



GARO GROUP

Whistleblowing Policy

GARO Group AB and its affiliates (or the "Company") (Corp. Reg No. 556051-7772)

Originally adopted October 18, 2024.

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1. INTRODUCTION

GARO Group has since many years established codes of conduct, policies, guidelines, and culture for how we act as a responsible company. By encouraging an open, transparent, and responsible corporate culture, GARO is convinced that situations of misunderstandings and serious events can be prevented by dialogue. However, it's important to combine that with an anonymous Whistleblowing system that's provided by an independent external third party, 2secure AB.

2. PURPOSE & RESPONSIBILITY

The purpose of this policy is to provide a framework, guidance and tools for reporting miss conditions and serious events relating to the company without fear of negative consequences. The company's managers are responsible for ensuring that employees in the GARO Group are familiar with this Policy.

3. SCOPE

The following stakeholders / partners are covered by this policy:

- Board of members
- Staffs, Consultants and Contractors
- Customers
- Suppliers and its subcontractors

4. COMMUNICATION

This policy will be introduced, distributed, and made available to all interested parties. To GARO employees, this policy is available on the company's Intranet. To others, it will be communicated via the group companies' websites or, for example, as an attachment to the ordinary supplier's agreement alternative.

5. WHISTLEBLOWING POLICY

5.1 General

GARO is looking to maintain an open business climate, high ethics and to always spot any possibility for improvements. Our most important sources for understanding eventual flaws are none other than our co-workers, customers, and business partners. The person who suspects an irregularity that goes against the values of GARO, have the possibility to speak up anonymously without fearing repercussions.

5.2 Who and what can be notified via whistleblowing?

The Authority for Data Protection and GDPR regulates who may be notified, as well as what kind of information can be managed through a whistleblower system. Sometimes data provided through the system may contain sensitive personal data, for example, when someone is named for a suspected crime. Personal data may therefore only be saved when there are very strong reasons.

Through this system, you can only report serious cases of maladministration involving GARO Group employees or other stakeholders/partners that have connection to it:

- Board of members
- Staffs
- Consultants and Contractors
- Customers
- Suppliers and its subcontractors

Only information that is substantively justified is treated, that is, for the purpose of investigating whether the person in question has been involved in serious irregularities. Such serious irregularities include:

- Financial crime such as bribery, bribery, theft, fraud and counterfeiting, bookkeeping and other breaches of accounting and tax legislation,
- A conflict of interest between an employee and GARO, or
- Discrimination and harassment and
- Other serious irregularities affecting the company's vital interests or the lives and health of individuals, such as serious environmental crime, theft, bullying, sexual harassment, major job security shortages.

The above crimes are examples. If you are unsure whether to report a problem, we recommend that you report it. If your notification can not be handled in the system, you will - if you have chosen to provide your contact information - get information about this and advice on where to turn.

5.3 Who can report?

The reporting routine can be used by all employees regardless of employment within GARO Group. Customers and suppliers can also use the system.

5.4 How to make a report?

Option 1: Report to an executive within GARO Group, either the organization or the management.

Option 2: Report anonymously through the report tool "Whistleblowing". For further information see below.

You can file your report through the following channels:

- Webpage: wb.2secure.se where you use the company code: **ucn265** to gain access to our Whistleblowing page.
- E-mail: wb@2secure.se
- Postal address: 2Secure, Box 34037, SE100 26 Stockholm
- Phone number: (+46)0771-77 99 77. Our external and independent party for our Whistleblowing cases is available from 08.00 to 16.30 during working days.

5.5 Reporting tool

To ensure your anonymity, a reporting tool is provided by an external and independent actor 2secure. The reporting channel is encrypted and password protected. You never need to enter your identity.

- You do not need proof of your suspicion, but no accusation may be made with malicious intent or knowing that the accusation is false.
- It is important that you describe all the facts in the case, including the circumstances that you think are less important.

5.6 Whistleblowing protocols and oversight structure

Upon receiving a notification regarding irregularities, the following actions take place.



The individual who receives the notification gains access to the information and initiates necessary actions. GARO collaborates with 2Secure, an external entity, to ensure the credibility of its services and the safety of individuals reporting irregularities. 2Secure is experienced in conducting investigations globally and follows precise procedures for handling sensitive information.

Access to the 2Secure IT System is exclusively granted to the HR Manager at GARO AB. This privilege allows for:

- Follow-up on reported cases.
- Management and oversight of any proposed improvements.

Whistleblowing Committee

In the event of a whistleblowing incident 2Secure promptly contacts the Whistleblowing Committee comprises:

- Marie Carlsson, HR Manager at GARO AB. Chairperson.
- Andreas Olsson, Sustainability Manager at GARO Group.
- Patrik Andersson, CEO and President, GARO Group.

5.7 What is a good "Whistle"

Before you decide to report an abuse, you should be aware that measures that affect others may be taken. Information must be reported with both good faith and intentions. If a report, after investigating the information, proves to be false, but is made with a good faith and a good intention, it is a valid report. Note that foul play of misleading information, or information left with a primary intention of harming or defaming others will not be tolerated. The faster the irregularities are made detected the faster an investigation can be made, measures can be taken, and greater harm can be avoided. The reported information must be as correct and detailed as possible, therefore it is important to be as descriptive as possible. When you make your report, we request you address the following issues:

- Involvement, who is involved? Can you specify the name, title and position of the person(s) the case concerns?
- When?
- Where?
- Was it a one-off situation or is it an issue in progress or a revolving problem?
- Evidence, is there any evidence such as documentation or photographs?
- Other relevant information.
- Contact information.

Information that you leave will be handled with confidentiality.

5.8 Feedback

You will be able to log in using your personal login and password to view any eventual questions or comments from the investigators who received your report. You could follow your case on wb.2secure.se if you saved the code, you are given when you complete your whistle.



5.9 Guaranteed privacy and anonymity

When you are reporting a case, you are free to choose if you want to specify your contact details or if you want to stay anonymous. Regardless of your choice all reports are taken seriously and are investigated. We ask of contact information because it might help the investigation for our external investigators if we can contact you for complementary data/information. Nonetheless, to specify such information is always completely voluntary.

Our system does not use cookies nor is any IP addresses registered, but if you are using a computer that is connected to GARO, your activity might be revealed in the internet log after you have visited the page where you file the report. If you wish to avoid revealing information, we encourage you to use a computer that is not connected to the internal network of GARO.

All data communication and, storage of personal data is encrypted to make sure that they aren't corrupted or revealed to unauthorized persons.

5.10 Not covered by this policy

The policy does not cover affairs such as:

- **Complaints and Dissatisfaction:** The policy does not cover general complaints, dissatisfaction with pay, ineffective systems, or lack of feedback regarding job performance.
- **No Relation to Maladministration or Serious Incidents:** These concerns must be directly connected to maladministration or serious incidents as per current legislation and company policy documents to be considered under this policy.
- **Handling by Managers:** Matters related to complaints, pay dissatisfaction, ineffective systems, or lack of feedback should instead be addressed to managers.
- **No Protection for Involvement in Irregularities:** If you are involved in irregularities and report them, this policy does not guarantee protection from disciplinary or legal actions resulting from your involvement.

6. VIOLATION, REVIEW AND CONTACT INFORMATION

Any violation of this policy will be handled by our HR-department. Serious or repeated violations may result in your employment with the company being terminated.

This policy will be subject to an annual review conducted by the Sustainability Committee, which will ensure that it aligns with our sustainability initiatives, evolving regulations, and best practices.

If you have any questions or comments about this document or the sustainability efforts of GARO Group, please contact our Sustainability Manager, Andreas Olsson, at andreas.olsson@garo.se or call +46 370 332 800.