

Whistleblowing policy

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PURPOSE

The purpose of this policy is to ensure that employees can voice concerns about major wrongdoings and malpractice within ALTEN without fear of retaliation.

Employees who suspect illegal conduct or wrongdoings of public interest are encouraged to disclose their concerns and can do so anonymously.

Anyone employed, candidates, interns, consultants, volunteers, and those involved or previously involved in a work-related relationship with ALTEN Sverige AB, 556420-7453, hereinafter "ALTEN," are defined as "employees" in this policy. Also, persons who previously had a work-related relation to ALTEN are included.

When can the whistleblowing service be used?

The internal reporting channel (whistleblowing service) allows any employee to report the following suspicions in any work-related situation:

- Illegal conduct (not only formalia)
- Wrongdoings of public interest

Matters regarding the employee's own work-related issues are typically not classified as public interest, unless unacceptable from a greater social standpoint. Concerns about an employee's working or employment conditions should primarily be raised with immediate manager or HR.

REPORTING

If an employee suspects illegal anomaly or wrongdoings of public interest, there are two ways to report it:

Option 1

Employees can choose to report a case anonymously through our external supplier Whistleblowing Solutions AB's report channel: <https://alten.whistlelink.com/>. Both Swedish and English are available on this channel.

When a case is reported anonymously the employee is never requested to reveal their identity. Reports and conversations with the reporting employee are encrypted and password protected.

After the case has been registered, the employee can log in to the website to answer any follow-up questions or examine any comments from the case officer. The employee must save the case and verification number issued when the case is registered since all communication will go through the website.

The case will be received by ALTEN's Legal Manager. If the case is inappropriate to be handled by legal manager/legal department the reported case will be handled by the ALTEN group legal director/department.

A confirmation of receipt of the report will be issued within 24 hours, however, if the case is reported during the weekend or on a holiday, the confirmation may take up to 72 hours.

Option 2

Report the case to the legal manager directly. E-mail, phone, or a scheduled meeting can all be used to report.

Contact information:

Phone: +46 (0)10-174 82 14, Mon-Thu 9-10 am

E-mail: whistleblower@alten.se

No matter which reporting option chosen, it is critical that the employee reporting is honest and sincere. An employee may not report a case with the aim to defraud or with knowing that the case is fraudulent. Any abuse of the whistleblower system is taken very seriously by ALTEN. ALTEN will make the final decision on what actions to take.

EXTERNAL WHISTLEBLOWING CHANNELS FOR REPORTING

Employees can report cases not only internally, but also externally to the proper authority within a specific field of responsibility or to any of the EU's institutions, according to the law. Even when a matter is reported externally, employees have a right to protection.

The following authorities has been appointed as proper authorities and has set up external reporting channels: *Arbetsmiljöverket, Boverket, Elsäkerhetsverket, Ekobrottsmyndigheten, Fastighetsmäklarinspektionen, Finansinspektionen, Folkhälsomyndigheten, Havs- och vattenmyndigheten, Integritetsskyddsmyndigheten, Inspektionen för strategiska produkter, Inspektionen för vård och omsorg, Kemikalieinspektionen, Konsumentverket, Konkurrensverket, Livsmedelsverket, Läkemedelsverket, Länsstyrelserna, Myndigheten för samhällsskydd och beredskap, Naturvårdsverket, Post- och telestyrelsen, Regeringskansliet, Revisorsinspektionen, Skatteverket, Skogsstyrelsen, Spelinspektionen, Statens energimyndighet, Statens jordbruksverk, Styrelsen för ackreditering och teknisk kontroll, Strålsäkerhetsmyndigheten och Transportstyrelsen*

PROCESS OF INVESTIGATION

Only the whistleblowing unit has access to the cases that has been reported through the website. The whistleblowing unit consists of Khatereh Razazi (responsible for the unit) and one other member of the legal department. All members in the whistleblowing unit are bound by secrecy which ensures a safe and confidential management of the cases.

If needed, the whistleblowing unit can add people to the investigation if there is need for more information or any expertise in the area. The added people will also be bound by secrecy.

RECEIVING CASES

When a case is received by the whistleblowing unit, it is decided whether it will be approved as a whistleblowing case or dismissed. If the case is granted, all necessary steps for an investigation will be taken.

If a case does not fall within the scope of what can be reported through the whistleblowing channel (see chapter **WHEN CAN THE WHISTLEBLOWING SERVICE BE USED?**) the whistleblowing unit will discard it. If there is insufficient information to investigate a case or if the issue has already been resolved, the unit may dismiss it.

Irrelevant privacy infringing information, such as health, political or religious affiliation, or sexual orientation, should never be included in a case. The whistleblower unit is responsible of properly handling the cases.

If a case does not meet the criteria for being investigated as a whistleblower case, the whistleblowing unit must inform the employee who reported the matter (if possible).

INVESTIGATION

All cases classified as a whistleblowing case shall be investigated and managed according to this policy. For the case to be classified as a whistleblowing case it must fall under the scope of what can be reported through the whistleblowing channel.

Whistleblowing cases shall be managed with secrecy and shall not be investigated by someone who is involved/named in the reported case. The whistleblowing unit can follow up with questions through the whistleblowing channel to the employee who reported the case. No one in the whistleblowing unit or any other person involved in the investigation will try to identify the reporting employee.

In instances of suspected crime the case may be forwarded to external authorities for further investigation.

THE REPORTING EMPLOYEE'S PROTECTION

A reporting employee who expresses a genuine fear or suspicion within this policy shall not risk losing the employment or to be affected by any form of sanctions or personal disadvantages, no matter if the suspicion turns out to be wrong, if the employee reported the case in good faith. The protection against sanctions from the employer is regulated by law.

The reporting employee's identity will be treated confidentially and will not be distributed to a third party unauthorized or to the person who is reported.

In cases of a suspected crime the reporting employee will be informed that their identity may be disclosed during court proceedings.

Information to the reporting employee

If the reporting employee has chosen to remain anonymous, the unit can ask follow-up questions and interact with him or her through the whistleblowing channel. To do so, the reporting employee must log in to the whistleblowing website on a regular basis, this is the only area where the messages will be accessible. Three months after obtaining confirmation of the case, the unit will provide feedback on the steps taken and why. If the employee decides to disclose his or her name, he or she will be kept informed about the progress of the inquiry unless it is not appropriate to do so due to the investigation, the reported employee's personal life, or other reasons of confidentiality.

FREEDOM OF INFORMATION AND PROCUREMENT AND PROHIBITION OF PUNISHMENT

The reporting employee is covered by freedom of information and procurement and is protected from punishments when they report illegal conduct and wrongdoings of public interest.

The freedom of information means that the reporting employee has the right to inform about situations that is confidential without having to face any repercussions.

Freedom of procurement means that the reporting employee has the right to retrieve information without facing any repercussions. The reporting employee must operate in good faith meaning that the reporting employee believes that the procurement is necessary in order to reveal the malpractice or wrongdoing. The freedom of procurement does not mean that anyone has to give or procure any information where the person will be charged for a crime. The information that has been obtained has to be used in a reporting case, otherwise the person who has obtained the information will not be covered by the freedom of procurement.

Prohibition of punishment means that the company can not take any measures that will negatively affect the reporting employee. The protection also covers the right to go to a union organization to get counselling about the reporting. Someone who criminalizes themselves in connection with procurement of information is not protected from punishments.

PERSONAL DATA

ALTEN is the data controller for the personal information collected as part of the whistleblower service. A summary of how the protection of personal integrity is managed can be found in **Appendix 1 – Personal data**.

ALTEN is personal data controller for the personal data that is handled within the scope of the whistleblowing service. In Appendix 1 – Personal data – you can find a summary of how protection of the personal integrity is managed.

UPDATES TO THE POLICY

This policy will be reviewed on a regular basis and revised by the whistleblowing unit as warranted.

APPENDIX I - PERSONAL DATA

You can remain anonymous when using the whistleblower service. ALTEN takes great account of the protection of personal integrity. The following is an overview of key points related to the General Data Protection Regulation and the whistleblower service.

Personal data

ALTEN is in charge of adhering to the rules governing the processing of personal data. When you use the whistleblowing system to provide information about yourself or others, it's critical that you feel safe.

Anonymity

When you submit a case to the whistleblowing system, you can choose whether or not to include your contact information; regardless of your decision, all cases will be treated similarly. However, if contact information is given, it may make the investigation easier for the whistleblower unit since they easier can come in contact with you.

Personal data controller

ALTEN is responsible for the processing of personal data.

The reason for the processing

Personal information will be used solely to conduct the inquiry into the reported case. ALTEN's whistleblowing policy explains which types of malpractices or wrongdoings that can be reported. If a case is reported to the whistleblowing system that isn't a whistleblowing case (see WHEN CAN THE WHISTLEBLOWING SERVICE BE USED?) All personal data will be destroyed and the case will be closed. The unit's decision will be communicated to you through the whistleblowing system.

Who has access to personal information?

Personal information will be utilized solely by ALTEN's whistleblower unit. Personal information is only accessible to those involved in the investigation. The police or another authority may be tasked with the investigation.

What kind of personal data are processed?

Only the personal data that is given by the reporting employee will be processed in the beginning. During the investigation the information that is needed will be processed as well. This primarily includes name, title and suspicion of malpractice or wrongdoing. The information will later be retrieved by the sources deemed necessary to investigate the malpractice or wrongdoing.

For how long will the personal data be saved?

The personal data will normally be deleted nine (9) days after the case is closed or dismissed. It will be saved for a maximum of two (2) years if there are any special circumstances.

Information to the reported employee

The reported employee will receive information about the case as long as it does not put the investigation at risk, in that case the information will be given when the investigation is no longer at risk. No requests for information will be answered during this time.

Requests for information

The reporting employee has the right to request information on what personal data that is processed in the whistleblowing service once a year free of charge. A request for information is e-mailed to dpc@alten.se. If any information is incorrect, incomplete, or misleading you have the right to have it corrected. A request for information from a reported employee will not contain information about the reporting employee, hence such information may be summarized.