

# Whistleblower Policy

**This Whistleblower Policy is written based on the EU-Whistleblower directive** ([Europaparlamentets och rådets direktiv \(EU\) 2019/1936 av den 23 oktober 2019 om skydd för personer som rapporterar om överträdelser av unionsrätten](#)).

The Directive includes many areas of law, such as financial services and product safety. The reporting also applies to tax crimes, money laundering and violation of data protection rules and competition rules.

The group's subsidiaries should keep the highest possible standard for openness, honesty and accountability. We expect that our employees and business partners who are worried over the group's performance, report this to us.

Employees are usually the first ones to discover irregularities in the company. The employee maybe chooses not to report this out of fear of seeming disloyal against colleagues or against the company. They may even fear getting harassed. It could be easier to ignore the case under these conditions, instead of reporting it.

The intention with this policy is to encourage the personnel to report cases without the risk of being subject to discrimination. The policy allows the personnel to bring up serious suspicions about irregularities in, or related to, the company, instead of looking away or trying to find a solution to the problem outside.

The policy applies to all the employees and business partners, our subsidiaries and all the stakeholders that are affected by our activities. The policy states clearly that if any irregularities are committed by the company or any of its employees, consultants, entrepreneurs or suppliers, the company will deal with it immediately and carefully investigate and correct it. We will also investigate how irregularities can be prevented in the future. We encourage all our customers to report all suspicions of possible irregularities.

## Definitions

### Whistleblowing

Whistleblowing means that anyone in the organization or outside will notify us that it occurs, will occur or has occurred some form of serious misconduct in the business that could cause damage to the company.

## **Irregularities**

Irregularities contain all unlawful and illegal behaviour, for example:

- An unlawful action, civil or criminal
- To not follow a pronounced company policy
- To consciously break local laws, regulations and rules of procedure
- Unprofessional behaviour
- Dubious accounting or accounts and fraud
- Activities that can cause damage to person or property
- Failure to correct, or take reasonable steps to report a case that probably could cause considerable and inevitable costs or loss for the company
- Misuse of power or position
- Unfair discrimination, such as discrimination due to age, race, gender, religion, sexual orientation, marital status, parental status, political opinion or ethnical background for employment or hiring of services
- Conflicts of interest

This is not an exhaustive list but only examples of types of behaviour that can be seen as irregularities.

## **Protection**

An employee who reveals an irregularity or expresses concerns, will through this Policy, be protected if the employee:

- Reveals the information in good faith
- Thinks that it's mainly true
- Not acts with bad intention or make false accusations
- Not searches for personal or financial gain

## **Process**

### **Contact person**

Anyone with complaints or fears should contact their supervisor, manager or the person at the department who is responsible for the current task. The supervisor or manager gets to decide if the case will be forwarded to the management, depending on how serious or sensitive the case and the designated person is.

To alert doesn't require any special form. An alarm can also be made to a safety representative within the frame for their tasks or through that a coworker turns to their trade union organization. You will first contact your closest manager. In case that you don't get an adequate response, then you can turn to the CEO of the company or the Group, or if they don't help, to the chairman of the Group. To facilitate for the person

intending to report, the Group has chosen to offer the following whistleblower functions:

Managing Director of the company where you work

CEO of the Group, Per Andersson, +46 70-081 96 40, [per.andersson@anva.se](mailto:per.andersson@anva.se)

Chairman of the Group, Per Vannesjö, +46 70-572 28 14,  
[per.vannesjo@amymone.se](mailto:per.vannesjo@amymone.se)

You can reach all the people above through phone, email or sending a letter to the head office Kopparbergsvägen 10, 722 13 Västerås

## Response

The company will act as soon as an alarm arrives about a serious misconduct. Thereafter an immediate analysis will be made concerning the issues that have been reported in order to decide whether further investigation is needed.

The alarm can:

- Be investigated by the management, the board, internal audit or as a disciplinary case
- Be forwarded to the police or other legal authorities
- Be forwarded to independent auditors
- Become an object for an independent investigation

To protect the involved people and the suspects from the alleged wrong acts, there will be made a first investigation to decide if further investigation is needed, and in such cases what form it should take. If an urgent action is needed, it will be taken before an investigation is carried out.

Within 7 workdays after an alarm has been received, the responsible manager will communicate back to you in order to:

- Confirm that the case has been received
- Indicate how the case will be handled
- Give an estimation how long it will take to reach a final solution
- Inform you whether a first investigation will be done
- Inform you if further investigation will be made, and if not, why so

The number of contacts between you and the managers concerning the case, will depend on the case's nature and how clear the information in your message has been.

The company will take measures to avoid complications that you can encounter as a result of your matter. The company confirms that everyone that raises concerns, will

receive information about how the case has been treated. With reservation for legal obstacles, the company will provide information about the outcome of the investigations above.

### **Time estimate**

Concerns will be investigated as soon as possible, however with reservation for that it could be necessary to send the case further, which could extend the investigation process. A serious and complex case could also prolong the time needed for the investigation. The company will already early try to give an indication how much time it will take to investigate the case.

### **Prevent blaim, negative special treatment and harassments**

The company will not tolerate that anyone tries to expose a person who has raised a serious concern for the company about an improper action, in a way that the person is negatively specially treated or harassed. All negative special treatment will be handled immediately with strict disciplinary consequences.

### **Confidentiality and anonymity**

The company will respect a whistleblower's confidentiality in a received matter where the person who complains demands confidentiality. Anonymous complaints are hard to follow up and confirm, if the complaining person does not want to state their name in a later stage.

### **False and malicious accusations**

It is the company's objective to continuously maintain the highest standard for honesty and integrity. We will ensure that enough resources will be made available to investigate all cases we receive.

It is however important that all employees who deliberate to present complaints, ensure that the complaints are truthful and sincere.

The company will see all consciously false or malicious accusations from an employee as a serious crime that can result in disciplinary measures, including dismissal.