

HUFVUDSTADEN'S WHISTLEBLOWER POLICY

28 March 2022



Hufvudstaden strives to have an open business environment characterised by high ethical standards. Our employees, customers and suppliers are our most important sources of information into any shortcomings that need to be addressed.

Anyone who suspects misconduct that is unlawful, or which may be in the public interest to disclose, has the opportunity to speak without fear of punishment. You can choose to submit information about such misconduct anonymously.

WHAT CAN BE REPORTED?

- Misconduct that is unlawful
- Misconduct which may be in the public interest to disclose

WHO MAY REPORT MISCONDUCT?

- Employees
- Volunteers and trainees
- Persons conducting work under supervision and management of an employee (e.g. hired consultants)
- Shareholders
- Sole traders
- Persons who are part of a company's administrative, management or supervisory body
- Customers, suppliers and other stakeholders

HOW ARE REPORTS OF MISCONDUCT MADE?

- Option 1: report misconduct to a manager in the Hufvudstaden organisation or group management.
- Option 2: report misconduct anonymously using our whistleblowing reporting tool, (see below).

HOW ARE OTHER ISSUES REPORTED?

Other issues such as disputes, errors, complaints, minor offences, harassment, bullying, dissatisfaction over pay and similar issues are not be reported using this function. Such matters must be reported in the first instance to an employee's immediate superior or in such ways as outlined in Hufvudstaden's other policies, guidelines and routines.

THE REPORTING TOOL

To protect your anonymity, Hufvudstaden has a reporting tool that is provided by an external, independent actor. This reporting channel is encrypted, and password protected. You never have to reveal your identity if you do not wish to do so.

- Whistleblowers do not have to provide proof of their accusations. However, no accusation may be made with malicious intent or in the knowledge that an accusation is false.

- It is important that whistleblowers include all relevant facts in their report, including details that may be considered unimportant. Claims should be carefully described and all documentation that may be relevant should be attached.

REPORTING VIA INTERNAL WHISTLEBLOWER CHANNELS

Reports of misconduct are submitted in writing via the website wb.2secure.se, via a link on Hufvudstaden's website, or orally by phone on 0771 77 99 77. You can choose to be anonymous on all three of these channels. If you wish to make a report in a physical meeting, you can request this on the wb.2secure.se website. Physical meetings are held either with a representative from Hufvudstaden or with Hufvudstaden's whistleblower services supplier, 2Secure, by agreement.

When submitting a report on wb.2secure.se, you must state Hufvudstaden's unique code – **tsd612** – to indicate that your report relates to Hufvudstaden. On the website, you are asked to answer a number of questions about your accusation. You may be anonymous and will be assigned a unique case number and a password that you will need to log into the website and follow the progress of your report and communicate with the administrator at 2Secure.

Once a report has been submitted, it is processed by experienced administrators at 2Secure, who contact Hufvudstaden's primary contact person based on a predetermined contact list of several names. If the primary contact person is the subject of the notification, another person on the contact list will be informed. It is always Hufvudstaden that ultimately assesses notifications and decides what measures to take. When you submit a report using Hufvudstaden's internal reporting channels, you have the right to legal protection under Swedish law, (2021:890), on protection of persons who report misconduct.

REPORTING VIA EXTERNAL WHISTLEBLOWER CHANNELS

In addition to reporting to Hufvudstaden's internal whistleblower channel, you can submit reports externally to a competent authority within a specific area of responsibility or to one of the EU's institutions, bodies or agencies. When you report externally, you also have the right to protection according under Swedish law, (2021:890), on the protection of persons who report misconduct. The following bodies have been designated as competent authorities and established external reporting channels: the Swedish Work Environment Authority, the National Board of Housing, Building and Planning, the National Electrical Safety Board, the Swedish Economic Crime Authority, the Swedish Estate Agents Inspectorate, the Swedish Financial Supervisory Authority, the Swedish Agency for Marine and Water Management, the Swedish Authority for Privacy Protection, the Inspectorate of Strategic Products, the Health and Social Care Inspectorate, the Swedish Chemicals Agency, the Swedish Consumer Agency, the Swedish Competition Authority, the Swedish Food Agency, the Swedish Medical Products Agency, the County Administrative Boards of Sweden, the Swedish Civil Contingencies Agency, the Swedish Environmental Protection Agency, the Swedish Post and Telecom Authority, the Swedish Government Offices, the Swedish Inspectorate of Auditors, the Swedish Tax Agency, the Swedish Forest Agency, the Swedish Gambling Authority, the Swedish Energy Agency, the Swedish Board of Agriculture, the Swedish Board for Accreditation and Conformity Assessment, the Swedish Radiation Safety Authority, and the Swedish Transport Agency.

STATUTORY REPORTING PROTECTION

Swedish whistleblower legislation, Act (2021:890) on the protection for persons who report misconduct, provides whistleblowers protection under certain conditions. In addition to the option of reporting suspected misconduct in accordance with whistleblower legislation, there is also a right to freedom of information and procurement in accordance with the Freedom of the Press Ordinance and the Freedom of Expression Act. This means that it is possible for employees, (with certain exceptions), in the private or public sectors to provide otherwise confidential information for publication to the mass media covered by the Freedom of the Press Ordinance or the Freedom of Expression Act.

Public sector employees and those employed by other entities where whistleblower protection applies in accordance with Act (2017:151) on whistleblower protection for certain activities or the Public Access to Information and Secrecy Act (2009: 400), have the right to greater statutory protection. This extended protection relates to investigative and retaliatory bans.

The ban on investigation means that an authority or other public body, generally may not investigate a person who has submitted a notice for publication.

The ban on retaliation means that an entity may not take measures that have negative consequences for an individual if they have exercised their freedom of expression and information.

Violations of the prohibitions on investigation and retaliation are punishable by a fine or imprisonment for up to one year, (Chapter 3, Section 4 TF and Chapter 2, Section 4 YGL).

WHO RECEIVES REPORTS OF MISCONDUCT?

Hufvudstaden works with 2Secure for whistleblower cases, which is an external, independent actor. All reports are received and administered by 2Secure. 2Secure has extensive experience of this type of investigation and have global capacity if needed. 2Secure works in consultation with Hufvudstaden's whistleblower committee. No information about whistleblowers is disclosed unless the whistleblower has consented otherwise. Whistleblowers decide whether they want to be completely anonymous to 2Secure's investigators or not. Irrespective of whether a whistleblower wishes to be anonymous, all reports are investigated and administered. All assessments and decisions regarding subsequent measures are made by Hufvudstaden's whistleblower committee.

FEEDBACK

After submitting a report, whistleblowers may log in with their credentials to view any follow-up questions/comments from the administrator at 2Secure. Submissions may be followed up via wb.2secure.se if a whistleblower has saved their case number and password that is generated when they submit their report. Whistleblowers are welcome to log in regularly as investigators may need to ask supplementary questions and, in some cases, want to take action quickly.

CONTACT DETAILS

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