

Whistleblower Policy

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1. The purpose of our whistleblower function

- 1.1 The purpose of this Whistleblower Policy is to handle reports filed under the whistleblower function of BTS Group AB ("The Company"), called *Trumpet* ("Trumpet"), administered by Whitepaper Advisors Sweden AB ("WPA") as independent consultants.
- 1.2 It is important for the Company that any misconduct is made known as early as possible, so as to minimise the risk of personal injury, material damage and damage to intellectual property, as well as damage to the Company's reputation. Under this policy, whistleblowers who are prepared to report misconduct are made aware that they are an important resource for the Company, and therefore the Company seeks to ensure a business environment in which whistleblowers feel that they can report misconduct safely and without fear of reprisals.

2. Who can file a report and how are they protected?

- 2.1 A report can be filed using Trumpet by anyone who in any way represents or is active in the Company in a work-related context. This includes Board members, all employees (permanent employees, probationary employees, fixed-term employees, and full-time and part-time employees), trainees and temporary employees (crew personnel). Shareholders who are active in the Company, as well as persons who are members of the Company's control bodies, such as auditors, may also file reports using Trumpet.
- 2.2 Any person who reports any misconduct that is subject to this policy (see below in clause 3) is protected from any reprisals, which means that a whistleblower or a related party may not suffer any negative consequences as a result of the person filing a whistleblower report. This protection is subject to the condition that the report was made in good faith, that the whistleblower had reasonable grounds to assume that the information concerning the misconduct was accurate, and that the report was made in one of the ways specified in this policy. The protection in accordance with this clause not only concern the employee as the whistleblower, but also its colleagues, or trade union representative, or health and safety officer who provide their assistance, as well as the employee's Company or employer. If an employee experiences reprisals as a consequence of a misconduct reported by a person or any other party, the employee must contact the HR department immediately. It should be noted that this protection does not prevent the Company from taking action against the employee for other reasons than the whistleblower report.
- 2.3 Any person who reports misconduct subject to this policy will be protected against most normal confidentiality obligations, provided that it was necessary to provide the information in question in order to disclose the misconduct. This protection does not include surplus information that is not reasonably required to be disclosed in order to reveal the misconduct. The protection applies irrespective of whether the duty of confidentiality is stipulated by agreement or law but does not include qualified confidentiality obligations. Examples of qualified confidentiality obligations that are not covered by the exemption from liability include breaches of confidentiality obligations to protect national security interests or concerning defence-sector inventions. Other confidentiality obligations that may not be breached on the basis of reference to whistleblower legislation are those intended to protect private individuals in healthcare and medical care, as well as several confidentiality obligations concerning educational activities. It should be noted that the protection from confidentiality obligations does not entail any right to disclose papers or documents.
- 2.4 It must be remembered that there is no protection from reprisals if a whistleblower report results in criminal liability. In order for the protection described in clauses 2.1-2.2 to apply, it is also a requirement that the whistleblower files the report through Trumpet, as a report to the authority in accordance with clause 9, or by publication in accordance with the conditions specified in clause 10.

3. What can be reported?

- 3.1. A report via the Trumpet whistleblower function must be based on concrete suspicions. An employee must have reasonable grounds to believe that the information the person provides is accurate, but the employee does not need to have evidence to support their suspicion. Reports that are filed solely on the basis of rumours or hearsay are not subject to the protection described in clauses 2.1-2.2 – as a general rule, the employee must have first-hand information. No allegation may be made with malicious intent or with the knowledge that the allegation is false. False or malicious allegations are a serious breach of the employment contract, and there is no protection from reprisals in the event of false or malicious reports.
- 3.2. For a qualified report to be filed via Trumpet, the report must concern an incident or circumstances within the framework of the Company's activities, or a concrete suspicion that such incidents or circumstances may arise, and which relate to any misconduct which should be disclosed in the public interest (see clause 3.3).
- 3.3. Misconduct which should be disclosed in the public interest concerns misconduct which in the interests of the general public should be discovered and investigated, for example financial crime such as bribery and counterfeiting, corruption, accounting offences and other infringements of accounting and tax legislation. Other examples are misconduct relating to serious environmental crimes, major safety deficiencies in the workplace and very serious forms of discrimination.
- 3.4. If the employee is uncertain of whether the report concerns circumstances covered by this policy, we advise the person to reach out to the People Experience team.

What should not be reported?

<ul style="list-style-type: none">• Public procurement• Financing of terrorism• Environmental protection• Feed safety and animal health and well-being• Protection of private life and personal data• Competition rules• Prevention of money laundering• Product compliance• Documents concerning the EU's financial interests	<ul style="list-style-type: none">• Financial services, products, and markets• Product safety• Transport safety• Public health• Network and information security• Corporate tax rules• Food safety• Consumer protection• Radiation safety and nuclear safety
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- 3.5. Matters of other types than those described in clauses 3.1-3.3 above must be handled by reporting to your immediate manager, to your manager's manager, or to another similar person in a managerial position, alternatively to a health and safety officer or a trade union representative, if you are a union member. Such reports may be subject to a prohibition of reprisals or similar protection under other regulation than the whistleblower

legislation, but not necessarily to the same extent as the protection provided under this policy.

- 3.6. Matters that are not subject to this policy, and which are not to be reported through Trumpet, may, for example, be incidents which should not be disclosed and investigated in the public interest, such as general dissatisfaction with how the business is run, or with leadership, pay or other customary human resources matters. The same applies to working environment issues that are not of a very serious nature.
- 3.7. Within the framework of the Company's internal regulations, a report that *does not* meet the criteria for a report to be filed under the whistleblower function in accordance with clauses 3.1-3.3 above is referred to as an *unqualified report*. An unqualified report will not be treated as a whistleblower report. If an employee files an unqualified report, the employee will be informed accordingly, and the report will be deleted from Trumpet within three weeks.

4. How to file a report

- 4.1. Suspected misconduct can be reported to Trumpet via the web form, or by phone or letter. Reports can be filed 24 hours a day, 7 days a week.

Filing a report via the website, or by phone or letter

- 4.2. For reports via Trumpet's web form, or by phone or letter, a special link on the Company's website describes how the report is to be submitted. Alternatively, type the address bts.trumpet-whistleblowing.eu/ on any device (computer, tablet or mobile phone) to access the Trumpet whistleblower system. If an employee chooses to submit the report in another way than via Trumpet's web form, it is important that the employee provides contact details in some form, so that the employee can obtain login details for the case management site in Trumpet for contact with the case officers. On this case management site, the employee will also receive feedback on the report the employee has filed (see clause 6.4 below).

Making a report at a physical meeting

- 4.3. A report can also be made at a physical meeting. If an employee wishes to request a physical meeting to make a report concerning circumstances as referred to in clauses 3.1-3.3 above, a request can be submitted via the web form, or by phone or letter. An employee wishing to request a physical meeting must provide their contact details, so that Trumpet can contact the employee to book a meeting. It should be noted that anonymity cannot be promised if a report is made at a physical meeting.

5. What should a report contain?

- 5.1. In the report, an employee must describe all the facts and develop your allegation as carefully and in as much detail as possible. The employee must also describe anything that may be of relevance to the report. The information provided must be as accurate and detailed as possible. A report must, if possible, at least contain the following information:
 - What the report concerns;
 - Who or what is involved;
 - Where the incident occurred;
 - When the incident occurred; and
 - Whether it was a one-off event, or concerns an ongoing or recurring problem.

5.2. Trumpet offers the opportunity to communicate with case officers – while still remaining anonymous. Via the system, case officers can ask the employee questions or provide feedback. It is therefore important that the employee writes down the log-in details in order to access this site, in case the employee chooses to remain anonymous.

6. Handling of the report

6.1. Reports filed through Trumpet is handled by a limited group of persons who are subject to strict confidentiality obligations. This limited group of people includes: Specially authorised people at WPA, and The Company's Whistleblower Committee, which comprises individuals working in the Company who have been specifically appointed to handle incoming whistleblower reports. ("Whistleblower Committee").

If the report concerns any member the Whistleblower Committee, an alternative committee that does not include this person will be appointed.

6.2. Within seven (7) days of filing a report, the employee will receive confirmation of its receipt on the Trumpet site where the employee can communicate with the case officers.

6.3. A report will be handled with respect, care, confidentiality, and due consideration of the integrity of all persons involved. A report will also be dealt with promptly and decisions on necessary measures will be taken as soon as possible, but never at the expense of quality or the legal protection of the individual or individuals who are the subject of the report.

6.4. Irrespective of whether the report is assessed to be qualified or unqualified, the employee will receive feedback on the assessment. If the report is assessed to be qualified, the employee will also receive feedback regarding the ongoing handling of the matter. Feedback will be made available no later than three (3) months after a filed report, but usually earlier, on the Trumpet site where the employee can communicate with the case officers.

7. Opportunity for anonymity

7.1. Reporting in the whistleblower function can take place either:

Completely anonymously, or

Openly in relation to both WPA and the Whistleblower Committee/Alternative Committee and the Company.

7.2. Communication can take place via Trumpet while maintaining anonymity and confidentiality.

7.3. If the whistleblower chooses not to conceal their identity, this information will be treated confidentially and kept secret for as long as legally possible. In the event of a report that results in a police report or other legal action, the Company or WPA may, however, be required to disclose the whistleblower's personal data (e.g. because the person may need to appear as a witness at a trial). In such a situation, the whistleblower will always be informed before their personal data is disclosed.

7.4. Anonymity cannot be promised if the employee chooses to make a report at a physical meeting. If the employee chooses to file a report by letter or phone, the employee needs to provide contact details in some form if the employee wishes to receive confirmation of receipt of, or feedback, on the report. If the employee also wishes to remain anonymous in relation to WPA, it is important that the employee carefully considers which contact details to provide.

8. Information about the processing of personal data

- 8.1. Personal data provided via Trumpet is processed in accordance with the provisions of the General Data Protection Regulation, other applicable legislation, and the Company's applicable personal data policy, which is available at <https://bts.com/privacy-policy>. Concerning such data, the Company is the data controller and WPA is the data processor. This includes the whistleblower's personal data if the whistleblower chooses not to be anonymous towards the Whistleblower Committee/Alternative Committee and the Company.
- 8.2. Personal data occurring in reports is subject to a statutory duty of confidentiality that prevents unauthorised disclosure. The duty of confidentiality does not prevent the authorised disclosure of personal data, such as when the personal data is required to be passed on to the police or another authority.

9. Opportunity to report misconduct to authorities

- 9.1. In addition to utilizing the Company's own internal whistleblowing channel the employee has the opportunity to file the report to a government authority. This is called "external reporting". When reporting externally the employee can receive the same protection as if they used the Company's internal whistleblowing channel and the employee can make reports about the same types of misconducts as described in clauses 3.1-3.3 above. The main difference between using the Company's whistleblowing channel and the external reporting procedure is that when reporting externally, it is a government authority which receives and follows-up on the report – not the Company. The Company will therefore, as an outset, not take part of the report and it is up to the relevant authority to decide what information will be shared with the Company.
- 9.2. The employee should be aware of that different government authorities and agencies are responsible for reports about misconduct in different areas. E.g. is the Swedish Authority for Privacy Protection responsible for reports about breaches of rules on the protection of personal data. Which procedures that shall be used and the available methods of filing a report can vary depending on the authority or agency, but the employee will always be able to leave a report orally, in writing or via a physical meeting.
- 9.3. There are a lot of different authorities and agencies which are tasked with operating the external reporting procedures in different areas. For an exhaustive list of authorities and agencies which are responsible for different areas, as well as their contact details, can be found on the webpage of the Swedish Work Environment Authority (in Swedish). [Link to the webpage](#).

10. Opportunity to publish information about misconduct

- 10.1. In certain cases, protection in the event of a whistleblower report in accordance with this policy (see clauses 2.1-2.3 above) may also be obtained if a whistleblower publishes information about such misconduct as referred to in clauses 3.1-3.3 above. Publication may, for example, consist of the whistleblower going to the media with details of the misconduct, or publishing the information on a blog or on social media.
- 10.2. Protection in accordance with clauses 2.1-2.3 will only be achieved upon publication if:
 - The whistleblower reported the misconduct to the authority in accordance with clause 9 without the authority taking any reasonable measures to rectify the misconduct, or if the whistleblower has not received feedback from the authority within the specified time;
 - The whistleblower has good reason to believe that reporting to the authority in accordance with clause 9 above would result in the whistleblower being subject to reprisals or that the misconduct cannot be eliminated; or

The whistleblower has good reason to believe that the misconduct poses a clear or imminent risk to someone's life, health or safety, or there is a substantial risk of environmental damage, or the whistleblower has other similar reasons for publishing the information.

- 10.3. We recommend that the employee always seek the advice of a trade union representative or legal representative (like Whitepaper Advisors) before publishing any information covered by the scope of this policy.

Freedom of disclosure and procurement

- 10.4. In Sweden, there is freedom of disclosure. This is an element of freedom of expression and concerns all persons who provide information for the purpose of publication and disclosure to the general public. Freedom of disclosure means that a public authority – i.e. state, region and municipalities – may not penalise any person who disclosed the information that has been published. Note that the freedom of disclosure as such does not prevent a private employer from acting on the disclosure of information. The freedom of disclosure only applies if the information is shared with the originator of books, newspapers, TV and radio programmes, or a similar publication medium. This may involve providing information to a TV reporter, newspaper journalist or author. The freedom of disclosure also applies if the information is provided to editors or publishers, such as a news or newspaper editorial team. It must be emphasised that freedom of disclosure is subject to certain limitations – there is no impunity, for example, if any disclosure is in breach of qualified confidentiality obligations.
- 10.5. In addition to the freedom of disclosure, freedom of procurement also applies. Freedom of procurement means that anyone may search for information on any subject for the purpose of publishing it or to utilise their freedom of disclosure, without a public authority – i.e. state, region and municipalities – being able to penalise that person. The freedom of procurement is limited, however, in such a way that the information may not be procured through certain criminal acts – such as theft, unlawful interception, unlawful coercion, and data breaches. Freedom of procurement does not prevent private employers from acting on the procurement of the information.

Appendix

Whistleblower Committee and Mission Statement

1 Introduction

- 1.1 This mission statement describes the assignment of The Company's Whistleblower Committee ("Mission Statement"). The Whistleblower Committee is an internal committee tasked with managing and deciding on reports filed in the Trumpet whistleblower function ("Trumpet").
- 1.2 The purpose of the mission statement is primarily to define the composition, mission, and meeting of The Company's Whistleblower Committee, as well as to appoint its contact person for whistleblower management in accordance with The Company's Whistleblower policy and the Case management procedure.
- 1.3 How to handle a report via Trumpet is set out in The Company's Whistleblower policy and the Case management procedure.
- 1.4 Similarly, what is stated herein shall apply to an alternative committee appointed in accordance with the Case management procedure in the event that a member of the Whistleblower Committee being affected by a notification.

2 Composition

The Whistleblower Committee is composed of the following positions:

- Chairman: Henrik Ekelund, henrik.ekelund@bts.com, +41 79 425 01 77
- EVP: Philios Andreou, philios.andreou@bts.com, +34 667 500 504
- Contact person: Stefan Hellberg, stefan.hellberg@bts.com, +46 708 58 75 75

3 Mission statement

The Whistleblower Committee's mission is to:

- decide whether a report filed via Trumpet is qualified or unqualified in accordance with the Whistleblower Policy and the Case management procedure,
- decide how to provide feedback to the whistleblower of an unqualified and qualified report,
- investigate and prepare a qualified notification for a decision regarding measures, thereby deciding whether an investigation of the report needs to be made, and whether such an investigation should be carried out by The Company and/or by WPA or other advisors,
- carry out all reports and investigations respectfully, carefully and with regard for the integrity of all individuals involved,
- handle all reports and investigations with confidentiality, privacy and taking into account the EU General Data Protection Regulation and other applicable legislation and The Company's applicable personal data policies,
- handle all reports and investigations promptly and take decisions on measures as soon as possible, but never at the expense of quality in the investigation or legal certainty for the individual or individuals subject to reports and investigations,
- give high priority to all tasks required by the Whistleblower Committee.

4 Meetings

- 4.1 The Whistleblower Committee shall meet when necessary.

- 4.2 The contact person listed in section 2 convenes the meetings of the Whistleblower Committee.
- 4.3 The starting point is that the Whistleblower Committee should meet physically or via video meeting. However, if there are clear reasons, a meeting may be held by telephone, or if there are strong reasons, per capsule.
- 4.4 The Contact person of the Committee, or any other person appointed by the Whistleblower Committee, shall be the secretary of the meetings and shall be responsible for recording discussion points and other relevant points at the meeting.

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