

Whistleblowing policy: Reporting misconduct in Hurtigruten Group

Introduction

Hurtigruten Group wants a culture of openness, where reports of possible misconduct are being dealt with in a sustainable way. A culture of openness is also important for the general working environment and employee satisfaction. All employees, hires or partners have the right and the duty to report misconduct within the company.

In addition, the following people can report misconduct when they perform work for, or with, Hurtigruten Group and its subsidiaries:

- Temporary or agency staff and consultants
- 3rd party manning agencies
- Job applicants
- Clients
- Suppliers
- Students
- Persons who, for training purposes or in connection with work-oriented measures, are placed in companies without being employees
- Guests
- Contacts of the Company and anyone else with whom employees come into contact during their employment

Purpose:

The procedure for reporting misconduct (whistleblowing) will help to uncover any objectionable conditions within the company and to act and prevent it from happening again. All reports will be treated confidentially and will be acted upon immediately.

Definition of misconduct and objectional conditions:

Conditions that are contrary to law, written ethical guidelines in the business, or with ethical norms that are widely supported in society.

These can be conditions that involve danger to health and safety, risk of or actual environmental damage, discrimination and harassment, corruption and other economic crimes, data privacy, abuse of power, work environment. It also includes non-compliance with the law (failure to comply with legal obligations or regulatory requirements) - here are some examples:

- Breach of law or regulations, for example local law, Marine Labour Convention
- Breach of Hurtigruten's policies, guidelines, and procedures

Procedure for reporting misconduct:

1. The employee's right to whistle blow/report misconduct is described in the Code of Conduct. The CEO is responsible for ensuring that the whistle blowing routines satisfy legal requirements.
2. Reporting misconduct can be done orally or in writing.

A report should contain a factual, objective, and concrete presentation of the potential misconduct. The following information should be included:

- What has happened (breaches of laws and regulations, breaches of ethical norms or internal policies and guidelines)?
- Where did it happen?
- When did it happen?
- Who or what has this affected and how?
- Are there witnesses or documentation that can substantiate the information about the misconduct?

You can choose to report anonymously or by name.

3. Every employee who observes an act of misconduct has several ways to report it, misconduct can be reported; to a safety representative, HR, to your manager or any other shore / sea staff / Designated Person Ashore (DPA) / public supervisory authority or other public authority.

Misconduct can also be reported through our digital whistleblowing portal: Report Misconduct. When using the portal, you can choose to report anonymously or identify yourself. Although employees can report anonymously, we would encourage employees to provide as much information as possible. Anonymous reports could potentially reduce the ability to investigate misconduct.

4. When using Report Misconduct, you will be assigned a username and password. All messages in the portal will be encrypted. If you whistle blow / report misconduct anonymously in Report Misconduct, it is important to keep the receipt with your assigned username and password so you can log in to communicate with the caseworker.
5. The case is reviewed by our legal counsel to ensure compliance and the correct support. The case will then be distributed to the correct stakeholder in the notification group. The notification group consists of the Head of People, and relevant Business Partner, supported by legal counsel or external support when applicable. If the case is of a nature that requires external support, the case will be shared with an external party (external legal team or health care provider.)
6. As a whistle-blower, you will receive feedback within 5 working days after the report of the misconduct has been received.
7. If you notify anonymously, it is important that you log in to view messages and follow up from your caseworker.

You can access Report Misconduct on our intranet, Hurtigruten.com (policies or DEI pages) or use the QR code visible on Report Misconduct posters on our ships. If you report your case directly, the person receiving the report is obliged to enter the case in our digital solution to ensure the case is followed up correctly.

Requirements:

We encourage you to report your concern internally. A person reporting misconduct is not required to prove the validity of the situation or prove that there was misconduct. The employee is only required to act in good faith.

When a verbal report is made by the whistleblower to a manager, HR representative etc., the person who receives the report should follow our guidelines and enter the case in the digital portal Report Misconduct to ensure compliance.

Unjustified reports that are made in ill-faith or to cause harm may result in disciplinary action.

Insight into cases:

Whistleblowing cases that are reported in Report Misconduct are stored in the system, which can only be accessed directly by our legal counsel. Legal counsel can then assign the case to the relevant caseworker (internal or external). The caseworker will only have access to the specific case(s) he/she is assigned to. The system will store an activity log. The administrator has access to all logs, and the log will be used should any disputes arise. The caseworker can only access the log related to the case they are working with.

Protection of retaliation:

HRG will ensure that the whistleblower is protected against any unfavorable treatment in reaction to reporting misconduct. The person who reports misconduct (whistle blows) shall not be subjected to retaliation upon whistleblowing.

Retaliation in this context means any unfavorable act, practice or omission that is a consequence of, or a reaction to the fact that the employee (or others) has reported a matter of concern.

The same applies to employees who express that they wish to report misconduct/whistle blow.

The same applies to those whose roles have the duty to whistle blow:

- The safety representative's
- The occupational health service

Contradiction (to deny):

The person that has been reported has the right to present his or her version of the case. They are thus entitled to see the whistleblowing report content (not who reported it if you anonymously did so) in order to allow them to defend themselves.

External whistleblowing (if internal whistleblowing has been attempted but fails or if it will not suffice):

You are encouraged to report misconduct to one of the following alternatives: your own manager, a safety representative, DPA (designated person ashore), or using the Report Misconduct QR code or link. However, the guidance that you should first notify internally does not apply if there is reason to believe that internal whistleblowing does not suffice or has failed.