

The Whistleblower Portal

Advokatfirmaet Wiersholm AS

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Wiersholm

Our solutions



Phone support

Wiersholm offers a solution where at least one of the employees offered is available to receive whistleblower alerts by telephone.

These may be reached through Wiersholm's switchboard and on their respective mobile phone numbers.



Mail/E-mail

Wiersholm offers an electronic or physical mailbox where employees act as recipients.

If desired, the letters will be scanned immediately and stored as a sensitive matter in Wiersholm's electronic matter archive.



Web solution

Wiersholm offers electronic receipt of tips sent from any computer with an internet connection.



Internal guidelines for whistleblowing alerts

Handling of whistleblowing alerts

The handling of whistleblowing alerts is sensitive, and the parties involved will often be subject to subsequent criticism.

The client and Wiersholm must work together to avoid a subsequent criticism of the process. Thus, building trust in respect of the protection of privacy and legal protection of those concerned is particularly important.

GDPR

All actual or potential whistleblowing alerts received are treated strictly according to privacy and other relevant legislation.

Our work is carried out according to the internal rules and procedures to which Wiersholm employees are subject.

Duty of confidentiality

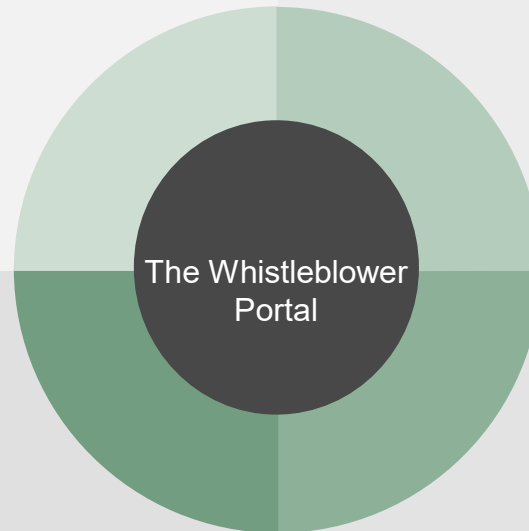
All actual or potential whistleblowing alerts received are treated strictly in accordance with the lawyers' duty of confidentiality and other rules of professional conduct for lawyers.

The information is only shared with Wiersholm's client.

According to an agreement with the client, anonymous whistleblowing alerts may be processed anonymously also vis-à-vis the client if specifically requested by the person submitting the alert.

Good factual information

Within the framework set out in the engagement, Wiersholm will ensure that all deliveries are based on the best factual information possible, including that the premises on which the assessments are based are tenable. Wiersholm will ensure that the delivery can be considered credible and professionally qualified.

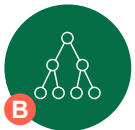


Immediate tip review

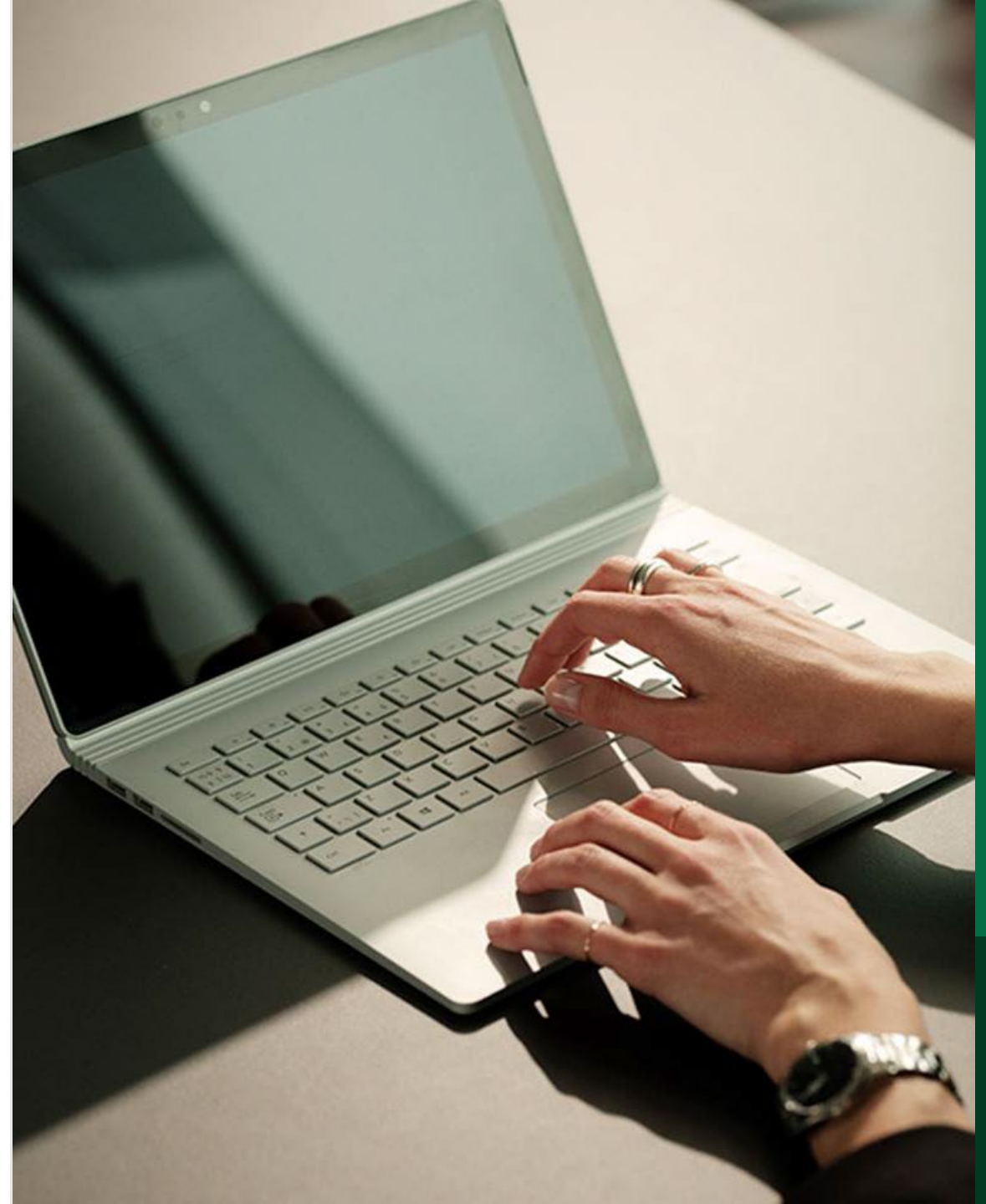
A well-known challenge is that whistleblowing is used as a means in conflicts with the employer or co-workers. The abuse is protected by the employer's fear of unlawful retaliation. This necessitates certain immediate analyses:



An immediate, preliminary evaluation of whether what comes to light is a potential whistleblowing alert, or whether, in reality, it is a matter of complaint.



The decision must be based on **the nature and content of the allegation**, not how it is presented by whistleblowing alerts. Both categories of whistleblowing alerts must be dealt with, but the means and legal frameworks differ.

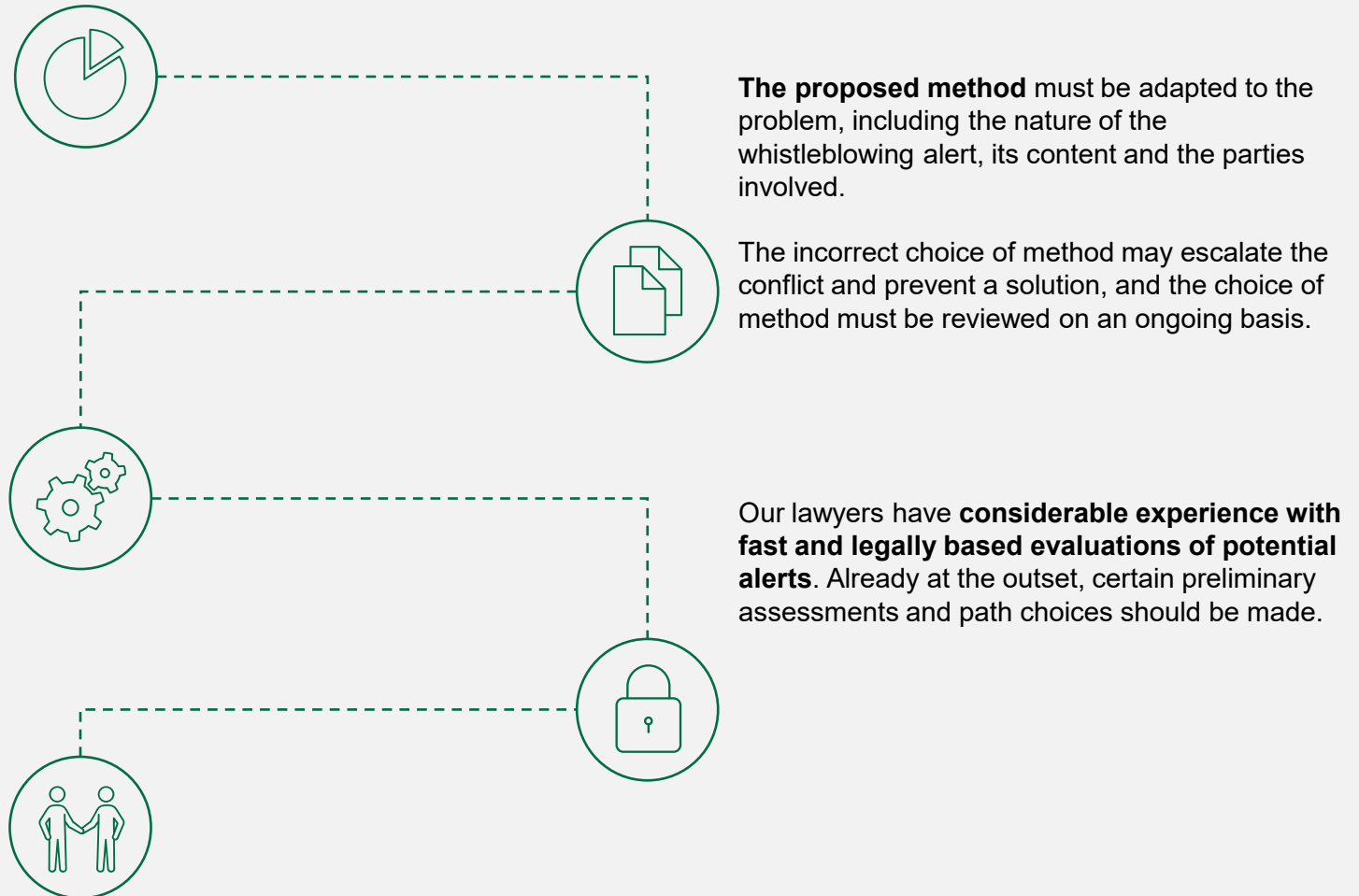


Initial analysis

The initial **analysis** must also, as far as possible, identify the problem that needs to be solved, and draw up an overarching, preliminary proposal for further handling.

Our team possesses **broad expertise** in investigation, employment law, privacy, public procurement, employment legislation, criminal law, contract law, freedom of information legislation, data analysis, contact with the authorities, etc.

Wiersholm guarantees a review of the tip **within 48 hours**, regardless of the time of receipt. If the situation demands it, Wiersholm will be able to take immediate action.



Our handling

Anonymity

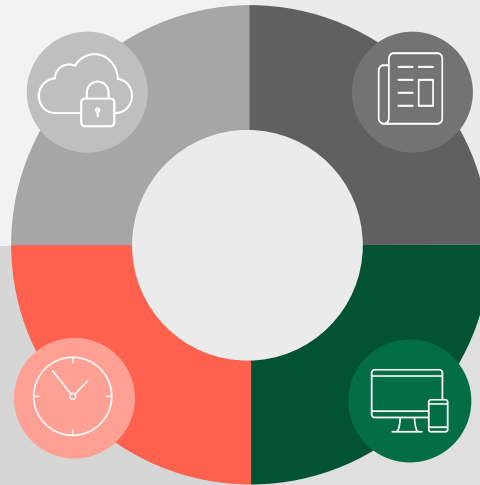
Protecting a demand for anonymity when the whistleblower sets this as a condition.

Knowing the whistleblower's identity will often be a prerequisite for a successful and efficient handling of whistleblowing alerts. The employer may still be required to facilitate anonymous whistleblowing. By extension, Wiersholm will take care of the whistleblower's demand for anonymity when this is deemed necessary.

Efficient timeframe

The project work is invoiced according to the time spent, limited to a maximum of 4 hours per whistleblowing alert.

The work will cover the preparation of a report that summarises the matter, as well as clear advice on the nature of the whistleblowing alert and advice on any further follow-up.



Systematisation of data

Systematisation of facts about the whistleblowing alert in question through contact with the whistleblower. The information is set down in a short memorandum to the client. At the same time, advice must be given to the client on further proceedings.

Wiersholm will seek to establish immediate contact with the whistleblower when this is deemed necessary for the further follow-up.

Technical platform

A technical platform for a "whistleblowing button" on websites and intranet sites.

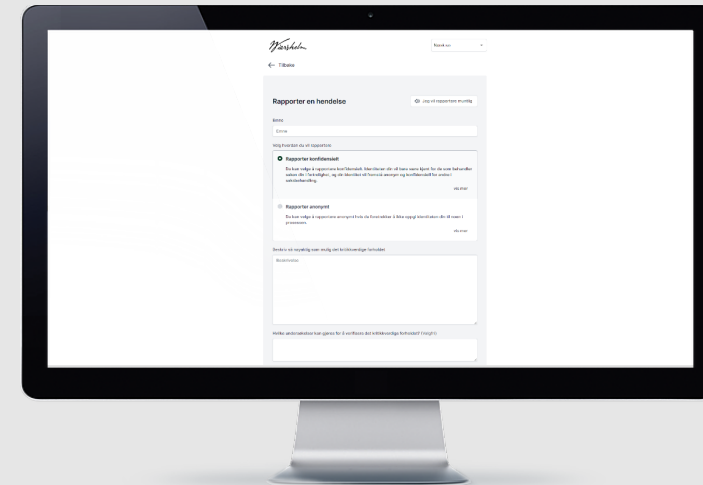
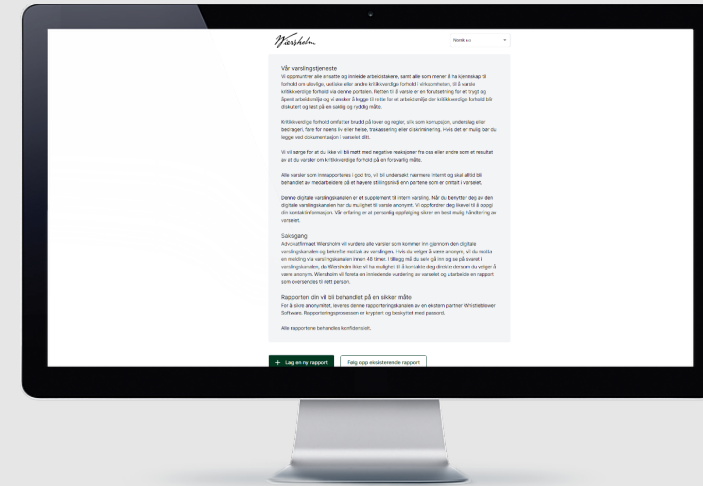
We propose a two-part solution with a whistleblowing button and a whistleblowing form. Both solutions will safeguard whistleblower protection and anonymity.

The Whistleblower Portal

Secure and efficient handling of whistleblowing alerts

All undertakings are required to implement procedures for secure handling of whistleblowing alerts, allowing employees to report censurable conditions at the workplace. We have developed a simple and secure digital solution for receiving whistleblowing alerts that complies with privacy and anonymity requirements. The Whistleblower Portal may be set up for use by external parties.

- The solution is encrypted and accessible from any computer with an internet connection.
- The Portal is adapted to the client's requirements in terms of visual profile and content.
- The solution may be made available through a whistleblowing button on a website or intranet site. Wiersholm will assist in the technical setup.
- Through the system, whistleblowers may notify and communicate anonymously.
- The system receives the whistleblowing alerts and ensures that they are channelled to the correct department in the undertaking.



Summary conditions

The Whistleblower Portal meets all statutory requirements, as well as relevant requirements for whistleblower protection, regardless of whether these are internal or external.

Together with Waterise AS and the relevant portfolio companies, we can both improve or prepare new **whistleblowing procedures** that make our digital whistleblower system work as well as possible, including clarifying the difference between a whistleblowing alert in the sense of the Norwegian Employment Act and a complaint about one's own working conditions, etc.

Wiersholm receives the whistleblowing alerts, prepares an **initial report** with clear advice and ensures that they are channelled to the contact person in the relevant company within 48 hours. Should the matter have group-wide significance, Wiersholm will ensure that it is raised with Waterise AS as required.

The project work is invoiced according to the time spent, **limited to a maximum of 4 hours per whistleblowing alert**. The contingency plan normally has a fixed price and is not affected by the number of whistleblowing alerts. However, in relation to Waterise AS and/or the portfolio companies, Wiersholm is willing to bear the costs associated with the setup and the solution for a trial period of one year. We may also review and provide input on whistleblowing procedures free of charge.

Wiersholm

Submission of whistleblowing alerts

Whistleblowing alerts may be submitted by going to the Portal's landing page and filling in the questionnaire. The Portal may be accessed from any device, including smartphones, and the whistleblower may report anonymously or openly. The system offers more than 70 different languages.

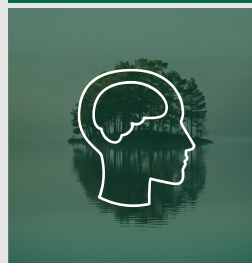


The whistleblowing alert is sent to the person in charge

Immediately following the submission, a notification is sent by e-mail and SMS to the person in charge, who logs the whistleblowing alert in the management tool. Login is secure and includes multi-factor authentication.

Dialogue with the whistleblower

The system enables anonymous dialogue between the person in charge and the whistleblower. Data is encrypted during transmission and storage. You decide who should have access to the system, and only authorised individuals may decrypt and read the dialogue..



Delegation and documentation

Are supported by an advanced and user-friendly investigative functionality, including alert categorisation, process status, memorandums, file upload for evidence, secure chat between authorised individuals or complete alert reassignment.

Statistics and reports

Quick overview of current and historical data, statuses, alerts and in-depth analysis. The dashboard accommodates individual settings and the report generator offers flexible presentation options.



Platform pricing after trial year

Partner pricing

Simple pricing model for your clients' whistleblower system regardless of how many languages, reporting channels or cases handlers



NUMBER OF EMPLOYEES IN YOUR CLIENT'S COMPANY:	PRICE PER YEAR
<49	EUR 600
50 - 250	EUR 900
251 - 500	EUR 1200
501 - 1000	EUR 1620
1001 - 2000	EUR 2220
2001 - 5000	EUR 2700
5,000 - 10,000	EUR 4600
10,000 - 15,000	EUR 7000
15,000 - 20,000	EUR 9000
20,000+	EUR 11000

All prices exclude VAT
All prices paid yearly in advance

Please note that these are special discounted prices that Whistleblower Software offers your clients.

