



Whistleblowing Policy

1. Status, ownership and applicability

This Policy has been approved by the Board of Directors and is a part of Fifax Ab's policies (later referred to as 'Fifax'). Other whistleblowing related instructions shall be in line with the content of this document.

The CEO is the owner of this document and oversees that other policies and other operational guidelines are aligned with this document and shall propose any necessary changes to them. Any changes to this document shall be approved by the Board.

This document is effective as of 12 May 2021 until further notice.

2. Background and objectives

Fifax's brand, public image and reputation are among its most important competitive factors. We are committed to conducting business with honesty and integrity. Fifax's Whistleblowing Policy supports responsible behavior and compliance with laws, regulations and our values through establishing requirements and procedures in relation to the reporting of violations. Fifax's Whistleblowing Channel provides an alternative and anonymous way to raise concerns of non-compliance with Fifax's values, ethical norms, laws and regulations.

3. Reporting violations or suspected violations

We encourage all employees and Fifax's business partners, suppliers, stakeholders or any person affiliated with Fifax to report suspected fraud or other violations. Employees do not need evidence or complete assurance of a violation to make a report. It is enough that you have a strong suspicion and that you make the report sincerely.

The following are examples of types of activities that should be reported:

- An employee believes that a manager, executive or employee has engaged in questionable accounting or auditing practices.

- A vendor or supplier offers an employee, and the employee accepts an inappropriate gift or money.
- A manager or executive requests employees to falsify Company data.
- An employee falsifies payroll or expense reimbursements.
- An employee engages in money laundering to legitimize proceeds of crime by disguising their true origin. A proceed of crime is any financial benefit obtained from criminal activity.
- An employee uses corporate property, information or his/her position for improper personal gain.
- An employee competing with Fifax directly or indirectly. it is prohibited for Fifax to participate in any agreements or procedures which are intended to limit competition between Fifax and its competitors. Abuse of dominant position is forbidden.
- An employee's private interest interferes in any way with the interests of Fifax.
- An employee, or members of his/her family, receives improper personal benefits as a result of his/her position at Fifax.
- An employee discloses non-public information that might be of use to competitors or harmful to Fifax.
- An employee is involved in theft of Fifax's property and assets. The theft of company assets may take several forms including embezzlement, which means that the employee has had the right to hold the assets, but he/she then uses them for unintended purposes.
- An employee disclosing of proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.
- Fifax cheats customers, suppliers or others who have a financial interest in it.
- Antitrust or competition law violations.
- A company superior asks employee to engage in activities they consider illegal or questionable.
- The offer or acceptance of cash gifts by any employee.
- An employee steals cash, merchandise or other Fifax's assets.
- Environmental violations are committed by an employee or Fifax.
- Any type of harassment, including racial or sexual harassment (the location procedure for resolution of this type of concern shall be utilized first for addressing these issues).
- Any other activity that may violate applicable laws, regulations or company values.

We recommend that an employee would first contact their Manager or other member of management. In most cases, an employee's manager is in the best position to address an area of concern.

If the employee feels he/she cannot discuss the matter with anyone in line management, the whistleblowing system provides an anonymous, confidential alternative reporting process.

4. Whistleblowing channel, report handling and investigation process

Fifax's Whistleblowing Channel is provided by an external party. The Whistleblowing Channel is a specialized service, designed to protect a whistleblower's identity when a report is made. If the whistleblower does not disclose his/her identity when making the report, he/she will stay anonymous throughout the whole process. Fifax will not attempt to find out his/her identity in any way. When a report is made, the whistleblower receives a personal ID number and password, to use in report related communications, anonymously, confidentially and securely.

Reports sent through the Whistleblowing channel will be received by an external service provider, which processes all reports confidentially. The external service provider will discuss the report with an appointed contact person at Fifax, the CFO or the CEO.

The external service provider can also continue discussing the case anonymously with the whistleblower through the Whistleblowing platform, if the whistleblower is willing to do so. The external service provider can advise Management to conduct severity assessment and preliminary inquiries in order to assist Management to decide on further action for Fifax.

If Fifax decides that investigation will not be carried out, the CFO or the CEO closes the case. The reported incident is recorded in case similar accusations will be brought forth later. If there are reasonable grounds to suspect fraud or other form violation has taken place based on the assessment, the CFO or CEO will decide to conduct an investigation. The Board of Directors is also informed, if needed.

The amount and nature of all whistleblowing reports will be recorded bi-annually for reporting purposes. The CFO or CEO shall report annually to the Board of Directors on this policy and his or her activities under it.

5. Whistleblower protection

Fifax takes the accusation of violations very seriously. Therefore, it is our policy that:

- The Whistleblowing Policy is intended to encourage and enable employees and others to raise serious concerns within Fifax prior to seeking resolution outside the company.
- We trust that all Fifax's employees will make the right decision and report any violations of the Fifax's values, guidelines, ethical norms or applicable laws and regulations to the appropriate personnel.
- No one shall suffer adverse employment consequences, harassment, be discriminated against or retaliated against for making a claim in good faith of a violation of Fifax's values, guidelines, ethical norms or applicable laws and regulations.
- An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or summary dismissal.
- However, any employee who is found to have intentionally made a false claim of violation of Fifax's values, guidelines, ethical norms or applicable laws and regulations will receive disciplinary action as deemed necessary.

6. Personal data

Fifax may receive information on both the whistleblower and persons involved in the suspected misconduct. Such information may contain sensitive information on suspected criminal behavior and other personal matters.

All information received according to the Whistleblowing Policy will be processed in accordance with applicable law on processing of personal data. Generally, all information received according to the Whistleblowing Policy will only be retained for as long as it is necessary unless otherwise required by law.

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with Fifax's information security processes and related controls.

7. Confidentiality

It is as important for Fifax to provide a mechanism for employees and Board members to safely report illegal activities and/or serious misconduct, as it is for the company to protect and to avoid damage to the reputation of innocent employees or Board members who are the subject of a reported violation.

For these reasons, Fifax will conduct its investigations of any reported violation as discreetly as possible and in a confidential manner to the greatest extent possible commensurate with carrying out a thorough and adequate investigation. Furthermore, to the extent possible, all reasonable efforts will be made to treat the whistleblower's identity as confidential.

This confidentiality and protection apply to reports of suspicions, even if those prove to be unfounded. However, if a report is found to have been false and made with malicious intent, a disciplinary process may follow.

If investigating the report leads to a criminal investigation by the authorities, case information will also be given to those entities/individuals participating in the investigation, who are legally entitled to receive the information. This information will include the whistleblower's contact details if they have been provided.