

# Whistleblower policy

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### 1. Background

Inission strives to have an open business climate, high business ethics and well-being employees. Our employees, customers and suppliers are our most important sources of insight into any shortcomings that need to be corrected. As we are a values-driven business, we want you who suspect that there are misconduct of public interest in our business to be able to whistleblow about these without fear of reprisals. You can choose to report anonymously. To protect whistleblowers and ensure that we meet our requirements under the so-called Whistleblower Act, we have established this whistleblower policy and a whistleblower function.



#### 2. Policy

#### 2.1 What does it mean to "whistleblow"?

To whistleblow means that you draw Inission's attention to irregularities in the public interest and misconduct due to violations of EU law.

## 2.2 Who can report via the whistleblower function?

The whistleblower function can be used by those who, in a work-related context, have received or obtained information about misconduct that is either of public interest or constitutes a violation of EU law.

The reporting function can thus be used by:

- employees (regardless of their current and former form of employment, including jobseekers)
- others who are or have been at Inission's disposal to perform work (such as temporary staff, trainees and other contractors)
- others who are or have otherwise been active within Inission (such as board members and shareholders at the disposal of the business) The whistleblower function can thus be used

In order for you to be covered by the Whistleblower Act's protection against reprisals, you must, among other things, be included (or have been included) in one of the above-listed categories of persons and have been informed of the reported misconduct in a work-related context.

# 2.3. What can be reported via the whistleblower function?

Via Inission's whistleblower function, you can report on:

- 1) maladministration in the public interest;
- 2) misconduct due to breaches of EU law

A "misconduct" can refer to intentional or negligent action or action or omission. A misconduct can also relate to a pure accident. A misconduct does not have to be ongoing, but may have ceased or been completed. That a misconduct should be of "public interest" means that the irregularity must concern the public and that the public must have a legitimate interest in being informed of the irregularity in order to, for example, remedy the irregularity or take protective measures in relation to the irregularity.

to report on:

- violations of law or regulation (such as bribery, accounting offences, violations of accounting and tax laws, environmental crimes, violations of competition laws or data protection laws)
- mismanagement of public funds (such as in connection with public procurement)
- serious irregularities affecting the life and health of individuals;
- deviations from Inission's externally communicated internal rules and policies, which may confer an advantage on Inission in terms of competition;
- actions that violate Inission's Code of Conduct

In order for you to be covered by the Whistleblower Act's protection against reprisals, you must, among other things, have reasonable grounds to assume that what you report is true.

## 2.4 What should not be reported via the whistleblower function?

Only information about irregularities that constitute misconduct either in the public interest or due to breaches of EU law can be reported via the whistleblower channel.

Information relating to individual working or employment relationships, such as information about discrimination, harassment, dissatisfaction with pay, benefits or tasks, work environment problems, cooperation problems and the like, must be reported to the respective company's human resources department or to its manager.

Information about any errors in the service provided and complaints must instead be reported to the respective company's quality department. If you use the whistleblower function to report anything other than misconduct that can be reported via the

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whistleblower function, what is reported will not be handled according to this whistleblower policy but according to the relevant procedure.

# 2.5 How is reporting done via the whistleblower function?

In order for you to feel confident in reporting misconduct, reporting takes place through a reporting tool provided by an external and independent party. The reporting tool is encrypted and password protected.

You do not need to disclose your identity in connection with reporting. You can choose to report in writing or orally as follows:

- Reporting tools: https://inission.whistlelink.com/
- 2) Phone: +46 54 77 19 305
- Physical meeting: You can schedule a physical meeting either by phone or via the reporting tool Each Recipient is authorized to

When you report; Remember to describe all circumstances, even those that you think are less important. You can also upload materials and documents. Incomplete reports may mean that it is not possible to investigate what has been reported and that appropriate measures cannot be taken to address what has been reported. If you report via the reporting tool; Make a note of the case number, the case-specific code, your personal login and password. You will need these in order to, among other things, be able to take part in the acknowledgement of receipt and feedback on your report.

#### 2.6 Who receives the whistleblower report?

All whistleblower reports are initially received by our external recipient lzefy. Izefy reviews a report received and then distributes it to one of the following persons appointed by Inission (each a "Recipient")

- 1) Petra Bachmann, HR-chef
- 2) John Granlund, CFO

If the matter relates to any of the above, the matter is only sent to the other person and to the Chairman of the Audit Committee:

Margareta Alestig

investigate the circumstances that have been reported (which includes communicating with you), following up on what has been reported and providing feedback to you. If external expertise is needed, Inission can also hire an external actor with extensive experience of whistleblower cases and related investigations.

# 2.7 Acknowledgement of receipt of whistleblower report

Within seven days of reporting through the reporting tool, you will receive an acknowledgement from the Recipient that the report has been received, unless you have opted out of further communication. To access the acknowledgement of receipt and to be able to communicate with the Recipient, you can log in to the reporting tool with your personal login and password, the case number and the case-specific code.

In the case of oral reporting, receipt of the report is confirmed in connection with the telephone call or the physical meeting.

#### 2.8 Follow-up and feedback of report

The recipient makes an initial assessment of and follows up on what has been reported. In connection with this, the Recipient may need to contact you. Although you are not obliged to participate in such follow-up contacts, failure to respond to any follow-up questions may result in the report not being investigated and appropriate action not being taken.

You can follow up on your case via the reporting tool, provided that you have entered your personal login and password, as well as the case number and case-specific code that you received in connection with reporting. Please log in regularly to the reporting tool, as the Recipient may need to ask you supplementary questions, and in some cases want to act quickly.

No later than within three months from the date on which you received confirmation that your report has been received, the Recipient will report back on the status of the matter and inform you of the actions taken in response to the report, unless you have opted out of further communication. In the case of written reporting via the reporting tool, feedback is provided directly in the reporting tool. In the case of verbal reporting, feedback is provided by the Recipient via the form of communication that you

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agreed with Izefy in connection with the reporting. The recipient will also inform the Board of Directors, via the Audit Committee, of its assessment and handling of the reported.

#### 2.9 Personal data

We take great care of the protection of personal privacy. Personal data that occurs in cases in the whistleblower function is processed in accordance with the Whistleblower Act. This means, among other things, that personal data is deleted no later than two years after the case has been closed, unless otherwise stated in other legislation.

Any personal data received through the whistleblower function in connection with the reporting of circumstances that do not relate to misconduct either in the public interest or due to a breach of EU law, is processed in accordance with the applicable legislation at any given time. Otherwise, reference is made to Inission's personal data policy.

#### 2.10 Missbruk

It is important that you do not report anything other than misconduct that you have reasonable grounds to believe are true.

We take seriously any intentionally false or malicious allegations and may take disciplinary action against you if you maliciously accuse someone else, without having reasonable grounds to believe that the reported information is true.

#### 2.11 Extern rapportering

Misconduct in the public interest or misconduct due to a breach of EU law can also be reported externally to a competent Swedish authority and, in some cases, to the EU institutions, bodies or authorities. Further information about external reporting can be found via the External reporting link.

#### 3. Target audience

This policy applies to all units within Inission.

#### 4. Roles and responsibilities

The CEO is responsible for this policy. The policy is revised annually.

#### 5. Exclusions

Exceptions to this policy shall be approved by Inission's CEO.

#### 6. Proof of compliance

• Reporting to the Audit Committee of matters received.



### 7. Associated documents

- Personalpolicy
- Staff guidelines
- The Code of Conduct