



Instruction for the whistle— blower function

1. Background

Vasakronan has a whistle-blower function and a Compliance Officer (CO) tasked with managing issues of improper conduct, irregularities and deficient compliance with regulations in the company or in other operations that the reporting individual has been in contact with in their work ("Misconduct"). Employees are to turn to the CO with suspicions of Misconduct and to transfer responsibility for further investigation of the issue. The CO at Vasakronan is the General Counsel. The CO ensures that regulations in the Swedish Act on the Protection of Persons Reporting Irregularities (2021:890) are observed.

2. Duty of confidentiality

The freedom to provide information rules apply: the CO has a duty of confidentiality regarding who has reported the suspected Misconduct. The CO is also to manage all issues under the duty of confidentiality and with the utmost discretion. However, if the investigation leads to suspicion of crime, the CO is to discuss any measures with the CEO or, if needed, directly with the Chairman of the Board. The duty of confidentiality does not apply if the individual who reported misconduct, through the act of reporting, committed a crime, or if the individual who reported the misconduct did not have sufficient reason to believe that the information submitted was true.

3. Reporting

Employees and suppliers, customers and other stakeholders can contact the CO directly to report suspicions of Misconduct, either verbally or in writing. It is also possible to report through an external whistle-blower function that protects the reporting individual's anonymity. Information about how whistle-blowing works is on the company's intranet and on vasakronan.se Verbal reporting is to be recorded or documented in written minutes.

4. Case management

Upon suspicion of any Misconduct, the CO is obligated to investigate the issue. Where the CO concludes that there are grounds for suspicion, the issue is to be managed and investigated with sound judgement and with the company's best interests in mind. The CO is also to inform the CEO and any affected managers in the event of suspicion of Misconduct. If there is any suspicion of crime, the CO is to always consult the CEO or, when applicable, the Chairman of the Board before the police report is filed.

When the process has started, the CO is to contact the reporting individual within seven days to confirm receipt of the submission. The CO is to ensure that the individual who reported the Misconduct receives appropriate feedback within three months of the confirmation regarding measures taken and why.

5. Monitoring and measures

If an investigation reveals deficiencies in the company's controls or procedures, the CO is to prepare proposals for measures to address these deficiencies.

The CO is to retain written reports and documentation of verbal reports as long as they are needed, though no longer than two years after the process has been completed.

The CO is to provide an annual report to the Board or the Chairman of the Board.