

Whistleblower Policy

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1 The purpose of our whistleblower function

- 1.1 The purpose of this Whistleblower Policy is to handle reports filed under the whistleblower function of Feralco group ("**The Group**"), called *Trumpet* ("**Trumpet**"), administered by Whitepaper Advisors Sweden AB ("**WPA**") as independent consultants.
- 1.2 It is important for the Group that any serious irregularity is made known as early as possible, so as to minimise the risk of personal injury, material damage and damage to intellectual property, as well as damage to the Group's reputation. Under this policy, whistleblowers who are prepared to report serious irregularities are made aware that they are an important resource for the Group, and therefore the Group seeks to ensure a business environment in which whistleblowers feel that they can report serious irregularities safely and without fear of reprisals.
- 1.3 Please note that this whistleblowing policy is not a comprehensive description of the subject matter on which you, as a whistleblower, can make reports on with protection established by law. Due to legal constraints on the processing of personal data caused by the fact that the Group is not obligated to establish whistleblowing procedures, we cannot process other reports than those that falls within the scope of this policy in our whistleblowing channel Trumpet. This whistleblowing policy does not in any way limit your possibility to, in accordance with law, report on subjects not within the scope of this policy.

2 Who can file a report in Trumpet and how are they protected?

Reporting persons who are active within the Group in a work-related context

- 2.1 A report can be filed using Trumpet by anyone provided the report regards irregularities in accordance with clause 3 below. However, the protection against reprisals and duties of confidentiality which follows from law and which is detailed in clause 2.2-2.3 below only applies to whistleblowers who in any way represents or is active in the Group in a work-related context. This includes Board members, all employees (permanent employees, probationary employees, fixed-term employees, and full-time and part-time employees), trainees and temporary employees (crew personnel). Shareholders who are active in the Group, as well as persons who are members of the Group's control bodies, may also file reports using Trumpet and benefit from protection.
- 2.2 Any person who reports any serious irregularity that is subject to this policy (see below in clause 3), and who is a person who benefit from protection in accordance with clause 2.1 above, is protected from any reprisals, which means that a whistleblower or a related party may not suffer any negative consequences as a result of the person 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 irregularity was accurate, and that the report was made in one of the ways specified in this policy. The protection in accordance with this clause not only covers the whistleblower, but also the whistleblower's colleagues, trade union representatives, or health and safety officers who provide assistance, as well as the whistleblower's employer or company if, for example, the whistleblower is temporary staff or a consultant at the Group. If a whistleblower experiences reprisals as a consequence of a irregularity reported by a person or any other party, the whistleblower should contact the CEO of the Group immediately. It should be noted that this protection does not prevent the Group from taking action against the whistleblower for other reasons than the whistleblower's report.
- 2.3 Any person who reports a serious irregularity subject to this policy, and who is a person who benefit from protection in accordance with clause 2.1 above, will, in most cases, be protected against sanctions due to the reporting constituting a potential breach of a confidentiality obligation, provided that there were reasonable grounds to believe that it was necessary to provide the information in question in order to disclose the irregularity. This protection does not include surplus information that is not reasonably required to be disclosed in order to reveal the irregularity. The protection applies irrespective of whether the duty of confidentiality is stipulated by agreement or law but does not include qualified confidentiality obligations. It should be noted that the protection from a breach of confidentiality obligations does not entail any right to disclose papers or documents.

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

External suppliers, customers etc. who are not active within the Group in a work-related context

2.5 Also persons who are not active in the Group in a work-related context, such as external suppliers and customers, may use the Groups whistleblowing procedures to report about the irregularities mentioned in clause 3.1-3.3 below. However, such persons are not covered by the protection against reprisals and confidentiality undertakings laid down by law which persons who are active within the Group in a work-related context are. The Group wants to underline that the Group of course has no intention to subject an external reporting person to any reprisals, provided the external person's reporting does not constitute a crime and that the report is made with good intentions.

3 What can be reported in Trumpet?

3.1 In order for a report to be filed in Trumpet, there must be a concrete suspicion of an event that fulfils **both of the following criteria:**

- it concerns a **serious irregularity** (see clause 3.2), and
- the irregularity has been committed by a member of the Group's management or by another key person in the Group (see clause 3.3).

A report that fulfils both criteria above is referred to as a qualified report or whistleblowing under the Group's internal rules.

3.2 A "serious irregularity" means:

- financial crime such as bribery, corruption, theft, fraud and forgery, corruption, accounting offences and other breaches of accounting and tax legislation; and
- other serious irregularities affecting the vital interests of the Group or the life and health of individuals, such as serious environmental offences, major shortcomings in workplace safety and very serious forms of discrimination and harassment.

3.3 Company management or other key persons means the following persons in the Group:

- the Group's CEO:s
- CFO
- Technical Director and Circularity Manager
- MD:s
- Sales Managers
- Controllers
- Industrial Plant Managers

3.4 A report via the Trumpet whistleblower function must be based on concrete suspicions. The whistleblower must have reasonable grounds to believe that the information provided is accurate, but the whistleblower does not need to have evidence to support their suspicion. Reports that are filed solely on the basis of rumours or hearsay are not subject to the protection described in clauses 2.2-2.3 – as a general rule, the whistleblower must have first-hand information. No allegation may be made with malicious intent or with the knowledge that the allegation is false. False or malicious allegations can be a serious breach of the employment contract, and there is no protection from reprisals in the event of knowingly false or malicious reports.

What should not be reported?

3.5 Matters of other types than those described in clauses 3.1-3.3 above must be handled by reporting to the immediate manager, to the manager's manager, or to another similar person in a managerial position, alternatively to a health and safety officer or a trade union representative, if the report concerns work environment matters or if the whistleblower is a union member and the matter regards the employment.

Such reports may be subject to a prohibition of reprisals or similar protection under other regulations than the whistleblowing legislation, but not necessarily to the same extent as the protection provided under this policy.

3.6 Matters not covered by this policy, and which should not be reported through Trumpet, may, for example, be:

- events that do not constitute a serious irregularity in accordance with clause 3.2 above, such as general dissatisfaction with the conduct of the business or with management, pay or other personnel matters; or
- serious irregularities committed by persons who are not members of the management or key personnel of the Group in accordance with clause 3.3 above.

3.7 Within the framework of the Group's internal regulations, a report that *does not* meet the criteria for a report to be filed under the whistleblower function in accordance with clauses 3.1-3.3 above is referred to as an *unqualified report*. An unqualified report will not be treated as a whistleblower report. If a whistleblower files an unqualified report, the whistleblower will be informed accordingly, and the report will be deleted from Trumpet within three weeks. In this case, the whistleblower can instead refer the circumstances the whistleblower wishes to address to the persons listed in clause 3.5 above.

4 How to file a report

4.1 Suspected irregularities can be reported to Trumpet via the web form, or by phone or letter. Reports can be filed 24 hours a day, seven days a week.

Filing a report via the website, or by phone or letter

4.2 For reports via Trumpet's web form, or by phone or letter, a special link on the Group's website describes how the report is to be submitted. Alternatively, type the address feralco.trumpet-whistleblowing.eu/ on any device (computer, tablet or mobile phone) to access the Trumpet whistleblower system. If a whistleblower chooses to submit the report in another way than via Trumpet's web form, it is important that contact details are provided in some form, so that the whistleblower can obtain login details for the case management site in Trumpet. On this case management site, the whistleblower will receive feedback on their filed report and will keep contact with the case officers (see clause 6.4 below).

Making a report at a physical meeting

4.3 A report can also be made at a physical meeting. If a whistleblower wishes to request a physical meeting to make a report concerning circumstances as referred to in clauses 3.1-3.3 above, a request can be submitted via the web form, or by phone or letter. A person wishing to request a physical meeting must provide their contact details, so that Trumpet can contact them to book a meeting. It should be noted that anonymity cannot be promised if a report is made at a physical meeting.

5 What should a report contain?

5.1 In the report, the whistleblower must describe all the facts and develop allegations as carefully and in as much detail as possible. The whistleblower must also describe anything that may be of relevance to the report. The information provided must be as accurate and detailed as possible. A report must, if possible, at least contain the following information:

- What the report concerns;
- Who or what is involved;
- Where the incident occurred;
- When the incident occurred; and
- Whether it was a one-off event, or concerns an ongoing or recurring problem.

- 5.2 Trumpet offers the opportunity to communicate with case officers – also if reporting anonymously. Via the system, case officers can ask the whistleblower questions or provide feedback. It is therefore important that whistleblowers who wishes to remain anonymous write down their assigned log-in details in order to access this site.

6 Handling of the report

- 6.1 Reports filed through Trumpet are handled by a limited group of persons who are subject to strict confidentiality obligations. This limited group of people includes:
- Specially authorised people at WPA, and
 - the Group's Whistleblower Committee, which comprises individuals working in the Group who have been specifically appointed to handle incoming whistleblower reports. ("**Whistleblower Committee**").

If the report concerns any member of the Whistleblower Committee, an alternative committee that does not include this person will be appointed.

- 6.2 Within seven (7) days of filing a report, the whistleblower will receive an acknowledgment of receipt on the Trumpet communication site where the whistleblower interacts with the case officers.
- 6.3 A report will be handled with respect, care, confidentiality, and due consideration of the integrity of all persons involved. A report will also be dealt with promptly and decisions on necessary measures will be taken as soon as possible, but never at the expense of quality or the legal protection of the individual or individuals who are the subject of the report.
- 6.4 Irrespective of whether the report is assessed to be qualified or unqualified, the whistleblower will receive feedback on the assessment. If the report is assessed to be qualified, the whistleblower will also receive feedback regarding the ongoing handling of the matter. Feedback will be made available no later than three (3) months after a filed report, but usually earlier, on the Trumpet site where you can communicate with the case officers.

7 Opportunity for anonymity

- 7.1 Reports in the whistleblower function can be made either:
- Completely anonymously,
 - Openly in relation to both WPA and the Whistleblower Committee/Alternative Committee and the Group.
- 7.2 If the whistleblower wishes, communication can be made via Trumpet while maintaining anonymity and confidentiality.
- 7.3 If the whistleblower chooses not to conceal the whistleblower's identity, this information will be treated confidentially and kept secret for as long as legally possible. In the event of a report that results in a police report or other legal action, the Group or WPA may, however, be required to disclose the whistleblower's personal data (e.g., because the person may need to appear as a witness a trial). In such a situation, the whistleblower will as a rule be informed before their personal data is disclosed, unless such information would jeopardise the related investigations or judicial proceedings.
- 7.4 Anonymity cannot be guaranteed if the whistleblower chooses to make a report at a physical meeting. If the whistleblower chooses to file a report by letter or phone, the whistleblower needs to provide contact details in some form if to receive an acknowledgment of receipt of, or feedback on, the report. If the whistleblower also wishes to remain anonymous in relation to WPA, it is important to carefully consider which contact details to provide.

8 Information about the processing of personal data

- 8.1** Personal data provided via Trumpet is processed in accordance with the provisions of the General Data Protection Regulation, other applicable legislation, and the Group's applicable personal data policy, which is available at [\[feralco.com\]](https://feralco.com). Concerning such data, the Group is the data controller and WPA is the data processor. This includes the whistleblower's personal data if the whistleblower chooses not to be anonymous towards the Whistleblower Committee/Alternative Committee and the Group.
- 8.2** Personal data occurring in reports is subject to a statutory duty of confidentiality that prevents unauthorised disclosure. The duty of confidentiality does not prevent the authorised disclosure of personal data, such as when the personal data is required to be passed on to the police or another authority.
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