



Whistleblower Policy

Revised – 04 January 2021

1. Objective

SMV's policies, principles and values have been developed to ensure high standards of conduct and ethical behaviour in all our business activities globally. This Whistleblower Policy is to ensure that our employees, consultants, agents, vendors, contractors and customers can raise concerns regarding actual or suspected contravention of our ethical and legal standards without fear of reprisal.

This policy aims to:

- I. Encourage people to report an issue if they genuinely believe that someone has contravened our policies, principles, values, standards, or the law.
- II. Outline how SMV will deal with all reported misconduct or unethical behaviour.
- III. Assist in ensuring that serious misconduct or unethical behaviour is identified, investigated (if necessary) and dealt with appropriately.

1. Who does this Policy apply to?

This policy applies to all people and representatives of the SMV group of companies, including directors, managers, employees, consultants, contractors, and agents, whether full-time, part-time, or casual at any level of seniority wherever employed or engaged.

2. What sort of concerns should be reported?

All personnel are encouraged to report any genuine matters or behaviour that they honestly believe contravenes SMV policies, principles, values, standards, or the law. For the purposes of making a report under this policy, matters may include any actual or suspected:

- I. Corrupt activities, such as offering or accepting bribes, kickbacks or inducements.
- II. Theft, fraud or misappropriation.
- III. Significant mismanagement or waste of funds or resources.
- IV. Serious harm to employees, public health, safety or the environment.

- V. Conduct or practices, which are illegal or breach any law.
- VI. Irregular accounting practices.
- VII. Workplace harassment, violence, and inappropriate behaviour
- VIII. Quality concerns.

3. The matter must be serious enough that it would, if proven, constitute:

- I. A criminal offence.
- II. Reasonable grounds for dismissing, or otherwise terminating the services of any employee, contractor representative or agent.
- III. Reasonable grounds for significant disciplinary action.

2. Reporting an incident/matter

If you become aware of any matter or behaviour that you think contravenes SMV's Principles of Ethics and Fairness, other policies or the law, then you should discuss the matter with your manager.

If you are not comfortable discussing the matter with your manager, or don't believe that your concerns will be taken seriously, then you should email the Director for Human Resources, titling the email "WHISTLEBLOWER REPORT" and sent to confidentialHR@smv.no and raise your concern in accordance with the procedure outlined below.

1. What happens after a report is made?

A summary, with the reporter's identifying details being redacted, is forwarded to the company's Managing Director, Company Secretary and Board of Directors.

If a member of the Board is implicated in the report, then the person will be excluded and not notified of the report.

We will investigate all reported concerns and will, where applicable, provide feedback regarding the investigation's outcome. We will take the

necessary course of action in response to all submissions.

Your identity and the facts of the report will only be disclosed to those that are actively involved in investigating the matters raised.

2. What happens to Whistleblowers?

Under no circumstances will the report of such information that the employee reasonably believes to be factual and is made in good faith be the basis for retaliatory action against the employee making the report. This is not an amnesty provision. If an individual who files a report is later discovered to have actively participated in activities that violate this program and / or the SMV Code of Conduct, or to have filed a false report, they will be subject to appropriate disciplinary action.

Whistleblowing is not about airing grievances. It's about reporting breaches of SMV's Principles of Ethics and Fairness, other policies or the law. A false or inaccurate report can damage the career prospects and reputation of people who are the subject of unfounded allegations. If your report is not made in good faith or is found to be malicious, deliberately misleading or frivolous, you may be subject to disciplinary action, to the extent your identity can be determined.