



GRÄNGES

Whistleblower function

Information and rules

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INTRODUCTION

For Gränges it is essential that information about irregularities comes to light. We have therefore implemented a Whistleblower function as a complement to our open corporate climate in order to detect irregularities that may seriously harm our business or our employees.

The purpose of the system is to provide a channel where events or circumstances can be reported without the whistleblower having to fear retaliation. It is our hope that any irregularities can quickly be uncovered and remedied before the underlying causes grow and become unmanageable.

This document describes how Gränges' Whistleblower function works in practice.

AIM

Gränges' Whistleblower function aims to ensure:

- That employees and other stakeholders inform Gränges of serious improprieties within the group. That information submitted is handled correctly in line with applicable legislation and regulation.
- That each person who informs Gränges in good faith is protected from retaliation.

WHAT CAN BE REPORTED?

A report via the Whistleblower function must be based on concrete suspicions. There must be reasonable grounds to believe that the information provided is accurate and based on first-hand information, but it is not necessary to have evidence to support the suspicion.

For a report to be filed via the Whistleblower function, 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
- In certain cases, infringement of legislation in designated areas

Within the framework of the Company's internal regulations, a report that fulfils any of the above criteria is referred to as a qualified report.

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.

Infringement of legislation in the following areas may be considered to constitute circumstances entailing that a report is considered to be qualified – even if this cannot be deemed to be in the public interest:

- Competition rules
- Consumer protection
- Corporate tax rules
- Documents concerning the EU's financial interests
- Environmental protection
- Feed safety and animal health and well-being
- Financial services, products and markets
- Financing of terrorism
- Food safety
- Network and information security
- Prevention of money laundering
- Product compliance
- Product safety
- Protection of private life and personal data
- Public health
- Public procurement
- Radiation safety and nuclear safety
- Transport safety

HOW CAN OTHER CONCERNS BE REPORTED?

Matters that are typically not qualified as Whistleblower cases are for example 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 HR matters. The same applies to working environment issues that are not of a very serious nature.

In practice, the Whistleblower function can be used to report all types of irregularities. However, we recommend Gränges' employees that concerns other than those described above are reported directly to local management, a relevant functional group in their region or at Gränges HQ, such as Legal, HR or Finance, in line with the reporting channels described in Gränges' Code of Conduct.

WHO CAN REPORT?

Anyone who suspects circumstances that conflict with the law, regulations, policies, or guidelines and which seriously concern the company, or its employees can make a report.

The Whistleblower function can be used by employees (irrespective of employment form) at all Gränges' companies. Customers, suppliers, partners, and other stakeholders can also use the system.

HOW CAN A REPORT BE MADE?

Gränges' use an external Whistleblower function named Trumpet, which is operated by the external and independent company, Whitepaper Advisors. The function can be reached, through the following link: <https://granges.trumpet-whistleblowing.eu/>.

When you are connected to the Whistleblower function – through the link above - you can opt to make your report through a web-based form, through a telephone call or by writing and sending a letter. A report can be filed 24/7. The report will always be treated with maintained anonymity and with strict confidentiality.

If you would like to report a case by **phone**; call +46 20 10 30 91 or 800 4455223 for US employees (24/7-availability).

If you would like to report a case by writing and sending a **letter**; send the letter to Whitepaper Advisors, PO Box 479, SE-201 24 Malmö, Sweden.

If you would like to file a report directly on the **web-portal**, connect through the link above and start the process by clicking "REPORT A CASE". Thereafter you will be guided through the entire process and on the portal, you will also find answers to the most frequently asked questions each step of the way. If you would like to be certain that no one is monitoring your activities you should use a private computer/laptop or cell phone and visit the Whistleblower function from a network that you fully trust, for instance your home network if such is available.

To ensure your anonymity, the Whistleblower function (and its reporting tool) is provided by an external and independent company. Your report will be encrypted and password protected. You never have to reveal your identity if you do not wish to. Using the system is also completely voluntary.

- You do not need evidence for your suspicions, but no accusations may be made with malicious intent or with the knowledge that the accusation is false.
- It is important that you describe all the facts of the matter, including the circumstances that you think may not be important.
- Please explain the reasons for your report as clearly as possible and attach all materials that may be relevant.

WHO RECEIVES THE REPORT?

Gränges' Whistleblower function is operated by the external and independent company Whitepaper Advisors, who provides the whistleblower reporting tool called *Trumpet*. All reports will be received and handled by the external company, which also will be able to assist Gränges in conducting investigations in conjunctions with the reports. Whitepaper Advisors as well as their partners have extensive experience from investigations and have furthermore global capacity should that be needed.

Whitepaper Advisors cooperates (or works in consultation) with Gränges' *Whistleblower Committee*. No details regarding the whistleblower will be disclosed unless you as the whistleblower have provided your consent. You can choose either to be totally anonymous to Whitepaper Advisors' investigators or tell them who you are. Regardless, all reports are investigated and processed.

The Whistleblower Committee consist of the Internal audit manager and SVP Sustainability.

HOW IS FEEDBACK PROVIDED?

At the latest within two weeks after making your report you can log on again with your login and password to see any follow-up questions/comments from the investigators that have received your report. You can monitor your matter via granges.trumpet-whistleblowing.eu/ if you have noted the code that you receive when you register your report. You should log on regularly as the investigators may need to ask you supplementary questions, and in certain cases, to act as quickly as possible.

HOW IS THE WHISTLEBLOWER PROTECTED?

Any person who reports any misconduct that is subject to this document is protected from reprisals, which means that a whistleblower or a related party may not suffer any negative consequences as a result of 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 document. The protection also concerns colleagues, including consultant or agency employees who provide their assistance. If you experience reprisals as a consequence of misconduct reported by you or any other party, you must contact the HR department immediately. It should be noted that this protection does not prevent Gränges from taking action against you for other reasons than your whistleblower report.

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. It should be noted that the protection from confidentiality obligations does not entail any right to disclose papers or documents.

It must be remembered that there is no protection from reprisals if a whistleblower report results in criminal liability.

HOW IS PERSONAL DATA HANDLED? (SWEDISH DATA PROTECTION ACT AND GENERAL DATA PROTECTION REGULATION)

You can be totally anonymous when using the Whistleblower function. Gränges takes great consideration of the protection of personal privacy. Below we have listed some key points about the Data Protection Act and the GDPR that can be useful for you to know.

Personal data

In all cases, Gränges is obligated to comply with the law regarding the processing of personal data. It is essential that anyone who provides information via the Whistleblower function feels secure about doing so.

Initially, the information registered by the informant is registered. If there is an investigation, the information needed to investigate suspicions of irregularity will be registered, which primarily includes name, position, suspicion of irregularity and the circumstances on which the report is based. Information will then be obtained from the sources deemed necessary to investigate the irregularity.

Personal data is deleted three weeks after the case of reported irregularity has been closed

Anonymity

As whistleblower you choose either to provide your contact details or remain anonymous. All reports are taken seriously and investigated regardless. It facilitates for the continued work of our external investigators if we can contact you to obtain supplementary information. Your contact details will therefore be requested. But providing these details is completely voluntary.

No IP addresses are registered, and the system does not use cookies. If you are using a computer that is connected to Gränges, however, it may be stated on the Internet log that you have visited the website when you made your report. If you do not wish this information to be visible, you should use a computer which is not connected to Gränges' network.

All data communication and storage of personal data is encrypted to prevent it being distorted or becoming known to unauthorised persons.

Personal data control

Gränges AB and its respective subsidiaries where the person who is reported for an irregularity is employed is responsible for processing personal data in accordance with the law. Gränges is thereby the data controller for all personal data processed in the Whistleblower service.

The purpose of registering personal data

Personal data will only be used for investigation within the Whistleblower function. In the section WHAT CAN BE REPORTED you can read about under which circumstances reports and information can be stored and processed through the system. As an employee you do not have to assess and judge whether the Whistleblower function should be used. It is up to the Whistleblower function and the Whistleblower Committee to judge which employees and/or representatives can be reported via this system. You can also read about which types of irregularities can be stored and processed.

If you report someone who does not belong to the appropriate category or if the irregularity is not serious enough to be handled within the Whistleblower function, the matter will be closed and all personal data will be erased.

Access to the personal data

Personal data will only be used for investigative purposes by Gränges Whistleblower Committee and by the independent external company that has been commissioned to receive the report. The information is only available to people who work with the current investigation. In some cases, an independent IT consultant can be hired for forensic investigations. The investigation may be handed over to the police or another authority, for example the economic crime authority.

Extracts from registers

As a Whistleblower you have the right to receive, free of charge, information about the personal data on you that is registered in the Whistleblower service. Such a request for an extract from a register shall be made in writing and be signed. Please send it to Gränges AB, Box 5505, SE114 85 Stockholm, Sweden.

If any of the details are incorrect, incomplete or misleading you have the right to request that they be corrected.

For further information regarding registration and processing, please refer to the user conditions – Terms of use – accessed in the main menu to the left in the Whistleblower function.