



Fibo Group's procedure for reporting (Whistle Blowing) and handling of non-conformities

ADOPTED IN BOARD MEETING ON 23 AUGUST 2017

Everyone in the Fibo Group is obligated to report breaches, or reasonable suspicions of breaches, of the Code of Conduct by following the procedure outlined below. Reports in accordance with this Whistleblower Policy may also be made by any person affiliated with Fibo Group, including business partners, suppliers etc.

In addition, as an integrated part of internal/external auditing, vendor assessment etc., the Fibo Group shall on a regular basis check that all aspects of the Code of Conduct are followed. The Fibo Group feels that our reputation is a priceless asset, in an effort to safeguard our commitment to Ethical treatment and adherence to our Code of Conduct; we have instituted the following procedure for reporting violations of the Fibo Group's Code of Conduct.

1. QUESTIONS ABOUT THE CONTENT OR EFFECTS OF THE CODE OF CONDUCT

Questions relating to the interpretation of the Code of Conduct or its practical application should be addressed to the general manager of the Fibo Group company concerned.

2. REPORTING

This procedure shall be used to report possible violations of Company policy, fraud or illegal acts within Fibo Group.

The following are only a few examples of types of activities that should be reported:

- An employee believes that a manager, executive or employee has engaged in questionable accounting or auditing practices.
- A vendor or supplier offers an employee, and the employee accepts an inappropriate gift or money.
- A manager or executive requests employees to falsify Company data.
- An employee falsifies payroll or expense reimbursements.
- An employee use corporate property, information or his/her position for improper personal gain
- An employee competing with the Fibo Group directly or indirectly.
- An employee's private interest interferes in any way with the interests of the Company.
- An employee, or members of his/her family, receives improper personal benefits as a result of his/her position at the Fibo Group.
- An employee discloses non-public information that might be of use to competitors or harmful the Fibo Group.
- An employee is involved in theft of the Fibo Group's property and assets.
- An employee disclosing of proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.
- The Company cheats customers, suppliers or others who have a financial interest in it.
- Antitrust or competition law violations.
- A company superior asks employees to engage in activities they consider illegal or questionable.
- The offer or acceptance of cash gifts by any employee
- An employee steals cash, merchandise or other Company assets.
- Environmental violations are committed by an employee or the Company.
- Any type of harassment, including racial or sexual harassment (the location procedure for resolution of this type of concern shall be utilized first for addressing these issues).
- Any other activity that may violate applicable law or the Company's policies.



It is the responsibility of everyone at Fibo to report incidences which may be in breach of the Fibo Group's Code of Conduct. All reports must be made without undue delay from the incident occurring.

- The report shall include the name of the employee making the report, the date and time of the report, and the nature of the report.
- The completed report must be forwarded to the CFO (Martin Prytz).
- If the persons reported are the CEO or CFO of Fibo Group or persons employed in their departments, the reports should be sent to the Chairman of the Group.
- The CFO shall at his/her discretion inform and advise the CEO or the Chairman of the Board of Fibo Group. The CFO shall immediately notify the CEO of any reported concerns or complaints regarding Fibo Group's accounting practices, reporting procedures, internal controls or auditing.
- Each completed report will be investigated.
- Local resources may be used to conduct the investigation if deemed necessary. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation.
- The final results of the report will be completed within 60 days and reviewed by the CEO, and a copy of which will be kept on file in the Accounting, Finance and Administration Department.
- The Board will be informed at every board meeting about incident reports received and the outcome of the investigation.
- Any violation of the Code of Conduct that is found will be dealt with accordingly.
- Violation of the Code of Conduct is a serious matter, and as such will be dealt with accordingly.
- Based on the outcome of such investigation, the CFO, CEO or Chairman of the Board of Fibo Group shall take any such action and/or impose such sanctions as are deemed appropriate and/or necessary, including any preventative measures, disciplinary sanctions or termination of supplier contract etc.
- For employees, consequences may involve verbal or written warnings or, if the matter is very serious, termination of, or summary dismissal from, their employment.

3. PERSONAL DATA

In relation to this Whistleblower Policy, Fibo Group may receive information on both the whistleblower and persons involved in the suspected misconduct. Such information may contain sensitive information on suspected criminal behavior and other personal matters.

All information received according to the Whistleblower Policy will be handled in accordance with applicable law on processing of personal data. Generally, all information received according to the Whistleblower Policy will only be retained for as long as it is necessary unless otherwise required by law.

4. CONFIDENTIALITY

It is as important for Fibo to provide a mechanism for employees and board members to safely report illegal activities and/or serious misconduct, as it is for the company to protect and to avoid damage to the reputation of innocent employees or board members who are the subject of a reported violation. For these reasons, Fibo will conduct its investigations of any reported violation as discretely as possible and in a confidential manner to the greatest extent possible commensurate with carrying out a thorough and adequate investigation. Furthermore, to the extent possible, all reasonable efforts will be made to treat the whistleblower's identity as confidential.

5. WHISTLEBLOWER PROTECTION

The Fibo Group takes the accusation of wrong-doing very seriously. Therefore, it is our policy that:

- The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Fibo Group prior to seeking resolution outside the company.
- No one shall suffer adverse employment consequences, harassment, be discriminated against or retaliated against for making a claim in good faith of a violation of the Fibo Group's Code of Conduct and Ethics.



- An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or summary dismissal.
- However, any employee who is found to have intentionally made a false claim of violation of the Fibo Group's Code of Conduct and Ethics Values will receive disciplinary action as deemed necessary, up to and including termination of employment.
- We trust that all the Fibo Group employees will make the right decision and report any violations of the Code of Conduct to the appropriate personnel.

6. CONTACT LIST

At Fibo we foster an open door policy and encourage employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's line manager is in the best position to address an area of concern. If this reporting channel is deemed inappropriate due to the individuals involved or the severity of the breach in question, the breach or suspected breach should be reported to the group CEO (Anders Carlson), or directly to the CFO (Martin Prytz), or alternatively, to the Chairman of the Board of Fibo Group (Patrik Nølåker). In exceptional circumstances where it would be inappropriate to approach any of the above, Executive Advisor to the FSN Funds Jesper Isaksen, or Compliance Officer at FSN Capital Partners, Rebecca C. Svensøy may be contacted.

Company/Role	Name	Telephone	E-mail
CEO -Fibo Group	Anders Carlson	+46 708 59 30 33	ACa@fibosystem.com
CFO - Fibo Group	Per Richard Olsen	+47 930 19 660	pol@fibosystem.com
Chairman, Fibo Group	Patrik Nølåker	+46 70 417 85 01	patrik.nolaker@yahoo.com
Executive advisor to FSN	Jesper Isaksen	+45 51 15 44 84	ji@fsncapital.com
Compliance Officer FSN Capital	Rebecca Svensøy	+47 924 97 857	rsc@fsncapital.com

Place and date of issue

Job position/Supplier