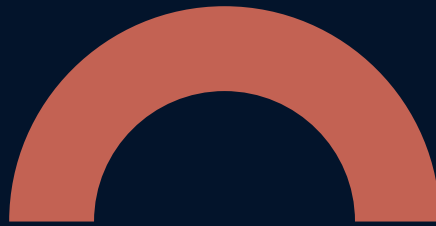


ROUTINES FOR INTERNAL REPORTING



Introduction

Norwegian Helsinki Committee (NHC) is committed to creating a safe and pleasant working environment for our employees and contractors. This means that we all at NHC shall contribute to achieving these goals by treating each other with respect and care.

Therefore, everyone at NHC is strongly encouraged to report internally if situations involving illegal or unethical behavior (hereafter: censurable conditions) in NHC are experienced or observed.

Below you will find information on what could be classified as censurable conditions (in Norwegian: kritikkverdige forhold), who can report, procedures for internal reporting and duties of employer when processing such reports.

NHC's Health and Safety representative (in Norwegian: verneombud) shall inform and make this document accessible for NHC's employees. Consultants, interns, volunteers and others related to a specific project(s) or Section(s) must be informed and provided with this document by their immediate superior/manager.

This document will be updated annually. Before making any such changes, amendments will be discussed by the Leadership Group and approved by the Board. You will be notified shortly once the changes have been approved.

1. Right to Report

NHC sets a low threshold for reporting and strongly encourages everyone to report about censurable conditions. Censurable conditions are behavior or circumstances that contradict with:

- Relevant Laws and regulations
- NHC's written internal directives or ethical norms (see NHC's Code of Conduct)
- Other ethical norms broadly accepted by society
- Criminal offenses are always considered as censurable conditions.

Examples of censurable conditions can include (this list is non-exhaustive):

- Danger to life or health
- Discrimination
- Bullying or any form of harassment, including those having a sexual character
- Corruption or other economic crime
- Abuse of power
- Unsatisfactory working environment
- Breach of confidentiality or personal data security



NHC recognises right to freedom of expression and encourages everyone to speak up about any matter of concern. Remember that notifications related to own employment conditions might not be considered as a report on censurable conditions. Examples of matters not considered as censurable conditions can be dissatisfaction with salary, professional disagreements, personal contractual matters or other. Any report shall be assessed individually, on a case-by-case basis.

2. Duty to Report

In some situations, everyone is required by law to report to the employer and/or the Health and Safety representative. Such cases can include:

- Situations where life and health could be in danger
- Harassment, bullying or discrimination at the workplace
- If an employee became injured or sick as a result of circumstances at the workplace

The health and safety representative has an extensive duty to report under the Norwegian Working Environment Act.

3. Who can report?

Everyone, including short or long-term employees, internal or external consultants, interns, volunteers and others, who experience or become aware of censurable conditions in NHC is strongly encouraged to report.

4. To whom should it be reported?

NHC recommends using an internal reporting avenue first.

- Report should be primarily submitted to your immediate superior/manager/HR manager or contact person at NHC.
- If reporting to the immediate superior/manager/contact person or HR manager is perceived as difficult or impossible, or if reporting has been attempted without satisfactory results, you are encouraged to notify the Secretary General directly. If reporting to the Secretary General is perceived as difficult or impossible, or if reporting has been attempted without a satisfactory result, you are encouraged to notify the NHC's President of the Board.
- You may also report indirectly through NHC's Health and Safety representative, staff representative or trade union representative (in Norwegian: en tillitsvalgt), a lawyer or other person you trust, who will bring the case forward to a responsible person(s).
- In case of criminal offenses, please consider reporting to the police.



Everyone has the right to report externally to the Norwegian public authorities (such as the Norwegian Labor Inspection Authority (Arbeidstilsynet), Norwegian Anti-Discrimination Tribunal (Diskrimineringsnemnda), etc.) or media. For procedures of such notification please refer to the Norwegian Working Environment Act (§ 2 A -2).

5. How to Report?

Reporting on censurable conditions can be made in writing or verbally. However, in order to avoid misinterpretation or misunderstanding, NHC recommends reporting in writing.

Report ought to be either in English or Norwegian and contain at least the following information:

- Name of the person who reports (except anonymous reports)
- What happened? Does it concern the violation of laws, NHC's Code of Conduct or other regulations or standards?
- Who is involved?
- Where and when did it happen?
- When was it discovered?
- Has it happened several times?
- Are there any proofs (written documents or people who witnessed the fact/facts)?
- Date and signature (signature not required for anonymous reports)

Report can also be submitted at varsel@nhc.no or via Stamina/Avanova (for NHC's staff only).

Remember that you can always choose to report anonymously by providing the information above but without specifying any personal information on yourself. Anonymous report could be submitted through an online, encrypted form available on NHC's webpage.

Reports submitted via NHC's webpage, email or Stamina/Avanova will be received by the HR manager directly.

NHC will process all notifications in a reasonable manner, irrespective of the form of reporting. However, please note that it might be challenging or more time consuming to follow up anonymous reports.

Before submitting the report, please make sure that the information is correct, and the report does not contain false accusations against someone.



6. What happens after the submission?

Person submitting a report (hereafter: Reporter) on censurable conditions must receive acknowledgment of receipt from the Reporting Council no later than 7 business days after the submission, unless it is impossible to notify (for instance anonymous reports).

Anyone submitting a report on censurable conditions shall not feel excluded or harassed. Everyone shall be able to continue their work under the same conditions as before, take part in professional and social activities at the workplace, receive the same salary and allowances as before.

Procedures related to report-processing

7. Common Principles of Processing

- Regardless of their nature, form or type, reports submitted to NHC shall be processed confidentially and in line with the personal data protection regulations.
- Confidentiality and privacy shall be respected at all levels of case-processing. No one shall be given access to the content of the report, information related to the report or circumstances of the case, the identity of the reporter and/or people involved in the notification, unless necessary for the case-processing (konfidensialitet).
- Receipt and processing of the report at any level shall be registered and documented in writing.
- Every report shall be taken seriously. Examination of the information on censurable conditions, including anonymous reports, shall start as soon as possible, but no later than 14 business days after submission of the report. This timeframe can be adjusted based on the complexity of the report.
- Decision on the case shall be taken as soon as possible, but no later than 50 business days after the submission of the report. This timeframe can be adjusted based on the complexity of the report.
- Everyone involved in the processing of reports must be impartial, having no interest in the case. In case of doubt on impartiality, the person in question shall not participate in report-processing at any level (Habilitet).

8. Who Processes the Report?

Once the report is received, NHC's Reporting Council shall:

- Assess whether the report is well-founded.
- Decide how to conduct and who shall be involved in the case-processing, in line with the confidentiality requirement and personal data protection regulations.
- Determine possible measures that should be taken, based on the content and nature of the report.



- Safeguard the parties involved in the case and consider whether health care services should be offered to the parties. Such assessment shall be made during every level of the case-processing.
- If the report concerns cases that fall under the health and safety representative's duties, such as accidents and safety for employees, the health and safety representative shall be informed as soon as possible.

NHC's Reporting Council shall consist of 1. the Secretary General 2. the HR manager and 3. relevant Head(s) of section(s) having personnel responsibility for the section(s) the report is related to. The Reporting Council shall decide if the Health and Safety Representative should be involved in the case-processing.

If the report is directed against the Secretary General, the Reporting Council shall consist of 1. the HR manager 2. at least one member of NHC's Leadership Group and 2. at least one member of NHC's Board.

In case where the report is directed against one or more members of the Reporting Council or in case of doubts as to their impartiality, such person(s) shall be excluded from the Reporting Council and shall not participate in the case-processing at any level.

9. Report-examination

During any level of the case-processing a reporter as well as others involved in the case can be invited to a meeting for an in-depth case-examination and/or asked to provide additional information or materials related to the reported case.

Minutes should be recorded during any such meetings. The minutes should describe events and times, names of persons involved and their association with the case. The parties shall be given the opportunity to access and provide input to the minutes of meetings that they themselves have attended.

10. Right to Information (the contradiction principle/prinsippet om kontradiksjon)

The person the notification is directed against shall be informed about the content of the report and be given a possibility to present his/her version of the case as soon as possible, but no later than 30 business days after the submission of the report. Exception from the right to information can be made after assessing possible risks, on case-by-case basis.

The report and identity of the reporter shall be kept confidential and not be disclosed to the person the report is directed against, unless necessary for case-processing.



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The report and identity of the reporter shall be kept confidential and not be disclosed to the person the report is directed against, unless necessary for case-processing.

11. Prohibition against Retaliation (Forbud mot gjengjeldelse)

Retaliation against a person who reports on a censurable condition or informs that the right to report will be invoked is prohibited. Retaliation means any unfavorable act, practice or omission that is a consequence of, or a reaction to, the fact that someone has reported or is about to report. This can include:

- Threats, harassment, arbitrary discrimination, social exclusion or other improper conduct
- Warnings, change of duties, relocation or demotion
- Suspension, dismissal, summary discharge or disciplinary action.

Reporting Council should conduct frequent follow-up conversations with the reporter in order to assess risks of possible retaliation. Retaliation can be reported in the same way as other censurable conditions.

12. Conclusion of Processing

The case shall be examined fully and thoroughly before making a decision on the case. Such decision shall be in writing, describing steps taken to examine the case, and conclude whether a situation involving a censurable condition has taken place.

The parties shall be informed in writing as soon as possible of the outcome of the case.

The Reporting Council decides whether it is necessary to keep records of the closed case. As a rule, such records should be deleted in no later than 60 business days after the conclusion of the case-processing.



13. Measure and follow up

The Reporting Council shall decide whether and what measures to impose if it is concluded that censurable condition has occurred. Possible measures can include disciplinary sanctions, including termination of employment. In case of criminal offenses, NHC may also inform the police.

If it is concluded that censurable condition has not occurred, the reporter shall receive a written notification on the decision as soon as possible. Reporter shall also be informed how the employer will follow up the case further.

The Reporting Council, in consultation with NHC's working environment group, shall consider whether and what measures will be required in order to reestablish a proper working environment.

