

# Whistleblower policy

## 1. Introduction

Samhällsbyggnadsbolaget i Norden AB (publ) and its subsidiaries (hereinafter referred to as **the "Company"**) have decided to strive for the highest possible level of ambition regarding openness, honesty and responsibility. In line with this position, this Whistleblower Policy (the **"Policy"**) aims to provide instructions and information applicable when individuals associated with the Company wish to report Misconduct (as that term is defined in Section 3 below). The policy also entails a position on the part of the Company that reports received regarding Misconduct related to the Company's operations shall be handled promptly and thoroughly.

Employees and other individuals connected to the Company are often the first to discover suspected irregularities within a business and the Company encourages such irregularities to always be raised. The company encourages employees to primarily contact their immediate manager to raise suspicions or knowledge of misconduct. An alternative option is also to report work-related Misconduct anonymously or non-anonymously through the Company's internal whistleblower channels in accordance with this Policy.

The whistleblower system gives individuals with a work-related connection to the Company an opportunity to act responsibly to preserve the Company's reputation and the public's trust in the Company's operations. The Company encourages reporting in accordance with this Policy in the event of suspicion of Misconduct as it enables the Company to act against such Misconduct. Each manager with personnel responsibility within the Company shall ensure that the Policy is well known and complied with within his or her respective area of responsibility.

## 2. What is Whistleblowing?

Whistleblowing is the reporting of suspected or established Misconduct related to the Company's operations that takes place through one of the procedures in section 6 below. Whistleblowing is an alternative to reporting directly to your manager.

## 3. What can be reported?

**"Misconduct"** means any form of serious circumstance that may have a negative impact on the Company and/or the operations or work environment of the Company's employees and/or business partners or any other serious work-related circumstance that may be of public interest to come to light.

Misconduct includes, but is not limited to, actual or suspicious:

- Violations of laws and regulations (civil and criminal).
- Financial fraud and irregularities (e.g. accounting errors, money laundering, insider crime, misappropriation of assets or fraud).
- Bribery and corruption.
- Serious threats to the environment, health or safety.
- Serious occupational safety and health deficiencies (such as systematic bullying, discrimination or harassment).
- Actions that seriously violate the Company's Code of Conduct or other material policies.

Matters that exclusively affect the relationship between an individual and the Company generally do not fall within the definition of Misconduct under this Policy. Instead, the company encourages such issues to be raised with their immediate manager.

## 4. Who can report?

The company ensures that reports received and suspicions of irregularities are handled correctly and discreetly. The following categories of people are encouraged to report Misconduct in accordance with this Policy:

- Employees (including temporary staff).
- Temporary staff (such as consultants and other independent contractors).
- Volunteers and trainees.
- Board members.
- Shareholders active in the Company.
- Others over whom the Company exercises control and direction.

This Policy shall also apply to persons who have not yet entered into a work-related relationship with the Company, provided that the information about Misconduct has been acquired during the recruitment process or through other negotiations prior to entering into an agreement. Furthermore, this Policy shall apply to persons who have belonged to any of the categories of persons above and have received or obtained information about Misconduct during their time in the business.

If you have knowledge or serious suspicion of a Misconduct, you are encouraged by the Company to either report the Misconduct to one of the Company's managers or report the Misconduct via the Company's internal whistleblower channels. When you report a Misconduct, you must have reasonable grounds to believe that the information about the Misconduct is true at the time of reporting. However, you are not required to present any evidence or the like. As long as you act in good faith, you will not face any negative consequences, even if the suspicion of a Misconduct turns out to be false upon further investigation.

## 5. What is meant by prohibition of retaliation?

If you receive information about a Misconduct in a work-related context, you will not be subjected to any form of retaliation for reporting such information in good faith to your immediate manager or via the Company's internal whistleblower channels. As long as you act in good faith, you will not face any negative consequences, even if the suspicion of a Misconduct turns out to be false upon further investigation.

However, protection against retaliation does not apply to persons who, through the collection of information or through the reporting itself, are guilty of crimes.

## 6. How to report?

The Company encourages employees to primarily contact their immediate manager to raise suspicions or knowledge of Misconduct. As an alternative, there is also an opportunity for individuals to report work-related Misconduct through the Company's internal reporting channels in accordance with the Policy.

Reporting of Misconduct can be done using one of the Company's internal whistleblower channels:

- You can file a complaint with [erik.borgblad@born.se](mailto:erik.borgblad@born.se) who is a partner and lawyer at the law firm Born.
- You can report to Erik Borgblad by phone; +46 73 516 00 08.
- You can request a physical or digital meeting with Erik Borgblad or your manager, which will be held within a reasonable time after your request.

If you report a Misconduct over the phone or at a meeting, your report will either (i) be recorded, provided you consent to the recording, or (ii) written down in a record that you will have the opportunity to review, correct and approve by signing.

To facilitate the subsequent investigation of the reporting, the Company encourages you to provide as detailed a description of the Misconduct as possible. If possible, the Company also encourages you to provide your contact details to facilitate the investigation, for example so that Erik Borgblad has the opportunity to ask appropriate follow-up questions about the information provided in your report. You may be asked to provide additional information during the course of the investigation. However, if you are anonymous at the time of reporting, the Company will not take steps to investigate your identity. You will be informed that the report has been received within seven days of receipt of the report, unless (i) you have indicated that you do not wish to receive such acknowledgement of receipt, or (ii) there is reason to believe that such acknowledgement of receipt cannot be provided to you without your identity being disclosed.

As an alternative to using the Company's internal reporting procedure, you can also report Misconduct directly to specially selected Swedish authorities (external reporting) without the risk of reprisals. Which authority you should report to depends on the nature of the Misconduct you are reporting about. The reporting shall be done using established reporting channels intended for reporting on Misconduct at the relevant authority.

## 7. Who will handle the report?

Reports of Misconduct submitted under this Policy are received by Erik Borgblad at the law firm Born. It is also Erik Borgblad who asks any follow-up questions and confirms receipt of your report. Erik Borgblad reports directly to the Company's investigation team, which consists of Executive Vice President Krister Karlsson, Executive Vice President Annika Ekström and Head of Human Resources Ji-Sun Lundbom (the **"Investigation Team"**). The investigation team decides whether the subsequent investigation of the report shall be handled internally by the Company or through the engagement of an external advisor.

All investigations are conducted independently and with integrity. The investigation team, or the external adviser engaged in the individual case, is authorised to take the necessary and appropriate investigative measures. The investigation team reports directly to the Company's CEO (or, if there is a conflict of interest, to the Chairman of the Company's Board of Directors).

Where a submitted report relates to or relates to a member of the investigation team or relates to a matter or a department with which a member of the investigation team may have a conflict of interest, that person shall not participate in the investigation of the report.

## 8. How is the investigation carried out?

After a report of a Misconduct has been received by Erik Borgblad and the Investigation Team has been informed thereof, the Investigation Team will evaluate the report and make a decision on further action. The investigation team may decide not to investigate a report, for example, when (i) there is insufficient information and/or evidence to conduct an investigation and the possibility of obtaining further information and/or evidence is lacking, or (ii) it can be established that the report has been made in bad faith. If the investigation team finds that a report is unfounded and should not be investigated further, the report shall be deleted.

If the investigation team decides to initiate an investigation, the investigation team shall inform the Company's CEO (or, in the event of a conflict of interest, the Chairman of the Company's Board of Directors) and the responsible manager of the practice group of the subject matter of the investigation. It must also be decided whether the investigation is to be carried out by the investigation team or another external adviser. Even when a decision is made that an investigation should not be initiated, the Company's CEO shall be informed.

Investigations are always carried out discreetly, confidentially and with priority. In connection with the investigation or after the investigation has been concluded, it may be necessary to disclose information that can make you identifiable by linking you to a certain activity within the Company in order to, for example, initiate a termination procedure or to fulfil an obligation under law. Information may also be provided to competent authorities. You will be informed of any such disclosure, provided that this does not obstruct or complicate the purpose of the disclosure.

Provided that you have not submitted an anonymous report, after submitting a report, you will be informed of follow-up actions in response to the report and the reasons for such follow-up actions within a reasonable time, but no later than three months from the date on which you receive acknowledgment that your report has been received, to the extent that such information would not prejudice the internal investigation or investigation or affect the rights of any person involved.

## 9. GDPR

Reports received through the Company's internal reporting channels shall not be stored for longer than is necessary and proportionate to investigate the reported Misconduct and to take appropriate follow-up measures, but no longer than two years after a follow-up case or investigation has been concluded. Investigations must be carefully documented.

Once information (“**Data**”) has been collected, the person or persons involved (the “**Data Subjects**”) will be informed about the processing of their personal data pursuant to Article 14 GDPR. If it is not possible to provide such information immediately, for example because it would risk a future investigation, the Company will disclose the information to the Data Subject only when such risk no longer exists. However, the Data Subject shall be informed as soon as possible, and no later than one month after the Data concerning the Data Subject has been obtained or in connection with the data being used to communicate with the Data Subject or disclosed to third parties. Information must also be provided to each person who requests whether there is Data recorded about him/her (Article 15 GDPR). As a general rule, such information must be provided within one month of the request being made. This period may be extended by a further two months if necessary, taking into account the complexity of the request and the number of requests received. The data subjects shall be informed of such an extension within one month of receipt of the request and the reasons for the delay shall then be stated. The information provided upon request must not reveal the identity of the person who provided the information.

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