

# **PanLink AB**

# **Whistleblowing Procedure**

# **Group Policy**

## Whistleblowing Procedure

Panlink company is committed to maintaining the highest standards of honesty, openness and accountability and therefore takes all misconduct very seriously, whether it is committed by Staff or Associated Persons.

This document sets out a procedure by which you can report any concerns and feel confident that you will not be liable to disciplinary action.

On the other hand, if you deliberately would make a false report for personal reasons or otherwise seek to abuse this procedure, then you may face serious disciplinary action.

Bullying or any other harassment of a colleague who has made a disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

### What sort of activities should I report using this procedure?

We would expect you to report any activities that constitute malpractice, like for example:

- Criminal offences or failure to comply with legal obligations
- Miscarriages of justice
- Actions which endanger the health or safety of Staff or the public
- Actions harmful to the business
- Bribery, inappropriate/excessive gratuities or other unethical issues
- Requests to take part in fraudulent behavior
- Actions which cause damage to the environment
- Actions that offend, discriminate against or alienate any Staff or business contacts
- Actions which are intended to conceal any of the above

If it is not clear that a particular action falls within one of these categories you will need to use your own judgement, but in principle it is better to report than to keep it to yourself.

### How do I make a report?

You can make a report orally or in writing

You can report anonymously using the URL-address:

<https://report.whistleb.com/Fairford>

which is a service handled by a third party. The report will then be handled by a competent person appointed by the Group.

A report can be submitted in the whistleblowing system in three different ways:

- i. **In writing:** In the whistleblowing system, there is a text form that can be filled out to report misconduct. Click [here](#) to access the text form and to file your report.
- ii. **By telephone:** Reporting can be done by telephone by leaving your message via the telephone answering service in the whistleblowing system. Telephone numbers and more information about how reporting can be done orally is found at the landing page of the whistleblowing system, accessible [here](#).  
Phone number Poland: **00800-1124498**

Code PanLink AB, Group: **322087**

- iii. **At a physical meeting:** At request, reporting can be made at a physical meeting with a member of the Whistleblowing Team. To schedule such a meeting, please contact Eva Scherl ([eva@fairfordholdings.com](mailto:eva@fairfordholdings.com)) or Robert Jonsrud ([robert@fairfordholdings.com](mailto:robert@fairfordholdings.com)) at Fairford.

Fairford would encourage you to file reports regarding misconduct directly to Fairford or in the whistleblowing system. However, reports may also, depending on the applicable legal conditions under the local law of your jurisdiction, be filed with local competent authorities.

If you so wish, we will keep your identity secret. However, if your report leads to a criminal investigation, you may be needed as a witness. Should this be the case we will discuss the matter with you at the earliest opportunity.

### How will my report be investigated?

If preliminary enquiries show that a full investigation is necessary, we will either, depending on the nature of the misconduct, investigate internally within the Group or refer to the appropriate external person for investigation. We will inform you of the outcome of the preliminary enquiries and any further action that has been taken.

If you are unhappy with the outcome of an investigation, we would prefer that you submit another report explaining why this is the case. If there are good reasons, your concern will be investigated again. If you think the concern still remains, you should raise the matter with the appropriate official organization or regulatory body.

### Anonymous reporting

Reports can be made anonymously in the whistleblowing system. However, you should be aware that it normally facilitates any subsequent investigation and handling of the matter if contact details have been provided. Therefore, we encourage whistleblowers to provide name and contact details when reporting a complaint. Regardless of whether you choose to be anonymous or not, Panlink will keep your identity confidential. If your report leads to a criminal investigation, you may however be needed as a witness. Should this be the case or if we for other reasons are obligated (e.g., under a legal obligation) to share your identity we will discuss the matter with you at the earliest opportunity.

### Non-retaliation

Panlink will not in any way retaliate against anyone who report concerns within the scope of this Policy in good faith. Neither will Panlink retaliate against anyone who in a work-related context assists others in reporting (e.g., elected representatives and safety representatives) or anyone related to the whistleblower (e.g., colleagues or relatives).

### Processing of personal data

Panlink is the Personal Data Controller of any personal data collected in the scope of this Policy and is responsible to ensure that the personal data is processed in accordance with applicable laws and regulations on data protection. We have taken both technical and organizational measures to protect

your privacy. You can always contact Panlink regarding privacy and data protection issues by sending an email to: [GDPR@panlink.se](mailto:GDPR@panlink.se)

Processing of personal data will be carried out in accordance with applicable data protection legislation. Reports in the whistleblowing system will be stored for no longer than necessary and proportionate. The system enables us to comply with the GDPR requirements for the handling of personal data, as well as protection by default and by design. The system is heavily encrypted, and all data is stored in safe servers located in the EU. Access to data is only possible by individuals appointed by Panlink

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**Alterations**

<b>Edition no</b>	<b>Alterations and changes within new edition</b>	<b>Changed by:</b>	<b>Issue date</b>
1	First edition	E.Tomaszewski	2017-08-21
2	New Faiford Whistleblowing team informations	P.Napierala	2024-06-05
3	Signalist regulations update	P.Napierala	2024-09-24