

## Policy – Whistle blowing

### Purpose and background

In its 2018 Code of Conduct, Heimstaden incorporates a policy and routines for the reporting of irregularities, so called Whistle blowing. Heimstaden doesn't tolerate any form of corruption or irregularities that violate our values and our policies.

This whistle blowing policy affirms that you as an employee or external stakeholder of our company may report perceived irregularities, knowing that;

- They will be processed in accordance with routines outlined in this policy
- They will be followed up
- We're transparent in relation to society and our own organisation in terms of the actions we take.

We do not tolerate any reprisals for a report submitted in good faith, and you should feel safe in the knowledge that you will not be disciplined for reporting irregularities. Heimstaden is responsible for protecting the whistle blower from any negative consequences of reporting irregularities. Any bullying, guilt tripping, harassment, unfair treatment, punishment or discrimination as a consequence of submitting a report is considered a violation of our code of conduct and carries disciplinary actions.

### What is considered an irregularity?

Examples of issues you should always report:

- Illegal activities
- Financial deceit (e.g. false accounting, breach of internal control procedures, misappropriation of assets or fraud)
- Bribery and corruption (e.g. giving or receiving a bribe)
- Crimes against competition law (e.g. exchange of pricing information, collaborations to reduce competition)
- Serious threats against the environment, health and safety
- Any other activities which are considered inappropriate; discrimination, abuse of power, bullying, harassment, failure to follow existing regulations, etc

Reporting an irregularity should pertain to abuses within company operations. This includes not only business operations but also how rules and regulations are followed and issues regarding the relationship between employer (us) and employee (you).

### Who may be reported for company irregularities?

According to Datainspektionen (the Data Supervision Authority) in Sweden, reporting may only pertain to serious irregularities committed by persons in key positions or management within said company or group.

## How do I report irregularities / blow the whistle?

At Heimstaden we work in a safe organisation where employees and managers speak openly about positive areas as well as areas that may require improvement or change. Reporting any irregularity through our whistle blowing function must therefore only be done once you have taken one of the following actions:

- If you've perceived an irregularity related to the employment/work/work environment/customers of yourself or a colleague – primarily raise the issue with your line manager.
- If you feel that your issue is not taken seriously, or feel uncomfortable raising it with your line manager – talk to their boss and/or HR. You may also whistle blow to a safety officer if it falls within their area of responsibility, or by contacting your union.
- If you feel you can't establish a dialogue with any of the above parties, there is a final route to take to resolve the matter. You can submit a formal report of irregularity through Heimstaden's whistle blowing function via our website or our intranet. You can choose to be anonymous or include your name. You can also send in your report by post to Heimstaden, HR-avdelningen, Östra Promenaden 7A, 211 28 Malmö.
- If you choose to report an irregularity, it is of utmost importance that you manage any information about persons or situations in such a manner that it doesn't violate the new data protection regulation.

**Reports of a private or inappropriate nature will not be processed.**

### What shall I report?

The more information you provide, the more likely we are to be able to fully pursue the matter. If possible, please include timings of the event(s), a description of what you've observed in as much detail as possible, as well as any knowledge of previous related incidents.

### What happens once I've submitted a formal report via the website?

#### Report

Once you've submitted your report – anonymously or not – your case is processed by Heimstaden's central HR department. The case is kept in a computer folder to which only the HR department have access. Physical letters are scanned and put in the same folder, after which letters are destroyed. If you want to remain anonymous, you will receive no reply, otherwise you will be sent a confirmation that Heimstaden has received your report.

#### Assessment of whether to further process the case

The HR department makes an initial assessment of the case. If they judge the case to be of private or inappropriate nature, or for other reasons not appropriate to pursue, the case is closed. Everything pertaining to the case is deleted and the only item saved is a note of the fact that a report was submitted but not further processed due to insufficient cause.

Any report regarding any irregular actions by HR must always be sent to the CEO.

# Heimstaden

*tid för dig*

## **Processing**

If the HR department judges the case to require further processing, the following will occur:

- Senior management will immediately be told that a report of an irregularity has been submitted, as well as the nature of the case. If the case relates to an obvious suspicion of illegal activities a police report will be filed.
- Any affected manager(s) and employee(s) is told that a report of an irregularity has been submitted if and when the case requires it.

A period of investigation follows, where affected persons provide their perspective on the case. Once the investigation is concluded, the senior management group takes a decision on the case. The decision includes how the case is judged, any consequences for affected parties, whether a report needs to be submitted to external authorities (e.g. police, tax authority, accountants, other legal authorities etc)

## **Closure and reporting**

Following a case closure, documents are stored for the period of time during which a legal dispute may be raised.