SPEAK UP ...

HOW TO RAISE CONCERNS AT NAMMO

Nammo

SECURING THE FUTURE

SPEAK UP •••

At Nammo, we act in line with our core values: Dedication, Precision and Care

To act in line with our values we must be honest, truthful, reliable and committed to speaking up. It is only through taking personal responsibility and having integrity that our voices can create a positive environment.

Why Speak Up?

As Nammo employees, we are expected to report any conduct that we believe, in good faith, to be a violation of our Code of Conduct, our policies or the law. By speaking up and reporting compliance concerns we are helping Nammo to review and act on any issue, and protecting our business and reputation.

Nammo managers are expected to emphasize the value of reporting concerns promptly and to foster an environment of open reporting. It is not easy reporting a suspected compliance breach and we must feel confident raising concerns without fear of retaliation. Nammo does not tolerate retaliation against any employee who raises a concern in good faith.

The main route for reporting is via the internal reporting procedure (see page 3), but if that is not possible you can use our secure integrity line: Speak Up.

What is Speak Up?

Speak Up is a third-party reporting system for all Nammo employees to report serious breaches, after all other options have been explored.

Speak Up facilitates confidential dialogue between Nammo and the employee reporter in their own language and within one common system. It is also possible to choose complete anonymity.

CONTENTS

HOW TO REPORT CONCERNS

Examples of concerns might include:

▶ Suspicions of financial misconduct, such as fraud, bribery, corruption or money laundering

▶ Human rights or environmental violations

▶ Harassment, bullying or discrimination

▶ Unethical or illegal conduct

▶ Misuse of sensitive and/or classified information

▶ Product safety

Reporting procedure:

1 Talk to your direct manager

If this is not possible:

2 Talk to your local human resources, employee representative and/or compliance officer

If you observe a serious breach of law, or genuinely believe that the matter cannot be dealt with through any of the above channels:

3 Report your concerns in strict confidence using Speak Up

Leave a message in your own language via the app or website.

The Speak Up system should not be used to:

▶ Report emergencies involving immediate threats to life or property. Please contact the relevant local authorities and/or safety/security representatives

▶ Report personal employment issues, for example matters relating to salary, vacation days or benefits. These should be raised with your line manager, HR or the employee representatives

▶ Settle personal disputes

▶ Make accusations that you know to be false or based on rumors and speculation

! If you observe or suspect misconduct, please follow our 3-step reporting procedure above.

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HOW TO
LEAVE A MESSAGE WITH SPEAK UP

You can choose to leave a message via the Speak Up app or by using the web system. Either method is easy to follow. Whichever option you choose, it is recommended that you write down your message in advance; this ensures that your message will be comprehensive and to the point. You also have the option to leave a voice recording via the app (be assured, Nammo will not hear your voice and will only receive a transcript).
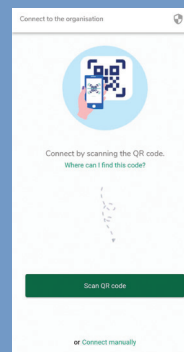
How to use the
SPEAK UP MOBILE APP

Download the **"Speak Up"** app by People Intouch from the App Store or Google Play or **scan the QR code** shown below.

SPEAK UP QR CODE
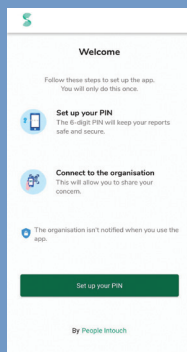
1 When you open the app, select **"Set up your PIN".**
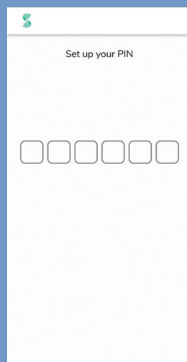
2 Enter a **six-digit code.** You will need to enter this PIN each time you open the app.

3 To connect to Nammo, **scan the Nammo QR code (see on page 5) or click "Connect manually"** and enter Nammo's unique organization code: **106348**.

4 Select **"+ New report"** to start a conversation and leave your message.

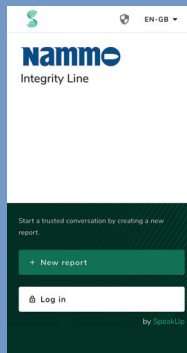You can opt to be notified of any responses via the app.

4

How to use the
SPEAK UP WEB SYSTEM

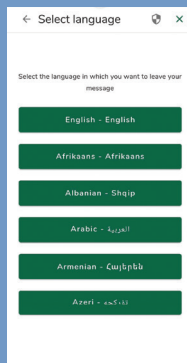To use the Speak Up web system, use the **Nammo URL** or scan the **Nammo QR code** shown below.

URL: nammo.speakup. report/integrityline

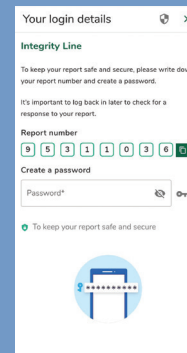### NAMMO QR CODE

1

Click on **"+ New report"** to start a conversation.

2

Select your language.

3

Note your **unique report number and create a password** for your report.

4

Write your message and press the **"Send message"** button when you are finished. You can choose to leave your email if you would like to be notified when there is a response.

WHAT HAPPENS
TO YOUR MESSAGE

1 The moment you send your message, the system will translate it into English. If it is a voice message, the recorded sound file will be automatically transcribed word by word. The recorded sound file will never be handed over to Nammo.

2 Once the transcription and translation are complete, the exact message – both in the original language and in English – will be received by the Chief Compliance Officer (CCO) of the Nammo Group and handled according to the established process of reporting concerns. In legal entities and countries that hold more than 249 employees, the report will be received and handled by an appointed person for the country concerned.

The Nammo Ethics & Integrity Council consists of representatives from the Nammo Corporate Staff (HESS, HR, Legal). The Nammo CCO, supported by the Ethics & Integrity Council, will be responsible for leading investigations of severe matters brought to its attention. Investigations will be carried out according to the established Investigation Response Plan and may include utilization of necessary internal resources or retained external resources. **All cases shall be handled in strict confidence.**

RESPONSE
TO YOUR REPORT

A response will be ready for you on the Speak Up system within seven calendar days. You will find your response on the same channel (app or web system) you used to leave your original message. The response will be translated by the system if necessary.

APP
... posted on the Speak Up app

To read the response:

► Open the app using your personal pin code

► After you log back in, you will see any responses from the organization

WEB
... posted on the Speak Up web system

To read the response:

► Use the Nammo URL: **nammo.speakup.report/integrityline**

► Choose **"Log in"** and enter your 8-digit report number

► Enter the password you created when you made the report

After you have read the response, you can immediately post a new follow-up message.

TIPS FOR
LEAVING A MESSAGE

1 The system is available 24/7 from any smartphone or computer

2 Leave your message, and receive a response, in your local language

3 You can choose to leave your message in writing, or with a voice recording using the app

4 Nammo wishes to have open communication wherever and whenever, but we recognize that there can be situations where anonymity is necessary – make sure you decide in advance if you wish to remain anonymous

5 Consider the amount and type of information you want to include before leaving your message – you may wish to write it down in advance. It is helpful to provide as many facts as possible (for example, a precise location, invoice numbers and exact dates). Personal names can be vital, but only include these if they are necessary for the purpose of addressing and resolving the matter

6 Upload any supporting documents via the app or web system if you have proof of your case in electronic form. **Please remember that uploading/sharing export-controlled technical information or classified information is strictly prohibited**

7 Keep a record of your pin code for the app or the case number and password for accessing your response through the web system

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