

Whistleblower policy

This policy addresses reporting of serious improprieties at Samhällsbyggnadsbolaget i Norden AB (publ) and its subsidiaries (“the Company”).

Introduction

The Company has decided to strive for the highest possible level of ambition regarding openness, honesty and acceptance of responsibility. As a consequence of this decision, we expect employees and others we work with who have serious concerns regarding any part of the Company’s operations to make their voice heard and to report this.

Employees are often the first to discover suspected improprieties and improper action within an operation. Consistent with the Company’s Code of Conduct, employees shall report all suspicions of improprieties and improper action to their immediate superior or manager. If the employee is in doubt about this or afraid of harassment and other reprisals, the Whistleblower System serves as an alternative way of reporting.

The purpose of this Whistleblower Policy (“the Policy”) is to offer employees an alternative channel for reporting suspicions of serious improprieties and improper action without risking subsequent reprisals, discrimination or other sanctions. The Whistleblower System is intended to be used for serious improper action and as a complement to customary reporting.

This Policy applies to all employees in the Company or its subsidiaries. The Policy also entails the Company taking a stance that it will immediately handle and thoroughly investigate received reports of improper action by the Company or its employees, consultants, contractors or suppliers, and take adequate steps.

The Whistleblower System gives all employees an opportunity to act responsibly to preserve the Company’s reputation and the public’s trust in the Company’s operations. The purpose of the Policy is to ensure that suspicions of improprieties and improper action are correctly handled and addressed.

What is Whistleblowing?

Whistleblowing is an alternative way to report improprieties and improper action to make the Company’s management aware of suspicions of serious improprieties and improper actions.

What does the Policy cover?

The Policy covers serious improprieties that could have a harmful impact on the Company’s business activities and cannot be reported in the regular channels due to the nature of the impropriety, such as:

- financial crime (such as inaccurate bookkeeping, violations of internal control procedures, misappropriation of assets or fraud).
- bribes and corruption (such as conflicts of interest, bribes, sponsorship and donations, gifts);
- serious threats to the environment, health and safety.
- activities that in ways other than by law, treaty or agreement are to be considered as seriously inappropriate actions (such as discriminatory work procedures, the use of child labour, human rights violations).

Who is protected?

The Company will ensure that received reports and suspicions of improprieties are handled correctly and discretely. Every employee who makes a revelation or expresses a suspicion under this Policy will be protected if the employee:

- provides the information in good faith.
- believes that it is substantially accurate.
- does not act maliciously or make false accusations.
- is not seeking personal or financial gain.

The Company will take steps to minimize the possible difficulties that may arise as a result of a person having reported a suspicion of impropriety. If it is required that this person witnesses in a criminal case or disciplinary matter, the Company will ensure that he or she receives legal counsel to this regard.

Where should a person make a report?

Anyone who has a complaint or a concern regarding impropriety in the Company's operations should primarily contact his or her superior, manager or the person in charge of the department concerned. Depending on the nature of the impropriety and the person who is suspected of improper action, the superior or manager will decide whether the issue will be forwarded to Company management. Secondly, and as a complement to the usual reporting channels and the procedures for handling serious improper actions, you can file a complaint or tip ("**the Report**") with Wistrand Law Firm ("**Wistrand**"), which accepts the Report on behalf of the Company. You can contact Wistrand either by e-mail to fredrik.rasberg@wistrand.se or by postal letter to the address Wistrand Advokatbyrå, Attn: Fredrik Råsberg, PO Box 7543, 103 93 Stockholm. If you are unable to send encrypted e-mail, you are recommended to send a regular letter.

How will the information be handled?

After Wistrand has received your Report, they will determine whether or not the information received is of such a nature that it should be handled in the Whistleblower System. If so, further investigation will be conducted. To protect the individuals involved and those who are suspected of improper action, an initial investigation will be done with the aim of determining if a more comprehensive investigation shall be done. If urgent steps are necessary, they may be taken before an investigation is done. All handling and storage of personal information will take place in Stockholm at the Company's head office, and at Wistrand.

Investigation procedures

The Report will be answered and handled by Wistrand. Wistrand and the Company will assess the accuracy of the reported suspicion only after having carried out an initial investigation and, if necessary, after having conducted a more comprehensive investigation of the issue in question. When required, a reported impropriety will be:

- investigated by Wistrand, which may involve relevant individuals within the Company's organization.
- subject to a report to the police or another authority.
- reviewed by an outside auditor, or
- reviewed by an independent investigator.

As a principal rule, if it is possible considering that the sender may have chosen to be completely anonymous, Wistrand will try to contact the sender within ten working days from receipt of the Report in order to:

- confirm that the Report has been received.
- propose how the matter will be handled if possible.
- provide an estimate on how long it may take to provide a final response, and
- inform if further investigations will be carried out or not and if so the reason for this.

Communication between the reporter and Wistrand regarding the reported impropriety depends on its nature, if the reporter has chosen to remain anonymous, the complexity and clarity in the information provided. The Company may request further information. Thereafter, with reservation for legal and other restrictions, Wistrand will provide information on the outcome of the investigation.

Time frame

Reported improprieties will be investigated as soon as practically possible. The severity and complexity of a reported impropriety affects how long it takes to investigate the issue. Wistrand will initially provide an estimate of the time frame for the investigation.

Prevention of counteraccusations, harassment and other forms of reprisals

A person who has reported a serious impropriety regarding a clearly improper action will receive support from the Company and the Company will not tolerate any form of sanction, disadvantage or discrimination of this person.

Confidentiality and anonymity

The Company respects the reporter's wishes regarding confidentiality. However, it may be difficult to follow up and investigate reports if Wistrand and/or the Company cannot contact the reporter.

False and malicious accusations

The Company's objective is to maintain the greatest possible honesty and reliability in its business activities. The Company assures that adequate resources will be appointed to investigate every received Report. However, it is important that the person considering a Report ensures that it is well-founded. No accusations may be submitted maliciously or in the knowledge that they are false. The Company will view every deliberate submission of false or malicious Reports by an employee as a serious disciplinary violation.

How we process personal data

The Report may contain personal data. How the Company processes personal data within the framework of the Whistleblower System is described below.

Personal data controller

Samhällsbyggnadsbolaget i Norden AB, 556981-7660, Strandvägen 1, 114 51 Stockholm, is the personal data controller for the personal data that is processed within the Whistleblower System.

Purpose of the processing

The purpose of processing personal data within the Whistleblower System is to discover serious improprieties according to that described in this Policy.

Legal grounds for processing

For the Company to achieve the purpose of the Whistleblower System, it is unavoidable that certain personal data may be processed. The Company has a justified interest in carrying out the processing in accordance with GDPR.

What personal data is registered?

The Report may include:

- a) contact information (such as name, address, e-mail address and phone number) for the person who submitted the Report and the person(s) referred to by the Report,
- b) details on the improprieties, and
- c) other personal data related to people mentioned in the Report.

If the Report leads to an investigation, the further information required to conduct the investigation will be added. This primarily includes the name of the suspected violator, position, information on violations and such circumstances that form the basis of the Report. Further information may be gathered from sources as is considered necessary to investigate the suspected violation.

How long will the personal data be saved?

The personal data that is compiled and processed will not be saved longer than necessary for the purpose stated above. Complaints, reports and information that have been investigated will be deleted when the information is no longer needed to conduct an investigation and take necessary steps. If the Company decides that no investigation will be commenced, the information will be deleted as soon as possible after such a decision has been made.

Who has access to the personal data?

The personal data is processed only by a limited number of individuals at the Company and Wistrand and only to the extent that they need access to the information to perform their work. In this context, personal data can be shared with other functions at the Company, such as certain persons in management, HR and the Board of Directors, or other persons who need to be aware of and therefore have an obligation to act on suspected improprieties.

When necessary, external parties, such as independent investigators, may be engaged to conduct technical and other investigations. Investigations may also be turned over to the police and other relevant authorities.

Security

The Company implements technical and organizational security measures to protect the personal data that is processed.

Information

You have the right to receive information on what personal data the Company has registered about you as a part of the Whistleblower System. Send your request to

Samhällsbyggnadsbolaget i Norden AB

Strandvägen 1
114 51 Stockholm
e-mail: ji-sun.lundbom@sbbnorden.se

If your personal data is incorrect, incomplete or misleading in relation to the purpose of the processing, you have the right to have such information corrected, blocked or deleted.

A person who is reported within the Whistleblower System will be provided information about this. If such information were to put at risk the subsequent investigation, the information will be provided only after such a risk is no longer present. During such a period of time, no register transcripts are provided. Information about you as a reporting person will not be disclosed even if you have not chosen to be anonymous.

Data protection officer and complaints

If you have questions about the personal data processing that takes place within the framework of the Whistleblower System, please contact the Company's officer in charge of personal data issues ji-sun.lundbom@sbbnorden.se

If you are dissatisfied with how your personal data is being processed, you can at any time contact or file a complaint with the Swedish Data Protection Authority, www.datainspektionen.se
