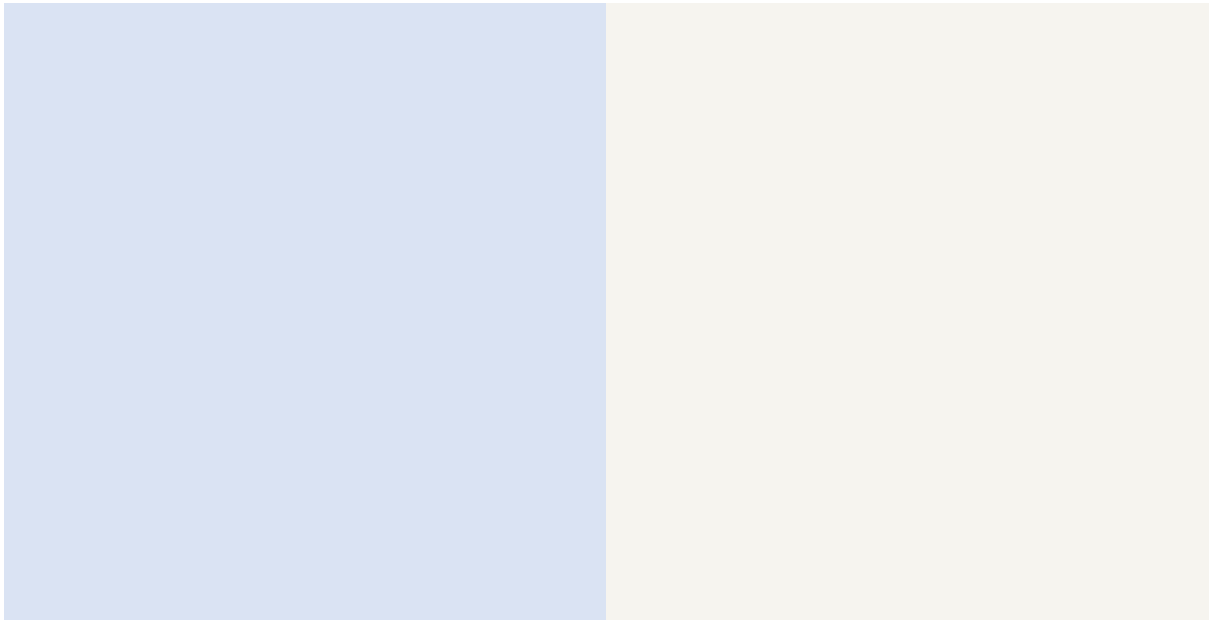


Reitan Retail

Whistle blowing process



REITAN
RETAIL

1 Innhold

2	Purpose and introduction	3
3	Ground principles	3
4	Overview of the process of handling whistleblower reports	4
4.1	Process flow	4
4.2	Receipt	4
4.3	Initial assessment	4
4.4	Risk assessment and quality assurance	5
4.4.1	General	5
4.4.2	Risk assessment	5
4.4.3	Quality assurance.....	5
4.5	Investigation	5
4.6	Summary report	6
4.7	Actions.....	7
4.7.1	Disciplinary actions	7
4.7.2	Other actions	7
5	Retaliations	7
6	Appendix	8

2 Purpose and introduction

The purpose of these procedures for handling reported issues of concerns is to establish internal detailed guidelines for how a whistleblowing report of a censurable condition is to be handled and documented, as to guide employees to ensure clear and predictable procedures.

3 Ground principles

Reitan Retail's principles for handling whistleblowing reports are:

- All reports are taken seriously
- All reports will be sufficiently investigated within reasonable time in a fair, open minded and objective manner
- Confidentiality and information security
- Protection of whistleblowers
- Whistleblowers reporting in good faith will not be subject to reprisals
- Non-anonymous whistleblowers will get timely feedback and information about the process
- Right to be informed of the nature and cause of the accusation against oneself and to be heard (contradiction)
- Process to be documented in writing (notoriety)

All sensitive information shall be handled on a strict "need to know" basis and in accordance with the applicable Data Protection Acts and regulations and guidelines set out by the local data protection authorities, local laws and other applicable regulations.

All employees are ordered to maintain duty of confidentiality with regards to sensitive information and shall sign a separate declaration of confidentiality if deemed necessary by the Head of HR/COO or external advisors.

The log and all other documentation shall be archived with limited access and be maintained in a secure and confidential manner. All physical documents shall be stored securely. All personal data collected during the investigation, except the final summary report, shall be deleted as soon as the investigation is concluded, unless legal proceedings are expected to take place. If so, personal data can be stored until the legal proceedings have been finalized.

4 Overview of the process of handling whistleblower reports

4.1 Process flow



All steps in the handling of the whistleblowing report shall be logged and documented in the table attached in Appendix to secure notoriety.

4.2 Receipt

If the whistleblower has requested a meeting to report, the meeting should be documented by making a recording of the conversation in a durable and retrievable form or through accurate minutes of the meeting. The whistleblower shall be offered the opportunity to check, rectify and agree the minutes of the meeting by signing them.

The current external advisor, or an internal receiver of the whistleblowing report shall, if possible, confirm receipt without undue delay and within 7 days, and inform the whistleblower that the report will be handled in accordance with these procedures for handling reported issues of concerns.

Anyone that receives a whistleblowing report shall handle it with necessary confidentiality and in accordance with this procedure, ensuring that the identity of every reporting person, person concerned, and third persons referred to in the report, for example witnesses or colleagues, is protected at all stages of the process. If the identity of the whistleblower is known, it shall only be disclosed to the extent it is necessary. The whistleblower shall, if possible, be informed that the receiver or others involved in the investigation may be summoned as a witness in a future legal proceeding, and thus be instructed to disclose the whistleblower's identity.

The receiver of the whistleblowing report shall always, to the extent appropriate, forward the whistleblower report to the Head of HR, COO or the Whistleblower channel. Alternatively, the receiver shall forward the whistleblower report to the current external advisor.

4.3 Initial assessment

The key objective of the initial assessment is further to conduct a preliminary material review to decide who needs to be informed about the whistleblowing report.

The current external advisor or the Head of HR will conduct an initial assessment and determine who needs to be informed/involved and who should be responsible for handling the specific whistleblower report. At this initial stage one must also ensure that the whistleblower report is reported in compliance with local data protection regulations.

4.4 Risk assessment and quality assurance

4.4.1 General

The objective of the risk assessment and quality assurance is to decide how to handle a specific whistleblowing report. The current external advisor or the Head of HR shall perform a risk assessment and quality assurance of the whistleblowing report at hand. The Head of HR may always confer with the current external advisor.

4.4.2 Risk assessment

The risk assessment involves a review and assessment of the report's potential consequences for Reitan Retail, such as reputation, personnel, operations, economy and possible sanctions, based on the assumption that the information in the whistleblowing report is true. The risk assessment shall also include an assessment of how to attend to the whistleblower. Whistleblowing reports on possible illegal or censurable conditions are of a sensitive character that requires a focus on personal protection and the need for confidentiality, and principles of independence, objectivity and contradiction.

4.4.3 Quality assurance

The quality assurance involves a preliminary evaluation where a dialogue with the whistleblower to collect complementary information is attempted, and if necessary, data is collected from other sources (i.e., other witnesses, internal governing documents, payments and public registries).

When the current external advisor is performing the initial assessments, an assessment report with advice for follow-up actions are to be sent to the Head of HR. Based on the risk assessment and quality assurance, the Head of HR decides whether a more extended investigation shall take place. If no further investigation is required, this shall be documented in the log and summary report.

Dependent upon the nature and severity of the whistleblowing report, the Head of HR shall at his/her discretion inform and advise the CEO and/or the Chairperson of the Board without undue delay.

The whistleblower shall normally be informed of whether a more extended investigation is decided.

4.5 Investigation

When a more extended investigation is decided due to the nature and severity of the whistleblowing report, the Head of HR is responsible for preparation of a tailor-made mandate/scope for the investigation, as well as a task- and progress plan and communication plan where necessary. The mandate should be adapted to secure that the investigation will answer important questions based on the character of the case. The Head of HR shall further consider whether the investigation should be conducted by an internal team or by the current external advisor. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and

the resources available to conduct the investigation, as well as competence requirements.

The investigation will normally consist of interviews of affected parties and witnesses, and collection of documentation. Applicable legislation for access to emails and electronic files on employees' computers must be observed.

Personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Parties that are interviewed shall receive sufficient information to secure their rights, and they have the right to contradiction, i.e., to comment and suggest alterations to the minutes from their interviews. It is a basic principle that the process shall be conducted in a fair, open and objective manner.

The person who has been reported on shall as a main rule be informed about the whistleblowing report and its content and be given the opportunity to give his/her version of the case ("the right to contradiction"). The person concerned is not entitled to information about the whistleblower's identity.

4.6 Summary report

The investigators shall analyse all collected information and prepare a summary report. The report shall include findings and observations on the reported matter, the procedure and the actions recommended or taken. The summary report shall answer the mandate given. In addition, the summary report shall include a self-evaluation of the process, as to enable learning points and identified changes that are needed in procedures etc.

As a main rule, parties involved shall receive sufficient information to secure their rights and have the right to contradiction on the factual parts of the summary draft report that concerns them.

The current external advisor and Reitan Retail aim to have a completed investigation and final summary report as soon as reasonable from reception of the whistleblowing report. The summary report will be reviewed by the COO, CEO and/or the Chairman, as decided during the initial assessment.

The Whistleblower and the person who has been reported on shall as a minimum receive information that the case is considered and concluded, also in the case that no irregularities or issues of non-compliance are found in the investigation. Whistleblowers that are not parties to the case are in principle not entitled to any information about the execution of the investigation or to the conclusion in the summary report but shall receive feedback on the outcome of investigations triggered by the report within three months, or six months in duly justified cases, from the acknowledgment/confirmation of receipt. When deciding what information to share, several issues need to be taken into consideration, such as confidentiality and personal information protection, the whistleblower's need for information, the building of a culture that values whistleblowers, and planned internal and external information on the issue.

If violations of the law come to light, the CEO and/or the Chairman is responsible for evaluating whether the company shall report to the relevant governmental control authority, such as the police.

The summary report shall be filed according to the internal archive routine and data protection acts, hereunder:

- The Norwegian Personal Data Act of 15 June 2018
- The Swedish Data Protection Act (2018:218)
- The Danish Data Protection Act of 23 May 2018
- The EU Directive 2019/1937 on the protection of persons who report breaches of Union law

4.7 Actions

4.7.1 Disciplinary actions

For employees, consequences may involve verbal or written warnings or, if the matter is very serious, termination of, or summary dismissal from their employment according to applicable labor regulations.

Any disciplinary actions shall be decided and implemented by the line management of the person that has been reported on and HR, and where necessary, with approval from the Head of HR and the CEO. The HR function shall always be involved prior to any disciplinary process. The disciplinary actions taken because of the conclusion of an investigation must always be proportionate and compliant with applicable laws and regulations as well as Reitan Retail's policies.

Employees who deliberately make a false report may also be subject to disciplinary action.

4.7.2 Other actions

Based on the outcome of the investigation, Head of HR or CEO shall take any such action and/or impose such sanctions deemed appropriate and/or necessary, including any preventative measures or termination of supplier contract etc.

5 Retaliations

Reitan Retail will do its utmost to take the necessary steps to ensure that no retaliation will take place, and that there will be no negative impact on the professional career of any person for reporting possible violations in good faith. The investigation team manager should check with the whistleblower that no retaliation has taken place by the time of the conclusion of the investigations and again six months after the conclusion.

6 Appendix

Action	Date	Responsible	Comments/Outcome
Receipt of whistleblowing report			[letter, e-mail, phone call] Issues raised
Dialogue with the whistleblower			
Report sent to CEO, COO and/or others			
Initial assessment			
Risk assessment			Risks identified
Quality assurance			Preliminary evaluation
Continued investigation needed?			Internal/External Involvement Mandate Task plan, Progress Plan, Communication Plan
Investigation/Fact finding			Interviews Documents Contradiction
Summary Report			Findings Observations Recommendations
Review of Summary Report			
Actions			Disciplinary Actions Other Actions
Information to whistleblower and person reported on			

Other actions are to be included as appropriate.



REITAN
RETAIL

+47 24 09 85 55
post@reitanretail.no
reitanretail.no

Gladengveien 2
0661 Oslo