



DELLNER GROUP

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## Our Whistleblowing Policy

Dellner Group's ambition is to be a global leader in the supply of products and services in the Polymer, Rail Brake, Glass, Braking and Hydraulic, Wind and Cylinders industrial segments. We are committed to doing business ethically and in accordance with sustainability principles. Our values and ethics are a valuable asset, and we strive to have an open business climate, high business ethics and always see opportunities for improvement. Detecting and correcting behaviour that runs counter to Dellner's values and Code of Conduct (the Code) is an important part of this commitment, in building trust and foster a culture where people feel comfortable to speak up and report actual or suspected violations of the Code.

This will be achieved through:

- implementing and maintaining appropriate channels to report, actual or suspected violations of the Code.
- ensuring that the channels allow for anonymous reporting as well as both oral and written reporting.
- ensuring that reports are taken seriously and investigated objectively and impartially by investigators of sufficient independency and autonomy.
- safeguarding that reports and investigations are treated confidentially and that personal data collected as a result thereof is protected in accordance with applicable privacy laws.
- keeping the reporter informed about the progress and, as reasonable, the outcome of the investigation.
- implementing appropriate corrective actions where the investigation is substantiated.
- monitoring and reporting statistics to Group Management and the Board of Directors
- protecting anyone who reports in good faith from any form of retaliation and taking measures against any instance of detected retaliation.
- providing clear, correct, and comprehensive information about available reporting channels and investigation practices.

Dellner employees and managers should report known or suspected breaches of the Code. To report a known or suspected breach of the Code employees should first consult local management, human resources or legal where appropriate.

Dellner has set up a Whistleblowing system where anyone who suspects serious suspected wrongdoings that may be in the public interest may report. The Whistleblowing system is provided by an independent third party called 2Secure. Reporting through the system allows employees and external stakeholders to remain anonymous.

To file a report in the 2Secure system, the reporter can visit [www.dellnergroupp.com](http://www.dellnergroupp.com) where a link to 2secure can be found or visit the 2secure website direct at [wb.2secure.se](http://wb.2secure.se). To file a report through 2Secure, the reporter will be required to enter the Dellner's company code, "**OKW080**". The 2Secure system will then give guidance on how to fill in the report. The reporter should save the individual code received which will allow the reporter to log on and follow up on the report and answer any follow-up questions. Dellner's Whistleblowing Policy is available at [www.dellnergroupp.com](http://www.dellnergroupp.com).

## About Whistleblowing

### What can be reported

- The law applies when reporting a misconduct in a work-related context where there is a public interest in disclosure.
- The law also applies when reporting misconduct in a work-related context in accordance with Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of Union law.

If the report does not fall within the scope of the above, the matter shall be reported in accordance with the Dellner's internal guidelines, policies or procedures.

### Who can report?

Any person who, through their work, has come into contact with a suspected misconduct can make a report, such as employees, volunteers, apprentices and trainees, persons performing work under the control and direction of an operator (e.g. hired consultants), shareholders active in the company, self-employed persons, persons who are members of the administrative, management or supervisory bodies of a company.

### How to make a report?

Option 1: Report to a manager, local management, human resources, legal or group management.

Option 2: Report anonymously through the whistleblowing reporting tool as instructed below.

### The reporting tool

You can go to [wb.2secure.se](http://wb.2secure.se) and report it your different ways, reference. Follow the instructions and when prompted, fill in our DELLNER GROUP company code: **OKW080**

2. Make a report via telephone: call **+ 46 77-177 99 77** to talk to 2Secure directly. They are open to receive calls 24 h/day every day of the year and speak English and Swedish.
3. Save the case number you receive in connection with making your report as this will allow you to log in to the system and follow your case anonymously.

#### a. Who receives the report

In whistleblowing cases, Dellner cooperates with 2Secure, an external and independent actor. All reports are received and handled by 2Secure officers. They have extensive experience in investigations and have global capacity if needed. 2Secure works in consultation with the Dellner's Whistleblower Committee. All assessments and decisions on actions are made by the Dellner's Whistleblowing Committee.

### Feedback

After registering a report, the whistleblower can log in again with his/her login details to see any follow-up questions/comments from the 2Secure administrator. The report can be followed up via [wb.2secure.se](http://wb.2secure.se) if the whistleblower has saved the case number and password generated when the report was made.

## **Handling of personal information**

When using the whistleblowing service, you can remain anonymous. Dellner takes the protection of personal integrity very seriously. Below is a summary of some important points regarding the General Data Protection Regulation.

### **Personal data**

At all times, Dellner is obliged to comply with the legislation regarding the handling of personal data. It is important that you feel safe when providing information about yourself and others in the whistleblowing system. We take the protection of personal integrity very seriously.

### **Anonymity**

As a whistleblower, you can choose whether to provide your contact details or remain anonymous. Either way, all reports are taken seriously. For our external caseworkers, it may facilitate further work if we can contact you for additional information; therefore, contact details will be requested. However, it is always completely voluntary to provide this information.

No IP addresses are recorded, and the system does not use cookies. However, if you use a computer connected to the Dellner, the internet log may show that you have visited the page where the notification is made. If you do not want this to be visible, use a computer that is not connected to the Dellner's network, or a personal smartphone or tablet.

### **Responsibility for personal data**

Dellner and the respective subsidiaries where the person notified is employed are responsible for the processing of personal data according to law.

### **Purpose of the registration**

The personal data will only be used to carry out the investigation of what has been reported to the whistleblowing system. In the whistleblowing guidelines, you can read about the type of misconduct that can be reported. The Swedish Authority for Privacy Protection regulates when people other than public authorities may handle personal data about violations of the law. If a report is received that cannot be processed in the whistleblowing service because of this, or if the misconduct is not serious enough to be handled in the framework of whistleblowing, the case will be closed, and all personal data will be deleted. You will receive a message in the whistleblowing system that this assessment has been made and information on where you can turn with your case instead.

### **Who receives the personal data?**

Personal data will only be used by the investigative function of Dellner's Whistleblowing Committee and the external company assigned to receive the report. The data is only accessible to persons working on the report in question. The investigation may be handed over to the police or another authority, such as the Swedish Economic Crime Authority or the relevant country authority.

**What personal data is recorded?**

Initially, the information you provide as a reporter is registered. During an investigation, the information needed to investigate the case will be registered, which primarily includes name, position and suspicion of the misconduct that forms the basis of the report. Information will then be obtained from the sources deemed necessary to investigate the misconduct.

**How long is the personal data kept?**

Personal data is usually deleted three weeks after the case is closed, but not more than 2 years after closure if there are special reasons.

**Information to the reporter**

A person reported in the whistleblowing service will receive specific information about it. If it could jeopardize the further investigation, the information will not be provided until it is deemed that there is no longer any such danger. During this time, no extracts from the register will be provided.

**Extracts from registers**

As a whistleblower, you have the right to receive information about the personal data registered about you in the whistleblowing service. Such a request for a register extract must be in writing and signed. Send it to 2Secure, Data Protection Officer, Box 34037, 10026 Stockholm. If any information is incorrect, incomplete, or misleading, you have the right to have it corrected upon request. A registry extract to the notified person will not contain information that would identify you as a whistleblower. The information may therefore be summarized.