

Procedure for external whistleblowing of censurable conditions at SpareBank 1 Østlandet

1. The purpose of the whistleblowing procedure

SpareBank 1 Østlandet shall conduct its operations in accordance with current legal rules and in accordance with a high ethical standard, as well as general requirements for sound business operations in general. As a responsible social actor, the Bank considers it important to receive feedback on censurable conditions in the Bank's operations.

The Bank therefore wishes to facilitate external reporting of censurable conditions in the knowledge that the notification will be handled in a safe and predictable manner.

Against this background, SpareBank 1 has established a whistleblowing procedure for external whistleblowers for the notification of censurable conditions in the Bank's operations. External whistleblowers means all companies, teams/associations, other private enterprises and natural persons who are not employed by SpareBank 1 Østlandet. Employees of SpareBank 1 Østlandet follow their own whistleblowing procedure, which is determined in accordance with the provisions of the Working Environment Act.

The routine does not apply to customer's own relationships and service delivery agreements. Customers who wish to complain about the Bank's decision or case processing related to the customer relationship and service delivery must use the Bank's appeal scheme. A link to the complaint form can be found [on the Bank's website](#) (in Norwegian).

2. Censurable conditions

Censurable conditions are circumstances that are contrary to legal rules and/or which contravene the general view of what is justifiable or ethically acceptable.

Examples of censurable conditions may be:

- Corruption or other financial crime
- An unacceptable working environment, including bullying and harassment
- Abuse of power/abuse of authority
- Danger to life and health
- Danger to the climate or environment
- Breach of personal data security

3. Whistleblowing procedure

External whistleblowers can notify censurable conditions directly to SpareBank 1 Østlandet by following a link [on the Bank's website](#) (in Norwegian).

Via this link, the external whistleblower gives consent to the Bank processing any personal data about the whistleblower provided by the whistleblower in connection with the notification. This personal data shall only be used to process the notification and shall be deleted after the processing of the notification by SpareBank 1 Østlandet has been

completed.

Notifications sent via this link are initially handled by the Bank's risk management department.

For the case processing of the notification, the Bank has established a separate whistleblowing group consisting of the Head of HR and Legal, Legal Director and the Head of Risk management and Compliance.

The whistleblowing group is coordinated by the Head of HR and Legal. The whistleblowing group is responsible for ensuring sound case proceedings and taking care of the parties involved.

The notification should have a factual form and a clear message that is substantiated by factual information.

4. Case processing of notifications

The whistleblowing group shall ensure that the notification is adequately investigated without unreasonable delay and, as far as possible, investigate the correctness of the circumstances being reported. They will discuss who should be involved and the further processing of the case.

The Bank's Data Protection Officer must be informed immediately and given access to notifications, or parts of notifications, that concern non-compliance with personal data legislation.

In deciding who should be involved in whistleblowing cases, impartiality must be considered. A person is considered disqualified if there are circumstances that are suitable to weaken confidence in his or her neutrality. If such circumstances exist, they shall not participate in the processing of the specific case.

To the extent that the notification is directly targeted at HR and Legal or for other reasons entails that the Head of HR and Legal is disqualified, the matter is sent to the CEO.

To the extent that the notification is directly targeted at members of the CEO's management group, the case is sent to the CEO and the Chairman of the Board is informed. An assessment is made of the CEO's impartiality, and if it is found that the CEO is disqualified, the case is dealt with by the Chairman of the Board.

To the extent that the notification is directly targeted at the CEO, the case is sent to the Chairman of the Board. To the extent that the notification is directly targeted at the Chairman or a Board member, the matter is sent to the Chairman of the Supervisory Board.

A log of all activity related to notifications received shall be kept, and all meetings shall be documented in the form of minutes. An action plan shall be drawn up for further processing of the notification, and the grounds for the final decision.

5. Principles for handling external whistleblowers

1. Whistleblowing is a positive initiative to give the Bank the opportunity to rectify violations of laws, regulations and ethical norms with broad support in society
2. Whistleblowing is included as a means of achieving the goal of the Bank having a high ethical standard
3. The notification is processed so that as few people as possible become aware of the identity of the whistleblower
4. The external whistleblower shall always receive feedback that the notification has been received
5. External whistleblowers shall always receive feedback that the case is resolved/closed by the Bank, unless the law imposes confidentiality provisions that prevent feedback from being given
6. If the external whistleblower is a customer of the Bank, or later wishes to establish a customer relationship, the notification shall not adversely affect current or future customer relationships and service delivery agreements.

6. Principles for handling notifications that apply to an individual

1. When handling notifications, the law of contradiction shall be followed
2. The person to whom the notification applies shall be informed that the notification has been received, as well as of the planned schedule for processing the case
3. According to personal data legislation, he or she is entitled to have access to the allegations about him or her, both about the censurable conditions and other personal data collected
4. Access shall be given as soon as possible after the notification has taken place and at the latest within one month
5. The right to information and access does not apply where exceptions have been made in Section 16 of the Personal Data Act, e.g. because information is required to be kept confidential for the purpose of investigating possible criminal offences. However, the Bank can not withhold information and access to a greater extent than necessary.
6. The person to whom the notification applies shall be given the opportunity to comment on the situation notified and give their version of the case. This includes the right to demand that incorrect or incomplete personal information is corrected under personal data legislation.

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