WHISTLEBLOWING POLICY
FOR
CLOUDBERRY CLEAN ENERGY ASA

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A. Introduction

1. Purpose of this Whistleblowing Policy

This Whistleblowing Procedure sets out the framework for dealing with concerns of illegal and improper conduct. The Purpose of the policy is to:

- *Notify and educate employees and other stakeholders of their right and responsibility to notify possible misconduct within Cloudberry Clean Energy (hereinafter Cloudberry), and*
- *Giving guidance on how such notification should be made and what to expect from Cloudberry's handling of concerns raised.*

This procedure is intended to ensure compliance with Act of 17 June 2005 no. 62 relating to working environment, working hours and employment protection etc. (nw. Arbeidsmiljøloven) chapter 2 A on notifications.

2. To whom does this document apply?

This policy applies to all employees, ex-employees, applicants and contractors in Cloudberry, The Board of Directors, and other representatives of the company, as well as our suppliers, business partners and affected third parties. The policy also applies to temporary workers hired from temporary work agencies.

3. Responsibilities and notification

The Chief Sustainability Officer and two appointed Directors of the Board are responsible for administering this procedure.

Employees are encouraged to notify their supervisor when appropriate.

Employees may also notify the CEO and the Board of Directors (contact information is available on the company's web) or use this link: Whistleblowing.

If you have questions regarding the content of this Whistleblowing Policy or its interpretation, please contact the Chief Sustainability Officer at ib@cloudberry.no.

4. Definitions

"Whistleblowing" is the act of reporting proven or suspected misconduct within an organization.

"Misconduct" refers to breach of laws or Cloudberry's policies or behavior contrary to generally accepted ethical norms. All misconduct can be subject to notification, however, to exemplify, the policy inter alia applies to the following:

- *Suspicions of bribery or corruption or other financial crimes*
- *Suspected breach of anti-money laundering or terrorist financing rules and procedures*
- *Behavior that is hazardous for health and safety*
- *Behavior that is hazardous for climate or the environment*
- *Abuse of authority*
- *Breach of personal data security*
- *Harassment, discrimination or bullying*

B. Procedure for whistleblowing

1. Why whistleblowing

Cloudberry wants to be made aware of any irregularities or other concerns regarding our organization and business. Employees and stakeholders are encouraged to ask questions, and report concerns if they are suspecting breach of the Code of Conduct or other relevant policies. When employees raise concern about possible misconduct, the company is given the opportunity to remedy, improve and to protect its interests, stakeholders and society at large.

Cloudberry employees and other stakeholders are therefore encouraged to report misconduct.

Under certain conditions, employees have a legal obligation to raise a concern. This applies if you:

- Observe errors or faults that can lead to loss of life or health, and you cannot correct the error yourself
- Become aware of harassment or discrimination in the workplace
- Notice that employees are injured or become ill due to their work environment

2. Raising a concern

a) Internally

In order to make the whistleblowing process as reassuring and accessible as possible, an internal system allowing employees to report misconduct in confidence is implemented. The Whistleblower Reporting Channel is accessed through IntegrityLog.

The individual submitting a case (the “whistleblower”) through IntegrityLog remains anonymous, unless the button to add personal details is employed.

The system requests selection of case topic (for example "Antitrust/Competition Law"). Thorough explanations of each category of misconduct are presented. The whistleblower is then further encouraged to describe the event. The report should, if possible, contain a detailed description of what happened, when it happened, the individuals involved, and if there were witnesses.

There is no requirement for the whistleblower to submit proof of the event, act or omission leading to the notification. However, to allow adequate follow-up actions, the report should include as much detail as possible and, if available, supporting evidence. The whistleblowing system allows the whistleblower to upload any relevant documentation.

Should a Cloudberry employee have reason to believe that the formal whistleblowing channel is ineffective, or if the concern pertains to an individual designated to receive such reports, the matter may instead be reported directly to a member of senior management or the Board of Directors.

b) Externally

Cloudberry employees have the right to report concerns externally if all internal reporting channels have been exhausted or are reasonably suspected to be compromised. In such instances, employees may notify external bodies, such as law enforcement authorities or the media. It should be noted, however, that the Norwegian Working Environment Act imposes specific conditions and requirements for publicly disclosing concerns related to the workplace.

- The employee must be in diligent good faith regarding the fact that there has been misconduct in the workplace. Being in "diligent good faith" means that you have reasonable grounds to believe that a breach of law has taken place and that the allegations

you put forth are correct. Cloudberry employees must not voice unfounded allegations in public.

- The concern must be regarding misconduct of public interest.

3. Cloudberry's handling of reports of misconduct

Cloudberry acknowledges the importance of ensuring predictability and confidence for all whistleblowers. We therefore ensure that all concerns raised by employees will be taken seriously and treated with respect.

Notifications through the whistleblowing system will be handled confidentially by the Chief Sustainability Officer and a Director of the Board. If the concern involves the executive committee, the report will be led by a representative from the Board of Directors. Cloudberry practices a low threshold to involve an external third party. The following principles for handling notifications apply:

a) Confidentiality

The process of handling a notification shall be kept confidential. If the identity of the whistleblower is reported, it shall only be made known to the minimum number of people necessary to carry out proper handling.

The whistleblower does not have the right to receive information on how the notification is handled.

b) Fair and objective process

Before Cloudberry starts follow-up of a notification, the Chief Sustainability Officer and a Director of the Board will ensure that all the individuals involved are not incapacitated due to their relationship with either the whistleblower or the person subject to allegations of misconduct. All aspects of the case will be examined and evaluated open-mindedly. A low threshold to involve an external third party shall be applied.

c) Protection of the legal rights of the person receiving allegations of misconduct and an adversarial process

The person subject to allegations of misconduct is entitled to information of all allegations against him or her and shall be given the chance to explain his or her version of the incident.

To protect the anonymity of the whistleblower, the person subjected to allegations of misconduct is not entitled to access the whistleblowing notification or other evidence that may reveal the identity of the whistleblower.

d) Protection of the whistleblower against retaliation

Employees who exercise their right to raise a concern through the whistleblowing channel shall be protected from any retaliation. This includes protection from dismissal, harassment, informal exclusions, demotions, or other negative consequences of the whistleblowing.

If a risk of the whistleblower being subjected to retaliation is suspected, the situation should be thoroughly considered and proper mitigating measures enabled.

e) Timeline

The whistleblower shall receive a receipt of the whistleblowing report within 7 days. Cloudberry shall investigate the report as soon as possible, and the whistleblower shall receive feedback on the case within three months.