

Whistleblowing directive

In the CalixKlippan Group, we strive to have an open and transparent workplace, where misconduct should not occur. It is therefore important to us that there is clear information on how to report confidentially and securely. In the event of suspicion of ongoing or past misconduct, resources must therefore be available to clear them up.

Whistleblowing means that an employee, contracted worker, job seeker, intern, person in company management, active shareholder, employees of subcontractors and contractors report misconduct/irregularities or problems that are of public interest. Below describes how whistleblowing works in our business and to clarify the protection the person who reports irregularities (the whistleblower) has.

1. What can I report about?

To be covered by the Whistleblower law's protection, there must be a public interest in the reported information that emerges. The more frequent and systematic the misconduct, the greater the public interest in the misconduct being remedied or stopped. The protection applies when reporting misconduct that has occurred or is highly likely to occur. The whistleblower does not have to provide actual evidence of the misconduct, but there must be objective circumstances or evidence that makes it reasonable to assume that the information is true.

Through our whistleblowing procedure, misconduct in the public interest can be reported, such as violations of human rights, corruption, misuse of public funds, criminal acts, violations of government regulations, acts that endanger life, health or the environment, violations of competition regulations and generally unethical actions and attempts to obscure any of the above.

If an employee has reason to suspect irregularities or violations, we encourage them to contact their immediate supervisor, their manager, or the HR function for further action. If this is not possible or relevant due to the nature of the irregularity or other circumstances linked to the Whistleblower law, the whistleblower procedure below should be applied. The same applies if information was provided within the company that was not followed up on or ignored.

2. How do I report?

The whistleblower reports via CalixKlippan's whistleblower channel Puls+, which is provided by the external actor Puls Solutions.

Link: [CalixKlippan Whistleblower channel Puls+](#)

The link can also be found on Intranet-SE and Klippan Safety's website. When reporting, the case must be described in as much detail as possible, and name persons who have more information or may otherwise be relevant for further investigation. It is possible to report an irregularity completely anonymously.

You can report through:

Written reporting

You report in writing in the digital form in the whistleblower channel Puls+ and describe your case.

Oral reporting

In the whistleblower channel Puls+, you choose to report by entering your report as a voice message via a phone call. The audio file is transcribed, and you will still have the option to report completely anonymously.

Physical meeting

You notify via the whistleblower channel Puls+ that you wish to have a physical meeting. You leave an email address so the case manager can contact you to book a physical meeting.

Please do not include sensitive personal information about people mentioned in your report if it is not necessary to be able to describe your case. Sensitive personal data is information about; ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, a person's sex life or sexual orientation, genetic data, biometric data used to uniquely identify a person.

3. What happens after I report?

The whistleblower must receive confirmation of receipt of his case within 7 days. The administration of reporting cases is handled by HR-Manager Klippan Safety or HR-Manager Calix/Preciform. All matters reported via the whistleblower procedure are subject to an investigation. An external or internal investigator is appointed, who is independent of and not involved in the matter. An investigation is launched immediately. If urgent action is required, it will be taken before an investigation is carried out.

The whistleblower will receive feedback if the case has been closed, if an internal investigation has been initiated or if the follow-up is still ongoing and about any results or measures taken within the framework of the investigation, subject to legal obstacles. Feedback regarding the matter must be given within three months at the latest.

If the whistleblower wishes to appeal any decision in connection with the whistleblowing, this is done in the same matter in the whistleblower channel Puls+ and external investigators are appointed if necessary to meet the appeal.

4. How do I find out what is happening with my case?

If you have entered your email address when reporting, you will receive notifications when your case is updated. You can then log in to Puls+ to take part in the sequence of events.

The person/those who is handling a reported case may not unauthorizedly disclose information that could reveal the identity of the reporting person or of any other individual appearing in the case.

If you have chosen to report completely anonymously, you must write down the case number and log in yourself to take part in the sequence of events and the confirmation that the case has been received. It is very important that you save the case number, otherwise you will not be able to access the case again. If you lose the case number, you can submit a new report in which you refer to the previous report.

It is important that you log in at regular intervals to answer any follow-up questions the case manager may have. In some cases, the case cannot be taken further without answers to such follow-up questions from you as the reporting person.

Written reports and documentation of oral reporting shall be retained for as long as necessary, but no longer than two years after a follow-up case has been closed.

5. Protection for whistleblowers

Duty of loyalty

As a private employee, employees are subject to a duty of loyalty. This means, among other things, that an employee who criticizes the employer publicly may face disciplinary consequences, such as dismissal. However, in the event of serious misconduct by the employer, a private employee is protected by the so-called Whistleblower law.

Professional secrecy

Exemption from liability in case of breach of confidentiality, which in short means that the whistleblower cannot be held criminally liable if the reporting violates a possible confidentiality obligation. If the person who reports by obtaining information is guilty of a crime, the exemption from liability also does not apply.

Protection against preventive measures

Means that the employer and the employer's representatives must not in any way prevent or attempt to prevent the whistleblower from reporting.

Protection against retaliation

Means that the whistleblower is protected from all forms of reprisals or attempted reprisals by the employer. This applies to Labor law reprisals such as termination, dismissal, etc., but also other reprisals such as, for example, rejection of leave applications and non-appearance of salary increases.

We do not tolerate that anyone who has reported an irregularity in accordance with the whistleblower procedure is in any way discriminated against, punished, or harassed because of the report. Any negative discrimination will have disciplinary consequences. This applies regardless of whether an investigation confirms or does not confirm reported

suspicions/accusations. The protection can also apply to relatives of the person who blows the whistle or people who assisted the person who blows the whistle.

6. Certainty requirements

The person who blows the whistle must have reasonable grounds to assume that the information provided is true (this is called the certainty requirement). Whistleblowing must therefore not be based solely on rumours and gossip. A good benchmark for a whistleblower to consider before making a report is to ensure that he has access to first-hand information on the matter.

However, the above does not mean that the person who blows the whistle must know that an irregularity has taken place. Genuine suspicions or concerns can and should also be reported.

However, knowingly spreading rumours and false or malicious allegations may be considered a serious breach of the employment contract and ultimately result in disciplinary action, including dismissal.

As a general rule, reporting of things that only concern the reporting person's own work or employment relationship is not covered. These issues are dealt through the mechanisms that already exist in the labor market, such as negotiation arrangements or safety representatives' opportunities to request measures regarding the work environment.

7. GDPR and handling of personal data

We always do our best to protect you and your personal data. We therefore ensure that our handling of these is always in accordance with the General Data Protection Regulation ("GDPR").

Personal data that is not relevant to the processing of a particular report shall not be collected and shall be deleted as soon as possible if it has been collected by mistake. Regarding thinning, it is stated that personal data in a follow-up case may not be processed longer than two years after the case was closed.

8. Further contact

If you have further questions regarding how we handle and/or evaluate whistleblower cases, the routines, and the process, you are always welcome to contact the case manager.

Contact information for the case manager: codeofconduct@klippan-safety.se