

CORPORATE WHISTLEBLOWING POLICY

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The Company aims to ensure an open corporate culture with compliance risks identified and managed at an early stage

1. Introduction

Lundin Energy AB and its affiliates (the Company) are committed to the highest standards of ethical and legal business conduct. In line with our Code of Conduct and our commitment to open communication, this Policy aims to ensure that regulations and stakeholder expectations concerning whistleblowing in the areas of the Company's operations shall be respected at all times.

2. Scope

This Policy aims to ensure protection exists when any individual (internal or external to the Company) reports on suspicions of wrongdoing by or within the Company, and that legitimate concerns regarding misconduct in the workplace are raised without reprisals or victimisation. Whistleblowing protection applies to reports of wrongdoing relating to:

- a. breaches of applicable laws or regulations;
- b. breaches of internal regulations, including the Company's Code of Conduct, policies, procedures and guidelines;
- c. unethical or improper conduct;
- d. legal wrongdoing such as tax fraud, corruption, money laundering or public procurement offences, environmental protection, public health and personal data protection.

3. Expectations regarding Whistleblowing

The Company shall:

- 3.1. Facilitate reporting to the Company by whistleblowers, either directly according to local Company procedures and national law, or in writing at lundinenergy@integritycounts.ca or via post or orally to +800-2002-0033, our third party 24/7 telephone hotline number.
 - 3.2. Thoroughly investigate suspected or known concerns and take appropriate action including disciplinary measures.
 - 3.3. Ensure all reports received from a whistleblower are kept in a secure place so that they can be used as evidence where and if appropriate.
 - 3.4. Involve relevant stakeholders such as senior management, the Norwegian works council if relevant, or the human resources department in the investigation process at an early stage of reporting by a whistleblower.
 - 3.5. Report on confirmed cases of whistleblowing of material significance in its Sustainability Report, subject to Company's legal obligations to personal data protection.
 - 3.6. Protect from repercussions any person who has reported in good faith a genuine whistleblowing concern.
 - 3.7. Protect the confidentiality of the whistleblower's identity, and personal data under the General Data Protection Act.
- ## 4. Responsibilities
- 4.1. The CEO and the country Managing Director each carry responsibility to ensure the Company implements this Policy and adopts a corporate culture fostering proper conduct in the workplace and openness in communications.
 - 4.2. VP Legal, the Compliance Manager or the country Managing Director, as relevant, is required to confirm receipt of whistleblowing reports to the whistleblower within seven working days, and to inform the whistleblower of any action taken, the status of the internal investigation and its outcome within three months.



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