

Swedfund's Whistleblowing Service – Guidelines

1. About the whistleblowing service

Swedfund International AB (“Swedfund”) works to combat corruption and other serious irregularities. An important part of that work consists of providing suitable reporting channels through which suspected irregularities may be reported in a way that feels safe for the person making the report. This can often be done, for example, by contacting an immediate supervisor, but sometimes this type of reporting channel is not enough.

Swedfund has set up a special whistleblowing service in order to make it easier to report serious irregularities. The service, which is available through Swedfund's website – www.swedfund.se – is an encrypted web solution which leads to a closed system provided by a third party, TripleB AB, which also goes by the secondary name, Whistleblowing Centre (“WhistleB”).

The whistleblowing service is not intended to replace internal information and reporting channels, but is intended only to complement these channels. This means that the service may only be used when it is reasonably necessary to avoid the usual reporting channels. For example, the report may be about someone who is in a position to prevent the report from being administered in a proper way.

2. How can a report be filed and how can its status be checked?

The whistleblowing service has a form in which the whistleblower can anonymously file a report which describes what has happened. When filing the report, the whistleblower can choose to have a personal user name and password in order to log on to the service which allows the whistleblower to subsequently read any follow-up questions and replies completely anonymously.

3. Who can file a report?

The whistleblowing service may be used by employees, contractors, interns, etc., at Swedfund and at the companies and funds in which Swedfund invests (Swedfund's portfolio companies)

4. What can be reported?

The whistleblowing service may only be used to file a report regarding *serious* irregularities involving:

- (a) bookkeeping, internal bookkeeping controls, audits, bribes or criminal activity within the banking and financial services;
- (b) serious violations of Swedfund's Code of Conduct, Policy for Sustainable Development or Anti-Corruption Policy; or
- (c) other serious irregularities affecting Swedfund's vital interests or a person's life or health.

5. Who can be reported?

In the event the report relates to an individual, only reports concerning persons in key or executive positions within Swedfund and Swedfund's portfolio companies are addressed. What is essential is that the report relates to a person who is in the kind of position that creates a risk that the report will not be administered in a proper way in normal reporting channels.

Suspensions regarding persons other than those holding key or executive positions must be addressed through normal reporting channels such as, for example, by reporting to the immediate supervisor.

6. What information should be reported?

A report may only contain the information requested in the whistleblowing service's reporting form. The information is to be completed as described in the instructions for the form.

The information must be accurate, adequate and relevant to the report. The report may not contain more information than necessary taking into account the purposes of the report. The report should not contain information which discloses race or ethnic origin, political views, religious or philosophical convictions or membership in a labour organisation, genetic information, biometric information to unambiguously identify a natural person, information relating to a person's health or a natural person's sex life or sexual orientation.

In addition, in the absence of special reasons, personal data relating to the person filing the report should be avoided.

7. How is the report handled?

Setterwalls Advokatbyrå AB ("Setterwalls") has been retained as the external party to evaluate reports in the first stage. If Setterwalls finds that the report

does not meet the requirements of these *Guidelines*, no further action will be taken. In the event the report is considered to fulfil the requirements, the report is further addressed by Setterwalls provided that the report relates to Swedfund as a company or persons in key positions or senior executives at Swedfund. Reports concerning Swedfund's portfolio companies or persons in key positions or senior executives of such companies are turned over to Swedfund for processing.

If a report is processed further and it is considered necessary, information in the report may also be shared with external parties engaged by Setterwalls or Swedfund in or outside Sweden in order to investigate the report or file a police report.

8. How are the interests of the person filing the report protected?

All data in the whistleblowing service is encrypted and password-protected and may only be accessed by specific persons at Setterwalls and Swedfund and, in Swedfund's case, only to the extent necessary in order to administer reports which pertain to Swedfund's portfolio companies or persons in key positions or senior executives of those companies. When administering reports, particular consideration is given to the need of preventing unauthorised access.

No investigation may be carried out regarding the identity of the person making the report. Furthermore, no steps may be taken against the person making the report simply because he or she has filed the report, unless the law prescribes that such investigation be carried out or that such steps be taken.

In the event the person filing report has provided personal data about him or herself in the report, the person filing the report may contact Swedfund to exercise his or her rights in order to obtain information regarding the processing of personal data. In the event the report in accordance with section 7 above has not been submitted to Swedfund, the person filing the report may instead turn to Setterwalls.

Contact information:

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Visiting address: Sturegatan 10, Stockholm
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9. What information is provided to the person covered by the report?

The person covered by the report will be informed that a report has been filed and that his or her personal data is being processed in the whistleblowing service.

The main rule is that the person covered by the report should be informed shortly after the report is received. If it is not possible to provide the information immediately, e.g. because it would threaten the continued investigation, the information may be withheld until the threat no longer exists. However, the person must be informed as soon as possible and not later than at the time at which the information is used to take measures against him or her.

10. Processing of personal data

The whistleblowing service includes the processing of personal data which is used to evaluate the reports filed in the service and to investigate whether the persons covered by the reports have been involved in serious irregularities. The personal data is processed in accordance with the applicable data protection legislation.

Swedfund International AB

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