



# GARO GROUP

## Whistleblowing Policy

GARO AB and its affiliates (or the "Company") (Corp. Reg No. 556051-7772)

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# Table of contents

- 1. INTRODUCTION ..... 3
- 2. PURPOSE & RESPONSIBILITY ..... 3
- 3. SCOPE ..... 3
- 4. COMMUNICATION ..... 3
- 5. WHISTLEBLOWING ..... 4
  - 5.1 General ..... 4
  - 5.2 What can be reported? ..... 4
  - 5.3 Who can report? ..... 4
  - 5.4 How to report ..... 5
  - 5.5 Reporting guidance ..... 5
  - 5.6 Governance and handling of reports ..... 6
  - 5.7 Confidentiality and protection ..... 6
  - 5.8 Feedback ..... 7
  - 5.9 Matters not covered by this policy ..... 7
  - 5.10 Reporting in external whistleblowing channels ..... 7
- 6. How personal data is processed ..... 8
- 7. Violation, review and contact ..... 8



## **1. INTRODUCTION**

GARO Group is committed to conducting its business in a responsible, ethical and transparent manner. The Group has established codes of conduct, policies and guidelines that define how we act and make decisions as a company.

An open and responsible corporate culture is essential. GARO encourages employees and other stakeholders to raise concerns and address issues through dialogue whenever possible.

However, there may be situations where individuals do not feel comfortable reporting concerns through normal channels. To ensure that serious concerns can always be reported safely and confidentially, GARO provides a Whistleblowing system that allows individuals to report suspected misconduct or irregularities.

The whistleblowing system is designed to ensure independent, objective and confidential handling of reported concerns.

## **2. PURPOSE & RESPONSIBILITY**

The purpose of this policy is to provide a clear framework, guidance and tools for reporting suspected misconduct, serious irregularities or breaches related to GARO's operations without fear of retaliation.

Managers within the GARO Group are responsible for ensuring that employees are aware of and understand this policy.

All reports submitted through the whistleblowing system shall be handled confidentially, objectively and in accordance with applicable laws and internal procedures.

## **3. SCOPE**

This policy applies to the operations of GARO AB and all of its subsidiaries and to individuals who have obtained information about potential misconduct in a work-related context.

## **4. COMMUNICATION**

This policy shall be communicated and made available to relevant stakeholders. Managers within the GARO Group are responsible for ensuring that clear and easily accessible information on how reporting is made via the internal reporting channels is provided to all relevant stakeholders.

For GARO employees, the policy is available on the company intranet. For stakeholders, the policy will be available on the Group's websites or communicated through relevant contractual documentation, such as supplier agreements.



## **5. WHISTLEBLOWING**

### **5.1 General**

GARO aims to maintain a transparent business environment, high ethical standards and a culture where concerns can be raised without fear of retaliation.

Employees and other stakeholders are encouraged to raise concerns through normal dialogue with managers whenever possible. However, certain situations may require a secure and confidential reporting channel.

For this purpose, GARO provides a whistleblowing system (internal reporting channels) that allows individuals to report suspected misconduct or serious irregularities in a confidential manner and, where permitted by law, anonymously.

Reports submitted in good faith will be taken seriously and handled objectively and confidentially.

### **5.2 What can be reported?**

The whistleblowing system is intended for reporting serious misconduct or irregularities of public interest and acts and omissions in breach of EU union acts, related to GARO's operations.

Examples include:

- Unlawful activities
- Financial crime such as bribery, corruption, fraud, theft or accounting irregularities
- Serious conflicts of interest
- Discrimination, harassment or other serious violations of workplace integrity
- Serious environmental violations
- Serious breaches of health and safety regulations
- Other misconduct that may significantly harm the company, individuals or society.

These examples are not exhaustive. If you are uncertain whether a matter should be reported, you are encouraged to submit a report.

### **5.3 Who can report?**

Reports may be submitted by individuals who have obtained information about potential misconduct in a work-related context.

This includes:

- Members of the Board of Directors
- Employees
- Trainees, volunteers and job seekers
- Consultants and self-employed persons
- Customers



- Suppliers and their subcontractors
- Other stakeholders connected to GARO's operations.

## 5.4 How to report

Concerns may be reported through the following channels:

### Internal reporting

Concerns may be raised through normal management channels, such as a direct manager or another appropriate manager within the organisation. If a concern of serious misconduct is raised, it is the duty of the manager to direct the information to the whistleblowing system.

### Whistleblowing system

Reports of serious misconduct should always be submitted through GARO's confidential whistleblowing system. Reporting within the whistleblowing system can be made either verbally or through GARO's web-based whistleblowing platform.

Reporting is made verbally by contacting the following authorized individuals personally or by telephone:

*CHRO GARO, Karin Wigert, +46 70 327 20 59*

*Chairman GARO, Axel Barnekow Widmark, +46 76 830 70 77*

*Manheimer Swartling, Madeleine Rydberger, +46 40 698 58 70*

Reporting is made via the web-based platform by using the following [link](#).

Reporting can also be made by requesting a physical meeting. A physical meeting may be requested by contacting either of the persons stated above or by submitting a request via web-based platform.

## 5.5 Reporting guidance

Individuals submitting a report do not need to provide proof of misconduct. However, reports should be based on reasonable suspicion and made in good faith.

Reports should contain as much relevant information as possible, for example:

- which GARO company the report concerns
- who is involved
- what has happened
- when and where the incident occurred
- whether the issue is ongoing or a single event
- whether documentation or other evidence exists
- any other information that may assist the investigation

Deliberately false accusations or reports made with malicious intent are not acceptable.



## 5.6 Governance and handling of reports

GARO has established a governance structure to ensure independent, confidential and objective handling of whistleblowing reports.

### Whistleblowing function

A designated whistleblowing function of each legal entity within the Garo Group consisting of authorized individuals is responsible for receiving and handling incoming reports.

The function performs an initial assessment to determine:

- whether the report falls within the scope of the whistleblowing system
- whether immediate measures are required
- whether a formal investigation should be initiated

Access to the whistleblowing system is restricted to authorized individuals only.

### Investigation process

Where further examination is required, an investigation will be initiated.

Investigations are conducted by the authorized individuals of the whistleblowing function but may also involve designated internal experts, such as compliance, legal or HR representatives, or external independent investigators, as deemed necessary and appropriate to assess the accuracy of the statements made in the report.

All investigations shall be conducted objectively and confidentially.

Individuals who are the subject of a report, or who may have a conflict of interest, shall not participate in the handling or investigation of the case.

### Board oversight

Overall oversight of the whistleblowing system is exercised by the Board of Directors.

The Board of each GARO legal entity receives periodic anonymized reports regarding:

- the number and nature of reported cases
- the status of investigations
- identified systemic risks or control weaknesses.

## 5.7 Confidentiality and protection

Reports may be submitted anonymously where permitted by law. Providing contact information is voluntary but may facilitate the investigation.

GARO's web-based whistleblowing platform, is provided by *Hailey HR*. The application ensures that confidentiality of the report can only be accessed by authorized individuals. These individuals cannot decrypt or read messages exchanged in the application or otherwise identify the reporting person.



All whistleblowing reports will be handled confidentially. Your identity will be treated with strict confidentiality by the authorized individuals. The authorized individuals handling the report and any investigation, may not disclose information that may reveal your identity, other than for authorized purposes. If information that can identify you is proposed to be lawfully disclosed (for instance, if deemed necessary to undertake the investigation or other measures), you will be informed hereof (if contact information have been provided), unless this would obstruct or impede the purpose of the investigation or measures.

GARO does not allow any form of retaliation against anyone who in good faith reports a suspected misconduct in accordance with this policy. GARO does not tolerate any form of retaliation against persons who report concerns or participate in investigations.

This policy does not restrict any rights of a reporting person under the constitutional freedoms of providing and retaining information (*Sw. meddelar- och anskaffarfrihet*).

## **5.8 Feedback**

The reporting person will receive confirmation that the report has been received, within seven days of the report (unless the reporting individual has declined such confirmation or there is reason to believe that a confirmation could reveal the identity of the reporting person).

If contact information has been provided, GARO may request additional information to facilitate the investigation.

Within the limits of confidentiality and applicable data protection rules, appropriate feedback will be provided to the reporting person regarding investigative measures taken. Such feedback will be provided within three (3) months from when the report was received. A notification will also be provided when the investigation is complete.

## **5.9 Matters not covered by this policy**

The whistleblowing system is intended for reporting serious misconduct as set out above.

The following matters should normally be addressed through ordinary management or HR processes:

- general dissatisfaction with working conditions
- complaints regarding salary or benefits
- interpersonal conflicts not involving serious misconduct
- performance management or workplace feedback

## **5.10 Reporting in external whistleblowing channels**

You also have a right to report suspected misconduct to any of the external whistle-blower channels established by local authorities or EU institutions, bodies, offices or agencies. These authorities are tasked with receiving, following up and providing feedback on reports of malpractice within a designated area of responsibility.



A list of Swedish authorities, their areas of responsibility and contact information for the external whistle-blower channels can be found [here](#).

## **6. How personal data is processed**

Information on how personal data is processed and information on the data controller of personal data processed in the whistle-blower channel can be found [here](#).

## **7. Violation, review and contact**

Violations of this policy may result in disciplinary measures in accordance with applicable laws and internal procedures.

This policy shall be reviewed regularly to ensure compliance with applicable legislation and best practices.

Questions regarding this policy may be directed to Sustainability Manager, Andreas Olsson, at [Andreas.olsson@garo.se](mailto:Andreas.olsson@garo.se) or call +46 370 332 800.