



**WHISTLEBLOWER POLICY REGARDING
FORENEDE GROUP'S WHISTLEBLOWER ARRANGEMENT - SWEDEN**

Dated: 17-12-2021

WHISTLEBLOWER POLICY

1 INTRODUCTION AND PURPOSE

- 1.1 This Whistleblower Policy describes the purpose of the Swedish entities within Forenade Group (hereinafter referred to as "**Forenade**") having introduced a voluntary Whistleblower Arrangement comprising of the Swedish entities within Forenade (hereinafter referred to as the "**Arrangement**"), how it works, who can make use of the Arrangement, and what may be reported through the Arrangement.
- 1.2 The Arrangement includes the following companies:
- Förenade Service AB
 - Förenade Care AB
 - Adium Omsorg AB
 - Hela Sveriges Assistans AB
 - Sjöstjärnan AB
- 1.3 The purpose of the Arrangement is to ensure that a Whistleblower, as defined in this Whistleblower Policy, is protected under the Swedish Act on protection for persons who report misconduct (hereinafter referred to as the "**Whistleblower Act**") when he or she reports violations or potential violations, allowing an independent and autonomous whistleblower unit to assess which steps are required in this respect.

2 WHO CAN USE THE ARRANGEMENT?

- 2.1 The Arrangement can be used by persons who report information on violations to which the person in question has gained access in connection with his or her work-related activities, and who belong to the following categories of persons (hereinafter referred to as "**Whistleblower**"):
- (i) Employees
 - (ii) Self-employed persons
 - (iii) Shareholders and members of the executive board, board of directors, or similar governing body in an undertaking.
 - (iv) Volunteers
 - (v) Paid or unpaid trainees
 - (vi) Persons working under the supervision and management of contracting parties, subcontractors, and suppliers.
 - (vii) Persons who are reporting or publishing information to which they have gained access in a work-related relationship that has ceased since then.
 - (viii) Persons in work-related relationships that have not yet commenced, who report information on violations to which they have gained access during the course of the recruitment process or other pre-contractual negotiations.
- 2.2 Persons listed under section 9.4 can also file reports under the Arrangement.
- 2.3 Persons not included in the categories of persons stated in sections 2.1 or 9.2.4 cannot file reports under the Arrangement, but have to report through ordinary communication channels. If the conditions are otherwise fulfilled in this respect, reports can be filed through the appropriate external whistleblower system designated by the Swedish Government (see https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som_sfs-2021-949), as described in section 11.

3 WHAT MAY BE REPORTED THROUGH THE ARRANGEMENT?

- 3.1 The Arrangement is open for reports regarding violations of EU law within the scope of application of the Whistleblower Directive (see section 3.4 (ii)) as well as reports regarding serious offences or other serious matters (see section 3.4 (i)).
- 3.2 "Violations" means acts or omissions that
- a) are illegal or constitute a serious offence or other serious matters comprised by section 3.4; or
 - b) allow circumventions of the purpose of the rules under section 3.4.
- 3.3 Any information may be reported, including reasonable suspicion about actual or potential violations or serious matters comprised by section 3.4 which have occurred or most probably will occur at Forenade, as well as any attempts to cover up such violations.
- 3.4 The report must concern violations or potential violations within the scope of the Whistleblower Act, defined as acts or omissions which:
- (i) constitute misconduct and where public interest motivates that they are reported, like for instance:
 - Violation of any duty of confidentiality
 - Abuse of financial means
 - Theft
 - Deceit
 - Embezzlement
 - Fraud
 - Bribery
 - Violation of industrial safety rules
 - Any form of sexual harassment
 - Severe harassment, e.g. bullying, violence, and harassment due to race, political or religious affiliation.
 - (ii) are illegal pursuant to EU law within a number of specific areas, including for instance:
 - Public procurement
 - Money-laundering
 - Product safety and compliance
 - Transport safety
 - Food and feed safety
 - Animal health and welfare
 - Protection of the environment
 - Public health
 - Consumer protection
 - Protection of privacy and personal data
 - Security of network and information systems.

The Arrangement may only be used for reporting violations or potential violations in relation to the issues described in section 3.4 that have occurred or most probably will occur in Forenade's organisation, committed for instance by employees, executive board, or members of the board of directors of Forenade. In connection with reports on incidents committed by Forenade, please note that such incidents may be reported although the incident cannot be attributed to an individual person but may be due to a basic systemic failure at Forenade.

- 3.5 Offences that are not comprised by the Arrangement must be reported through ordinary communication channels. If the conditions are otherwise fulfilled in this respect, reports can be filed through the appropriate external whistleblower system designated by the Swedish Government (see https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som_sfs-2021-949), as described in section 11.

4 CONTENTS OF THE REPORT

- 4.1 To facilitate further investigation of the reported issue, and to be able to identify the offence, it is important that the Whistleblower describes the offence in the best possible way. It is thus not possible to make any further investigations of a report if the report is not specified or if it only contains very general allegations without any further clarification.
- 4.2 Therefore, it is important that the Whistleblower - to the utmost extent - provides the following information:
- a description of the matter;
 - the person(s) involved;
 - whether others are aware of the suspicion about the matter;
 - whether the executive board knows about the matter;
 - whether documents exist that support the matter;
 - whether and where further information may be found about the matter;
 - for how long the matter has gone on; and
 - whether the Whistleblower knows about any attempts to hide the offence.
- 4.3 Manifestly unfounded reports will not be investigated further.

5 HOW CAN A REPORT BE SUBMITTED AND WHO IS TO RECEIVE THE REPORT?

- 5.1 Forenade has appointed a whistleblower unit that
- (a) will receive the reports and be in contact with the Whistleblower;
 - (b) will follow-up on the reports; and
 - (c) give feedback to the Whistleblower.
- 5.2 The whistleblower unit in charge of the tasks mentioned in section 5.1 consists partly of two lawyers from Plesner Law Firm (hereinafter "**Plesner**"), and partly of an impartial group of persons at Forenade.
- 5.3 Written reports are submitted through Plesner's Whistleblower Arrangement that can be found on Forenade's website: <https://whistleblower.plesner.com/direct.aspx?c=ForenadeSverige>

- 5.4 Written reports are received by two lawyers at Plesner Law Firm. Plesner will make a legal capacity assessment of the persons of the whistleblower unit who are able to process the report, after which the report will be forwarded to the relevant persons (hereinafter referred to as “**Case Managers**”) at Forenade. Before forwarding the report, Plesner will assess whether the report falls within the scope of application of the Arrangement.
- 5.5 The whistleblower unit will treat all written reports as confidential.
- 5.6 The Case Managers appointed to receive and follow up on the reports are subject to a duty of confidentiality regarding the information contained in the reports.

6 ANONYMITY

- 6.1 A Whistleblower who wants to submit a report through the Arrangement may do so anonymously.
- 6.2 Forenade encourages the Whistleblower to state his or her name when submitting a report so that the Case Managers are able to ask clarifying questions and subsequently provide feedback on the further course of the investigation. However, anonymous communication between Plesner and a Whistleblower is possible if the Whistleblower chooses to be anonymous (see sections 6.3 and 6.4).
- 6.3 If the Whistleblower chooses to submit an anonymous report, it is recommended - to ensure full anonymity - that the Whistleblower uses a private PC or, for instance, a PC located at a public library.
- 6.4 To ensure the Whistleblower's anonymity towards Forenade it is also possible - by means of a communication module in the reporting channel - to provide Plesner with additional information about the reported matter, which Plesner will then pass on to the Case Managers. Thus, it is possible by means of the communication module in the Arrangement to provide additional information and remain anonymous. In connection with the reporting, a one-off code is generated which, in order to safeguard the anonymity, cannot be re-created. Therefore, it is **important** that the Whistleblower keeps the code and remembers to log on the communication module to communicate with the whistleblower unit.
- 6.5 The communication module can be accessed through the above-mentioned link under the Arrangement to log on the communication module. It is important that the Whistleblower regularly enters the communication module to check whether Plesner has asked any questions. Plesner is not able to come into contact with the Whistleblower in any other ways, for instance to inform the Whistleblower that additional questions etc. have been submitted.

7 INFORMATION TO THE WHISTLEBLOWER

- 7.1 The Whistleblower will receive:
- an acknowledgement of receipt of the report within three (3) days of that receipt; and
 - feedback soonest possible and in principle within three (3) months from the acknowledgement of receipt of the report.
- 7.2 “Feedback” means a notification about the measures taken by Forenade to assess the correctness of the allegations made in the report and, where relevant, to counter the reported offence. The feedback provided by the whistleblower unit must, at any time, observe the rules under data protection law, which may entail limitations in relation to the contents of the feedback to the Whistleblower.
- 7.3 Depending on the circumstances, an extension of the timeframe for the feedback may be required, where necessary due to the specific circumstances of the case, in particular the nature and complexity of the report, which may require a lengthy investigation. If this is the case, the Whistleblower must be notified in this respect.

8 INFORMATION TO THE REPORTED PERSON

- 8.1 After a preliminary investigation has taken place and all relevant evidence has been secured, the reported person will for instance be informed about:
- the identity of the Case Manager(s) responsible for the investigation of the report; and
 - the issues of the report.
- 8.2 Reference is also made to Forende's Privacy Policy for the Whistleblower Arrangement, containing further information on the processing of personal data and the rights of the data subject.

9 PROTECTION OF THE WHISTLEBLOWER

- 9.1 Pursuant to the Whistleblower Act, Whistleblowers are protected against retaliation when submitting a report to the Arrangement. Such protection only applies if the following conditions are fulfilled:
- The person submitting the report meets the conditions to be considered a whistleblower (see section 2).
 - The Whistleblower had reasonable grounds to believe that the reported information was correct at the time of reporting.
 - The reported information falls under the scope of application of the Whistleblower Act (see section 3.4).
- 9.2 "Retaliation" means unfavourable treatment or unfavourable consequences as a reaction to a report. This may be suspension, dismissal, demotion, or equivalent measures.
- 9.3 If the Whistleblower submits a report in bad faith and is fully aware of the fact that the reported information is not correct, the Whistleblower is not protected against retaliation. Depending on the circumstances, it can constitute a criminal offence and the Whistleblower can also be liable for damages if he or she has deliberately submitted false reports. If the Whistleblower is employed by Forenade, it may also have employment-related consequences, entailing inter alia the summary dismissal of the Whistleblower.
- 9.4 In addition to the group of persons mentioned in section 2.1, the protection described in this section 9 also applies to the following persons or entities:
- 1) Intermediaries
 - 2) Third parties who are connected to the Whistleblower and risk being subject to retaliation in a work-related context (for instance a colleague).
 - 3) Undertakings and authorities which the Whistleblower owns or works for or is otherwise connected with in a work-related context (for instance an undertaking owned by the Whistleblower).
- 9.5 Information about the identity of the Whistleblower or any other information that directly or indirectly may reveal the Whistleblower's identity will only be disclosed to other persons than the whistleblower unit after having obtained prior explicit consent from the Whistleblower
- 9.6 However, information on the Whistleblower's identity may be revealed without consent to other public authorities where this is necessary for the prevention of offences (e.g. a criminal act that has not yet been committed), or with a view to safeguarding the rights of defence of the persons concerned. If the identity of the Whistleblower is disclosed without consent, the Whistleblower will be informed accordingly and be provided with the grounds for the disclosure, unless such information would jeopardize the related investigations or judicial proceedings.

9.7 The identity of the Whistleblower may also be revealed in connection with legal proceedings regarding the reported matter.

9.8 Other information from the report, i.e. information not revealing the Whistleblower's identity, will only be disclosed to persons outside the whistleblower unit as part of a follow-up on the report or for the purpose of preventing a potential offence in relation to the issues described in section 3.4.

10 PROTECTION OF THE PERSON CONCERNED

10.1 The person concerned, i.e. the person affected by the report, is entitled to protection of his or her identity during the investigation and has a right to effective defence.

10.2 Further, Forenade will observe the rights of the person concerned in accordance with the General Data Protection Regulation, see Forenade's Privacy Policy for the Whistleblower Arrangement.

11 EXTERNAL WHISTLEBLOWER SYSTEMS

11.1 A Whistleblower who intends to submit a report under Arrangement may instead choose to file the report through the appropriate external whistleblower system designated by the Swedish Government (see <https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som-sfs-2021-949>) - for instance, if the Whistleblower fears retaliation.

11.2 It is emphasized that the Whistleblower is free to choose to submit a report through the Arrangement or through the external whistleblower system.

12 DATA SECURITY AND DATA STORAGE

12.1 Reports are stored as long as necessary and proportionate in order to comply with the requirements imposed by Swedish law.

12.2 Forenade and Plesner will process all information reported through the Arrangement, including information on persons reported through the Arrangement, in accordance with applicable law in force at any time.

12.3 All reports will be stored properly, and it will only be possible for relevant persons of the whistleblower unit to access the information.

12.4 A report falling outside the scope of the Arrangement will be immediately forwarded to Forenade's HR manager and closed in the Arrangement.

12.5 In principle, reports will be deleted from the Arrangement 45 days after Forenade has finalized the processing, unless Forenade has legitimate reasons to continue the storage, e.g. if required by other legislation, or if there is reason to believe that the report may be corroborated by subsequent reports on the same issue.

12.6 If the matter is reported to the police or another authority, the report will be closed in the Arrangement immediately after the case has been closed by the authorities in question.

12.7 If - on basis of the collected data - a disciplinary sanction is implemented against the reported person, or if there are other grounds justifying and requiring the continued storage of the data on the person concerned, such data will be stored, where an employee is involved, in the employee's personnel file.

12.8 Otherwise, the information is stored in accordance with Forenade's deletion policy.

13 QUESTIONS

- 13.1 If you have any questions regarding this Whistleblower Policy, you are welcome to contact Förenade Service Head of HR, Anders Lang, at ANDL@forenade-service.se or Förenade Care Head of HR, Lotti Klefström, at LOTTIK@forenadecare.com

14 UPDATING

- 14.1 This Whistleblower Policy has been updated on or before: *December 17. 2021*

PRIVACY POLICY FOR WHISTLEBLOWER ARRANGEMENT

ADIUM OMSORG AB

This Privacy Policy explains how the Swedish entities with Forenede Group ("Forenede)", "we" or "us") processes personal information in connection with reports to Forenede's Whistleblower Arrangement.

Below is a description of the personal data processing that takes place and the rights you have if you are reported through the Whistleblower Arrangement, as well as your rights if you use the Whistleblower Arrangement to report another person.

Reference is also made to Forenede's Whistleblower Policy, containing information about who can submit reports and who can be reported.

This policy only concerns the handling and the investigation of reports submitted through the Whistleblower Arrangement. Therefore, this policy must - in relation to employees - be seen in connection with Forenede's other relevant policies and procedures.

1 DATA CONTROLLER

The legal entity responsible for the processing of your personal information is:

Adium Omsorg AB

CVR.no.: 556669-9004

Midgårdsgatan 2

262 71 Ängelholm

2 DESCRIPTION OF THE PROCESSING

The following is a description of how Forenede will process information on the person who is reported about (the "**Reported Person**") as well as the person who is submitting the report (the "**Whistleblower**") in connection with reports to Forenede's Whistleblower Arrangement as set out in Forenede's Whistleblower Policy.

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
<p>#1 Handling and investigation of reports under Forenede's Whistleblower Arrangement regarding:</p> <ul style="list-style-type: none"> The Reported Person <p>Sources</p> <p>We can collect information from the following sources:</p> <ul style="list-style-type: none"> Plesner Law Firm Employees of Forenede Self-employed persons Shareholders and members of the executive board, board of directors, or similar governing body in the undertaking Volunteers Paid and/or unpaid trainees Persons working under the supervision and management of contracting parties, suppliers, and sub-suppliers Persons who are reporting information to which they have gained access in a work-related relationship that has ceased since then. Persons in work-related relationships that have not yet commenced, who report information on violations to which they have gained access during the course of the recruitment process or other pre-contractual negotiations. 	<p>We can process the following personal data categories about you:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email telephone number, Other information included in the report. <p><u>Sensitive information,</u> including information on sexual matters, may be included in the processing.</p> <p><u>Information on criminal offences or possible criminal offences</u> may also be included in the processing.</p>	<p>We process your personal data on the following bases:</p> <ul style="list-style-type: none"> GDPR, Article 6.1.f.f: Necessary for the purposes of the legitimate interests pursued by Forenede or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Forenede's legitimate interest is to enable Forenede to process reports received under Forenede's Whistleblower Arrangement. GDPR, Article 9.2.f: Processing is necessary for the establishment, exercise or defence of legal claims. Information on criminal offences or possible criminal offences is processed on the basis of section 5.1. in Ordinance (2018:219) with Supplementary Provisions to the EU Data Protection Regulation (necessary for the establishment, exercise or defence of legal claims). 	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> Plesner Law Firm Förenade Service AB, Förenade Care AB, Hela Sveriges Assistans AB and Sjöstjärnan AB IT suppliers External advisors The police Public authorities, e.g., the Swedish Financial Supervisory Authority, the Swedish Data Protection Agency, or relevant tax authorities. 	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the Arrangement are in principle deleted after 45 days, unless Forenede has legitimate reasons for continued retention. Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Forenede's HR manager where they will be processed in accordance with Forenede's relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded. If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority. Otherwise, the data will be retained in accordance with Forenede's deletion policy.

<ul style="list-style-type: none"> Any other persons submitting reports through the Arrangement. 				
Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
<p>#2 Handling and investigation of reports under Forenedes Whistleblower Arrangement regarding:</p> <ul style="list-style-type: none"> The Whistleblower <p>If there is suspicion of the report being deliberately false, this purpose also comprises investigation of the Whistleblower.</p>	<p>We can process the following categories of personal data about you, provided that your report is not anonymous:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> Name, email, telephone number, The contents of your report. <p>As a rule, no sensitive information about you will be processed as part of the handling of the report - unless you choose to provide such information yourself.</p> <p>However, information on criminal offences or possible criminal offences may be included in the processing if there is a suspicion that the submitted report is deliberately false.</p>	<p>We process your personal data as described above on the following bases:</p> <ul style="list-style-type: none"> GDPR, Article 6.1.f: Necessary for the purposes of the legitimate interests pursued by Forenedes or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Forenedes legitimate interest is to enable Forenedes to process reports received under Forenedes Whistleblower Arrangement. GDPR, Article 9.2.f: Processing is necessary for the establishment, exercise or defence of legal claims. Information on criminal offences or possible criminal offences is processed on the basis of section 5.1. in Ordinance (2018:219) with Supplementary Provisions to the EU Data Protection Regulation (necessary for the establishment, exercise or defence of legal claims). 	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> Plesner Law Firm Förenade Service AB, Förenade Care AB, Hela Sveriges Assistans AB and Sjöstjärnan AB IT suppliers External advisors The police Public authorities, e.g., the Swedish Financial Supervisory Authority, the Swedish Data Protection Agency, or relevant tax authorities. 	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation. Reports submitted to the Arrangement are in principle deleted after 45 days, unless Forenedes has legitimate reasons for continued retention. Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Forenedes HR manager where they will be processed in accordance with Forenedes relevant policies and procedures. Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded. If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority. Otherwise, the data will be stored in accordance with Forenedes deletion policy.
Sources				
<p>We can collect information from the following sources:</p> <ul style="list-style-type: none"> Plesner Law Firm You 				

3 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are subject to a report submitted through the Whistleblower Arrangement, you will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In this connection, you will receive information about:

- The identity of the person(s) who is/are responsible for the investigation of the report
- A description of the contents of the report

As mentioned below in the section about your general rights, you have a right of access to the report that was submitted about you. However, your right to access to the report might be limited in accordance with Swedish law.

You also have the right to request rectification of the information in the report if you believe this to be false, misleading, or incomplete. If your request in this respect cannot be met, the information will be supplemented with your comments.

4 CONSEQUENCES OF THE PROCESSING

Reports and investigation of reports to the Whistleblower Arrangement may have significant consequences for the person who is reported, as reports concern violations or suspected violations of the law, as further outlined in the separate guidelines for the Arrangement.

Likewise, a report to the Whistleblower Arrangement may have significant consequences for the person who has submitted the report in case of a deliberately false report. Such cases may have criminal consequences.

5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Your personal data will not be transferred to countries outside the EU/EEA.

6 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Swedish Data Protection Agency.

You are furthermore entitled to dispute our processing of your personal data in the following events:

- If our processing of your personal data is based on the GDPR, Article 6.1 (e) (public interest or exercise of official authority) or Article 6.1 (f) (balancing of interests), see above under legal basis for the processing, you are, at any time, entitled to dispute such processing for reasons related to your particular situation.

There may be conditions or limitations on these rights, e.g., you may not be entitled to deletion of your personal data in a specific case – this depends on the specific circumstances of the processing activities.

You can make use of your rights by contacting Vårdcontroller, Mikaela Janson, at mikaelaj.uppsala@forenadicare.com.

1 IT POLICY

For employees of **Forenade**, reference is made to Forenade's staff manual/IT Policy containing information on Forenade's IT and email policy.

2 QUESTIONS

If you have any questions regarding this policy, please feel free to contact Head of HR, Lotti Klefström, at LOTTIK@forenadicare.com.

Last updated: December 2021