

AB Sagax

Guidelines for Sagax whistle-blower service

Adopted by the Board of AB Sagax on 8 May 2024

1. Introduction

A high level of sound business ethics is fundamental to Sagax's credibility. The company has a responsibility to its owners and employees, customers and other partners to act correctly with respect to applicable law and regulations in the company's various markets. The company's aim is to be transparent and the operations should be subject to examination.

Sagax has zero tolerance for corruption, discrimination, harassment, crime and environmental transgressions. To reduce risk and to maintain trust in operations, it is important that suspected improprieties are uncovered and measures taken early.

These guidelines describe how Sagax employees and contractors can report any suspected improprieties, money laundering or funding of terrorism.

Sagax encourage whistle-blowers to submit reports in their own name. All reports from whistle-blowers and relevant discussions will always be kept confidential. If the whistle-blower prefers to remain anonymous, however, there is an anonymous whistle-blower function that is administered by an external party that guarantees anonymity and secure handling of submitted reports.

2. Suspicion of improprieties/legal transgressions

Each employee or contractor is to report any suspicion of violations of Sagax's Code of Conduct for Suppliers, other policies or in suspected cases of fraud, money laundering or funding of terrorism. Whistle-blowers do not need to have strong evidence for transgressions before they express their suspicions or fears, but no knowingly false allegations or ones made with malicious intent are permitted. Abuse of the system by knowingly reporting false or misleading information is a serious crime and can lead to disciplinary measures, including dismissal.

Employees are to contact their supervisor about issues pertaining to dissatisfaction with the workplace.

3. The whistle-blower service's function

There are different ways to submit a suspicion, but regardless of manner all incoming messages are always confidential.

Sagax recommends that an employee who suspects imminent fraud should first contact their supervisor.

If the suspicions concern the employee's immediate supervisor, they can report their suspicions to Sagax management.

Finally, an employee can report suspicions via the online external whistle-blower function for reporting, which is administrated by an external party, either in their own name or anonymously.

4. The investigation process

All reports of suspicions are treated seriously and in accordance with these guidelines.

Sagax management is responsible for the whistle-blower service and, in consultation with representatives from the external whistle-blower function, an assessment is made of incoming items and decisions on further investigation.

Items regarding suspicions of money laundering or funding of terrorism are submitted directly to the CEO, except in cases where allegations concern the CEO him/herself, in which case the item is handled like any other item that the whistle-blower service receives.

- All whistle-blower messages are handled confidentially by everyone involved in the investigation process.
- An item is not investigated by anyone affected by the reported suspicion.
- No one who is a part of the investigation is permitted to attempt to identify the whistle-blower.
- The investigation is administered by Sagax management and can, as needed and under strict confidentiality, also include other individuals whose expertise is deemed necessary for correctly investigating the case.
- Only individuals who perform the investigation are given access to reports and information about the investigation. Forwarding information related to the investigation is limited to only what is necessary for the investigation.
- Individuals investigating the item can communicate with the whistle-blower via the anonymous whistle-blower function. Such messages are anonymised.

Protection for whistle-blowers

A whistle-blower who expresses a genuine suspicion according to these guidelines does not risk losing their job or some form of sanction as a result of their report. It makes no difference if the suspicion turns out to be incorrect, as long as the whistle-blower was acting in good faith.

The whistle-blower's identity is kept confidential at every stage of the investigation process. In allegations of criminal activity, however, the whistle-blower's identity (if it is known) may need to be disclosed during the legal procedure.

Protection of and information about an person affected by a report

The rights for individuals who are the subject of investigation according to these guidelines are included in applicable data protection regulations. Such individuals have the right to access information about themselves and to require corrections if the information is incorrect, incomplete, or out of date.

However, these rights may be subject to any comprehensive protection measures that are required to prevent the destruction of evidence or other obstacles in the handling and investigation of the report.

Reporting on results

After the investigation, results are reported to the CEO. In the event that the CEO is the subject of investigation or suspicions, the report is submitted to the Board, which decides on corrective measures.

Erasure of personal data

All submitted suspicions are erased when the item is concluded, usually within two months after the investigation is over. All documentation from any investigation is anonymised by de-identifying any details that can directly or indirectly identify the whistle-blower or the person who was the subject of investigation.

5. Responsibility for the guidelines

Sagax management is ultimately responsible for the company's guidelines for the whistle-blower service, for its compliance and follow-up and for its annual revision.

The company is to make all employees familiar with the content of these guidelines through information and training.

This document is an in-house translation of the Swedish guidelines. In the event of discrepancies, the Swedish original will supersede the translation.