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## **WHISTLEBLOWING POLICY**

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## 1. INTRODUCTION

Indutrade's good reputation is based on integrity and sound business practice. We strive to maintain a transparent business environment and high business ethics in line with our Code of Conduct. Our long-term success is built on making business in a fair and ethical way. This is described in our Code of Conduct.

In order to simplify for those who want to provide information about misconduct that violate current legislation or Indutrade's policies and ethical business standards, Indutrade provides two alternatives for reporting.

**Alternative 1:** Contact your closest manager in the first instance. If this is not an option then contact the Managing Director of your business. If the information you want to provide concerns the Managing Director of your business then contact the Business Area Head, your Business Unit Managers, or any other member of the board of the business, or someone else within the business that you feel comfortable talking to.

Matters relating to poor management, inefficient systems or other operational aspects, alcohol or drug problems, petty theft at work, less serious work environment problems etc. should always be reported in accordance with Alternative 1.

**Alternative 2:** Submit a report through Indutrade's Whistleblowing System. Submitting a report through the Whistleblowing System is limited to the pre-conditions described in this Whistleblowing Policy. *If these pre-conditions are not met you should instead use Alternative 1.*

You have an important role by raising your concern if you suspect a serious misconduct, that should be prevented or corrected. You do not need proof for your suspicions, but all messages must be made in good faith. We encourage you to be as specific as possible to support any subsequent investigation of your report. If the information is too general you may be asked to provide further information.

## 2. WHO CAN I REPORT?

A report in the Whistleblowing System may only concern serious misconduct by *an individual who is in a leading position or who is considered key personnel within Indutrade Group.*

Such individuals include:

- (a) board members,
- (b) persons in management, such as Managing Directors, Business Unit managers, or Business Area Heads, and
- (c) other persons that act with a high degree of autonomous decision power and who has a strong influence in the organisation.

If your suspicion concerns *any other employee* you should use your regular reporting channels (Alternative 1), *i.e.* you should report to your closest manager, Managing Director, Business Unit Manager, Business Area Head, or any other member of the board of the business, or someone else within the business you feel comfortable talking to.

### 3. WHAT CAN I REPORT?

Reports submitted in the Whistleblowing System may only concern matters of a serious nature, such as:

- (a) illegal activities of a serious nature,
- (b) financial fraud (such as incorrect accounting, violations of internal control procedures, misappropriation of assets or fraud),
- (c) bribery and corruption (for example, taking or giving bribes),
- (d) violations of competition law legislation (*eg.* exchange of price sensitive information, illegal cooperation between competitors),
- (e) serious threats to the environment, health and safety,
- (f) activities that are otherwise seen as seriously inappropriate behaviour, for example, discriminatory work routines, harassment and other serious unethical conduct, the use of child labour and human rights violations,
- (g) violations of Indutrade's Code of Conduct, or
- (h) other serious misconduct which concerns Indutrade's vital interests or individuals' life and health.

Complaints and matters such as poor management, alcohol or drug problems, petty theft at work, less serious work environment problems, *cannot be reported in the Whistleblowing System.*

If your report is deemed to fall outside the scope of the Whistleblowing System you will receive a notification with instructions on who to direct your matter to. Your report will then be deleted from the system.

The information in a report should always be submitted in good faith and, to the extent possible, fact based. Personal data (*i.e.* any information relating to an identified or identifiable individual) should only be included in the report to the extent necessary. Sensitive personal data, such as personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual orientation etc. should not be included unless absolutely necessary.

### 4. WHY ARE THERE SO MANY RESTRICTIONS ON WHAT I CAN REPORT?

The restrictions on who and what you can report through the Whistleblowing System follow from the EU's general data protection regulation (the GDPR) and other relevant regulations on the use of whistleblowing systems in Sweden. This Policy describes how the Whistleblowing system may be used, but it is always the controller of personal data, *i.e.* Indutrade, that is responsible for the processing of personal data submitted through the system.

## 5. HOW DO I SUBMIT A REPORT?

To submit your report, go to <https://report.whistleb.com/en/indutrade>

## 6. WHAT WILL HAPPEN WHEN I HAVE SUBMITTED A REPORT AND WHO WILL HAVE ACCESS?

To strengthen the protection of whistleblowers and to ensure the confidential handling of your report Indutrade uses the third party provider WhistleB (whistleb.com). They manage the reporting system and enables you to submit your report anonymously. WhistleB will not be able to read the report you submit.

Once you have filed a report it will be received by Indutrade's Whistleblowing Committee. The Whistleblowing Committee is comprised of Vice President Group HR and CFO.

The Whistleblowing Committee will never try to find out who submitted a report. The Whistleblowing Committee can communicate with the whistleblower through the Whistleblowing System and all their activities within the Whistleblowing System will be logged.

A member of the Whistleblower Committee will recuse him/herself if there is a conflict of interest. When you submit your report, you may also request that a certain committee member cannot investigate your report.

The Whistleblowing Committee will review your report and decide on appropriate measures. Further investigation into the matter may require the involvement of other group functions or external expertise, *i.e.* legal counsel, accounting firms, forensic firms etc.

You will always receive a confirmation of receipt of your report. If your report was deemed to fall outside the scope of the Whistleblowing System you will receive a notification with instructions on who to direct your matter to. Your report will then be deleted from the system.

If your report was deemed to fall inside the scope of the Whistleblowing System you will be notified once the investigation is finished. The notification will not necessarily include the result of the investigation.

## 7. HOW WILL MY PERSONAL DATA BE PROCESSED?

### Categories of personal data and data subjects

Whistleblowing reports typically contain personal data relating to the whistleblower, the alleged person and to other individuals such as witnesses etc. Personal data processed may include names, roles or functions, contact information, alleged misconduct, and other types of personal data collected within the investigation, *e.g.* phone records, computer files, correspondence, etc.

### Purposes of processing and legal basis

Personal data will be processed for the purposes of discovering, investigating and remediating serious misconduct within the Indutrade Group. The processing is based on Indutrade's legitimate interest to ensure that its business operations are carried out in

accordance with applicable law, principles on business ethics, and internal policies and procedures.

#### Retention period

The personal data will only be stored for as long as necessary to investigate a whistleblowing-report and take relevant measures in relation to the result of such investigation.

#### Third party transfers

The personal data may be shared with external legal counsel, accounting firms, forensic firms, or other service providers necessary for discovering, investigating and remediating serious misconduct, police and/or other relevant authorities.

#### Information to data subjects and data subjects' rights

If we receive a whistleblowing report which includes your personal data or if your personal data is collected within an investigation, we will provide you with information if possible. However, if the provision of such information may compromise the investigation, you will instead receive information as soon as possible after the investigation has reached a stage where such risk no longer exists. At the latest, you will receive information when your personal data is used to take measures in relation to you.

You are entitled to know what personal data we are processing about you, and you can request a copy of such data. However, note that to the extent disclosure of your personal data may compromise an investigation, we may not be able to meet your request. You are entitled to have incorrect personal data about you corrected, and in some cases you may request that we delete your personal data. You are also entitled to object to certain processing of your personal data, and request that the processing of your personal data should be restricted.

#### Contact details and controller of personal data

Indutrade AB, org.nr 556017-9367, address Box 6044, 164 06 Kista, e-mail address [privacy@indutrade.com](mailto:privacy@indutrade.com), and phone number 08 703 03 00 is the controller of personal data processed within the Whistleblowing System.

If you have questions regarding how we process personal data about you, you may contact us at the contact information stated above.

If you have any objections or complaints about the way we process your personal data, you have the right to file a complaint to the Swedish Data Protection Authority (Sw. *Integritetsskyddsmyndigheten*).