**Whistleblowing Policy**

This policy is translated from Swedish.

1. **Introduction**

Our company strives to achieve and maintain an open business climate and high business ethics. Our employees are our most important source of insight for revealing possible misconduct that needs to be corrected.

The purpose of this policy is to encourage employees to report matters without any risk of subsequent victimisation, discrimination or disadvantage, and to ensure appropriate handling of the investigation. This policy aims to ensure that serious concerns are properly raised and addressed within our company.

Whistleblowing provides a means for all employees to report suspicions of misconduct, that is, actions not in line with our company values and policies, and that may harm individuals, our company or the environment. Our whistleblowing scheme is an early warning system to reduce risks. It is an important tool for safeguarding high standards of corporate governance and maintaining customer and public confidence in our business.

Whistleblowing matters will always be handled confidentially at the whistleblower’s request. We also offer an anonymous reporting channel which is provided by an external partner, the Whistleblowing Centre. The Whistleblowing Centre ensures anonymity and secure handling of whistleblower reports.

1. **When To Use Whistleblowing?**

All employees are equally entitled to express misgivings. Our whistleblowing scheme can help alert us to serious risks affecting individuals, our company or the environment, such as:

* deficiencies regarding accounting, internal accounting controls and auditing matters, failure to fight

against bribery and/or banking- and financial crime, or

* other serious improprieties concerning the company’s or the group’s vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies as regards the security at the place of work and very serious forms of discrimination or harassments.

Please note, there are restrictions on the use of a whistleblowing scheme in certain countries. The whistleblowing policy follows Swedish law and EU data protection regulations. When there is a whistleblowing case the national regulations on whistleblowing will be respected.

For issues relating to dissatisfaction at the work place, please contact your supervisor or manager.

1. **How to express misgivings?**

If an employee becomes aware of an issue or behaviour that is not in line with our company values and policies, different ways of reporting are available; please see *Alternatives 1-3* below.

A potential whistleblower does not need to have firm evidence of malpractice before expressing a misgiving. However, reports should be submitted honestly and in good faith.

We encourage whistleblowers to submit reports openly. Whistleblowing reports and discussions will remain confidential at all times if the whistleblower requests this. However, if the whistleblower prefers to be anonymous, we also offer an anonymous reporting channel.

**How to express misgivings:**

* **Alternative 1: Report to your manager or another manager within our organisation**
* **Alternative 2: Report to the Whistleblowing Investigation Officer**

Rebecka Thörn, lawyer

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* **Alternative 3: Report anonymously through the whistleblowing reporting channel,** https://report.whistleb.com/NIBE and fill in **NIBE** as company code.

If an employee wishes to make an anonymous report, this is possible through the external web-based whistleblowing channel. The whistleblowing channel is administrated by the Whistleblowing Centre, an external and impartial partner that safeguards anonymous handling of whistleblowing reports.

The identity of the whistleblower will not be requested at any stage of the process. All information, reports and follow-up questions are encrypted and password protected.

**False and malicious allegations**

A whistleblower should be sincere. No allegations should be made maliciously or with the knowledge that they are false. Abuse of the system, that is, deliberate reporting of false or malicious information by any employee, is a serious disciplinary offence and may result in disciplinary action, including dismissal.

1. **The investigation process**

**The Whistleblowing Team and responsibilities**

Access to whistleblower reports through our anonymous whistleblowing channel is restricted to our Whistleblowing team. Every member of the team is bound by a confidentiality agreement which states that all whistleblowing cases must be handled confidentially. In case of an investigation, the team may include other people and request information and expertise, also in confidence.

**The Whistleblowing Team**

**Head of Whistleblowing team:**

Per-Ivar Svensson, lawyer

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**Whistleblowing Investigation Officer:**

Rebecka Thörn, lawyer

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**Receiving a report**

All reports will be treated seriously and according to this policy.

Upon receiving a report, the Whistleblowing Investigation Officer (WIO) decides whether to accept or decline the report. If the report is accepted, appropriate measures for investigation will be taken, please see *Investigation* below.

The Whistleblowing Investigation Officer may decline to accept a report if:

* the alleged conduct is not reportable conduct under this policy;
* the report has not been made in good faith or is malicious;
* there is insufficient information to allow for further investigation;
* the matter of the report has already been solved.

Potentially intrusive information of a personal nature, such as health, political, sexual, or religious beliefs will not be included in an investigation.

Please note, there are restrictions on the use of a whistleblowing scheme in certain countries. Our Whistleblowing team is responsible for correct handling of all reports. If a report includes issues not covered by the scope of the whistleblowing policy, the Whistleblower Investigation Officer should take appropriate actions to solve the problem.

**Investigation**

All accepted reports of alleged misconduct will be subject to a thorough investigation in accordance with this policy. The Whistleblowing team will review the report and determine the appropriate manner of investigation.

* All whistleblowing reports are handled confidentially.
* A report will not be investigated by someone who may be concerned or connected with the misgiving.
* The Whistleblowing team will, when needed, submit follow-up questions via the anonymous reporting channel. This anonymous dialogue is enabled by the external part, the Whistleblowing Centre, to protect the anonymity of the whistleblower.
* No one from the Whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower by any means.

**Information to the Whistleblowing team when there is an open report to a site manager**

Site manager receiving a whistleblowing case should immediately inform the Whistleblowing Investigation Officer (Rebecka Thörn).

**Whistleblower protection in the case of non-anonymous whistleblowing**

If a whistleblower expresses a genuine misgiving under this policy, he/she will not be at risk of losing his/her job or suffer any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided he/she is acting in good faith.

The whistleblower’s identity will be kept confidential at all stages of the process and, in particular, will not be disclosed to any third parties, to the person specified in the report or to the employee’s line manager. If the whistleblower chooses not to be anonymous, he or she will be informed of how the investigation will proceed.

Unless it is inappropriate to do so, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations, subject to considerations of the privacy of those against whom allegations have been made and any other issues of confidentiality.

In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

**Protection of, and information to, a person specified in a whistleblowing report**

The rights of the individuals specified in a whistleblowing report are subject to applicable data protection laws. Such individuals will receive information regarding the details of the processing of their personal data. However, such information will not contain any details regarding the identity of the person leaving the report. Individuals specified in a whistleblowing report may always request that inaccurate or incomplete personal data is corrected.

These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the report.

**Reporting of findings**

At the end of the investigation, the Whistleblowing Investigation Officer will report the findings to the Head of Whistleblowing team and to the Managing Director.

In the event that the Managing Director or Head of the Whistleblowing team, or both, are subject to an investigation or allegation, the Chairman of the Board of Directors of NIBE Industrier AB (publ), or other person appointed by the company, will receive the report and decide on corrective measures.

Statistics on whistleblowing cases will be presented to the Board of Directors on a regular basis.

**Deletion of data**

All whistleblowing reports will be deleted when no longer needed for investigation and enforcement purposes. Deletion will be made within 30 days after the investigation have been closed.

Documentation from investigation that is not erased may not contain any personal data and should therefore be anonymised; name and address must be removed together with any other information which directly or, in conjunction with other data, indirectly could identify the person.

The Whistleblowing team has the right to retain documentation relating to a closed whistleblowing case in order to fulfil the requirements of lawyers regarding documentation. According to the attorney ethics rules confidentiality under law applies.

**Personal Data Controller**

NIBE Industrier AB (publ.) is personal data controller for personal data processed in the whistleblowing scheme.

1. **Policy Review**

The Whistleblowing policy will be reviewed periodically by the Whistleblowing team. A report will be made to the board of the outcome of each review.

1. **Legal basis of the Policy**

This policy is based on the Swedish Personal Data Act (*In Swedish: Personuppgiftslagen, PUL*) and the guidelines from the Swedish Data Inspection Board on whistleblowing (*In Swedish: Datainspektionens föreskrift rörande whistleblowing, DIFS 2010:1*).

1. **Need for registration of the whistleblowing scheme?**

The whistleblowing scheme does not need to be registered with the Swedish Data Inspection Board.

Please note, there are national variations on the need for registration of a whistleblowing scheme.

1. **Transfer of Personal Data outside the EEA**

There is a general prohibition on the transfer of personal data out of the European Economic Area (EEA) unless specific mechanisms are used to protect data.

Personal data processed in the whistleblowing scheme will not be transferred outside the EEA.

**About the Whistleblowing Centre**

The Whistleblowing Centre offers an impartial full-service whistleblowing solution for monitoring business ethics.

Information in the external web-based reporting channel is encrypted and password-protected and can only be accessed by persons authorised by the company.

The anonymous whistleblowing channel is a complement to the company´s regular reporting channels and should be recognised as an important part of the company´s strive for an open business environment, where ethical conduct is highly valued. The Whistleblowing Centre service constitutes an adequate preventive procedure, as stipulated in stronger legislation on anti-corruption.

**Additional information**

Swedish Data Inspection Board

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