

POLICY

WHISTLEBLOWING

Issued by	Chief Executive Officer
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1. Purpose

The purpose of this policy is to ensure that Norges Bank Investment Management (NBIM) has in place an internal whistleblowing system for both the reporting of wrongdoings in NBIM and the handling of subsequent whistleblowing cases.

2. Policy

NBIM prioritises the prevention of misconduct, fraud and corruption and promotes a culture of openness and transparency. All employees shall be able to raise their concerns about wrongdoings with their immediate superiors, even if this involves criticism of colleagues or superiors. Employees shall also have access to an internal whistleblowing system for cases where there is a wish to report outside the normal reporting line.

NBIM regards an allegation made by a whistleblower in good faith to be an act of loyalty that contributes to safeguarding the material and immaterial values and the reputation of the organisation. NBIM will do its utmost to protect the whistleblower from any form of retaliation.

2.1 Definitions

- Whistleblowing refers to a notification of illegal activities or other forms of wrongdoing in the workplace that affects employees, suppliers, NBIM or the public in general, irrespective of how the notification is brought forward.

2.2 Whistleblowing system

- NBIM shall have in place a sound and effective system for internal whistleblowing as a key instrument for the disclosure of information when the normal reporting channels are not appropriate.
- Whistleblowing reports are to be processed through a separate administrative system.
- NBIM shall designate an officer in charge of handling whistleblowing reports. The designated officer is responsible for establishing appropriate whistleblowing channels for NBIM and for establishing supplementary guidelines for whistleblowing.
- Supplementary guidelines shall contain a detailed description of what whistleblowing is and when it may be used, and information about what needs to be included in a whistleblowing report and evidence requirements for such reporting.

- Administrative rules for handling whistleblowing reports shall ensure confidentiality, predictability, fairness and objectivity. The administrative rules shall be available to all employees at the workplace.

2.3 Anonymous whistleblowing

- A whistleblower may remain anonymous regardless of the channel they use to make their report.
- The consequences of reporting anonymously shall be clearly set out in the administrative rules, allowing a potential whistleblower to make an informed decision regarding whether or not they wish to be anonymous.

2.4 Protection of personal data

- Any personal data relating to a whistleblowing report shall be protected in accordance with statutory requirements and requirements laid down by the Norwegian Data Inspectorate (Datatilsynet).

2.5 Management responsibilities

- All managers shall be familiar with and be able to direct employees to information regarding the whistleblowing system.
- Managers shall ensure that whistleblowers are protected and are not subject to retaliation or reprisals.