

# Whistleblower policy

## Introduction

RG Discovery is committed to adhering to high standards of ethical business conduct. In line with this commitment, this whistleblowing policy aims to provide instructions and information applicable when individuals wish to report misconduct related to the company.

RG Discovery shall, when hiring a new employee and thereafter, regularly offer all employees, trainees, temporary staff and board members information about the whistleblower service, thereby increasing the awareness in this area. The policy shall also be accessible and easy to access for shareholders in RG Discovery and the company's various business partners.

Each manager with personnel responsibility within the company shall ensure that the Policy is well-known and complied within his or her respective areas of responsibility. All employees and other individuals performing work for the company are responsible for familiarizing themselves with and acting in accordance with the Policy.

Employees are encouraged to contact their immediate manager in the first instance, alternatively the immediate manager's manager or HR-manager, in order to raise suspicions or awareness of misconduct. As a second option, individuals have the opportunity to report on work-related misconduct either anonymously or non-anonymously through the company's internal reporting channels in accordance with the Policy.

## Definition of misconduct

Misconduct means any serious circumstance that may adversely affect the company and/or the activities or work environment of the company's employees and/or business partners or any other serious work-related circumstance that there may be a public interest in its publication.

Misconduct includes, but is not limited to, actual or suspected:

- violations of laws and regulations (whether civil or criminal)
- violations of the company's policies, instructions and guidelines
- bribery and corruption
- serious risk to the life or health of individuals (such as, for example, environmental crime or widespread safety deficiencies in a workplace)
- serious health and safety deficiencies (such as systematic bullying, discrimination or harassment)

Matters that exclusively affect the relationship between an individual and the company do not generally fall within the definition of misconduct under this Policy. Instead, the company encourages such issues to be raised by individuals with their immediate manager in the first instance, alternatively the immediate manager's manager or HR-manager, depending on the circumstances.

## Scope and responsibilities

The following categories of persons are encouraged to report misconduct in accordance with this Policy:

- employees (including part-time or fixed-term employees)
- temporary agency staff (such as consultants or other independent contractors)
- persons carrying out internships or volunteer work in the company
- members of the board
- shareholders
- business partners (for example consultants or suppliers). Customers and clients are not included among business partners and are therefore not covered by the Whistleblowing Act.

This Policy shall also apply to persons who have not yet initiated a work-related relationship with the company, provided that the information about misconduct has been acquired during the recruitment process or through other negotiations prior to entering into an agreement. Furthermore, this Policy shall apply to persons who have belonged to any of the personal categories above and have received or obtained information about misconduct during the time in the business.

If you have knowledge or serious suspicion of a misconduct, you are encouraged to either report the misconduct to your immediate manager in the first instance, alternatively the immediate manager's manager or HR-manager or through the internal reporting channels. When reporting a misconduct, you must have reasonable grounds to believe that the information about the misconduct is true at the time of reporting. However, you are not required to present any evidence or the like. As long as you act in good faith, you will not face any negative consequences, even if the suspicion of a misconduct after closer investigation turns out to be erroneous.

## Prohibition of retaliation

If you receive information about a misconduct in a work-related context, you will not be subjected to any form of retaliation for reporting such information in good faith to your immediate manager, the immediate manager's manager or HR-manager or through the internal reporting channels. "Retaliation" means any direct or indirect act or omission that occurs in a work-related

context and that is prompted by an internal or external reporting of a misconduct, and that causes or may cause harm and/or negative consequences for the reporting person.

It should be noted that the protection against retaliation does not extend to persons who, through the collection of the information or through the reporting itself, are guilty of criminal offences.

## Internal reporting procedure

We have chosen that all reports are received and investigated by the external actor Human&heart HR AB and their whistleblowing service "Trust&heart" to ensure legal certainty. The whistleblowing system is used to report any type of misconduct or misconduct in the public interest.

A report to the whistleblower service can be made anonymously.

- **Digital notification via:** <https://visselblasning.trustheart.se/rgdiscovery/>
- **Letter:** You can post a letter marked "Whistleblower" addressed to Human&heart, Pelle Bergs backe 3c, 79150 Falun
- **Phone:** +46 (0)8 82 40 00, open 08.00-16.00
- **Meeting:** You can request a physical or digital meeting with an investigator, which after your request will be held in a reasonable time. During the meeting, you can present information orally and/or in writing

If you report a misconduct by phone or at a meeting, your report will either:

- be recorded, provided that you consent to the recording, or
- be written down in a protocol that you will have the opportunity to review, correct and approve by signing.

In order to facilitate the subsequent investigation of the report, you are requested to provide a description, as detailed as possible, of the misconduct. For example, you can include documents, images, and/or videos when you submit your report.

Keep in mind that no sensitive personal data (data revealing ethnic origin, political opinions, religious beliefs, membership in a trade union, health status or sex life) should be included in the report, provided that the data is not of relevance to the investigation of the reported misconduct.

If possible, please provide your contact details to facilitate the investigation. You may be asked to provide additional information during the investigation.

Reporting can be done in Swedish, English, German, Norwegian, Danish and Finnish. You will be informed that the report has been received within seven days of receipt of the report, unless you have stated that you do not wish to receive such a confirmation of receipt, or there is reason to believe that such acknowledgement of receipt cannot be provided to you without disclosing your identity.

As an alternative to using the internal reporting procedure, you can also report misconduct directly to specially selected Swedish authorities (external reporting) without the risk of retaliation. Which authority you should report to depends on the nature of the misconduct that you report. Reporting shall be carried out using established reporting channels intended for reporting misconduct by the relevant authority.

## Data protection and privacy

All processing of personal data within the framework of the company's whistleblowing system takes place in accordance with applicable legislation. Processed personal data is normally deleted within two years after an investigation of a reported misconduct has been completed.

When assessing and investigating reports via the whistleblower service, our partner Human&heart processes personal data in its capacity as Personal Data Controller. Here you can read their [privacy policy](#)

## Investigation function

The company's investigative function consists of the CEO, HR Manager and an operative board member ("**Investigation Function**").

The investigation function ensures that the case is investigated and recommends appropriate action. The investigation function must act independently and with integrity. Members are authorized to take such investigative measures as they deem necessary and appropriate in each case.

The investigation function has confidentiality regarding all information they receive as a member of the investigation function and may not disseminate the information further, except in the cases specified in this Policy.

## Investigation

After a report of a misconduct has been received and registered, the investigator at Human&heart will evaluate the report. The investigator at Human&heart may decide not to investigate a report in, for example, cases when:

- the information in the report is not relevant
- there is insufficient information and/or evidence to carry out an adequate investigation and there is no possibility of obtaining further information and/or evidence, or
- it can be established that the report has been submitted in bad faith. If the investigator finds that a report is unfounded and should not be investigated further, the report shall be deleted immediately.

The investigation function shall consider whether the responsibility for further actions within the framework of the investigation should be placed on relevant internal resources, such as IT, HR, finance department or a specific branch of business. The investigation function shall also consider whether there is a need to hire external investigators.

Investigations should always be conducted discreetly, confidentially and with priority.

In connection with the investigation or after the investigation has been completed, it may be necessary to release information that can make it identifiable by linking you to a certain activity within the company in order, for example, to initiate a dismissal procedure. Information may also be provided to competent authorities. You will be informed if such disclosure may occur, provided that this will not hinder or complicate the purpose of the disclosure.

Provided that you have not submitted an anonymous report, after submitting a report, you will receive information about follow-up actions in connection with the report as well as the reasons for such follow-up actions within a reasonable time, but no later than three months from the date of receipt of a confirmation that your report has been received, to the extent that such information would not harm the internal investigation or investigation or affect the rights of any person involved. If appropriate and possible, you will be continuously informed of the status of the investigation, and all follow-up measures taken, in connection with the report.

## Actions

After an investigation has been completed, the investigation function shall recommend appropriate measures. The investigation function, together with the chairman of the board and the CEO, shall decide on appropriate measures and ensure that corrective measures are taken and follow-up on the status of the implementation of such measures to the investigation function.

The measures shall be effective, proportionate and fair in relation to the interests of the company as well as the individuals involved and/or the organizations. The company shall comply with relevant regulations, company policies, as well as the company's culture and values. Measures may include, for example, a written warning, dismissal and/or referral to competent authorities for further investigation.

## Documentation

Notifications received through the internal reporting service shall not be stored longer than is necessary and proportionate to investigate the reported misconduct and to take appropriate follow-up action, but no longer than two years after the conclusion of a follow-up case or investigation.

This Policy was adopted by RG Discovery AB's Board of Directors 2023-12-01.