

Whistleblowing policy Atrium Ljungberg AB

(Resolved at the Board meeting on 20 May 2021)

Purpose and goal

Atrium Ljungberg AB, including the Group’s subsidiaries (‘Atrium Ljungberg’), strives to have an open business environment and good business ethics, and is constantly looking at ways to improve. Our employees, customers and suppliers are our most important sources for insights into any failings that need to be corrected. Anyone who suspects any irregularities that are in violation of Atrium Ljungberg’s values, Business Ethics Policy or legislation must be able to speak up without fear of reprisals. You can choose to submit your information anonymously. Atrium Ljungberg has a Whistleblowing Policy and reporting function in place to protect any whistleblowers.

Responsibility and governance

This policy has been adopted by Atrium Ljungberg’s Board of Directors and executive management team.

What can be reported?

This system enables you to report any suspicions of serious irregularities. This includes, for example:

- financial crimes, including the giving and receiving of bribes, theft, fraud and counterfeiting, false accounting and any other violation of accounting and tax legislation.
- a conflict of interests between an employee and Atrium Ljungberg, or
- other serious irregularities that impact Atrium Ljungberg’s vital interests or an individual’s life and health: for example, serious environmental crimes, serious safety failings at the workplace, and very serious forms of discrimination and harassment.

The following key people can be reported: Board members, members of executive management, employees that report directly to members of executive management, Establishment Retail & Offices, project managers, project leaders.

Who can report

This reporting routine can be used by all Atrium Ljungberg’s employees (irrespective of their employment status). Customers and suppliers can also use the system.

How do I make a report?

- Alternative 1: Report to a manager in Atrium Ljungberg’s organisation or the Group management team.
- Alternative 2: Report anonymously using the reporting tool for whistleblowing, see below.

How are other matters reported?

This system should not be used for other matters, such as disputes, faults/errors, complaints, minor offences, harassment, bullying, dissatisfaction with pay, etc. These matters must firstly be reported to the line manager or as described in Atrium Ljungberg's other policies, guidelines and routines.

The reporting tool

A reporting tool, managed by an external and independent company, is used to protect your anonymity. This reporting channel is encrypted and password-protected. You never have to disclose your identity if you do not want to.

- You do not need to have any proof of your suspicions, but no accusation should be made with harmful intent or with the knowledge that the accusation is false.
- It is important for you to describe all the facts in the matter, including anything that you do not think is very important.
- Please make a detailed statement and attach everything that may be relevant.

To make a report, go to 'link' and enter company code 'pkt762'.

Who receives the report?

Atrium Ljungberg works with 2Secure, an external and independent actor, for whistleblowing cases. All reports are received and managed by 2Secure. They have extensive experience of investigating these cases and have global capabilities if required. 2Secure works in consultation with Atrium Ljungberg's Whistleblowing Committee, which comprises the General Counsel and the Chairman of the Board. No information about the whistleblower will be disclosed if the whistleblower has not given their approval for this. You yourself choose if you want to remain completely anonymous to 2Secure's investigators or if you want to disclose who you are. All reports will be investigated and managed regardless of whether or not you wish to remain anonymous.

Feedback

Within two weeks of making the report, you can log in again using your personal login details and password to see if the investigators who received your report have any comments/follow-up questions. You can monitor your case via 'link'. Log in regularly as the investigators may need to ask you supplementary questions and there are times when they will want to act as quickly as possible.

Updates

This policy must be updated annually or whenever it is deemed necessary, and is adopted at an ordinary Board meeting that follows the inaugural meeting.