

Swedfund's Whistleblowing Service – Guidelines for Use of Internal Whistleblowing Channel

1. Regarding the whistleblowing channel

- 1.1 Swedfund International AB ("**Swedfund**") works to combat bribes, corruption and other irregularities in the organisation. An important part of that work consists of making it possible for employees to report irregularities in a straightforward and secure manner. Often times, this may be accomplished by means of a conversation with, for example, an immediate supervisor, the supervisor's supervisor or with the safety representative, but it is sometimes difficult to feel secure when making a report in this manner. The purpose of these guidelines is to make it possible to confidentially report any problems or irregularities. The guidelines are intended to further ensure that persons filing reports are protected from reprisals as a consequence of such reports.
- 1.2 Swedfund has an internal whistleblowing channel which is provided by NAVEX/WhistleB ("**WhistleB**"). The whistleblowing channel is intended to supplement, but not replace, other reporting channels, e.g. reporting to the immediate supervisor or the supervisor's supervisor.
- 1.3 The whistleblowing channel may be reached via [[länk](#)].

2. Who can file a report?

The whistleblowing channel may be used by employees, contractors, interns, consultants, board members, etc. at Swedfund.

3. How can a report be filed?

- 3.1 A report may be submitted via the whistleblowing channel in three different ways:
- (i) **In writing:** There is a form in the whistleblowing channel which may be completed in order to report irregularities.
 - (ii) **Orally by telephone:** Reporting may take place orally by telephone. The oral report will be recorded and saved.
 - (iii) **At a physical meeting:** Upon request, reporting may also take place via a physical or virtual meeting. The request for a physical or virtual meeting may be carried out via the written or oral whistleblowing channel as set forth above.
- 3.2 You also have the possibility to report irregularities externally to competent government authorities. The competent Swedish government authorities and their areas of responsibility are listed in an appendix to the Ordinance on the Protection of Persons Reporting Irregularities (Swedish Code of Statutes 2021:949) which is available [here](#). Irrespective of the government authority to which a report is sent, a person filing a report may feel secure in the knowledge that a report will be addressed since all competent government authorities

appointed by the government are obliged to transfer a received report to the proper competent authority.

- 3.3 The use of the whistleblowing channel and the provisions of these Guidelines do not affect your constitutional right to anonymously provide and acquire information in accordance with the Swedish Freedom of the Press Act and the Fundamental Law on Freedom of Expression. This means that (subject to certain exceptions) it is possible to submit, with impunity, otherwise confidential information for publication to the mass media with a certificate of publication.

4. Is it possible to be anonymous?

- 4.1 In conjunction with written and oral reporting, you can choose to be anonymous. However, we encourage you to identify yourself when you submit the report. If you identify yourself, it is possible for us to quickly initiate a confidential dialogue with you which may facilitate the work of investigating your report. Irrespective of whether or not you choose to be anonymous, we will do everything in our power to keep your identity strictly confidential. All data in the whistleblowing channel is encrypted and password-protected, with access granted only to specially appointed persons.
- 4.2 In conjunction with filing of a written report via the form, you will receive an ID and password in order to be able to log into the whistleblowing channel which makes it possible for you to access follow-up questions, replies or feedback. If you have elected to remain anonymous, you may do so while staying anonymous.
- 4.3 If a report is submitted in a manner other than in writing via the form, we will communicate with you by means of follow-up questions, replies or feedback in the same manner as you submitted your report. The information you have provided will continue to be treated in strict confidence.

5. Which irregularities can be reported?

- 5.1 Through the whistleblowing channel, you can report irregularities within Swedfund about which you have learned in a work-related context. Irregularities may be ongoing or imminent and may consist of an act or omission. Examples of such irregularities as may be reported are irregularities concerning:
- bookkeeping, internal bookkeeping controls, audits, bribes or other financial crimes;
 - public procurement, competition, money laundering and financing of terrorism, product safety and product compliance, transportation safety, environmental protection, food and feed safety, animal health and wellbeing, public health, consumer protection, protection of privacy and personal data;
 - serious violations of Swedfund's policies; or

- other irregularities contrary to law or concerning Swedfund’s vital interests or a person’s life or health.
- 5.2 There must be a public interest in the disclosure of the irregularities you are reporting. Thus, any irregularity concerning your work situation or the terms and conditions of your employment must, as a general rule, be brought to light through other channels, e.g. by reporting to your immediate supervisor or your supervisor’s supervisor or Human Resources.
- 5.3 Reporting must take place in good faith. To the best of your ability and knowledge, you must ensure that the information included in the report is as correct and complete as possible.
- 5.4 The whistleblowing channel may not be used to reveal classified information in accordance with the Swedish Protective Security Act (Swedish Code of Statutes 2018:585) or information concerning national security in the activity of a government authority within the area of defence and security.

6. Confirmation and feedback

- 6.1 You will receive a confirmation that the report has been received within 7 days. Thereafter, provided that reporting took place in accordance with these Guidelines, you will receive feedback regarding the steps which have been taken as a consequence of the report within 3 months of the date of confirmation of receipt of the report.
- 6.2 If you elect to remain anonymous and do not wish to provide an e-mail address or a telephone number in order to obtain access to the log-on information for the whistleblowing channel, we will not be able to send a confirmation or feedback.

7. Handling of the report

- 7.1 The report will be administered in accordance with Swedfund’s internal routines. Setterwalls Advokatbyrå AB (“**Setterwalls**”) has been retained as the external party to evaluate the reports at the first stage. Where it is deemed suitable, the report will be submitted to specially designated persons within Swedfund for handling. The report will then be investigated by Setterwalls and/or Swedfund who, where necessary, may retain additional external resources such as other law firms, auditing firms or the like. The investigation will be conducted as quickly as possible and in a confidential, fair and impartial manner.
- 7.2 If a report is investigated further and it is determined to be necessary, the information in a report may be shared with other persons in Sweden and abroad for the purpose of investigating or following up on the subject matter of the report.
- 7.3 Written reports and documentation of oral reports are preserved and deleted in accordance with applicable laws. Documentation will not, however, be preserved for more than two years following conclusion of the matter.

8. Prohibition against reprisals

- 8.1 If you file a report in good faith, i.e. with good intentions and with the belief that what you are reporting is true, we will not hold you responsible for having disregarded any duty of confidentiality, nor pursue any reprisals (i.e. some form of punishment) against you irrespective of the results of the investigation.
- 8.2 The prohibition against reprisals applies also in relation to persons who, in a work-related context, assist you in the reporting (e.g. elected representatives and safety representatives) or who are otherwise associated with you (e.g. colleagues and relatives) and in relation to legal persons (e.g. companies) owned by you or for which you work.
- 8.3 However, there will be no release from liability in conjunction with any disregard of a duty of confidentiality in accordance with the Swedish Defence Inventions Act (Swedish Code of Statutes 1971:1078) or the intentional disregard of a duty of confidentiality which, according to the Swedish Public Access to Information and Secrecy Act (Swedish Code of Statutes 2009:400) limits the right to release and publish information in accordance with the Freedom of the Press Act and Swedish Fundamental Law on Freedom of Expression.

9. Cooperation

Swedfund's employees are obliged to cooperate and provide such information as is requested in conjunction with (i) internal investigations and (ii) inquiries and investigations conducted by police, courts of law and other government authorities. You are required, according to your best ability and knowledge, to ensure that all information provided in such contexts is truthful.

10. Processing of personal data

The whistleblowing channel includes the processing of personal data which is used to evaluate the reports filed in the whistleblowing channel and to investigate whether the persons covered by the reports have been involved in serious irregularities. The personal data is processed in accordance with applicable data protection legislation, Swedfund's internal policies, and the information regarding the handling of personal data provided in conjunction with a report filed in the whistleblowing channel (see the document "*Integrity Guidelines for Whistleblowing - Information Regarding How We Process Your Personal Data When You Use Swedfund's Internal Whistleblowing Channel*").

Swedfund International AB

15 December 2023