

Whistleblower Policy - Gordon Services AB

Definitions

GDPR

General Data Protection Regulation is a European regulation that regulates the processing of personal data and the free flow of such data within the European Union.

Whistleblower Directive

Directive 2019/1936 on protecting people who report breaches of the Union law.

Whistleblower Act

Swedish Act (2021: 890) protects persons who report breaches.

Visslan

The Whistle Compliance Solutions AB's service Visslan enables digital reporting of misconduct: <https://visslan.com/>.

Misconduct

Acts or omissions that have occurred in a work-related context which has a public interest in bringing to light.

Reporting

Oral or written provision of information on misconduct.

Internal reporting

Oral or written provision of information on misconduct within a private sector company.

External reporting

Oral or written provision of information on misconduct to the competent authorities.

Disclosure or disclose

To make information about misconduct available to the public.

Reporting person

A physical person who reports or discloses information on misconduct acquired concerning their work-related activities.

Reprisal

Any direct or indirect act or omission that occurs in a work-related context and that is caused by internal or external reporting or disclosure that gives rise to or may give rise to undue harm to the reporting person.

Follow-up

If the recipient of a report took any action to evaluate the accuracy of the allegations made, when appropriate, to address the reported breach, including actions such as internal investigations, inquiries, prosecutions, recovery measures, and closure of proceedings.

Feedback

The reporting person ("whistleblower") provides information on the measures planned or taken as follow-up and the reasons for such follow-up.

Background

At Gordon Delivery, we strive for an open and transparent workplace where misconduct is not tolerated. We need clear information on how to report misconduct. If there is suspicion of ongoing misconduct, resources should be available to handle it. By making it easy to report, we protect the trust of our employees, customers, and the public in us.

This whistleblower policy applies to the legal entities:

Gordon Services AB (559016-9750)

Gordon Delivery Denmark Aps (41720107)

Gordon Delivery Finland Oy (32360393)

Gordon Delivery Norway AS (927759608)

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1. Who can whistleblow?

Those who whistleblow receive protection under the Whistleblower Act if they are employees, volunteers, interns, active shareholders, persons otherwise available for work under Gordon's control and direction, or are part of Gordon's management, executive or supervisory bodies. Contractors, subcontractors, and suppliers to us who become aware of misconduct within Gordon can also report. The fact that you have terminated your employment relationship with us or that it has not yet commenced is not an obstacle to reporting misconduct.

In addition, we also allow persons outside the above categories to use our internal reporting channel. We will treat all reports equally and ensure confidentiality, even if you, as an outsider, are not covered by the protection provisions of the Whistleblower Act.

1.1 What can I blow the whistle on?

If there is suspicion of possible misconduct or violation of laws and/or regulations, we encourage you to report this as a whistleblowing case. It is essential that the person reporting has reasonable grounds to believe that the misconduct is true and exists. When assessing the background, circumstances, and information available during reporting, it is important that it can be considered a violation.

2.1 Matters of public interest

You can report information about misconduct arising in a work-related context that there is a public interest in disclosing. For other personal complaints that do not have a public interest in being disclosed, such as disputes or complaints regarding the workplace or work environment, we encourage you to contact your manager, HR or another appropriate person responsible instead. This is to ensure that these matters are handled in the best possible way.

The following are examples of serious misconduct that should be reported as whistleblowing:

- Deliberately false accounting, internal accounting controls, or other financial crimes.
- Occurrence of theft, corruption, vandalism, fraud, embezzlement, or data intrusion.
- Serious environmental crimes or significant deficiencies in workplace safety.
- Severe forms of discrimination or harassment.
- Other serious misconduct affecting life or health.

- Other serious misconduct affecting the vital interests of the company.

At Gordon, we have also considered all unethical or illegal behaviours irregularities worth whistleblowing. Therefore, we treat all incoming reports equally, based on the law's intention and protection.

If the reporting does not meet the criteria of the whistleblower law, the law itself cannot provide protection. However, we will still offer the same confidentiality and security against retaliation as a lawful report, provided that the reporting is true and/or made in good faith.

You can report the following examples of unethical or illegal behaviours:

- Actions and omissions that go against our culture, vision, and values.
- Acts that violate good ethics and standards in the labour market.
- Drug and alcohol abuse during working hours.
- Dangerous acts that could cause physical harm to persons or property.
- Discrimination of any kind.
- The exploitation of position and/or abuse of power.

2.2 Misconduct violating EU law

In addition, reporting information about misconduct arising in a work-related context that violates EU regulations or provisions is possible. If you believe that Gordon has violated EU regulations or requirements, you are encouraged to report this through the whistleblowing system.

3. How do you report?

We use Visslan, Gordon's digital whistleblowing channel. It is accessible through <https://gordondelivery.visslan-report.se/>. On the website, you choose "report" to then be able to describe your suspected misconduct. Please describe what happened as thoroughly as possible so that we can ensure that adequate measures can be applied. Therefore, it is also possible to attach additional evidence, such as written documents, pictures, or audio files.

3.1.Sensitive Personal Data

Please do not include sensitive personal data about individuals mentioned in your report if it is not necessary to describe your case. Sensitive personal data, including ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, a

person's sex life or sexual orientation, genetic data, and biometric data used to identify a person uniquely.

3.1.1 Anonymity

You can remain anonymous throughout the process without affecting your legal protection, but you also have the option to confess your identity under strict confidentiality. Anonymity sometimes makes it difficult to follow up on the case and the actions we can take. Still, in such cases, we may later ask you to confess your identity under strict confidentiality.

3.1.2 Follow-up and Login

After reporting, you will receive a 16-digit code, which you can log in to Visslan's platform using the following link: <https://gordondelivery.visslan-report.se/>. You must save the code; otherwise, you cannot view the case again.

If you lose the code, you can submit a new report referring to the previous report.

Within seven days, you will receive confirmation that a case handler has received your report. The case manager is an independent and autonomous party that receives cases in the reporting channel, whose contact details are attached in "6.1 Contact Details for Case Handler". You can communicate through the platform's built-in and anonymous chat function. You will receive feedback within three months on any actions planned or taken due to the reporting.

To answer any follow-up questions from the case manager, you must log in with your 16-digit code regularly. In some cases, the case can only be progressed with answers to follow-up questions from you as the reporting person.

3.2 Oral Reporting

In addition, it is also possible to conduct an oral case by uploading an audio file as an attachment when creating a case at <https://gordondelivery.visslan-report.se/>. You then choose "Yes" to the question about evidence to be able to upload your file. In the audio file, you describe the same circumstances and details as you would have done in a written case.

In addition, a physical meeting with the case manager can be requested via Visslan, which is easiest done by either requesting it in an existing whistleblowing case or creating a new report.

3.3 External Reporting

We urge you always to report misconduct internally first, but if difficulties arise or it is deemed inappropriate, it is possible to conduct external reporting instead. We refer you to contact competent authorities or, where applicable, EU institutions, bodies, or agencies.

Contact details for these are available at the following web address:

www.visslan.com/resources/visselblasarpolicy/extern-rapportering.

4. What are my rights?

4.1 Right to confidentiality

During the processing of your case, we will ensure that your identity as the reporting person is treated confidentially and access to the case is prevented for unauthorised personnel. We will not disclose your identity without your consent unless applicable legislation requires it, and we will ensure that you are not subjected to retaliation.

4.2 Protection against retaliation

When whistleblowing, there is protection against negative consequences for reporting misconduct in the form of a prohibition against retaliation. The protection against retaliation also applies, in relevant cases, to persons in the workplace who assist the reporting person, your colleagues and relatives in the workplace, and legal entities that you own, work for, or otherwise have a connection with.

This means that threats of retaliation and attempts at revenge are not allowed. Examples of such retaliation include termination, changed job duties, disciplinary measures, threats, discrimination, blacklisting within your industry, or the like because you have blown the whistle.

Even if you were identified and subjected to retaliation, you are still protected if you had reasonable grounds to believe that the misconduct reported was true and within the scope of

the Whistleblower Act. Note, however, that protection is not obtained if it is a crime to obtain or access the information that has been reported.

The protection against retaliation also applies in legal proceedings, including defamation, copyright infringement, breach of confidentiality, violation of data protection rules, and disclosure of trade secrets or claims for compensation based on private, public, or collective labour law. You should not be held liable for any reporting or disclosure provided that you had reasonable grounds to believe that reporting or disclosing such information as necessary to expose misconduct.

4.3 Disclosure of information

The protection also applies when disclosing information. It is assumed that you have reported internally within the company and externally to an authority or directly externally. No appropriate action has been taken within three months (in justified cases, six months). Protection is also obtained when you have reasonable grounds to believe there may be an obvious danger to the public interest if it is not disclosed, such as in an emergency. The same applies when there is a risk of retaliation in external reporting or when the misconduct is unlikely to be effectively remedied, for example, in the risk of evidence being hidden or destroyed.

Note, however, that this protection does not apply if you, as the reporting person, disclose information directly to the media following an otherwise applicable protection system for freedom of expression and communication. You still have whistleblower protection and freedom of acquisition where applicable.

4.4 Right to review the documentation at meetings with case handlers

Suppose you have requested a meeting with case handlers. In that case, with your consent, they will ensure that complete and accurate meeting documentation is preserved in a durable and accessible form by, for example, recording the conversation or conducting a protocol. Afterwards, you will have the opportunity to review, correct and approve the minutes by signing them.

If the conversation was not recorded, the case handler has the right to document the conversation through minutes. Afterwards, you will have the opportunity to review, correct and approve the transcription by signing it.

5. GDPR and handling personal information

We always do our best to protect you and your personal information. Therefore, we ensure that our handling of this information always follows the General Data Protection Regulation ("GDPR").

In addition, we will delete any personal information that is unimportant to the case and only keep the case for as long as we need to. A case may be processed a maximum of two years after its conclusion. For more information on how we handle personal information, please refer to the Company's Personal Data Policy.

6. Further contact

For technical questions about the Visslan platform, please create a case at <https://gordondelivery.visslan-report.se/>. If that is not possible, contact The Whistle Compliance Solutions AB, who developed Visslan. Contact information for for The Whistle Compliance Solutions AB is provided below:

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