

Appendix 1 – Recharge’s Whistleblowing Routine and Procedure

Introduction

At Recharge, we encourage transparency and the notification of wrongdoing in the company. This document outlines the procedure for notification of such incidents and the actions we will take to address them.

Who Can Notify?

All full-time, part-time, permanent, or temporary employees in Recharge and its subsidiaries, including contractors and sub-contractors, have the right to notify wrongdoing in the company. This also includes persons who are deployed in enterprise for training purposes or in connection with work-related measures and those who participate in labor market measures when they perform work for Recharge.

How to Notify Concerns?

Employees and contractors, including sub-contractors, are encouraged to notify their immediate superior if they witness any wrongdoing in the company. They can also notify Recharge’s safety representative, employee representative or our lawyer. If they cannot or do not want to notify their immediate superior, or their immediate superior has not addressed the situation they have raised, they can notify Recharge’s whistleblowing committee or our external whistleblowing channel. The notification can be sent anonymously or by name.

Recharge's Whistleblowing Committee

Recharge's Whistleblowing Committee is an internal body tasked with making independent assessments of a notification in accordance with the provisions of the Working Environment Act. The Whistleblowing Committee consisting of the following persons:

- Director People & Communication, Hege Greaker
- Director Legal, Compliance & ESG, Fredrick Holm-Hansen
- Chief Performance Officer, Morgan Lind

Notification may be made to one or more members of the Whistleblowing Committee by completing an online form sent by e-mail to whistleblowing@rechargeinfra.com.

External whistleblowing channel (Advokatfirma Haavind AS)

If the employee wishes to notify our external whistleblowing channel, the notification can be sent by e-mail to the company Advokatfirmaet Haavind AS, org. nr. 986 420 177, ("Haavind").

Upon receipt of a notification, Haavind will review the information provided by the whistleblower and make an initial assessment. Haavind will then forward the notification to Recharge in a satisfactory manner, together with a briefing on what the notification is about and with suggestions for any measures or further processing.

The further follow-up of the alert takes place either by Haavind by agreement with Recharge or Recharge’s Whistleblowing Committee.

Notification to the external reception may be made by completing the electronic form sent by e-mail to varslingrecharge@haavind.no.

Employees can always notify externally to a public supervisory authority or another public authority. For other external notifications, there are limitations. Employees may notification externally to the media or the public in general, if the employee is in good faith about the content of the notification, the notification relates to wrongdoing that are of public interest, and the employee has first notificationed internally or has reason to believe that internal notification will not be appropriate.

Form and Content of Notification

To notify Recharge of any incidents or concerns, you may use our notification form or notification orally. In case of oral notification, the receiver must document the information provided. You may choose to identify yourself or remain anonymous. If the notification happens anonymously, Recharge will not know who has notified the incident. However, anonymous notifications should only be made in exceptional cases since transparency is encouraged. Anonymous notifications make it difficult to investigate and respond to the incident.

You can also state your identity to Haavind, but ask to remain anonymous to Recharge. Regardless of whether you give your name or notification anonymously, the notification will be handled in accordance with the laws and regulations governing the processing of cases.

Even if employees could report anonymously, such reporting should only take place in special cases. Recharge encourages transparency. The reason for this is that anonymous reports weaken the ability to investigate the circumstances and make it difficult to comment on and refute what is reported ("contradiction").

The notification should include the following information:

- Date of notification.
- Date and time of the observed incident.
- Specific details of the incident.
- Location and time of the incident.
- Names of individuals who may have information related to the incident.
- Any relevant previous incidents.

Processing of Notification

All notifications, including anonymous ones, will be handled promptly, respectfully, thoroughly, and accountably.

The person receiving the notification is responsible for confirming receipt of the notification to the whistleblower, but anonymous notifications cannot be confirmed.

The notification will be reviewed by either Recharge's Whistleblowing Committee or an external whistleblowing channel by agreement with Recharge. The committee assesses whether there is a notification pursuant to the Working Environment Act and decide how to proceed, including necessary investigations.

If possible, whistleblowers will be informed about the next steps in the process, but anonymous notifications may make this difficult.

Each case will be handled properly and adapted to the specific content of the notification. Documentation will be obtained as needed, and additional information from the whistleblower may be requested.

Confidentiality will be maintained throughout the process, and the identity of the whistleblower will only be shared on a need-to-know basis. Impartiality will also be ensured.

The notification shall be dealt with in accordance with the principles of proper case processing and adapted to the content of the notification. The documentation (conversations, written documents, etc.) to be obtained is assessed on a case-by-case basis. It may be appropriate to contact the whistleblower to get more facts and information to decide on the case.

Each case

The processing of the report shall be based on confidentiality and confidentiality. This means that the identity of the whistleblower must only be made known to the person who, based on consideration for the processing of the report and contradiction, needs this information. Furthermore, the processing must meet requirements for impartiality and impartiality.

When the case is sufficiently informed, the decision on further follow-up and the outcome of the case shall be made by Recharge within a reasonable time. When a decision in the case has been made, the whistleblower must be given feedback that the case has been processed and closed.

Consideration should always be given to whether the individual whistleblowing case provides a basis for general measures in the business.

Support for Those Involved

Recharge is committed to ensuring a safe and supportive working environment for individuals who notification incidents, both during and after the whistleblowing process.

Protection Against Retaliation

Recharge will take all necessary measures to protect employees who notification in accordance with the Working Environment Acts and this notification procedure from any adverse actions, practices, or omissions that may be taken as a consequence of or reaction to their notification ("retaliation"). If an employee notification such retaliation, Recharge must investigate the matter and provide evidence that no such retaliation has taken place. Additionally, Recharge has a responsibility to safeguard employees from retaliation by third parties.

Support for Those Being Notified (Re-Notified)

Recharge has a duty to consider the well-being of the person(s) who are the subject of the notification, whether the notification circumstances are serious or not. Investigations must also take into account their right to respond and present their own perspective.



An alert will often be directed at one or more people directly or indirectly. Recharge has a duty to consider that the person(s) being reported are not unnecessarily burdened, regardless of whether the reported circumstances are reprehensible and how serious it is in the event. Persons whose allegations are made against them shall be given the opportunity to express their views, and investigations in the case shall take account of contradiction.

Duty of Confidentiality and Personal Data

Whistleblowing cases are subject to the same confidentiality and data protection laws as other documentation. The whistleblower's identity and identifying information will be kept confidential, and only shared with those who have a specific need to know.

All whistleblowing cases are processed in accordance with the Personal Data Act.

The notification form is attached.