

Whistleblowing Policy

HydrogenPro

1 Whistleblowing policy for employees in HydrogenPro

All HydrogenPro employees anyone working on behalf of HydrogenPro should be informed on the whistleblowing policy as outlined below.

Employees, hiring agency workers and other persons performing services for the Company without being employed by the Company, who become aware of reportable concerns, including but not limited to human rights violations and discrimination as outlined in our Code of Conduct item 2.7, are encouraged to notify in accordance with these guidelines.

2 What is whistleblowing?

Whistleblowing means notifying of reportable concerns in the workplace, including concerns regarding the Company's business and the business operations of any hiring agency, direct or indirect supplier, or business partner of the Company.

Reportable concerns include as an example information about criminal acts, breaches of law or other statutory requirements, breach of the Company's policies such as the Code of Conduct and breach of general ethical standards. The concerns should have a certain general interest, concerns that an employee or contract worker believes to be reportable based on own political or ethical convictions are not covered by this policy.

Example of reportable concerns include actions/omissions that entails or constitutes:

- a risk to life and health
- a risk for the environment and the climate
- corruption and other financial crime
- abuse of authority
- unjustifiable working environment
- breach of personal information security
- human rights violations (included in the Company Supply Chain Policy)

Statements about matters that only apply to the employee's own employment or working conditions are not considered as reportable concerns covered by this policy unless the matter concern any of the above-mentioned situations.

Whistleblowing is regulated in the Norwegian Working Environment Act chapter 2a and highlighted in HydrogenPro's Code of Conduct.

3 Why is whistleblowing desirable and why do we encourage notifying?

Being aware of matters worthy of criticism occurring within the Company or in connection with Company operations makes us able to address and sort out these issues. We become able to clear up the issue and operate in a more professional manner.

Reporting helps ensure that criminal offences and reportable concerns are avoided in our business, which in turn creates a better working environment. Sharing information you have on reportable concern helps us achieve this.

4 Who may report concerns?

All employees and contracted workers in the Company as well as Suppliers and Business Partners may report concerns. HydrogenPro subscribes to the principle of "Penalty free" reporting as stated in our Code of Conduct.

5 Who should you report your concerns to?

You can always notify your immediate supervisor, the Chief Executive Officer or the Director of the Board. You can also notify our safety delegate Kai Inge Grønli, mobile 997 98 141, e-mail: kai.inge.gronli@hydrogenpro.com, who will subsequently follow up the report with the relevant managerial person in the Company.

If the information concerns an issue that may involve managers in the Company, and/or you have not obtained any reaction from the person you first reported to, please contact the Chief Executive Officer Jarle Dragvik, mobile 911 72 734, e-mail: jarle.dragvik@hydrogenpro.com or the Chairman of the Board Dag J. Opedal, mobile 900 40 460 or e-mail: djopedal@gmail.com.

You are always entitled to report relevant concerns to public authorities, including the Norwegian Labour Inspection Authority, the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime and the Norwegian Competition Authority; but it is preferable that you first try to disclose your concerns internally pursuant to the Company's notification system as outlined here.

6 How can you report your concerns?

You can report them either verbally over the telephone, or directly to a persons specified in these internal guidelines. You can also send a letter or an email.

Notification pursuant to these guidelines may be done anonymously, but, if possible, it is desirable that you provide your identity as this may help the Company thoroughly investigate the concern. This also ensures the best possible result. If reporting is done disclosed, your name as a notifier will in any case be kept confidential by the limited circle of people handling the issue within the Company.

7 What should the notification contain?

The notification should contain the following:

- Name of the notifier (may also be anonymous)
- Place of service (may be anonymous)
- Date of notification
- Time, event date and time of event or observation
- Specific description of the act/incident/issue being notified
- Place of action
- Witnesses

- Knowledge of previous cases, including with the same person(s).

8 HydrogenPro's handling and Follow-up of the notification and reporting

- All enquiries are taken seriously.
- The person reporting their concerns shall within a reasonable amount of time receive confirmation that their report has been received, with an indication of how things will proceed and how long the process is estimated to take.
- The person about whom the notification is given, shall, as a norm, be informed of the contents of the notification and be given an opportunity to present their side of the matter.
- The employer shall "as far as possible" process the notification "without divulging the identity of the whistle-blower to anyone other than those who have a need or right to such knowledge"
- The Personal Data Act's rules on the right to information and access for the whistle-blower and the person reported on will be respected during the processing of the case. Persons reported on will have the right to know the identity of the whistle-blower, unless there is a basis for exemption under the personal data protection rules.
- The employer shall initiate appropriate investigations and ensure that the matter has been satisfactorily clarified before a decision is made.
- The employer must consider whether measures need to be implemented in order to protect the interests of the parties involved before a conclusion is reached on the matter.
- The process must be documented in writing, and a decision must be made about whether censurable actions have taken place.
- The parties shall be notified of the outcome as soon as possible.
- As appropriate, the employer shall implement measures if censurable actions have taken place.

9 Security for the notifier/whistleblower

Reporting in good faith is encouraged and will not be met with any form of retaliation, either by the Company or a hiring agency. Please see HydrogenPro's Code of Conduct item 5.

Retaliation means any unfavorable act, practice or omission that is a consequence of, or a reaction to an employee having given notice. It can, for example, be a receiving a warning, dismissal, unreasonable discrimination, harassment, change in work tasks or position and more.

If you nevertheless experience retaliation, report this immediately to the Director of the Board; Dag J. Opedal, mobile 900 40 460 or email: djopedal@gmail.com. He will follow up immediately.

HydrogenPro

Hydrovegen 55,
3936 Porsgrunn, Norway

hydrogenpro.com
info@hydrogenpro.com
Tel: +47 990 79 500