

# PHARMAQs notification poster

notification of criminal, illegal or discreditable behaviour or circumstances at PHARMAQ

## Why a notification channel?

PHARMAQ wishes to adhere to all national and international legal requirements, and the company also intends to instil confidence by implementing a variety of measures to promote a healthy corporate culture. As one of several such measures the company has provided a facility for making notifications to an external party. Such notifications are the most important means by which discreditable or illegal behaviour or circumstances such as harassment or financial irregularities are brought to light.

## What is notification?

Notification is the process by which a person reports of **criminal, illegal or discreditable behaviour or circumstances** within the company to an external party, instead of using normal internal company channels for this purpose. Under normal circumstances you should report to your immediate supervisor or a more senior line manager. You can also notify management indirectly via a union official or employee health and safety representative. *Notification in this context is taken to mean reporting to an external party. Your identity can be concealed from your employer, but not from the external party.*

## What constitutes criminal, illegal or discreditable behaviour or circumstances?

By illegal or criminal behaviour or circumstances is taken to mean those which entail danger to the life or health of personnel, hazardous products, embezzlement, theft, fraud, corruption, financial infidelity, etc. By discreditable behaviour or circumstances is taken to mean breaches of internal guidelines or ethical norms, such as bullying, sexual harassment, discrimination, drug abuse, poor working environment conditions, etc.

## Who can make notifications?

All PHARMAQ employees, inclusive of contracted employees and consultants, are entitled to make notifications. External personnel or companies with or without formal affiliation to PHARMAQ are also welcome to make notifications of incidents involving matters as described above. The guidelines apply to external notifiers in so far as they are appropriate.

## How do I make a notification?

A notification may be made orally or in writing, e.g., by telephone or e-mail.

## To whom can I make a notification?

If you prefer not to make a notification through line management channels, you may do so directly to an external party.

**The law firm BDO AS, Interity Services, either by phone: Tel. no.: +47 970 86000, or by completing a separate notification form which can be found at PHARMAQ's internet website. Visit [www.pharmaq.no](http://www.pharmaq.no)**

## Regarding entitlement and obligation to notify

- You are obliged to notify of behaviour or circumstances which endanger human life or health.
- Each employee is encouraged to notify of discreditable behaviour or circumstances since this may contribute to PHARMAQ's corporate development in accordance with its values and ethical regulations.
- Whether you are an employee or external contributor, you are entitled to notify of discreditable behaviour or circumstances you observe within the company.

## What should the notification contain?

This is described in the form provided by the law firm G-Partner, and a notification should include the following:

- Your full name (identity can be concealed from your employer)
- Notifier's place of work (location can be concealed from your employer)
- Date of notification
- Period or date and time of observation, as appropriate
- Specific description of what you observed
- Location where the behaviour/circumstances took place
- Other witnesses and/or additional information
- Knowledge of previous matters involving the same person(s)

## What principles apply when dealing with notifications?

- All notifications will be taken seriously
- All notifications will be dealt with without delay
- It will be possible for the notifier to conceal his/her identity from the employer
- Anonymous sources can be equally as valuable as identified sources, but it is important to obtain verified information
- The different methods of making notifications will be assigned equal weight
- It is prerequisite that all notifications are dealt with in

confidence

- The notification system can be used without fear of reprisal

## Who will deal with the notification? What is the procedure?

All notifications are received by the law firm and are subject to a preliminary review and analysis. A provisional assessment is sent to the relevant HR representative at PHARMAQ. It is the HR representative who, together with the General Manager, as appropriate, will decide as to what measures will be taken. This will depend on factors such as the nature of the circumstances in question and the person against whom the notification has been made.

The HR representative is obliged to inform the company's management, including the works council (BU) and the Board. The matter will be archived/recorded and will also be dealt with in accordance with currently applicable internal regulations and relevant legal requirements.

## Will I receive any feedback?

The notifier will, if possible, receive a confirmation that the notification has been received. As regards access to documents, and the appropriate time for this, such matters will be governed by the Norwegian Personal Data Act, among others.

## Do any restrictions apply to notifications?

Regulations regarding duty of confidentiality, defamation, etc., apply irrespective of the entitlement to notify pursuant to the Norwegian Working Environment Act.

## Do I run any risks in making a notification?

Reprisals against employees who make such notifications are prohibited pursuant to the Norwegian Working Environment Act.

Furthermore, the notifier is entitled to conceal his/her identity from the employer, but not from the external party.

## Consideration of the person against whom a notification is made

In cases where the employer decides to follow up the matter, the person against whom the notification is made will in the first instance be informed of the notification and of the information which has been reported in accordance with proper procedure and in the strictest confidence. By this means the person in question will be given the opportunity to present his/her version of events. When the matter has been concluded, the person against whom a notification has been made will be informed without delay, irrespective of the outcome.