



ROWICO HOME

# WHISTLEBLOWER POLICY

**ROWICO**

H O M E



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## Purpose

This document describes how whistleblowing is handled within Rowico Home and how reports of suspected misconduct are made and investigated. The policy aims to promote a transparent and responsible work environment and to protect the person who reports irregularities. This policy applies to all employees, consultants, interns and others with a relationship with the company. Suppliers, subcontractors, and business partners of Rowico Home who have become aware of irregularities within Rowico Home can also report. All reports will be treated in the same way and with the same protection as stated in this policy.

## What can be reported

If you suspect irregularities or a violation of law or regulation, we encourage you to report it to us as a whistleblower case. When reporting, it is important that at the time of reporting, you had reasonable grounds to believe that the information you provided about the irregularity was true. Any report by this policy must be well thought out and sincere, with the understanding that all allegations and information provided are truthful. You may report information about irregularities that have occurred in a work-related context and are of public interest. For other personal complaints that are not of public interest, such as disputes or issues related to the workplace or work environment, we encourage you to contact your immediate manager, their manager or HR. This will help ensure that these issues are handled most effectively. You may also report material deviations from the Rowico Code of Conduct that are of public interest. The following types of serious misconduct are covered by the whistleblower system:

Violation of law, corruption, fraud or financial irregularities, serious work environment problems, or safety deficiencies. Discrimination, harassment, or other irregularities within HR and other serious misconduct (such as environmental crimes) that affect the company, employees, or the public.



## How to report

To report, our digital whistleblower channel, which is available through the Rowico website can be used. On the website, you can choose to "File new report" and then describe the suspected irregularity. Describe what happened as accurately as possible, so appropriate measures can be taken. Do not include sensitive personal information about people mentioned in your report, unless it is necessary to be able to describe your case. **Once you have reported, you will receive a code that you need to save to be able to access your report in retrospect and for follow-up.** If you lose the code, you can submit a new report that refers to the previous report. In accordance with the stated time frames in The Whistleblower Act, the whistleblower will receive confirmation that the case manager has received the report, within seven days. The case manager is the independent party that receives reports in the reporting channel. If you have any questions or concerns, you and the case manager can communicate via the platform. You will receive a response within three months on any actions planned or implemented as a result of the report.

## Whistleblower protection

You can remain anonymous throughout the process without affecting your legal protection, but you also have the option to disclose your identity under strict confidentiality. Rowico Home does not tolerate anyone who reports irregularities in accordance with this policy being discriminated against, punished, or harassed in any way because of the report. It is prohibited to subject a whistleblower to negative consequences because of a report.

A whistleblower is protected by law in several ways. First, the person cannot be punished for violating confidentiality, unless it is qualified confidentiality. The employer may also not hinder the reporting in any way. In addition, the whistleblower is protected against retaliation, which means that the employer may not take negative measures such as dismissal, denial of leave, or failure to provide a salary increase.



## Handling of reports

All reports received are investigated primarily by a case manager at Visslan. Internal investigators may take over the case. The reporter is informed of the progress and results of the investigation to the extent possible. Handling of personal data provided is always in accordance with the General Data Protection Regulation (GDPR). In addition, all personal data that is not relevant to the case will be deleted and the case will only be kept for as long as is necessary and proportionate to do so. Rowico Home uses the digital whistleblower function Visslan. This solution has been chosen to ensure compliance with laws and regulations regarding whistleblower anonymity.

## Further Contact

For questions about this whistleblower policy, please contact:

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