

Whistleblowing Policy

About Hufvudstaden

Hufvudstaden is a long-term property owner whose main focus is high quality, great service and enduring business relationships. The company was founded in 1915 and currently owns 29 properties with attractive office and retail premises in central Stockholm and Gothenburg. The Group includes AB Nordiska Kompaniet, which owns the NK brand with department stores in Stockholm and Gothenburg, with its subsidiary NK Retail AB operating parts of the retail business. We cooperate with our tenants and partners to create safe and vibrant marketplaces with the objective of strengthening our customers' competitiveness.

We offer successful businesses attractive premises in central locations.

1. Introduction

Hufvudstaden strives for an open business climate with a high level of business ethics. It is important that all irregularities and misconduct are highlighted and investigated as early as possible. Our employees, customers and suppliers are our key source of insights into any shortcomings that must be corrected. Hufvudstaden encourages a culture in which reporting of misconduct is a natural part of the culture of the operation. We strive for an open and transparent culture where whistleblowers can act without fear of retaliation. All reports are taken seriously and are investigated confidentially to ensure responsible and fair processing.

2. Scope

This policy applies to all employees and representatives in the Hufvudstaden Group.

3. Whistleblowing

3.1 Areas for reporting

The whistle-blower service is intended to be used for reporting information on irregularities and misconduct that should be brought to light as a matter of general interest. This could include, for example, violations of laws and regulations, corruption, bribery, economic crimes, environmental crimes, incorrect use of financial resources and serious cases of harassment. Violations of various laws and provisions linked to EU law are also covered, and are regarded as urgent matters to report.

On the other hand, the service is not to be used to report issues that concern only one's own work situation – for example, dissatisfaction with salary or similar, since these normally do not fall under whistleblowing. It is also important to be aware that certain types of reporting obligations should be managed through different channels. The whistle-blower service is not intended for reporting cases in which there is an obligation to report under operation-specific laws and regulations.

Persons who use the whistle-blower service do not need to have evidence proving the truth of their report. Having good faith around their suspicions is enough. However, the report should not be based on rumours or hearsay, and lying or deliberately providing false information is not permitted.

3.2 Protection in the form of discharge from responsibility

Anyone with suspicions of misconduct that violate the law or that should be revealed as a matter of general interest has the right to report this under protection against retaliation. A person who reports such circumstances cannot be held responsible for violating confidentiality, provided that the person at the time of reporting had sufficient reason to believe that the report was necessary to reveal the misconduct. The same protection applies when gathering information prior to reporting, provided that the person does not commit a crime in the process. However, exceptions for qualified confidentiality apply under the Defence Inventions Act (SFS 1971:1078), where the discharge from responsibility does not apply.

The fact that a person making a report is covered by discharge from responsibility means that they cannot be held legally responsible, either under criminal law or through damages, for having violated confidentiality. It is important to note, however, that these regulations do not grant the right to disseminate documents or documentation from the business.

Hufvudstaden will provide support for anonymous reporting.

3.3 Protection against obstructive actions or retaliation

A person exercising operational authority may not obstruct, attempt to obstruct or otherwise make reporting difficult. It is also forbidden to retaliate against anyone owing to a report having been made. Retaliation pertains to actions, either direct or indirect, that lead to or could lead to harm or disadvantages for the person making the report. Examples of such actions could include suspension from work, furlough, termination, changed work tasks or reduced salary. The protection against retaliation applies not only to the person making the report, but also to others who support the person in making the report – for example, an elected representative or a safety officer. Moreover, retaliation may not be directed towards colleagues, family members, or a legal entity that the person making the report owns, works for or has any other connection to.

4. Monitoring and compliance

Monitoring and evaluation will be carried out on a continuous basis to ensure compliance with this Whistleblower Policy, and that it is available both internally and externally. This policy is in effect until further notice and will be reviewed as needed.