

Whistleblowing guidelines



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Introduction

Storskogen is committed to achieving transparency and maintaining high business ethics within our organization, including all companies in our group. Our whistleblowing service provides a confidential way to report suspicions of misconduct. This tool is crucial for reducing risks and maintaining trust in our operations by enabling early detection and response to potential misconduct. Reports can be made openly or anonymously through our whistleblowing service.

When to blow the whistle?

Our whistleblowing channel is designed to alert Storskogen and its group companies about serious risks of irregularities and misconduct of public interest that may affect people, our organization, society, or the environment. Reportable issues include:

- Corruption and financial irregularities: Bribes, unfair competition, money laundering, fraud, and conflicts of interest.
- Health and safety violations: Workplace health and safety issues, product safety concerns, and serious discrimination and harassment that violate the law.
- Environmental violations: Illegal treatment of hazardous waste.
- Privacy violations: Improper use of personal data.

For issues related to dissatisfaction in the workplace or similar matters, employees are encouraged to contact their supervisor or manager, as these do not fall under the whistleblower channel's scope.

A whistleblower does not need firm evidence for expressing a suspicion but must have reasonable grounds to believe that the information reported is true. Deliberately reporting false or malicious information is forbidden. Misuse of the whistleblowing channel is a serious disciplinary offense and may lead to disciplinary measures, including termination of employment.

Who can use the whistleblowing channel?

The reporting channel is available for employees, trainees, volunteers, consultants, jobseekers, and other stakeholders within the Storskogen group, where the relevant group company has fewer than 250 employees. Group companies with more than 250 employees must have their own whistleblowing team and internal reporting channel.

How to blow the whistle?

There are several ways to raise a concern:

- Anonymous or confidential messaging: Use the whistleblower reporting channel at Whistleblowing Reporting Channel.
- Direct contact: Email the whistleblowing team at whistleblowing@storskogen.com.
- Company-specific contact: Reach out to the person responsible for whistleblowing at your company.
- External channels: Report to competent authorities as listed in the appendix to the Swedish governmental ordinance.



If requested, a report may also be made in a physical meeting within a reasonable time.

Investigation process

All received messages are handled confidentially. The whistleblowing team, consisting of appointed individuals with the authority to handle such cases, will determine if the report meets the legal requirements to be considered a whistleblowing case. If so, appropriate investigation measures will be taken. The reporting person will receive an acknowledgment of receipt within seven days. If the report is not investigated, the whistleblowing team will provide guidance on where to direct the report.

The whistleblowing team will provide feedback on the measures taken due to the report within three months according to local/EU legislations.

Protection of whistleblowers

Whistleblowers are protected from retaliation, such as job loss or other sanctions, provided they had reasonable grounds to believe their suspicion was true at the time of reporting. This protection does not apply if the whistleblower has committed a crime related to the reporting.

Processing of personal data

Storskogen Group and the relevant group company process personal data in reports to manage the internal reporting channel, fulfilling legal obligations under applicable whistleblowing regulations and GDPR. Personal data is processed to follow up and evaluate the reporting channel and manage legal claims resulting from a report. Reports are stored as long as necessary and for 30 days after a case is closed. For more information on personal data processing in the internal reporting channel, please visit our GDPR Information Page [Storskogen - information on GDPR](#).

Contact information

For more details or to report an issue, contact us at whistleblowing@storskogen.com.