

Background and purpose

The purpose of this routine is to do everything we can to detect any misconduct in our workplace at an early stage. Anyone who suspects an irregularity that is contrary to law, our Code of Conduct or our values must be able to report this without fear of retaliation.

Roles and responsibilities

CFO has an overall responsibility to operate and monitor the whistleblowing service.

Receipt of reports: from time-to-time designated external recipient function (hereinafter "the Recipient").

Internal recipient of reports: 1-2 persons appointed from time to time by Chairman of the Board (hereinafter "Internal Recipient").

The Chairman of the Board has the right to act independently in the event of whistleblowing reports that may affect those who maintain the whistleblowing function.

The parent company is responsible for procuring a whistleblowing service that can be accessed from the corporate group's website. Each company within the corporate group instructs a jointly procured third party to receive and assess the whistleblowing reports and, on behalf of each company, report back to the whistle-blower.

Follow-up

Reporting of overall statistics takes place to the Board when necessary, however at least once a year.

Discovery and reporting

Irregularities can be detected by several different categories of people. Some categories, such as employees, are subject to statutory protection. Regardless of who makes the discovery, it should be possible to blow the whistle via web form, telephone or at a personal meeting. It is up to the reporting person to choose the channel according to their preferences.

Regardless of whether the whistle-blower is protected or not, the same routines are applied regarding the handling of secrecy, independence, and prohibition of retaliation.

Routine

Name, e-mail, and telephone numbers for Internal Recipient are provided to the Recipient via Settings in the whistleblowing system or orally in connection with onboarding.

1. The Recipient receives the report via the whistleblowing service.
2. Feedback on a received report is sent to the whistle-blower within seven days (unless the reporting person has declined confirmation, or the Recipient has reason to believe that a confirmation would reveal the person's identity).
3. The Recipient assesses the report – is it a whistle-blower case? If necessary, additional information is requested from the whistle-blower.
4. If appropriate, the Recipient may invite the Internal Recipient or the Chairman of the Board or someone appointed by these persons to be able to participate in the handling of the specific whistleblowing case.
5. The Recipient assesses and justifies whether the case is a whistle-blower case or not.
6. Feedback is given to the reporting person.
7. Feedback is given to the Internal Recipient according to the agreed routine and frequency.
8. Internal Recipient has the opportunity to call for further investigation of cases that are considered whistleblowing cases. He or she can also call for further investigation or

proposed measures for cases that have not been assessed as whistleblowing cases.

Furthermore, Internal Recipients may call for proposals for preventive measures to prevent similar incidents.

9. When the case is closed, it is scheduled for deletion in accordance with current legislation.