

Whistleblower Policy Addovation

Contents

1	Background.....	2
2	Scope.....	2
2.1	Who is covered by the policy?	2
3	Policy Statement.....	2
3.1	Purpose.....	2
3.2	Description Whistleblowing Protection.....	2
1.1.1	Protection in the form of a discharge	2
1.1.2	Protection against obstruction and retaliation.....	3
1.1.3	Protected circle of persons.....	3
1.1.4	What should be reported?.....	3
1.1.5	Our whistleblower function	3
1.1.6	External reporting.....	4
1.1.7	Freedom to provide information and freedom to acquire.....	4
4	Version History.....	5

1 Background

We want to do everything we can to detect any misconduct within our organization at an early stage. We believe that the involvement of employees and other stakeholders is an important part of this work. We therefore want to encourage a climate where reporting misconduct is a natural and ordinary part of the company's culture.

2 Scope

2.1 Who is covered by the policy?

A person who, in a work-related context, has received or obtained information about misconduct and who belongs to one or more of the following categories of persons at the organisation:

- a) employee,
- b) subcontractor,
- c) persons enquiring about or looking for a job,
- d) persons seeking or carrying out volunteer activities,
- e) persons applying for or completing traineeships,
- f) persons who are otherwise available to perform or carry out work under the control and direction of the establishment,
- g) self-employed persons seeking or carrying out assignments,
- h) persons available to be or are members of the administrative, management or supervisory body of the establishment,
- i) shareholders who are available to be or who are active in the limited liability company, or
- j) persons who have belonged to any of the categories of persons above and have received or obtained the information during their time in the business

3 Policy Statement

3.1 Purpose

The purpose of this policy is for the organization's employees and other stakeholders to feel safe reporting misconduct and other serious incidents without fear of reprisals or other negative consequences. The purpose of the policy is also to ensure that the reports are handled according to our established procedures so that the whistleblower knows that the reports are taken seriously and handled confidentially.

3.2 Description Whistleblowing Protection

1.1.1 Protection in the form of a discharge

A reporting person shall not be held liable for a breach of confidentiality if there were reasonable grounds to believe that reporting was necessary to reveal the misconduct. The fact that the whistleblower may not be held liable means protection against legal liability, for example, the person may not be sentenced to imprisonment or be required to pay compensation.

1.1.2 Protection against obstruction and retaliation

Anyone at the business may not obstruct or attempt to obstruct reporting. In other words, people are protected against the threat of punishment when reporting, and anyone at the organisation may not obstruct reporting, for example by not providing information about how reporting is done. Nor is anyone at the organisation allowed to take reprisals because of the fact that a report has been made. Retaliation is a direct or indirect action taken or not taken that causes or may cause harm to the reporting person. Examples include suspension, lay-offs, dismissals, changes in duties, salary reductions, harassment or discrimination.

1.1.3 Protected circle of persons

The protection applies to:

- (a) a reporting person (as referred to in section 3 above);
- b) someone at the organisation who assists the reporting person in reporting, such as an elected representative or a safety representative,
- c) someone at the organisation who is connected to the reporting person, such as a relative or colleague, and
- (d) a legal entity that the reporting person owns, works for or is otherwise associated with.

1.1.4 What should be reported?

The whistleblower service is to be used to report information about misconduct concerning the organisation's vital interests, the life or health of individuals, or misconduct that there is a public interest in revealing.

Remember that you don't need to have proof that your report is true, it's enough that you have good faith about your concerns. However, it is not allowed to lie or knowingly provide false information in your report.

Information that only concerns your personal work situation, such as dissatisfaction with salary or the like, does not usually constitute a whistleblower case.

1.1.5 Our whistleblower function

Whistleblowers have the opportunity to submit their report via:

[Whistleblower Channel Addovation](#)

To ensure your anonymity, keep the following in mind:

Copy the link above and type it into your browser.

Do not use your organization's computer, phone, or network.

Our whistleblower function gives people the opportunity to submit the report in writing via a secure and anonymous cloud service provided by an independent third party. It is also possible to submit your report by phone or by booking a physical meeting for those who wish. The different options and more information about them can be found via the link.

If the report is submitted in writing via the web form, you can choose whether you want to remain anonymous or leave your contact information. Whether you want to remain anonymous or not, you will receive an anonymous ID and password that you can use to stay in touch and get feedback from the person investigating the report.

If you choose to submit your report via the telephone number found via the link above, you will only be contacted for further information and feedback if you choose to provide contact information, and not if you choose to remain anonymous.

The reports are received by Clara Österberg, HR Manager and Per Inge Sævareid, COO and Board member (hereinafter the Recipients) and are handled as follows:

1. The Recipients receive the case via Qnister's whistleblower service, alternatively by phone or in person.
2. Feedback on the receipt of a report is given to the whistleblower within seven days (unless the reporting person has renounced acknowledgment or there is reason to believe that a confirmation would reveal the person's identity).
3. The Recipients begin an assessment of the report – is it a whistleblower case? If necessary, additional information is requested from the whistleblower where possible.
4. If necessary, the Recipients have the right to invite additional persons, who are covered by statutory or contractual confidentiality, to participate in the handling of the whistleblowing case in question.
5. The Recipients assess and justify whether the case is a whistleblower case or not.
6. Feedback is given to the reporting person.
7. Cases that are deemed to be whistleblowing are further investigated. If a crime is suspected, a police report must be filed. If appropriate, the investigator may also continue to investigate or submit proposals for action in cases that have not been assessed as whistleblowing. Furthermore, the Inquiry Chair may submit proposals for preventive measures to prevent similar incidents.
8. Feedback is given to the reporting person even after further investigation.
9. When the case is closed, it is scheduled for deletion in accordance with current legislation.

1.1.6 External reporting

The protection described above also applies when reporting is done externally to an authority, in cases where the matter involves or has an impact on an authority. The agencies appointed by the Government have their own external reporting channels and procedures for receiving, following up and providing feedback on reports within each agency's area of responsibility. Such external reporting is the responsibility of the specific designated authorities, and our organization has no connection to such reporting channels. More information about what external reporting means and which authority you should turn to within Sweden can be found in the Ordinance (2021:949) on the protection of persons who report misconduct. You can also submit your report to the EU institutions, bodies, offices or agencies if the report relates to EU law. More information on the procedure can be found from the respective authorities and EU functions.

1.1.7 Freedom to provide information and freedom to acquire

This policy or our internal reporting channel does not restrict freedom of the press and freedom of expression, and we would therefore like to inform you about the freedom to provide information and the freedom to procure.

Freedom of information follows from the Freedom of the Press Act and the Fundamental Law on Freedom of Expression and entails the right to provide information to the mass media for publication. Freedom of acquisition means that everyone has the right to acquire data intended for publication in a mass media covered by the Constitution.

A reporting person has the same protection in the disclosure of information as in internal reporting and external reporting, provided that the person first reported externally or that the situation involves a danger to life, health, safety or a risk of extensive damage to the environment.

4 Version History

Version	Issue date	Made by	Approved by	Reason for issue
A1	12.14.2023	MAHJ	CLOS	Released version