

This is an in-house translation

Whistleblowing Policy

1. Introduction

Samhällsbyggnadsbolaget i Norden AB (publ) and its subsidiaries (hereinafter the “**Company**”) have decided to endeavour to achieve the highest possible level of commitment in relation to transparency, honesty and responsibility. In line with this commitment, this Whistleblowing Policy (the “**Policy**”) is intended to provide the applicable instructions and information when individuals connected to the Company wish to report any Wrongdoing (as the term is defined in section 3 below). The Policy also entails a commitment by the Company to ensure that all reports which concerns Wrongdoings connected to the Company’s operations shall be handled expeditiously and thoroughly.

Employees and other individuals connected to the Company are often the first persons to discover suspected wrongdoing within a business and the Company encourages all such persons to always raise their concerns on suspected wrongdoings. The Company encourages employees to primarily contact their immediate managers in order to raise a concern relating to suspected wrongdoing. An alternative possibility is to report work-related Wrongdoing anonymously or non-anonymously through the Company’s internal whistleblowing channels in accordance with this Policy.

The whistleblowing system gives individuals with a work-related connection to the Company a possibility to act responsibly in order to maintain the Company’s reputation and the public’s faith and confidence in the Company’s operations. The Company encourages reporting in accordance with this Policy when there is a suspicion of Wrongdoing since it thereby enables the Company to take action against such Wrongdoing. Each manager with personnel responsibility within the Company shall ensure that the Policy is well-known and complied with within his or her area of responsibility.

2. What constitutes Whistleblowing?

Whistleblowing is the reporting of suspected or established Wrongdoing with a connection to the Company’s operations which is done pursuant to any of the procedures set out in section 6 below. Whistleblowing constitutes an alternative to reporting directly to one’s manager.

3. What can be reported?

“**Wrongdoing**” means any form of serious conduct which may have an adverse effect on the Company and/or the business or the work environment for the Company’s employees and/or business partners or any other serious work-related conduct which may be of public interest.

Wrongdoing includes, but is not limited to, any actual or suspected:

- violation of laws and regulations (civil and criminal)
- financial fraud and misconduct (for example, false accounting, money laundering, insider crimes, embezzlement of assets or fraud)
- bribery and corruption
- serious threats against the environment, health or safety
- serious work environment deficiencies (such as systematic bullying, discrimination or harassment)
- conduct which constitutes a serious breach of the Company’s Code of Conduct or other material policies.

Issues which exclusively affect the relationship between an individual and the Company do not normally fall within the definition of Wrongdoing according to this Policy. Instead, the Company encourages persons to address such issues with their immediate manager.

4. Who can report?

The Company ensures that all submitted reports concerning suspicions of Wrongdoing are correctly and discretely addressed. The following categories of persons are encouraged to report any Wrongdoing in accordance with this Policy:

- employees (including temporary personnel)
- contract workers (such as consultants and other independent contractors)
- volunteers and trainees
- board members
- shareholders actively engaged in the Company's operations
- other persons in respect of whom the Company exercises control and management.

This Policy shall also apply to persons who have not yet commenced a work-related relationship with the Company provided that the information concerning any Wrongdoing has been acquired during the recruitment process, or through other pre-contractual negotiations. In addition, this Policy shall apply to persons who have acquired information within the context of a work-based relationship with the Company which has since ended.

If you have any knowledge or serious suspicion of a Wrongdoing you are strongly encouraged to either report the Wrongdoing to one of the Company's managers or report the Wrongdoing through the Company's internal whistleblowing channels. To report a Wrongdoing you must have reasonable grounds to assume that the information concerning the Wrongdoing is correct. It is not required, however, that you present any evidence. Provided that you have acted in good faith, you will not face any adverse consequences, even if the suspicion of Wrongdoing proves to be incorrect following further investigation.

5. What is meant by prohibition against retaliation?

If you receive information concerning a Wrongdoing in a work-related context you will not be exposed to any form of retaliation for having reported such information in good faith to your immediate manager or via the Company's internal whistleblowing channels. Provided that you have acted in good faith you will not face any adverse consequences, even if the suspicion of Wrongdoing proves to be incorrect when the matter has been further investigated.

However, the protection against reprisals does not apply if it can be established that a criminal offence has been committed when gathering the information for the report or if the report itself constitutes a criminal offence.

6. Reporting procedures

The Company encourages employees to primarily contact their immediate manager in order to raise concerns about a Wrongdoing. As an alternative, there is also a possibility to report work-related Wrongdoing through the Company's internal reporting channels in accordance with this Policy.

Reporting of Wrongdoing should be made using one of the Company's internal whistleblowing channels:

- You can submit a complaint to erik.borgblad@born.se who is a partner and lawyer (Sw: *advokat*) at advokatfirman Born.
- You can report to Erik Borgblad via telephone: +46 73 516 00 08.

· You can request a physical or digital meeting with Erik Borgblad or your manager, which following your enquiry will be held within a reasonable time.

If you report a Wrongdoing via telephone or during a meeting, your report will either: (i) be recorded, provided that you consent to such recording; or (ii) be written down in a protocol which you will have the opportunity to review, rectify and approve by way of signing it.

In order to facilitate the subsequent investigation, the Company encourages you to provide as detailed information of the Wrongdoing as possible. If possible, the Company also encourages you to provide your contact information in order to facilitate further investigation, for example to enable Erik Borgblad to ask appropriate follow-up questions. You may be requested to provide additional information during the course of the investigation. However, if you are anonymous in conjunction with the reporting, the Company will not take any measures in order to investigate your identity. You will be informed that the report has been received within seven days from the date on which the report was received, unless: (i) you have stated that you do not wish to receive such a confirmation of receipt; or (ii) there is reason to assume that such a confirmation of receipt cannot be provided without disclosing your identity.

As an alternative to using the Company's internal reporting procedure, you can also report a Wrongdoing directly to a specifically selected Swedish public authority (external reporting) without the risk of retaliation. Which public authority you should submit your report to depends on the nature of the Wrongdoing which you are reporting. Reporting shall be made with the help of established reporting channels designated for reporting of Wrongdoing at the relevant public authority.

7. Who will handle the report?

Reports of Wrongdoing which are submitted in accordance with this Policy are received by Erik Borgblad at advokatfirman Born. It is also Erik Borgblad who asks follow-up questions and confirms the receipt of your report. Erik Borgblad reports directly to the Company's investigation team which consists of [include position/names of the persons who constitute the investigation team] (the "**Investigation Team**"). The Investigation Team decides whether a subsequent investigation should be handled internally by the Company or through the engagement of an external adviser.

All investigations are conducted independently and with integrity. The Investigation Team, or the external adviser who is engaged in the individual case, is authorised to take the investigative measures which are necessary and appropriate. The Investigation Team reports directly to the Company's CEO (alternatively, where a conflict of interest exists, to the Company's chairman of the board of directors).

If a filed report concerns or relates to any member of the Investigation Team or concerns an issue or a business department in relation to which a member of the Investigation Team may have a conflict of interest, then such member shall not participate in the investigation of the report.

8. How is the investigation conducted?

Once a report of a Wrongdoing has been received by Erik Borgblad and the Investigation Team has been informed thereof, the Investigation Team will evaluate the report and determine the next steps. The Investigation Team may decide not to investigate a report, for example if: (i) there is insufficient information and/or evidence in order to conduct an adequate investigation and there is no possibility to obtain further information and/or evidence; or (ii) it can be established that the

report has been provided in bad faith. If the Investigation Team finds that a report is unfounded and shall 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 Company's chairman of the board of directors) and the responsible manager for the business department concerning the subject-matter of the investigation. It should also be decided whether the investigation shall be performed by the Investigation Team or an external adviser. The Company's CEO shall be informed notwithstanding that a decision is taken not to investigate the report.

Investigations are always performed discretely, confidentially and with priority.

In connection with the investigation, or after the investigation has been concluded, it may be necessary to disclose information which could identify you in order, for example, to commence a dismissal procedure or in order to comply with legal obligations. The information may also be disclosed to competent authorities. You will be informed of such disclosure, provided however that informing you will not impede or complicate the purpose of the disclosure.

If you have filed a report, using the Company's internal reporting procedures, and provided that you have not done so anonymously, you will receive information on actions taken as follow-up to the report and the grounds for such follow-up within a reasonable timeframe but not later than three months from when you have received confirmation of receipt of the report, insofar as such information would not prejudice the internal enquiry or the investigation or affect the rights of any person concerned.

9. GDPR

Reports received through the Company's internal reporting channels shall not be stored for a period longer than is necessary and proportionate in order to investigate the reported Wrongdoing as well as to take appropriate follow-up measures, however, not longer than two years after a follow-up matter or an investigation has been concluded. Investigations shall be thoroughly documented.

When information ("**Data**") has been collected, the person or the persons involved (the "**Data Subjects**") will be informed in respect of the processing of their personal data in accordance with Article 14 of GDPR. If it is not possible to disclose such information immediately, for example if it would jeopardise a future investigation, the Company will disclose the information to the Data Subject first when such risk no longer subsists. However, the Data Subject shall be informed as soon as possible, and not later than one month after the Data regarding the Data Subject has been obtained or in connection with the information being used in order to communicate with the Data Subject or being disclosed to a third party. Information must also be provided to each person who requests this if the Data is registered concerning him/her (Article 15 of GDPR). As a general rule, such information shall be disclosed within a period of one month after the request has been made. This period may, where required, be extended by a further period of two months, taking into account how complicated the request is and the number of requests which have been received. The Data Subjects shall be informed in respect of such extension within one month from the date on which the request was received and the reasons for the delay shall be stated in such context. The information which is disclosed upon request may not disclose the identity of the person who has provided the information.
