

Whistle-blower policy

This policy describes which matter are reportable, how you can report your concerns and how the company will protect you as the whistleblower.



Established by: Group HR-Director

Owner: The Board of Directors

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1. Introduction

1.1 Purpose

For Byggfakta Group it is crucial to maintain a high level of ethics and integrity in everything we do, in order to be successful and keep our high level of reputation.

Our core values, business principles, Code of Ethics and Conduct, and other policies guide our everyday conduct and we have a professional responsibility to speak up and report unethical behaviour.

Byggfakta Group's Whistleblower Policy is an important element in detecting corrupt, illegal or other undesirable conduct. We strongly encourage you to speak up if you suspect or witness any matters of concern. Byggfakta Group obliges to investigate in all reports made under this policy in a professional manner.

1.2 Definition of a whistle-blower

A Whistleblower is someone who discloses Reportable Conduct. A Whistleblower can be a current or former partner, director, officer, employee, volunteer or supplier of goods or services to Byggfakta Group. It also applies to relatives, dependents, or spouses of any of these people.

1.3 Do the right thing and show moral courage

Byggfakta Group expects that everyone who works for us comply with our Code of Ethics and Conduct, business principles, policies and procedures, professional standards and current laws and regulations. You are also responsible to speak up and do the right thing when you suspect any kind of misconduct, by report this, using the channels describes in this policy.

We encourage you talk to a trustworthy person close to you, which could be your trusted partner, manager, coach, HR etc. We appreciate hearing your concerns directly so that we can resolve them directly. If you raise or disclose a Whistleblower report according to this policy, we have the responsibility to support and protect you, including not disclosing your identity (unless required or permitted by law).

1.4 Reportable Conduct

Reportable conduct is anything that you have reasonable grounds to suspect, in relation to Byggfakta Group, such as but not limited to:

- misconduct, or an improper state of affairs or circumstances.
- conduct that represents a danger to the public or the financial system.

Examples of Reportable Conduct include but are not limited to:

- illegal conduct, such as theft, violence or threatened violence, and criminal damage against property
- fraud, money laundering or misappropriation of funds

- offering or accepting a bribe
- financial irregularities
- failure to comply with, or breach of legal or regulatory requirements
- engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

1.5 Accessibility and monitoring

The whistleblower policy is posted to the common intranet page, which is based in our SharePoint platform. The intranet is available to all employees, partners and suppliers related to Byggfakta Group; in all the countries we operate. The Policy will be reviewed and revised annually by the Group HR-Director and The Board will provide oversight of the Policy.

2. How to conduct a Whistleblower report

2.1 When to conduct a whistleblower report?

Before conducting a Whistleblower Report you should make sure that you have reasonable grounds to suspect reportable conduct. *'Reasonable grounds to suspect'* is based on objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard. However, a Whistleblower does not need to prove their allegations. In addition, the disclosure can still qualify for protection even if the disclosure turns out to be incorrect.

2.2 How to conduct a whistleblower report?

Byggfakta Group encourage you to contact our internal whistleblower function with any concerns. You can report your concerns by phone, email or by sending an anonymous letter. The internal whistleblower function is supervised by the Group HR-Director.

Contact details:

Phone number:	+447786256701
E-mail:	whistleblower@byggfaktagroup.com
Post address:	Private and Confidential Lindi Teate The Old Post Office St Nicholas Street Newcastle upon Tyne NE1 1RH

When submitting a whistleblower report you should use the [whistleblower-template](#) and include details such as:

- date, time and location;
- names of person(s) involved, roles and their business group;
- your relationship with the person(s) involved;
- the general nature of your concern;
- how you became aware of the issue;
- possible witnesses;
- other information

Byggfakta Group recommends using the channels above to report your matter, but you can also make a report directly to the:

- Immediate manager
- CEO
- Group HR Director
- Board member

The person you disclose the matter to are then responsible to submit a whistleblower report to the whistleblower function, while keeping your identity anonymous.

As mentioned, you always have the right to submit your report anonymously and if so, you will still be protected under the Whistleblower Laws. However, requiring complete anonymity may practically make it more difficult for us to investigate the issue and take the further actions. By not being anonymous, we can contact you directly to discuss your concerns which will help us investigate the complaint more quickly and efficiently.

2.3 Protection of your identity

When you submit a whistleblower report, your identity (or any information which could identify you) will only be shared when and where:

- you give us your consent
- Byggfakta Group is required by law

However, you should be aware that we do not need your consent if:

- the information does not include your identity
- we have taken all reasonable steps to reduce the risk that you will be identified from the information
- it is reasonably necessary for investigating the issues

3. Investigation of a disclosure

3.1 Who will investigate the matter?

All the submitted Whistleblower Reports will be considered by the whistleblower function, who will appoint an investigator to investigate the Whistleblower Report. All Reports will be taken seriously and will all be assessed carefully to determine whether an investigation is required. The outcomes of the investigation are reported to the Head of the whistleblower function. The head of the whistleblower function will review the outcome and determine appropriate actions to respond to the matter.

3.2 The process of investigation

The circumstances require different kind of steps and investigation methods, but Byggfakta Group are entitled to make sure that all matters, investigations, and processes need to be:

- fair
- conducted as quickly and efficiently as possible
- determined whether there is enough evidence to substantiate the matters reported
- independent of the person(s) concerned with the allegations

During the process, you will be provided with feedback and expected timeframes. Further, Byggfakta Group will notify you once an investigation has been completed. However, the discloser must be aware that we may be unable to disclose particular details or the outcome of the investigation.

4. How the whistleblower will be protected

To be qualified for protection under this Whistleblower policy, the whistleblower must make a report directly to an eligible recipient.

The protections include:

- Identity protection
- Protection from Detriment
- Compensation and remedies
- Civil, criminal, and administrative liability protection.

By submitting a whistleblower report aligned with this policy, we commit to take all reasonable steps to protect you from Detriment.

4.1 Detrimental Conduct

Byggfakta Group does not tolerate any form of detrimental Conduct taken by any person against the Whistleblower or any people who are involved in an investigation of a Whistleblower Report.

Examples of detrimental conduct can include, but are not limited to: ·

- dismissal of an employee or alteration of an employee's position/ duties to their disadvantage, or negative performance feedback that is not reflective of actual performance
- harassment, intimidation, or bullying;
- threats to cause detriment directly or indirectly.

Byggfakta Group takes all allegations of detrimental conduct very seriously. If you believe that you are suffering detriment you should report it to us, and we will take appropriate steps in accordance with this and the company's other policies.

4.2 False or misleading reports

When making a disclosure, you are expected to have reasonable grounds to suspect the information you are disclosing is true, but you will not be subject to a penalty if the information turns out to be incorrect. However, it is prohibited to submit a report, which you know is untrue or is misleading. This may be a breach of our business principles, code of conduct and/or other policies and will be considered a serious matter.