

# BSTGroup

## Whistle Blowing Policy

### Background

At BST Group, we strive to maintain an open and transparent workplace where misconduct should not occur. It is therefore important for us that clear information is available on how to report confidentially and securely. In case of suspicion of ongoing or past misconduct, resources must therefore be available to address them.

By making it easy to report, we collectively promote the trust of our employees, customers, and the public in us. Our cases are initially handled by the law firm VICI to ensure independent case management. Our internal contacts may then take over the case from the initial case managers. See more information and contact details under "6.1 Contact Details for Case Handlers"

This whistleblower policy covers the legal entities BST Fire Protection Team AB (556879-0512), BST Södra AB (559017-8090), BST South AB (556822-9248), BST West AB (559070-5132) & Brandkon-sulten BK AB (556389-3345).

### Definitions

- **GDPR:** The General Data Protection Regulation ((EU) 2016/679), which is a European regulation governing the processing of personal data and the free movement of such data within the European Union.
- **Whistleblower Directive:** Directive 2019/1936 on the protection of persons reporting on breaches of Union law.
- **Whistleblower Law:** (2021:890) on the protection of persons reporting misconduct.
- **Visslan:** The Whistle Compliance Solutions AB's whistleblowing service [Visslan](#), which enables digital reporting of misconduct.
- **Misconduct:** Actions or omissions that have come to light in a work-related context that are of public interest to disclose.
- **Reporting:** Oral or written provision of information about misconduct.
- **Internal reporting:** Oral or written provision of information about misconduct within a private sector company.

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- **External reporting:** Oral or written provision of information about misconduct to the competent authorities.
- **Disclosure or public disclosure:** Making information about misconduct available to the public.
- **Reporting person:** A physical person who reports or discloses information about misconduct acquired in connection with their work-related activities.
- **Retaliation:** Any direct or indirect action or omission that occurs in a work-related context and is caused by internal or external reporting or by a disclosure, and which causes or can cause unjustified harm to the reporting person.
- **Follow-up:** Any action taken by the recipient of a report to assess the accuracy of the statements made in the report and, where applicable, to manage the reported violation, including through measures such as internal investigations, inquiries, prosecution, actions to recover funds, and closing the procedure.
- **Feedback:** Providing reporting persons (“whistleblowers”) with information about the measures planned or taken as follow-up and the reasons for such follow-up.

## 1. Who can blow the whistle?

You can blow the whistle and obtain protection under the whistleblower law if you are an employee, volunteer, intern, active shareholder, person otherwise available for work under our control and management, or part of our administrative, management, or supervisory bodies. Contractors, subcontractors, and suppliers to us who have learned of misconduct within the company can also report. The fact that your work-related relationship with us has ended, or has not yet begun, is not a hindrance to reporting misconduct.

## 2. What can I whistleblow about?

If you suspect a potential misconduct or breach of law and/or regulations, we encourage you to report this to us as a whistleblowing case. It is important that at the time of reporting, you had reasonable grounds to believe that the information about the misconduct you reported was true. In assessing whether reasonable grounds existed, the circumstances and information available to you at the time of reporting will form the basis for whether you could have assumed the misconduct was true. The above requirements must be met for you to be protected under the whistleblower law. Before you whistleblow, read 5 questions to determine if you are protected by the whistleblower law.

### 2.1 Misconduct of Public Interest

You can report information about misconduct that has occurred in a work-related context and is of public interest to be disclosed. For other types of personal complaints that do not have a public

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interest in being disclosed, such as disputes or complaints about the workplace or working environment, we encourage you to contact your nearest manager, HR manager, or another appropriate responsible person. This ensures that these cases are handled in the best possible way. Examples of serious misconduct that can be reported include:

- Deliberate incorrect accounting, internal accounting control, or other financial crimes.
- Occurrences of theft, corruption, vandalism, fraud, embezzlement, or data breach.
- Serious environmental crimes or major safety deficiencies at the workplace.
- If someone is subjected to serious forms of discrimination or harassment.
- Other serious misconduct affecting individuals' lives or health.
- Other serious misconduct affecting the vital interests of the company.

## **2.2 Misconduct Contrary to EU Law**

There is also the possibility to report information about misconduct that has occurred in a work-related context that contravenes EU legal acts or regulations. If you suspect this is occurring, please read the whistleblower law Section 2 and the scope of application of the whistleblower directive in Article 2 and Annex Part 1 for applicable laws.

## **3. How do I report?**

### **3.1 Written Reporting**

For written cases, we use our digital whistleblowing function, The Whistle. It is always available at <https://bstgroup.visslan-report.se/>. On the website, you choose to "report" and then you can describe your suspected misconduct. Please describe what happened as thoroughly as possible, so that we can ensure that appropriate actions can be taken. It is also possible to attach additional evidence, such as written documents, pictures, or audio files.

#### **3.1.1 Sensitive Personal Information**

Please do not include sensitive personal information about individuals mentioned in your report unless it is necessary to describe your case. Sensitive personal data includes information about: ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, a person's sex life or sexual orientation, genetic data, and biometric data used to uniquely identify a person.

#### **3.1.2 Anonymity**

You can remain anonymous throughout the process without affecting your legal protection, but you also have the option to disclose your identity under strict confidentiality. Anonymity can, in some

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cases, complicate the follow-up possibilities and the actions we can perform, but in such cases, we may later ask you to confidentially disclose your identity.

### 3.1.3 Follow-up & Login

After you have reported, you will receive a sixteen-digit code, which you will use to log into The Whistle from <https://bstgroup.visslan-report.se/>. It is very important that you save this code, as you will not be able to access the case again otherwise. If you lose the code, you can submit a new report referring to the previous report.

Within seven days, you will receive confirmation that the case handler has received your report. The case handler is the independent and autonomous party that receives cases in the reporting channel, whose contact details are attached in "6.1 Contact Details for Case Handlers". If you have questions or concerns, you and the case handler can communicate in the future through the platform's built-in and anonymous chat function. You will receive feedback within three months on any actions that have been planned or carried out as a result of the report.

It is important that you log in regularly with your sixteen-digit code to respond to any follow-up questions the case handler might have. In some cases, the case cannot proceed without answers to such follow-up questions from you as the reporting person.

### 3.2 Oral Reporting

Additionally, it is also possible to conduct an oral case by uploading an audio file as an attachment when creating a case on <https://bstgroup.visslan-report.se/>. You then choose "Yes" to the question of evidence to be able to upload your file. In the audio file, you describe the same circumstances and details as you would have in a written case.

Furthermore, a physical meeting with the case handler can be requested via The Whistle. This is most easily done by either requesting it in an existing case or creating a new report.

### 3.3 External Reporting

We encourage you to always first report misconduct internally, but if difficulties should arise or it is deemed inappropriate, it is possible to conduct external reporting instead. We then refer you to contact the competent authorities or, where applicable, EU institutions, bodies, or agencies. Contact information for these can be found at the following web address: External whistleblowing reporting channels.

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## 4. What are my rights?

### 4.1 Right to Confidentiality

During the handling of the case, it will be ensured that your identity as the reporting person is treated confidentially and that access to the case is prevented for unauthorized personnel. We will not disclose your identity without your consent unless required by law, and we will ensure that you are not subjected to retaliation.

### 4.2 Protection Against Retaliation

When whistleblowing, there is protection against negative consequences from having reported a misconduct, in the form of a prohibition against retaliation. This protection also applies in relevant cases to people at the workplace who assist the reporting person, your colleagues, relatives at the workplace, and legal entities that you own, work for, or are otherwise affiliated with.

This means that threats of retaliation and attempts at retaliation are not allowed. Examples include if you were to be fired, have your job duties changed, be subjected to disciplinary actions, threatened, discriminated against, blacklisted within your industry, or similar due to having blown the whistle. Even if you are identified and subjected to retaliation, you are still covered by the protection, provided you had reasonable grounds to believe that the reported misconduct was true and within the scope of the whistleblower law. However, note that protection is not granted if it is a crime in itself to acquire or have access to the information reported.

The protection against retaliation also applies in legal proceedings, including concerning defamation, copyright infringement, breach of confidentiality, violation of data protection regulations, disclosure of trade secrets, or regarding claims for compensation based on private law, public law, or collective labor law, and you should not be held liable in any way as a result of reports or disclosures, provided you had reasonable grounds to believe it was necessary to report or disclose such information to expose misconduct.

### 4.3 Disclosure of Information

The protection also applies when disclosing information. It is assumed that you have reported internally within the company and externally to an authority, or directly externally, and no appropriate action has been taken within three months (in justified cases six months). Protection is also granted when you had reasonable grounds to believe that there would be an obvious risk to the public interest if the information were not disclosed, for example, in an emergency situation. The same applies when there is a risk of retaliation in external reporting or it is unlikely that the misconduct will be effec-

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tively remedied, for example, when there is a risk that evidence may be concealed or destroyed.

However, note that this protection does not apply if you, as the reporting person, release information directly to the media in accordance with an otherwise applicable protection system for freedom of speech and information. You still have whistleblower protection and freedom to acquire information where applicable.

#### **4.4 Right to Review Documentation at Meetings with Case Handlers**

If you request a meeting with a case handler, they will, with your consent, ensure that complete and accurate documentation of the meeting is preserved in a durable and accessible form. This can be done through recording the conversation or by taking minutes. Afterwards, you will have the opportunity to check, correct, and approve the minutes by signing them.

If the conversation was not recorded, the case handler has the right to document the conversation through minutes. Afterwards, you will have the opportunity to check, correct, and approve the transcription by signing it.

We recommend that this documentation be kept on The Whistle's platform by the whistleblower creating a case where the information can be collected securely.

## **5. GDPR and Personal Data Handling**

We always strive to protect you and your personal data. We therefore ensure that our handling of these is always in compliance with the General Data Protection Regulation ("GDPR").

In addition, all personal data irrelevant to the case will be deleted, and the case will only be stored as long as it is necessary and

## **6. Additional Contact Information**

If you have further questions regarding how we handle whistleblowing cases, you are always welcome to contact the case handlers.

For technical questions about the Visslan platform, please create a case at: <https://bstgroup.visslan-report.se>.

If that is not possible, contact The Whistle Compliance Solutions AB, which developed Visslan. Con-

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tact details are provided below.

## 6.1 Contact Details for Case Handlers

### Julia Lundqvist

Assistant Lawyer

Direct: +46 (0)10-209 12 72

Mobile: +46 (0)735- 98 12 21

Email: [jl@vici.se](mailto:jl@vici.se)

Address: Box 1209, 221 05 LUND

### Adam Gullstrand

Lawyer

Direct: +46 (0)10-209 12 67

Mobile: +46 (0)701-41 59 97

Email: [ag@vici.se](mailto:ag@vici.se)

Address: Box 1209, 221 05 LUND

## 6.2 Internal Contacts

### Sofia Söderström

Group Head of People and Culture

Mobile: +46 (0)76-136 07 11

Email: [sofia.soderstrom@bstab.com](mailto:sofia.soderstrom@bstab.com)

Address: Lerkrogsvägen 21, 126 79 Hägersten

These contacts are available for support and to answer any questions you may have related to whistleblowing processes and technical issues with the Visslan platform.

### Patrik Viksten

CFO

Mobile: +46 (0)705-28 48 00

Email: [patrik.viksten@bstab.com](mailto:patrik.viksten@bstab.com)

Address: Lerkrogsvägen 21, 126 79 Hägersten

The above internal contacts may take over the case from the case handlers, regardless of whether the matter is considered a whistleblowing or, for example, a personnel matter.

### **6.3 Contact Details for The Whistle Compliance Solutions AB**

Email: [clientsupport@visslan.com](mailto:clientsupport@visslan.com)

Switchboard number: +46 10-750 0810

Direct number (Daniel Vaknine, CEO): +46 73 540 1019

Visit [Visslan's website](#) for more information about Visslan.