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| <br><b>ZETTERBERGS</b><br><br>PERSONALHANDBOK | Ethic and moral<br><br>Whistleblower policy | Kapitel   | <b>PH 10.9</b> |
|   |   | Blad      | 1(3)           |
| Utfärdad av: Gabriella Hellman  |   | Utgåva nr | 1              |
|   |   | Datum     | 2023-03-22     |

## Whistleblower policy

At Zetterbergs Industri, we strive to have an open and transparent workplace, where misconduct should not occur. It is therefore important to us that there is clear information on how to report confidentially and securely. By making reporting easy, we work together to promote employee, customer and public trust in us. We expect our employees and partners who are concerned about the company's conduct to raise this with us.

The intent of this policy is to encourage staff to report cases without risk of victimization or discrimination. This policy enables staff to raise serious suspicions of impropriety in, or related to, the company.

This policy applies to all employees of Zetterbergs and business partners.

The policy clearly states that if any impropriety committed by the company or any of their employees, consultants, contractors or suppliers is reported, then Zetterbergs will initiate an investigation and thoroughly investigate and implement corrections. We will also review how irregularities can be prevented in the future.

### Definitions:

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#### Whistleblower

Whistleblowing involves bringing potentially illegal and/or unethical activity, also known as impropriety, to management's attention.

#### Irregularity

- Irregularities include all illicit and illegal behaviour, eg.
- An unlawful act, civil or criminal
- Failure to comply with a company policy
- Knowingly violating a country's local laws or regulations
- Questionable bookkeeping or accounting and fraud
- Activities that may cause damage to persons or property
- Failure to correct, or take reasonable steps to report, a case likely to cause substantial and unavoidable cost or loss to the Company
- Abuse of power or position for an unauthorized purpose
- Unfair discrimination, such as discrimination based on age, race, sex, religion, sexual orientation, marital status, parental status, political opinions or ethnic background for employment or use of services
- Conflicts of interest

This is a list of examples of the types of behavior that may be considered misconduct.

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## Protection

An employee who discloses an impropriety or raises concerns will be protected by this policy if the employee;

- Discloses information in good faith
- Believe it is mostly true
- Not acting with malice or making false accusations
- Not seeking personal or financial gain

## Process:

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Anyone with complaints or concerns should be reported via our reporting function on our website. HR will be the recipient of the information. If the complaint concerns HR, you can report directly to one of the people below.

Michael Thorén Zmudzin production manager michael.thoren@zetterbergs.se, 0292-705 59

Lars Erfäldt CEO lars.erfaldt@zetterbergs.se, 0292-705 06

Reporting takes place via link; <https://zetterbergs.se/visselblasare/>

## Response:

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Zetterbergs will act on all reports that come in.

Where possible, the matter may;

- Investigated by management, the board, internal audit or as a disciplinary matter
- Forwarded to the police or other legal authorities
- Forwarded to independent auditor
- Be the subject of an independent investigation


In order to protect the individuals involved and the suspects from alleged wrongdoing, an initial investigation will be conducted to determine whether the investigation is needed, and if so, what form it should take. If urgent action is required, it will be taken before an investigation is carried out.

Within ten working days of a report being received, HR will communicate back to you to;

- Confirm that the matter has been received
- Indicate how the case will be handled
- Give an estimate of how long it will take to reach a final solution
- Announce whether an initial investigation will be carried out
- Notify you if further investigations will take place, and if not, why

The number of contacts between you and HR regarding the matter will depend on the nature of the matter and how clear the information you provided.

Zetterbergs will take measures to facilitate your situation in the matter.

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Zetterbergs will confirm all reports received, and assure that the matter has been dealt with, subject to legal obstacles.

### Other:

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#### Time estimate

Reports will be investigated as quickly as possible. It may be necessary to pass the case on to an external investigator, which may extend the investigation time. A serious and more complex case can also result in a prolonged process. The company will try to inform early on how long the investigation will take.

#### Prevent blaming, negative discrimination and harassment

Zetterbergs will not tolerate anyone trying to subject a person who has raised a serious report for the company to negative special treatment or discrimination. Any discrimination will be dealt with promptly with disciplinary action.

#### Anonymity

Zetterbergs will respect a whistleblower's anonymity in a case received where the whistleblower requests it. Anonymous complaints are difficult to follow up and confirm, if the person does not want to give their name at a later stage.

#### False and malicious allegations

Zetterberg's goal is to continue to maintain our honesty. We ensure sufficient resources to investigate the cases we receive. However, it is extremely important that the notifier ensures that you are sincere in your report. The Company will view any knowingly false or malicious allegations made by an employee as serious, which may result in disciplinary action and/or employment law action.

#### Questions or concerns

If there are questions or concerns about this policy, you are welcome to contact our HR manager. Gabriella Hellman, [gabriella.hellman@zetterbergs.se](mailto:gabriella.hellman@zetterbergs.se), 0292-705 44