

# Qliro Group Whistleblower Policy

## 1. Introduction

Acting openly, honestly and responsibly is an important part of Qliro Group's culture. We therefore expect employees, business partners and others with whom the Group has contact or does business with and who have serious suspicions about impropriety, fraud, corruption or other unsatisfactory states of affairs in the Group's operations to step forward and talk about these suspicions. To allow people to report potential infringements and offences, Qliro Group has a whistleblowing process that is described in this policy.

The aim of this policy is to assure all of our employees that they can raise matters concerning Qliro Group without fearing a negative treatment or reprisals. Employees must feel confident that reports made in accordance with this policy are taken seriously and managed both professionally and confidentially.

## 2. What is whistleblowing?

It is usually the employees, those who are close to day-to-day operations, who first realise that something is not right. Qliro Group encourages employees to raise issues relating to suspicion of unsatisfactory states of affairs for discussion. It is unacceptable for us to turn a blind eye to serious incidents and suspicion of behaviour that is detrimental to trust or other infringements.

Some employees may not dare step forward and talk about their suspicions as such actions may feel disloyal to colleagues and/or the employer or they may be concerned about reprisals as a consequence of making such a report. Qliro Group wants to encourage employees to step forward and report suspicions about serious infringements. The aim is to make subsidiaries' and Group management aware of potentially illegal acts and/or acts that are detrimental to trust.

## 3. What type of infringements may be reported?

Serious infringements often mean 'impropriety', which is a generic term comprising acts of various types such as illegal, unethical and illegitimate acts, for instance:

- a) An illegal act, whether it is a civil or criminal offence
- b) A breach of Qliro Group's code of conduct or infringements that entail potential harm to Qliro Group's reputation
- c) Breach of or failure to comply with any of Qliro Group's policies
- d) A serious threat to the environment or health and safety
- e) Unfair discrimination in connection with employment or provision of services
- f) Unprofessional behaviour or behaviour that does not meet established standards
- g) Abuse of authority for impermissible or concealed purposes
- h) Doubtful accounting and auditing practice
- i) Bribes and corruption
- j) Action that creates a conflict of interests or disqualification
- k) Other acts that must be regarded as serious infringements.

This list is not exhaustive. It aims only to indicate the type of action that may be considered to be inappropriate.

## 4. How do I report an infringement?

An infringement under this policy should initially be reported to your line manager. If this is not appropriate for various reasons, there are alternative reporting paths:

### **Subsidiary level**

Contact one of the following:

- a) Your line manager
- b) Another manager in your organisation
- c) The CEO of your subsidiary

### **Group level**

If you do not receive an adequate response at subsidiary level or if your matter is about more than just your own organisation, you can contact the Chairman of Qliro Group's Audit Committee (a committee within Qliro Group's Board of Directors), as follows:

By email: [whistleblowing@qlirogroup.com](mailto:whistleblowing@qlirogroup.com)

By letter/post: Qliro Group AB, attn.: Chairman of the Audit Committee of the Board of Directors, Box 195 25, 104 32 Stockholm.

You can report in the following ways:

- a) *Openly*: This means that you give your name and let the persons involved know who has raised the matter.
- b) *Confidentially*: This means that you give your name on condition that it is not disclosed without your prior consent.
- c) *Anonymously*: This means that you do not give your name and you therefore remain anonymous. Please note that reports made anonymously may only be made by ordinary post to the specified recipient.

## **5. Information that should be included in a whistleblowing report**

- a) What has happened? Please be as detailed as possible in your description.
- b) When and where did it happen?
- c) Who was involved?
- d) Can this be expected to happen again. If so, when and where?
- e) Who else knows about the above or has access to relevant information?
- f) Is there any documentation or are there other facts that can be used as evidence?
- g) Is there any other information that may be relevant or necessary for the investigation?

## **6. What action will the company take?**

Qliro Group will be receptive and act on suspicions of infringements that come under this policy. To protect everyone involved, an introductory investigation will be conducted. A decision will then be made on any full investigation and in applicable cases also on the form the investigation will take. If immediate action is required, this will be taken before the investigation is conducted. The general principle that Qliro Group will apply is to act in accordance with what is best for the company, its employees and its shareholders.

Qliro Group's action will vary according to the nature of the incident. Suspicions that are reported may be archived and either investigated internally or passed to the police or any other appropriate external authority.

All data is to be deleted at the end of an investigation, unless the investigation leads to disciplinary action or legal proceedings.

## **7. Protection of the whistleblower**

We will do our utmost to protect the identity of whistleblowers. However, it is important for everyone who is considering making a report to ensure that the information is true and preferably verified. No accusations must be made in the knowledge that they are false or based on personal or financial gain.

Qliro Group is aware that it may be difficult to report a problem, in particular on account of fear of reprisals by those accused of impropriety. Therefore, we do not tolerate harassment or bullying and will take

action to protect everyone who reports their suspicions in good faith. Where possible, the identity of the whistleblower will not be revealed unless this is required for the investigation or if the law so demands.

## **8. False and misleading accusations**

It is important for anyone who is considering making a report to ensure that it is well-founded. No accusations may be made malevolently or in the knowledge that they are false. Qliro Group will regard each intentional submission of false or malevolent reports by an employee of Qliro Group as a serious disciplinary breach.

## **9. When must the whistleblowing process not be used?**

The whistleblowing process must not be used for:

- a) Personal conflicts or disagreements, dissatisfaction with bonuses/performance, dissatisfaction with tasks assigned and similar matters
- b) Evil intentions and reporting colleagues or managers for no reason
- c) Matters that should appropriately be reported to HR, for example suspicions relating to colleagues with health and behavioural problems or similar.

## **10. Follow-up and implementation**

The content of this policy ought to be annually revised by Group HR and updated versions of the policy shall be reviewed and approved by Qliro Group's Board of Directors. All managers with responsibility for staff are responsible for ensuring that this policy is known and complied with within their department/area of responsibility. All employees have access to Qliro Group's policies, instructions, guidelines and similar documents via Qliro Group's intranet.