

## Swedfund's Whistleblowing Service – Guidelines for Use of External Whistleblowing Channel

### 1. About the whistleblowing channel

Swedfund International AB (“Swedfund”) works to combat corruption and other serious irregularities. An important part of that work consists of providing suitable reporting channels through which suspected irregularities may be reported in a way that feels safe for the person filing the report, i.e. the whistleblower.

Swedfund has set up a special whistleblowing channel in order to make it easier to report serious irregularities within Swedfund and the companies and funds in which Swedfund invests (“**Swedfund's portfolio companies**”). The whistleblowing channel, which is available through Swedfund's website - [www.swedfund.se](http://www.swedfund.se) - is an encrypted web solution which leads to a closed system provided by a third party, NAVEX WhistleB (“**WhistleB**”).

The whistleblowing channel is not intended to replace internal information and reporting channels, but only to complement these channels. This means that the channel may only be used when reasonably necessary to avoid the usual reporting channels. For example, the report may be about someone who is in a position to prevent the report from being administered in a proper way.

### 2. How can a report be filed and how can its status be checked?

The whistleblowing channel contains a form in which the whistleblower can anonymously file a report which describes what has happened. There is also a function which makes it possible for the whistleblower to make a report orally.

When filling the report in the whistleblowing channel, the whistleblower is given an ID and password which makes it possible for the whistleblower to log onto the whistleblowing channel and read any follow-up questions and replies while staying anonymous.

### 3. Who can file a report?

Swedfund's external whistleblowing channel may be used by employees, contractors, interns, etc., at Swedfund and Swedfund's portfolio companies.<sup>1</sup>

### 4. What can be reported?

The external whistleblowing channel may only be used to file a report regarding *serious* irregularities involving:

- (a) bookkeeping, internal bookkeeping controls, audits, bribes or criminal activity within banking and financial services;
- (b) serious violations of Swedfund's Code of Conduct, Policy for Sustainable Development, or Anti-Corruption Policy; or
- (c) other serious irregularities affecting Swedfund's vital interests or a person's life or health.

### 5. Who can be reported?

In the event the report relates to an individual, only reports concerning persons in key or executive positions within Swedfund or Swedfund's portfolio companies are accepted. What is essential is that the report relates to a person who is in the kind of position that creates a risk that the report will not be administered in a proper way in normal reporting channels.

Suspicious regarding persons other than those in key or executive positions must be addressed through normal reporting channels, such as, for example, by reporting to HR or the immediate supervisor.<sup>2</sup>

### 6. What information should be reported?

A report which is filed in the external whistleblowing channel may only contain the information requested in the whistleblowing channel. The information is to

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<sup>1</sup> Employees, contractors, interns and others who are directly active in Swedfund may also use Swedfund's internal whistleblowing channel to report irregularities in accordance with the provisions of *Swedfund's Whistleblowing Service - Guidelines for Use of Internal Whistleblowing Channel*.

<sup>2</sup> Employees, contractors, interns and others who are directly active in Swedfund may also use Swedfund's internal whistleblowing channel to report suspicions about other persons in accordance with the provisions of *Swedfund's Whistleblowing Service - Guidelines for Use of Internal Whistleblowing Channel*.

be completed in accordance with the instructions provided in the whistleblowing channel.

The information must be accurate, adequate and relevant to the report. The report may not contain more information than is necessary taking into account the purposes of the report. The report should not contain information which reveals race or ethnic origin, political views, religious or philosophical convictions or membership in a labour organisation or genetic information, biometric information to unambiguously identify a natural person, information regarding health, or information regarding a natural person's sex life or sexual orientation.

In addition, personal data relating to the whistleblower should be avoided in the absence of special reasons.

#### **7. How is the report handled?**

Setterwalls Advokatbyrå AB ("**Setterwalls**") has been retained as the external party to evaluate the reports in the first stage. In the event Setterwalls determines that the report does not meet the requirements of these Guidelines, no action will be taken. In the event the report is deemed to meet the requirements, the report is further administered by Setterwalls in so far as the report pertains to Swedfund as a company or a person in a key or executive position within Swedfund. Reports pertaining to Swedfund's portfolio companies or persons in key or executive positions within such companies are transferred to Swedfund to be dealt with.

In the event a report is subject to further handling and it is deemed necessary, the information in the report may also be shared with other persons, both in Sweden and abroad, for the purpose of investigating the report or filing a police report.

#### **8. How are the interests of the whistleblower protected?**

All data in the whistleblowing channel is encrypted and password-protected, and may only be accessed by specific persons at Setterwalls and Swedfund. In administering the report, particular consideration is given to the need to prevent unauthorised access.

No investigation may be carried out into the identity of the whistleblower. Furthermore, no steps may be taken against the whistleblower unless the law requires that an investigation or measure be carried out.

In the event the whistleblower has provided his or her own personal data in the report, the whistleblower may contact Swedfund in order to exercise his or her



rights and to obtain information regarding the processing of personal data. In the event the report in accordance with section 7 above is not filed with Swedfund, the whistleblower may instead contact Setterwalls.

*Contact information:*

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Postal address: Box 3286, 103 65 Stockholm  
Telephone no.: +46 (0)8 725 94 00

Setterwalls Advokatbyrå AB  
Visiting address: Sturegatan 10, Stockholm  
Postal address: Box 1050, 101 39 Stockholm  
Telephone no.: +46 (0)8 598 890 00

**9. What information is provided to the person covered by the report?**

The person covered by the report will, to the extent required by applicable law, be informed that a report has been filed and that his or her personal data is being processed in the whistleblowing channel.

The main rule is that the person covered by the report should be informed shortly after the report is received. If it is not possible to provide the information immediately, e.g. because it would threaten the continued investigation, the information may be withheld until such threat no longer exists. However, the person must be informed as soon as possible and not later than the time at which the information is used to take measures against him or her.

**10. Processing of personal data**

The whistleblowing channel includes the processing of personal data which is used to evaluate the reports filed in the whistleblowing channel and to investigate whether the persons covered by the reports have been involved in serious irregularities. The personal data is processed in accordance with applicable data protection legislation, Swedfund's internal policies, and the information regarding the handling of personal data provided in conjunction with a report filed in the whistleblowing channel (see the document "*Integrity Guidelines for Whistleblowing - Information Regarding How We Process Your Personal Data When You Use Swedfund's Internal Whistleblowing Channel*").

Swedfund International AB

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