

WHISTLEBLOWING POLICY

Approved by the Board of Directors 10. February 2022

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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 Group, 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 in the Cloudberry Group, The Board of Directors, and other representatives of the company, as well as our suppliers and business partners. The policy also applies to temporary workers hired from temporary work agencies.

3. Responsibilities and notification

The Chief Sustainability Officer and a Director 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 Director of the Board (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 sa@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:

- *Suspicious 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 [Whistleblowing](#).

The individual submitting a case (the "whistleblower") through [Whistleblowing](#) 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, involved individuals, 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.

b) Externally

Cloudberry employees have legal right to voice their concerns externally to a supervisory authority.

Employees may also notify serious concerns in public, for instance through media. If you intend to raise a concern regarding your workplace in public, you must however be aware that the Working Environment Act sets out additional requirements:

- 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.
- The employee must first raise the concern internally or have reasonable grounds to believe that an internal notification will not be effective.

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. 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 risk related to the whistleblower's situation should be thoroughly considered and proper mitigating measures enabled.

The Whistleblowing Policy has been approved by the Board of Directors 10. February 2022.