of whistleblowers
- Protector shall impose sanctions where it is established that the whistleblower knowingly reported or publicly disclosed false information.

