

# Whistleblower Policy

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# 1 Summary

- **Who can report:** All employees (regardless of employment form), as well as customers, suppliers, partners, and other stakeholders.
- **What can be reported:** Any type of irregularity, particularly serious concerns related to Granges' operations, that may be in the public interest or involve breaches of legislation.
- **How to report:** Reports can be made 24/7 through the external and independent provider Whitepaper Advisors via the platform Trumpet. You can report via web form, phone call, or letter. Link: <https://granges.trumpet-whistleblowing.eu>
- **Qualified vs. non-qualified reports:** All reports are reviewed initially. Qualified reports are handled by the Whistleblower Committee with support from an external advisor. Non-qualified reports are referred to regional whistleblowing representatives.
- **Protection from retaliation:** Anyone who reports in good faith is protected from retaliation or other negative consequences. This protection also covers individuals assisting in the reporting process.
- **Handling of personal data:** All personal data is managed in compliance with the GDPR and deleted within three weeks after the case is closed.
- **Feedback and follow-up:** You can log in using your case code and password to follow your report and respond to any follow-up questions from the investigators.

# 2 Introduction

For Granges it is essential that irregularities that may seriously harm our business or employees comes to light. As a complement to our open corporate climate, we have a Whistleblower Function.

The purpose of the function is to provide a channel where events or circumstances can be reported anonymously 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 Granges' Whistleblower Function works in practice.

# 3 Aim

The purpose of the Whistleblower Function is to provide a channel where events or circumstances can be reported anonymously. This aims to ensure:

- That employees and other stakeholders inform Granges 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 having his or her identity revealed, or any other negative consequences.

## 4 What can be reported?

All types of irregularities can be reported through the Whistleblower Function. However, the intention is that reports be based on concrete suspicions, and that there are reasonable grounds to believe that the information provided is accurate and based on first-hand information. It is not however necessary to have evidence to support the suspicion.

## 5 Qualified and non-qualified reports

Even though all types of irregularities can be reported through the Whistleblower Function, there are laws governing its use. The Whistleblower Function will separate qualified from non-qualified reports.

For a report to be considered qualified, the concern must be related to Gränges' own activities. It must also be related to misconduct that is:

- In the public interest
- In certain cases, breaches of legislation in designated areas

Misconduct that is in the public interest typically affects the general public to a wider extent, for example financial crime such as bribery and corruption, environmental crime, serious forms of discrimination or misconduct that present an imminent risk to people's lives and health, counterfeiting, accounting offences and other infringements of accounting and tax legislation.

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

When a report is registered, Gränges' external party carries out an initial investigation to judge whether the information submitted complies with the above conditions and recommends to the Whistleblower Committee how to proceed. The Whistleblower Committee then decides whether the report is qualified or non-qualified.

## 5.1 Qualified reports

Qualified reports are investigated by the Whistleblowing Committee with support from the external advisor and reported to the Chairperson of the Audit Committee. The conclusion of the investigation, including any actions taken, is decided jointly by the Chairperson of the Audit Committee and the Whistleblower Committee. A summary of the whistleblowing cases are at least once a year reported to the Board of Directors.

## 5.2 Non-qualified reports

Non-qualified reports are, following approval from the whistleblower, referred to each region's whistleblowing representative for follow-up. Please note that the case will subsequently be closed in the Whistleblower Function, and feedback will no longer be available through the platform. How can other concerns be reported?

Private concerns such as dissatisfaction with how the business is run, leadership, pay or other HR matters, are less likely to be considered qualified through the Whistleblower Function. The same applies to working environment issues that are not of a very serious nature.

We recommend Gränges' employees to report other concerns than those described in the previous section directly to local management, a relevant functional group in their region or to Gränges Group functions in line with the reporting channels described in Gränges' Code of Conduct.

# 6 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.

# 7 How can a report be made?

Gränges uses an external Whistleblower Function and tool, "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 connected to the Whistleblower Function – by using the link above – whistleblowers can choose to make a 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 the whistleblower would like to report a case by phone; call +46 20 10 30 91 or 800 445 5223 for US employees.

If the whistleblower 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 the whistleblower 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 the whistleblower will be guided through the entire process and on the portal, and also find answers to the most frequently asked questions each step of the way. If the whistleblower would like to be certain that no one is monitoring his or her activities, a private computer/laptop or cell phone should be used and the Whistleblower Function should be visited from a network that is fully trusted, for instance a home network if such is available.

To ensure the whistleblower's anonymity, the Whistleblower Function (and its reporting tool) is provided by an external and independent company. The report will be encrypted and password protected. The whistleblower never has to reveal his or her identity if he or she does not wish to do so. Using the system is also completely voluntary.

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

In addition to Gränges' Whistleblower Function, the Swedish government has appointed a number of authorities that, through external reporting channels, must receive, follow up and provide feedback on reports of misconduct within their designated area of responsibility. The full list of responsible authorities can be found in the regulation on the protection of persons reporting misconduct (2021:949), see link to [List of Authorities](#).

## 8 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 conjunction with the reports. Whitepaper Advisors as well as their partners have extensive experience of investigations and have a 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 the whistleblower has provided his or her consent.

All reported concerns are taken seriously and given fair and objective follow-up. Qualified whistleblower cases are handled by Gränges' Whistleblower Committee while other cases like violations against Gränges' Code of Conduct are transferred to appointed representatives within each region. All functions are required to maintain all information in the strictest confidence to ensure the integrity of the process. The appointed representatives for the respective regions are:

- Gränges Americas: General Counsel & Senior Vice President Human Resources, Gränges Americas

- Gränges Asia: VP Human Resources, Gränges Asia
- Gränges Europe: General Counsel, Gränges Europe

## 9 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/](https://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.

## 10 How is the Whistleblower protected?

Any person who reports any misconduct that is subject to this document is protected from reprisals from Gränges, 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.

It is important to note that there is no protection from reprisals if a whistleblower report results in criminal liability.

In some cases, whistleblower protection may also be obtained if a whistleblower publishes information externally about certain misconduct. However, legislation varies between countries and before publishing such information you are recommended to seek advice of a trade union representative or a legal advisor.

## 11 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.

### 11.1 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,

## 11.2 Anonymity

As a whistleblower, you can choose either to provide your contact details or remain anonymous. All reports are taken seriously and investigated regardless. It facilitates 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 unauthorized persons.

## 11.3 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.

## 11.4 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.

## 11.5 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.

## 11.6 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.