

The whistleblowing poster for the Norsk Gjenvinning Group

What is whistleblowing?

Whistleblowing means reporting unacceptable circumstances to someone who can do something about it.

Unacceptable circumstances are breaches of laws, rules, generally accepted ethical norms, other external obligations or the Norsk Gjenvinning Group's Code of Conduct.

Whistleblowing is positive

Whistleblowing is positive for both the company and society as a whole because it means unacceptable situations can be remedied. People who are willing to whistleblow are an important resource for the Norsk Gjenvinning Group.

Right and obligation to whistleblow

The individual employee is encouraged to report unacceptable circumstances because this can help the Group develop positively. Normally, employees do not have an obligation to whistleblow. However, it shall always take place if criminal situations and circumstances that may put lives or health at risk are discovered or suspected.

Who should you whistleblow to?

If an employee becomes aware of illegal acts or breaches of the Norsk Gjenvinning Group's Code of Conduct, he/she shall notify the:

Immediate manager

Whistleblowing notification can be done in writing, via email or verbally. If it is provided verbally, it is important that the person who receives the notification writes down everything that is said. If an employee feels that it is difficult to notify the manager, he/she may turn to the Director of Compliance, CCO.

Director of compliance, CCO.

The CCO is independent of the line organisation and reports directly to the CEO and in necessary cases directly to the Chairman of the Board. The CCO can be contacted on the following email address or phone number: varsling@ngn.no, Mobile (+47) 971 96 907.

The Norsk Gjenvinning Group Whistleblowing Channel

The whistleblowing channel is available both internally and externally on the Internet. Forms for

whistleblowing are available at the following address:

<http://www.nggroup.no/varsling/>

The whistleblowing channel is operated by an external partner and is prepared for anonymous whistleblowing.

The Group's whistleblowing service:

Web: <http://www.nggroup.no/varsling/>

Email: varsling@ngn.no

Telephone: (+47) 971 96 907

Whistleblowing can be done anonymously, but, normally, transparency will make the process easier and ensure a better outcome for all the parties involved. The whistleblower's identity is confidential information.

Following up notification

- All whistleblowing reports shall be taken seriously and properly investigated.
- Managers who receive a whistleblowing notification shall immediately contact the Director of Compliance, CCO. If necessary, measures shall be implemented in accordance with the "Compliance Force".
- The whistleblower shall receive preliminary feedback within one week after the notification has been received.
- If it turns out that the criticism is unjustified or based on a misunderstanding, the whistleblower shall be provided with a proper explanation.
- The management is also responsible for taking care of those who have been subject to unjustified criticism.

The whistleblower must not be penalised

An employee who whistleblows in accordance with these procedures shall not be penalised. A whistleblower who experiences reprisals must turn to a manager or the Director of Compliance, CCO, who will promptly deal with and potentially correct any such situation.

Review of whistleblowing procedures

At least once a year, the management of each division shall discuss the topic of whistleblowing with the employees.

In the folder "Whistleblowing Guidelines" you will find more information about the Group's whistleblowing service.