

DESCRIPTION OF WHISTLEBLOWER SYSTEM

Contact details

e-mail: whistleblower@enequi.com

Recipient/handler

The recipients of the reporting or notification are two appointed representatives not part of the company board. These representatives are not employed by the company.

Who can be reported?

Employees in the Enequi group (Enequi AB or Gycom AB) can be reported, including consultants and members of the Board of Directors.

What can be reported?

All suspicions or indications of severe irregularities like fraud, accounting violations, bribery, and corruption or when someone in a managerial position seriously abuses his/her position.

The whistleblower system shall not be used for minor business issues or minor irregularities nor for work environment issues. The system shall not be used as a channel for customer complaints.

What is required in the report?

To be able to handle the report in a practical and correct way the recipient of the report needs the following information:

1. The name of the person that is reported.
2. The organization or part of an organization for which the report concerns.
3. A description of the severe issue or irregularity.

To further simplify the communication between the recipient and the reporter during the investigative work, the reporter should state his or her contact details. This information is kept confidential by the recipient unless otherwise stated by the reporter.

Basic Process

1. Anonymous information or notifications, reported in the whistleblower system, will be received by the recipients of the mailbox.
2. A quick investigation is required to minimize the possible financial impact, to secure proof, to map the sequence of activities and to secure and control company assets.

Dok.nr: 0402-1
Datum: 2021-09-22

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Godkänd av: Håkan Svärd

3. The initial stage of the investigation could consist of collecting information, securing, or blocking accounts and accesses, collection of witness statements and prevention of possible proof to potentially be destroyed.
4. All communication and transfer of information shall be done in a secure and confidential manner.
5. Once the investigation and proof collection has been completed, action will be taken in accordance with applicable laws and ethical regulations.

Involved persons and function

The following persons or functions will be involved apart from the recipients of the report:

- If the subject of the report or notification is an employee who is not in a managerial position, the managers manager of the employee will be involved in accordance with the grandfather principle.
- If the subject of the report or notification is a manager or member of the management team (including the managing director or CEO of the company), the Chairman of the Board of Directors shall be involved.
- If the subject of the report or notification is the Chairman of the Board of Directors, other board members can be involved depending on the needs for help by the recipients of the report.