

# CORPORATE WHISTLEBLOWING POLICY

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**Lundin Energy aims to ensure the highest standards of integrity and upholds ethical behaviour in the workplace**

## 1. Introduction

Lundin Energy 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 legitimate concerns regarding serious misconduct in the workplace are raised without reprisals or victimisation.

## 2. Scope

**2.1** This Policy is applicable to all employees and contractor personnel of the Company to ensure that conduct is appropriate in the workplace and actions are taken upon suspicion of improper conduct.

**2.2** Improper conduct in the workplace may arise from:

- a. Breaches of applicable laws or regulations
- b. Breaches of internal regulations, including the Company's Code of Conduct, policies, procedures and guidelines
- c. Other serious misconduct

**2.3** Grievances regarding employment conditions are beyond the scope of this Whistleblowing Policy and are covered by separate Human Resources policies.

## 3. Expectations regarding Whistleblowing

The Company shall:

- 3.1** Encourage reporting of suspected or known misconduct warranting whistleblowing on a blame-free and where applicable, anonymous basis.
- 3.2** Thoroughly investigate suspected or known concerns and take appropriate action including disciplinary measures.
- 3.3** Report on confirmed cases of whistleblowing of material significance in its Annual Report.
- 3.4** Protect from repercussions any person who has reported in good faith a genuine whistleblowing concern.
- 3.5** Ensure that harassment or victimisation will not be tolerated. Any case of post-whistleblowing victimisation shall be reported through the applicable whistleblowing procedure.
- 3.6** Ensure that every effort shall be made to protect the whistleblower's identity if s/he wishes to stay anonymous.

## 4. Responsibilities

- 4.1** The CEO carries overall responsibility to ensure The Company adopts a corporate culture, which fosters proper conduct in the workplace and openness in communications.
- 4.2** Senior Management and country Managing Director are responsible for the day-to-day prevention and detection of improper conduct in the workplace and shall ensure local whistleblowing procedures are maintained to detail the process for raising concerns and follow-up actions.

**Nick Walker**  
*President and CEO*  
Lundin Energy AB