



FRØY

Whistleblowing Policy

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Whistleblowing Policy

Approved by: Chief Executive Officer

Executive party: Head of HR and Administration

POLICY

Frøy ASA and its daughter companies, hereby referred to as Frøy, want to maintain a culture that is open whistleblowing. A culture that is open for all to speak out on these topics will contribute to a positive work environment, and for the company to be managed in the best possible manner.

Working conditions that are of an illegal or unethical character are harmful for the working environment, the persons involved, and the company. Therefore, it is important that these conditions are handled in a responsible manner.

All workers have an individual statutory right to whistleblowing if such conditions are present. This applies to hired employees as well.

Whistleblowers are protected from retaliations following the whistleblowing. Hired employees are to be protected from retaliation from the hiring company and their own employer.

The Ship Labor Act establishes that the employee's notifying is to take place in a proper manner and are a central guidance in our internal whistleblowing routines.

By critique-worthy conditions, we mean conditions that can include for example:

- Risk of health and safety
- Environmental hazards
- Corruption
- Misuse of power
- HMS-violations
- GDPR-violations

Employees on board vessels over 500 GT can notify directly to their closest manager, designated person, or to the Norwegian Maritime Directorate.

Employees on board vessels under 500 GT can notify their closest manager/skipper, designated person, or their operational coordinator.

Employees on land can notify critique worthy conditions to the closest manager with personnel responsibility, or to the designated person.

All whistleblowing can be given in written or oral form.