

Whistleblowing Policy

Garda Sikring Group

Policy Owner:

Hilde Kathrine Nystad Monteiro
Group HR-director

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This Policy will be reviewed and updated annually.

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1. Policy Statement and Scope

This Whistleblowing Policy is globally valid and applies to all entities of Secure HoldCo AS (“Garda Sikring Group”, “the Company” or “we”). The commitments, rules and procedures set out in this Policy apply to the activities of all entities of the Company. It is publicly disposed and incorporated in Garda Sikring Groups routines and clearly communicated internally and externally.

This policy applies to all employees, agency workers, other organisations and volunteers employed or engaged by Garda Sikring Group (hereby “Colleagues” or “employees”).

We are committed to conducting business with honesty and integrity, and we expect all Garda Sikring Group employees to maintain the same high standards.

This policy is designed to ensure that employees can raise their concerns about wrongdoing or malpractice within the Group without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The policy aims to:

- encourage colleagues to raise serious concerns at the earliest opportunity ;
- provide colleagues with guidance as to how to raise those concerns; and
- reassure colleagues that they can raise concerns without fear of reprisals, even if they turn out to be mistaken.

This policy is intended to cover any form of serious concern as defined in Section 3 of this policy.

2. Local law compliance

Garda Sikring Group will comply with local laws in

the conduct of this Policy. Refer to Section 10 for list of relevant local laws where there is legal provision for Whistleblowing.

3. Reportable concerns

Colleagues are encouraged to make a disclosure of any actions or behaviour they genuinely believe may be:

- dishonest
- fraudulent
- corrupt
- illegal
- serious conflict of interest
- any breach of a legal obligation or duty
- disclosures related to miscarriages of justice
- a danger to the health and safety of the public and/or other employees
- discrimination and/or harassment
- bullying
- damage to the environment
- other unethical conduct

This list is not exhaustive.

4. Raising a concern

Colleagues should report all concerns through the whistleblowing portal. Whistleblowing portal is linked on sub-entity website.

All concerns will be forwarded to the HR-director for coordination of their treatment, as per Section 5.

There may be some circumstances it may be appropriate for a colleague to report their concerns to an external body such as a regulator. We would encourage colleagues to seek advice and/or speak to local HR-director internally who may be able to assist before reporting a concern externally.

There are independent charities in some countries who operate a confidential helpline for whistleblowing advice. Refer to Section 8 for details.

Measures to protect the identity of whistleblower is as followed:

- Limited access to see cases in Whistleblowing Portal, only HR-director with access.
- Anonymous whistleblowing if desired.
- If interviews are necessary, they are conducted in sensitive and secure locations.
- Whistleblower communication is crawled in the portal, and it is a secure messaging platform.

5. How to raise a concern

All concerns must be raised through the whistleblowing portal. Through the portal, colleagues can raise their concern both anonymously or with their name.

The earlier they express their concern, the easier it is to act. Colleagues will need to provide the following information:

- the nature of their concern and why they believe it to be true ;
- the background and history of the concern (giving relevant dates) ;
- any witness(es).

Colleagues are expected to have genuine concern relating to suspected wrongdoing or malpractice within the Company and there are reasonable grounds for their concern.

Colleagues should not assume that Garda Sikring Group is aware of the problem and are encouraged to utilise this Policy to bring any concerns to its attention.

6. What Garda Sikring Group will do

The Company will acknowledge, promptly assess and where appropriate investigate and take corrective action, as and if required.

Where appropriate, the matters raised may:

- be investigated by management or through the disciplinary/grievance process, unless the HR-team deems other treatment is necessary
- be referred to the police
- be referred to the external auditor

Within a reasonable period following a concern being raised, the person investigating the concern will write to the colleague:

- acknowledging that the concern has been received
- indicating how the Company proposes to deal with the matter
- telling them whether further investigations will take place and if not, why not.

Colleagues raising the concern will be interviewed to ensure that their disclosure is fully understood.

Colleagues may be accompanied by a union representative or a work colleague.

Confidentiality will be fully maintained, consistent with the need to conduct an adequate review and applicable laws.

Garda Sikring Group will do what it can to minimise any difficulties that a colleague may experience because of raising a concern. For instance, if they are asked to give evidence in criminal or disciplinary proceedings, the Company will arrange for them to receive appropriate advice and support.

Colleagues will be assured that their disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, Colleagues will be kept informed of the progress and outcome of any investigation, maintaining the anonymity of the Colleagues to the fullest extent.

The Group hopes Colleagues will be satisfied with any action taken. If they are not, and they feel it is right to take the matter outside the Company, the following are the Company's prescribed contacts:

- colleagues' own professional regulatory body
- colleagues' own trade union (if applicable)
- the police
- other relevant bodies prescribed by local legislation (section 10).

If colleagues choose to raise concerns outside the Company, they should ensure that it is to one of the above prescribed contacts. A public disclosure to anyone else could take them outside the protection of their own country laws and of this Policy.

Colleagues should not disclose information that is confidential to the Company or to anyone else, such as a customer, supplier or contractors of the Company, except to those included in the list of prescribed contacts.

This Policy does not prevent a Colleague from taking their own legal advice.

7. No recrimination

Colleagues who made a complaint in good faith or reported a good faith concern will not suffer recriminations because of their disclosure. Some examples of recrimination include:

- loss of job
- physical or psychological abuse or threats
- demotion of role, pay or entitlements

- current or future bias within the company

Colleagues who believe that they have been subjected to any recrimination for having submitted a complaint should immediately report the concern to either the HR team or a member of the Executive team. Any complaint that such recrimination has occurred will be investigated.

If such a complaint is substantiated, disciplinary action will be taken, up to and including termination of those involved.

The Group cannot provide immunity from any civil or criminal legal liability resulting from the actions of a Colleague making a disclosure under this Policy.

8. Future amendments

This policy is non-contractual and as such the Group reserves the right to modify the policy and associated processes at any time.

9. Local Laws

The following is a list of countries and their associated laws extending protection to employees in respect of whistleblowing.

Norway: Act on working environment, working hours and job security etc. (Working Environment Act)

Finland: The Finnish Whistleblower Act (1171/2022)

Denmark: The Danish Whistleblower Protection Law

Sweden: The Whistleblower Act (SFS 2016:749)

10. Independent charities

The following is a list of independent charities, that we are aware of, operating within those countries who provide legal protections for whistleblowing. These charities offer a confidential helpline for whistleblowing advice:

WIN (Whistleblowing International Network). Their contact details are: info@whistleblowing-network.org or you can visit the website: <https://whistleblowingnetwork.org/Home>

Norway: The Parliamentary Ombud (Sivilombudet). Their contact details are: +47 22 82 85 00 or you can visit the website: <https://www.sivilombudet.no/en/>

Denmark: The National Whistleblowing Scheme (Den Nationale Whistleblowingordning). Their contact details are: +45 33 19 32 02 or you can visit the website: <https://whistleblower.dk/>