

ALEIDO

# Whistleblowing Policy



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The purpose of this Whistleblowing report Policy is to allow people to anonymously report improprieties occurring within or pertaining to Aleido.

A whistleblower is a person who exposes information within an organisation which the public has an interest in its revealing, e.g., activity that is deemed illegal, dishonest or incorrect.

The information of alleged wrongdoing can be classified in many ways: violation of company policy, law, regulation, or threat to public / national security, as well as fraud and corruption. A whistleblower can be an Aleido employee or a person who is not employed by Aleido. Less important wrongdoings shall be reported to Aleido's HR department.

## WHAT CAN BE REPORTED

Work-related information which the public has an interest in its revealing can be reported, including for example any below issues:

- Unlawful activity.
- Financial fraud (for example accounting manipulation, non-compliance with internal procedures, misappropriation of assets or fraudulent statements).
- Bribery or corruption (for example conflicts interest, bribery, sponsorships & donations, gifts or facilitation payments).
- Violation of competition laws (for example price fixing, exchanging price sensitive information, collusion with competitors).
- Serious endangerment to human health and life (for example serious environmental crimes, major deficiencies as regards the security at the workplace and any forms of discrimination or harassments).
- Activities which otherwise by law, treaty or agreement amount to serious improper conduct (for example discriminatory practices, use of child labour, human rights violations).
- Attempts to conceal any of the above.

## WHO ARE PROTECTED

The aim of the whistleblowing procedure is to offer the person reporting anonymity. A whistleblower who discloses information in accordance with the Swedish whistleblower act (2021:890) or EU Whistleblower Directive 2019/1937 is protected from disciplinary actions. The protection extends to the reporting person's, colleagues and relatives, anyone assisting the reporting person and legal entities the reporting person owns or works for. Aleido will respect the confidentiality of any whistleblowing complaint received.

However, it must be appreciated that it may be difficult to follow up and verify anonymous complaints and to verify complaints if the complainant is not prepared to give their name. If anonymity is requested, however, Aleido will respect that confidentiality.

Any person who makes a disclosure or raises a concern under this Whistleblowing Policy will be protected from any disciplinary actions on the condition that the complainant:

- discloses the information in good faith,
- believes it to be substantially true,
- does not willfully submit false allegations, and
- does not commit a crime when reporting or collecting the information.

## HOW TO REPORT

A complaint or concern may be reported either directly to Aleido or to an external party, an authority. You choose how you wish to report. Your options are; using a template on Aleido's webpage, book an appointment to report in person, through a telephone call or directly to an authority.

Here is how to report using a template on Aleido's webpage.

1. Complete the template on Aleido's webpage with your title and a description of the issue to be reported. If your report concerns an Aleido company (incl. Aleido Group AB, Aleido Sweden AB, Aleido Learning Sweden AB, Aleido Germany GmbH, Aleido GmbH, Aleido Hungary Kft, Aleido UK Ltd., and Aleido Learning UK Ltd. (Walkgrove Ltd.)) the template can be found here: <https://whistleblower.aleidogroup.com>
2. When finished, press the submit button to save the information anonymously.
3. You will automatically receive a link to the report that enables you to view the response.
4. Aleido's General Counsel as well as an external legal counsel receives the report. If it should be inappropriate for the matter to be handled by the General Counsel, the external legal counsel will handle the matter.
5. An initial response will be issued, which you can view by clicking the link received upon submitting your report (you are the only one that can see the information. No other employees at Aleido have access).

Here is how to report by telephone or during a physical meeting:

1. Call Aleido at +4631-394 03 00 and ask to be directed to the General Counsel.

Please note that Aleido may, according to law, be obligated to disclose information that could identify the reporting person, if you chose to report orally.

Here is how to report directly to an authority:

Several Swedish authorities have been ordered by the government to receive and investigate whistleblower reports. A full list can be found at the Swedish government's webpage and the list currently includes e.g.: Swedish Work Environment Authority, Swedish Competition Authority and Swedish Financial Supervisory Authority.

A report is made by following respective authority's instructions. The report will thereafter be investigated by the authority and not by Aleido.

## HOW A REPORT TO ALEIDO IS HANDLED

2. You will receive confirmation that the matter is being handled within 7 days of leaving a report.
3. Aleido's General Counsel or the external legal counsel carries out an initial investigation and suggests actions to be taken. The investigation together with the suggested actions are communicated with the CEO. If the CEO should be subject to the report, the investigation together with the suggested actions are communicated with the chairman of the board of directors of Aleido Group AB.
4. The General Counsel or the external legal counsel and the CEO decides on actions to be taken.
5. Within 3 months of leaving a report you will receive information on what actions has been taken as a result of your report.

You have the option to opt-out of receiving confirmation and information.

You will be able to follow the handling as well as the outcome of your report on Aleido's web template by clicking the link received upon submitting your written report.

## GENERAL PRINCIPLES FOR WHISTLEBLOWING

Aleido will not tolerate any attempt to apply sanctions or disadvantages or to discriminate against anyone who has reported a serious and genuine concern that they may have in accordance with this Whistleblowing Policy.

Aleido is striving to meet the highest standards of honesty and ensures that sufficient resources will be put into investigating any report made. However, it is important for anyone contemplating making allegations to ensure that they are sincere. No allegations should be made maliciously or with the knowledge that they are false.

## MORE INFORMATION

For more information regarding the Swedish legislation on whistleblowing, please visit: <https://www.av.se/om-oss/visselblasarlagen/>

You should also know that The Freedom of the Press Act and Fundamental Law on Freedom of Expression assures individuals a right to collect information and provide media and press with information for publication.