



Whistleblowing protection Policy

SVEDBERGS GROUP POLICY

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1. Introduction

At Svedbergs Group¹ we are committed to running a responsible business and becoming the leading player in sustainable bathroom fittings in all markets in which we operate.

We recognise the importance of protection of personal data and routine for following up on whistleblowing among our own workforce as well as in our value chain.

At the same time, we need to follow the legal requirement regarding whistleblowing and be aware of any incidents.

In line with our sustainability strategy, we have one corporate target on detection and communication of our whistleblowing policy.

1. 20% Physical audits of strategic suppliers

Svedbergs Group manages and sets targets for its operations in line with the UN Sustainable Development Goals and the Paris Agreement².

1.1. Purpose & Scope

This policy describes how we:

- Fulfil the legal requirements put on the organisation to have a whistleblowing function.
- Detect and investigate any incoming whistleblowing cases.
- Manage reported whistleblowing cases.
- Protect the organisation's rights and obligations in the light of the reported irregularities.
- Process the personal data

This document has also been developed to provide our stakeholders with clear guidelines on our commitments, requirements and routine on Whistleblowing.

It applies to all Svedbergs subsidiaries, their employees, their suppliers and sub-contractors wherever in the world they operate. When setting this document, we considered the stakeholders' interests and how the policy will impact them.

This policy is reviewed annually to ensure that it remains appropriate to our business; it is communicated internally and externally to all relevant stakeholders through the appropriate channels (intranet, website, etc).

¹ Svedbergs Group consist of several subsidiaries in Europe and in the UK. For more information, check our website, [here](#).

² The Group joined the UN Global Compact in 2019 and works with the areas and 10 principles set by the UN.

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2. Our Governance – Roles & Responsibilities

At Svedbergs Group the oversight of Sustainability, including social-related impacts, risks and opportunities, is embedded at the highest level of our company. We are continually devolving our corporate governance structure in recognition of the urgency of social responsibility in response to our increasing understanding of the impact on our business.

Our Group’s Board maintains oversight of social-related issues and monitors progress toward our goals and targets. In 2021 we established the Sustainability Council, composed by all Sustainability Leads from each subsidiary, which meets four times a year, and is chaired by Svedbergs Group Director of Business Development and Sustainability.

The Council:

- Discusses strategic guidance on sustainability matters.
- Coordinates sustainability activities and has oversight of internal sustainability data gathering and external disclosures.
- Reviews the commitments on environmental, social and governance aspects.
- Drives implementation of the Group sustainability strategy, including implementation of our roadmaps, ensuring focus and alignment on execution.



CFO has an overall responsibility to operate and monitor the whistleblowing service.

Receipt of reports: from time-to-time designated external recipient function (hereinafter “the Recipient”).

Internal recipient of reports: 1-2 persons appointed from time to time by Chairman of the Board (hereinafter “Internal Recipient”).

The Chairman of the Board has the right to act independently in the event of whistleblowing reports that may affect those who maintain the whistleblowing function.

The parent company is responsible for procuring a whistleblowing service that can be accessed from the corporate group’s website. Each company within the corporate group instructs a jointly procured third party to receive and assess the whistleblowing reports and, on behalf of each company, report back to the whistle-blower.

3. Follow-up

Reporting of overall statistics takes place to the Board when necessary, however at least once a year.

3.1. Discovery and reporting

Irregularities can be detected by several different categories of people. Some categories, such as employees, are subject to statutory protection. Regardless of who makes the discovery, it should be possible to blow the whistle via web form, telephone or at a personal meeting. It is up to the reporting person to choose the channel according to their preferences.

Regardless of whether the whistle-blower is protected or not, the same routines are applied regarding the handling of secrecy, independence, and prohibition of retaliation.

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4. Routine

Reporting of overall statistics takes place to the Board when necessary, however at least once a year.

Name, e-mail, and telephone numbers for Internal Recipient are provided to the Recipient via Settings in the whistleblowing system or orally in connection with onboarding.

1. The Recipient receives the report via the whistleblowing service.
2. Feedback on a received report is sent to the whistle-blower within seven days (unless the reporting person has declined confirmation, or the Recipient has reason to believe that a confirmation would reveal the person's identity).
3. The Recipient assesses the report – is it a whistle-blower case? If necessary, additional information is requested from the whistle-blower.
4. If appropriate, the Recipient may invite the Internal Recipient or the Chairman of the Board or someone appointed by these persons to be able to participate in the handling of the specific whistleblowing case.
5. The Recipient assesses and justifies whether the case is a whistle-blower case or not.
6. Feedback is given to the reporting person.
7. Feedback is given to the Internal Recipient according to the agreed routine and frequency.
8. Internal Recipient has the opportunity to call for further investigation of cases that are considered whistleblowing cases. He or she can also call for further investigation or proposed measures for cases that have not been assessed as whistleblowing cases. Furthermore, Internal Recipients may call for proposals for preventive measures to prevent similar incidents.
9. When the case is closed, it is scheduled for deletion in accordance with current legislation.

5. Information about processing of personal data

Below is information about the processing of personal data that takes place in connection with our handling of whistleblowing cases and your rights as registered.

Controller

The party responsible for the processing of personal data, the controller, is:
Svedbergs Group AB, 556052-4984
Box 840
SE-301 18 Halmstad
E-post: gdpr@svedbergs.se

5.1. Purpose of processing and legal basis

The purpose with the processing is to fulfil the legal requirement put on the organisation to have a whistleblowing function and to be able to investigate the incoming whistleblowing cases. The purpose is also to process personal data when it is necessary to follow up whistleblowing cases. This means we might need to process personal data to be able to:

- Manage reported whistleblowing cases.
- Protect the organisations' rights and obligations in light of the reported irregularities.
- Fulfil the legal requirements put on the organisation.

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The legal basis for the processing of personal data in whistleblowing cases is the legal obligation in 5 kap. 2 § in the Swedish whistleblowing law (2021:890).

The legal basis for the processing of personal data when following up whistleblowing cases and when taking other measures in relation to a whistleblowing case is to comply with a legal obligation or the organisation's legitimate interest in looking after its rights in relation to reported irregularities.

5.2. Categories of data subjects

Personal data of the following categories of data subjects can be processed when handling whistleblowing cases:

- The reporting data subject, if she or he doesn't choose to be anonymous.
- Data subjects mentioned in a whistleblowing case.
- Data subjects with the administrative role to manage and investigate whistleblowing cases.

5.3. Data transfer

Data may be provided to public authorities (e.g., the Swedish police authority when a whistleblowing case leads to a police report) in compliance with legislation. Data may also be provided to other parts of our organization or another company within our group when investigating and following up whistleblowing cases.

Personal data is also processed by processors when we handle whistleblowing cases. Processors are only allowed to act on instructions from us which is regulated in a data processing agreement.

5.4. Transfer to a third country

We strive not to transfer data to a country or company located outside the EU/EEA and all personal data related to the content in reported whistleblowing cases is stored within the EU/EEA on servers owned by Swedish companies.

Log in and access to the whistleblowing system is administrated through active directory, Microsoft Azure. The data is stored within the EU/EEA but the supplier of the service is an American company, this means personal data related to log in and access administration might be accessed by American authorities which could have a negative effect on the data subjects privacy since American authorities aren't bound by the GDPR. If personal data is transferred to a third country, standard contractual clauses are in place as appropriate safeguards. Please contact us for more information on how we protect your personal data.

5.5. Retention and deletion

The personal data included in a whistleblowing case will be kept for two years from when the case was closed.

The personal data which is needed for administration and to manage log in and access to the whistleblowing system will be kept for as long as the log in and access is valid.

All personal data will be deleted when the retention period ends.

If a whistleblowing case needs further internal investigation, the personal data will be kept for as long as it is needed to investigate the case.

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5.6. Your rights as a data subject

When the company collects and processes your personal data, you have certain rights. You have the right to:

- Request a copy of the personal data that the company processes and details of how the data are processed.
- Request the rectification of any inaccurate data.
- Request to be erased. However, this can only be done if there is no other legal basis giving the company the right to retain the data.
- Request that processing be restricted under certain circumstances, such as during a period when the correctness of the data is under investigation.
- Exercise the right to data portability.
- Oppose to profiling.
- Lodge a complaint with the data protection authority (in Sweden Swedish Authority for privacy protection IMY) regarding our processing of personal data.

Please note that the rights above can be affected by the professional secrecy for information related to a whistleblowing case and also if exercising the rights above would hinder the investigation of a whistleblowing case. The possibility to exercise your rights will be assessed in light of the legal basis and purpose of the processing.

If you have any questions regarding the processing of your personal data, please contact us through the contact information provided in the beginning of this information.

5.7. Security

The company takes appropriate technical and organisational information security measures to prevent and limit risks associated with processing personal data, such as unauthorised access, disclosure, misuse, alteration, and destruction. Only authorized personnel bound by secrecy have access to identifiable personal data.

If you have any questions, please contact us at www.svedbergsgroup.com.

Approval

This Policy has been approved by Per-Arne Andersson, CEO.

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