

Confirma Software Whistleblowing – Policy

This day, 2023-12-17, the following policy has been established for Confirma Software.

Background

Confirma Software strives to conduct business according to the true Nordic principles and values of honesty, respect, decency and care for our colleagues, customers and suppliers. Likewise we are focused on adhering to the relevant sets of rules and regulations in our different operating areas. By encouraging an open and responsible corporate culture, Confirma Software is convinced that most situations of malpractice and serious incidents can be prevented. While we always encourage direct and honest feedback at all levels in the organization, we recognize that sometimes a situation that is in breach with our principles or rules and regulations may arise. This can be difficult to address directly with the persons involved. We have therefore implemented a whistleblowing procedure to ensure that all of our employees can address such incidents without the risk of repercussions, and to ensure that the incident is evaluated by people who are neutral to the situation itself. Confirma Software expects all employees to report all misconduct in the workplace, which means that we do not live up to our principles or rules and regulations. This policy is intended to be understood and applied in the light of the action plan for the whistleblower function established by Confirma Software.

Purpose

The purpose of this policy is for Confirma Software's employees to feel safe and know that they can report misconduct and serious incidents concerning Confirma Software without fear of negative consequences. Confirma Software's employees must feel that their reports made in accordance with this whistleblower policy are taken seriously and that they are handled professionally and confidentially.

Guidelines

Employees are encouraged to report any misconduct and serious incident that they perceive as violations of laws, guidelines, internal governing documents or the like. Notification must be made in the manner described in Confirma Software's action plan.

Confirma Software believes that the following points are examples of malpractices and serious incidents that should be reported:

- a criminal act has been committed, is being carried out or is at risk of being carried out.
- a person has not complied with applicable law, does not comply with applicable law or risks not complying with applicable law.
- an employee's health and safety has been threatened, is threatened or is at risk of being threatened.
- an employee has violated, violates or risks violating Confirma Software's code of conduct.
- the environment has been harmed, is harmed or at risk of being harmed.
- manipulation of accounting or financial data.
- financial crime such as giving and taking bribes, fraud and counterfeiting.
- serious forms of discrimination and harassment
- information that any of the above situations are deliberately withheld.

The policy does not cover issues such as dissatisfaction with pay, poor or unfair leadership, inefficient systems or lack of feedback regarding the performance of tasks. Employees who wish to raise issues in these areas should in the first instance turn to their immediate manager or to the next level manager.

Provided that suspicions of misconduct, negligence or deficiencies in the workplace are reported in good faith and not out of malice or for personal gain, and that there are good reasons to assume that the case is relevant and the employee has followed the reporting procedures, the case will be handled as follows:

- The employee will not be subjected to any harassment or disciplinary action by Confirma Software as a result of him or her reporting a misconduct.
- As far as possible, evidence that can be traced to the employee will be kept confidential.

Abuse of this policy, for example by reporting false, malicious or baseless accusations, means that the employee is not covered by the above protection.

Employees must report their suspicions of misconduct in accordance with Confirma Software's action plan. As an employee, you can submit an oral and / or written notification. It must always be clear that this policy is used and whether the employee wishes to keep his or her identity secret. The reporting person will receive a confirmation of their notification as well as information about the measures that are planned and / or taken.

If the person allows, we will contact the person for questions, otherwise we will notify of decisions made within 3 months, if anonymous, no direct information will be provided.

Confirma Software is obliged to investigate and handle all reports fairly, quickly and confidentially as far as possible. The length and scope of the investigation will depend on the nature of the case. An initial investigation is carried out to decide whether there are grounds for continuing the investigation or if there is no basis for continuing the investigation due to the fact that the report is based on incorrect information, for example.

The person responsible for processing the report can set up a meeting with the employee. The employee may need to prepare parts of the notification in writing, these points will then be discussed in full during the meeting. The person responsible decides whether further action should be taken and, if

so, what is the most appropriate measure. This may mean that the employee must attend further meetings with the management or that the employee is asked to present further evidence, which is considered necessary. The employee will, as far as possible, be informed of what measures Confirma Software decides to take and must handle such information as strictly confidential.

Responsibility

Confirma Software's managers are responsible for ensuring that all employees within Confirma Software are familiar with Confirma Software's whistleblower policy.

Questions

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