



Whistleblowing Procedure

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Approved by: General Manager

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Encouragement:

The right to report censurable conditions in the workplace is regulated by [Chapter 2 A of the Working Environment Act](#). All employees and hired workers who have reason to believe that there are censurable conditions in the company are encouraged to report them. This procedure does not limit the right to report.

Purpose:

This whistleblowing procedure has been developed in collaboration with employees and their representatives and is intended to help uncover any censurable conditions in the company.

Who has the right to report:

All employees and hired workers may report censurable conditions. In addition, the following individuals working in the company have the right to report:

- Students at institutions with educational or research purposes
- Business partners
- Individuals placed in the company for training or employment-related measures
- Individuals participating in labor market measures without being employees

Right to report censurable conditions:

The right to report applies to "censurable conditions in the employer's business." Censurable conditions are defined in [arbeidsmiljøloven § 2 A-1 \(2\)](#) of the Working Environment Act as "*conditions that are in violation of legal rules, written ethical guidelines in the company, or ethical norms that are widely supported in society,*" such as:

- a) danger to life or health
- b) danger to the climate or environment
- c) corruption or other financial crime
- d) abuse of authority
- e) irresponsible working environment
- f) breach of personal data security



Statements concerning only the employee's own working conditions are normally not considered whistleblowing:

- Examples include statements about personal conflicts, professional or political opinions, or general dissatisfaction with the workplace. However, a statement is considered whistleblowing if it concerns "censurable conditions," such as harassment.

Duty to report:

In some cases, employees are obligated to report. You are required to notify the employer and/or safety representative about harassment, discrimination, and conditions that may pose a danger to life and health, cf. Working Environment Act § 2-3. [arbeidsmiljøloven § 2-3](#)

See also the safety representative's duty to report: Working Environment Act § 6-2 (3) [Arbeidsmiljøloven § 6-2 \(3\)](#)

Who to report to:

As a rule, reports should be made internally through the line, i.e., to the immediate supervisor. Other relevant recipients may include:

- The supervisor's manager
- The safety representative
- Union representatives
- A lawyer

Report concerning the company's top executive should be sent to the chairman of the board.

Procedure for reporting:

A report should be admitted to report@strand-shipping.no. The report should contain a factual, objective, and specific description of the potentially censurable condition.

The following information should be included:

1. What happened (violation of laws, ethical norms, or internal guidelines)?
2. Where did it happen?
3. When did it happen?
4. What is the scope?
5. Are there witnesses or documentation to support the report?

To ensure Strand Shipping can handle the report effectively, it is preferable that the report is written, preferably with examples and documentation. It is also helpful to include contact information so that Strand Shipping can reach out if more information is needed.

Anonymous reporting:

It is possible to report anonymously. One may choose not to provide a name or request anonymity during the case processing. If the identity of the whistleblower is known, the employer cannot guarantee anonymity unless exceptions apply under data protection regulations. It is encouraged to identify oneself, as anonymous cases can be difficult to follow up.

Reporting to public authorities:



Employees may always report externally to a public authority.

Reporting to the media/public:

The right to report externally to the media or the public requires that the employee is in good faith regarding the content of the report, that the censurable condition is of public interest, and that internal reporting has been attempted first. The requirement for internal reporting does not apply if there is reason to believe that internal reporting would be ineffective.

Prohibition against retaliation:

A whistleblower must not be subjected to retaliation. The same applies to employees or hired workers who express an intention to report. Any adverse action, practice, or omission resulting from or in response to whistleblowing is considered retaliation.

Employer's handling of whistleblowing cases:

1. All inquiries are taken seriously
2. The whistleblower shall receive confirmation of receipt within a reasonable time, including information about the process and estimated processing time
3. The person reported on shall, as a general rule, be informed of the content of the report and given the opportunity to present their version
4. The employer shall, "as far as possible," handle the report "without disclosing the whistleblower's identity to anyone who does not need or have the right to know"
5. The rules of the Personal Data Act regarding the right to information and access for both the whistleblower and the reported person will be observed
6. The employer shall conduct adequate investigations and ensure the case is sufficiently clarified before making a decision
7. The employer shall assess whether measures are needed to protect involved parties while the case is ongoing
8. The case shall be documented in writing, and a conclusion shall be made on whether censurable conditions occurred
9. The employer is the data controller under the Personal Data Act and must ensure compliance with data protection regulations, including deletion of data when no longer needed
10. The parties shall be informed of the outcome of the case as soon as possible
11. The employer shall implement measures if censurable conditions have occurred, to the extent deemed appropriate

Special note on harassment

Our company has zero tolerance for harassment. Harassment is prohibited by law, cf. the Equality and Anti-Discrimination Act § 13 and the Working Environment Act § 4-3 (3). [likestillings- og diskrimineringsloven §](#)



[13](#) and [arbeidsmiljøloven § 4-3 \(3\)](#) Harassment is a broad term and includes all forms of harassment, including bullying and sexual harassment.

If we become aware of allegations of harassment through a complaint, report, workplace survey, or otherwise, this will be investigated and handled responsibly, based on the company's procedure for handling whistleblowing cases.

04 June 2025

Tom Engø

CEO