



HÅNDVERKS
GRUPPEN

Whistleblowing procedure

Document Control

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1. Background & Purpose

Håndverksgruppen and its subsidiaries (hereinafter referred to as “the Group” or “Håndverksgruppen”) are committed to maintaining a transparent and responsible workplace. The Group encourages all employees to speak up if they become aware of any misconduct or inappropriate practices within the organization.

This Whistleblowing procedure outlines how employees can report concerns related to potential legal violations, breaches of Håndverksgruppen’s Code of Conduct, or non-compliance with internal policies and procedures. It also explains how such reports will be handled.

Håndverksgruppen believes that openness, integrity, and effective communication throughout the organization ensures good business practice and promotes an enhanced work culture. By providing a clear process for raising concerns, we aim to foster a culture of trust and accountability across the organization.

This Whistleblowing Procedure is established in compliance with the EU Whistleblowing Directive (2019/1937) and its implementation in national law across our operating countries, including the Norwegian Whistleblowing Act, Swedish Whistleblowing Act, and equivalent Danish and German legislation.

2. Scope

The procedure applies to all entities within the Group, all full-time and part-time employees of the Group, hired personnel, consultants, as well as board members and administrative advisors (together “personnel”).

This procedure also enables reporting by:

- Suppliers, contractors, and subcontractors working with Håndverksgruppen
- Business partners and other third parties with whom Håndverksgruppen has a business relationship
- Job applicants and former employees
- External persons who become aware of misconduct related to Håndverksgruppen

Reports from external parties will be handled in accordance with this procedure insofar as applicable.

3. Roles & Responsibilities

All personnel are expected to report any suspected misconduct, violations of law, or breaches of Håndverksgruppen’s policies in good faith. The management of each subsidiary is responsible for the implementation of this procedure including ensuring effective communication to all personnel of their rights and obligations related to whistleblowing.

The whistleblowing officers, listed in section 4.4.1 below, are responsible for receiving and managing reports, safeguarding confidentiality, and coordinating follow-up actions.

The CEO is the owner of this procedure, and with the support of the Group Sustainability Manager, the CEO is responsible for reviewing and updating the procedure.

While this procedure provides a Group-wide framework, country-specific requirements under national whistleblowing legislation apply where personnel are based or where the reported conduct occurs. In cases where national law provides greater protection or additional rights beyond this procedure, the stricter standard shall apply. Country managing directors ("MD") are responsible for ensuring compliance with local whistleblowing regulations and communicating any country-specific requirements to personnel.

4. Procedure statement

4.1 What is whistleblowing?

Whistleblowing is the reporting of misconduct within an organization.

Such misconduct includes any violation of applicable laws and regulations in the countries in which Håndverksgruppen operates. It also includes breaches of company policies or commonly approved ethical norms. Examples of violations include, but are not limited to:

- Circumstances that endanger employees' lives or health
- Damage to the climate or environment (hazardous products, pollution etc.)
- Corruption or other economic crimes (such as embezzlement, theft, fraud, etc.)
- Breach of sanctions
- Abuse of authority
- Unsound working environment (harassment, bullying, sexual harassment, discrimination, racism, etc.)
- Breaches of Personal Data Protection legislation
- Other violations of the Code of Conduct, Supplier Code of Conduct, this Whistleblowing procedure and other applicable policies or procedures of Håndverksgruppen.

Typical HR related problems such as internal conflicts between personnel, will normally not be considered as a violation relevant for whistleblowing.

4.2 Who can report concerns?

This procedure applies to all personnel of Håndverksgruppen, as defined in section 2 above. Workers hired from temporary-work agencies also have a right to report breaches at the hirer's undertaking.

Reports in accordance with this Whistleblowing procedure may also be made by any person affiliated with Håndverksgruppen, including business partners, suppliers etc. External persons who have no connection with Håndverksgruppen may also report any circumstances they find unacceptable. In such cases these guidelines apply insofar as they are applicable.

The above-mentioned categories of people can report on suspicious misconduct that has taken place in a work-related context and constitute information that is of public interest that it is brought forward and acted upon.

This can for example be suspicions of fraud, corruption or other forms of financial crime, disregard of work environment legislation, suspected environmental crime or serious forms of systematic harassment. Attempts to conceal misconduct may in itself constitute misconduct.

4.3 Right and duty to report

All personnel of Håndverksgruppen have the right to report violations within the organization.

All personnel have a duty to report about criminal offenses and circumstances where life or health is endangered and breaches of the Code of Conduct. Questions relating to the interpretation of the Code of Conduct or their practical application should be addressed to their line manager or the managing director (MD) of the relevant subsidiary.

Anyone reporting concerns in good faith can do so without fear of reprisals.

We encourage employees to make whistleblowing reports without undue delay from the incident occurring, so that the violation can be halted or investigated as soon as possible.

4.4 How to report concerns?

4.4.1 Internal whistleblowing

At Håndverksgruppen we foster an open-door policy and encourage personnel to share their questions, concerns, suggestions, or complaints with someone who can address them appropriately. In most cases, an employee's line manager or HR representative is in the best position to address an area of concern. If this reporting channel is deemed inappropriate due to the individual's involvement or the severity of the breach, the breach should be reported to the MD of the relevant subsidiary, directly to the group CEO, or alternatively the Chairman of the Board of Directors ("the Board") of Håndverksgruppen.

In exceptional circumstances where it would be inappropriate to approach any of the above, Compliance Officer at FSN Capital Partners AS, Hanne Iversen, or Fredrik Bergsmark Grimstad at PwC may be contacted. Håndverksgruppen has mandated Fredrik Bergsmark Grimstad as an external part managing whistleblowing reports. He will assess if and whom to inform at Håndverksgruppen.

Contact list

Håndverksgruppen Group CEO	Øyvind Emblem	+47 95 75 11 88	oe@handverksgruppen.com
Chairman of the Board Håndverksgruppen	Per Sjöstrand	+46 70724 5149	per.sjostrand@instalco.se

FSN Capital Partners Compliance Officer	Hanne Iversen	+ 47 922 55 231	hanne.iversen@fsncapital.com
External contact person	Fredrik Bergsmark Grimstad at PwC	+47 984 59 372	fredrik.grimstad@pwc.com

Håndverksgruppen has furthermore established an electronic Whistleblowing channel available at <https://trustcom.pwc.no/handverksgruppen>.

At Håndverksgruppen, a whistleblowing report can always be forwarded by letter, e-mail, phone call or in person, openly or anonymously. There are no requirements as to the form of the report, but Håndverksgruppen encourages employees to report concerns in writing and through the electronic Whistleblowing channel. The whistleblower decides what information is to be provided. However, to ensure sufficient information to be able to perform adequate follow-up actions, the report should include as many details as possible and available supporting evidence, such as:

- The period, and date and time if applicable, of the circumstances concerned
- The employees' observations
- The place where the incident occurred
- Other witnesses
- Any supporting documentation

4.4.2 Whistleblowing to external reporting channels

Håndverksgruppen's aim is to arrange its procedures so that internal whistleblowing will always be sufficient. However, if a whistleblower does not believe that a report will be managed appropriately in Håndverksgruppen's internal reporting channels, misconduct can also be reported externally to an authority that can receive, provide feedback on, and follow up on whistleblowing cases. The whistleblower has the right to report to a supervisory body or other public authority (for example the Norwegian Labor Inspection Authority, the Norwegian Data Protection Authority or the police).

In Sweden, several authorities have been mandated by the Swedish government to establish external reporting channels within certain areas. A list over authorities and areas of responsibility can be found [HERE](#).

The whistleblower can in certain instances report to the media or public, limited to situations when it is done in good faith, the concern has public interest, and internal whistleblowing has proven to be inappropriate or ineffective.

4.4.3 Anonymous whistleblowing

The whistleblower may report anonymously through the electronic Whistleblowing channel. However, whistleblowers should be aware that:

- The receiver may not be able to provide feedback when the identity of the whistleblower is unknown
- Proper investigation may prove difficult if the information provided cannot be tested or verified
- The investigator cannot ask follow-up questions to obtain further information from the whistleblower.

For these reasons, Håndverksgruppen encourages named reporting where possible, with assurance of strict confidentiality and protection from retaliation. If anonymity is essential, whistleblowers should provide as much detail and supporting evidence as possible in the initial report.

4.5 How to handle whistleblowing reports

Håndverksgruppen's basic principles for handling whistleblowing reports are:

- All reports are taken seriously
- All reports will be sufficiently investigated within reasonable time in a fair, open minded and objective manner
- All reports are treated with confidentiality and upholding information security
- Protection of all whistleblowers
- Whistleblowers reporting in good faith will not be subject to harassment, discrimination or punishment
- Non-anonymous whistleblowers will get timely feedback and information about the process
- The process will be documented in writing

All sensitive information shall be processed on a strict "need-to-know" basis and in accordance with relevant data protection acts and any guidelines established by local privacy authorities, local laws, and other relevant regulations. Note that there may be specific requirements under local data protection acts, particularly when using electronic reporting channels.

All employees are required to maintain confidentiality regarding sensitive information and shall sign a separate confidentiality agreement if deemed necessary by the CEO or external advisors.

All information received in connection with a whistleblowing report shall be archived with limited access and preserved in a secure and confidential manner. All physical documents shall be stored securely.

All personal data collected during the investigation, except for the final report, shall be deleted immediately after the investigation is concluded, unless legal proceedings are expected. If that is the case, personal data may be retained until the legal proceedings are completed.

4.5.1 The process for handling whistleblowing reports

Håndverksgruppen shall conduct an initial assessment and quality assurance of all whistleblowing reports received. Håndverksgruppen have appointed designated persons to manage incoming reports for the reporting channels.

If the report reveals conditions that require investigation, an investigation team will be appointed. External advisors or internal resources may be used to conduct the investigation. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation.

The whistleblower, unless chosen to remain anonymous, shall as a minimum receive:

- Confirmation that the report has been received within seven (7) calendar days.
- Feedback on how a report has been managed and which measures have been taken within three (3) calendar months after the confirmation that the report has been received.

If the investigation cannot be completed within three months, the whistleblower will be informed of the reasons for the delay and provided with an indicative timeline for conclusion.

A final report including the results of the investigation will be prepared within a reasonable time and shall be reviewed by the group CEO or Chairman of the Board and/or external advisor, as appropriate. The final report shall be filed according to internal archive routines and data protection acts.

Based on the outcome of such investigation, the CEO and/or Chairman of the Board, as appropriate, shall take any such action and/or impose such sanctions as are deemed appropriate and/or necessary, including any preventative actions, disciplinary sanctions or termination of supplier contract etc. For employees, consequences may involve verbal or written warnings or, if the matter is very serious, termination in accordance with applicable legislation for employees. An employee who deliberately makes a false report may also be subject to disciplinary actions.

More detailed instructions related to the process for handling whistleblowing reports are to be found in Appendix 1.

4.6 Protection of whistleblowers

It is important for Håndverksgruppen to provide a mechanism to safely report illegal activities and/or serious violations, as it is for the company to protect and to avoid damage to the reputation of innocent employees or board members who are the subject of a reported violation.

For these reasons, Håndverksgruppen will conduct its investigations of any reported violation as discreetly as possible and in a confidential manner to the greatest extent possible commensurate with carrying out a thorough and adequate investigation. Furthermore, to the extent possible, all reasonable efforts will be made to treat the whistleblower's identity as confidential, unless permission in writing (including e-mail) has been obtained from the whistleblower to disclose the individual's identity. The protection of identity shall also be taken into consideration during the initial assessment and the subsequent risk assessment when scoping the investigation, hereunder the existing level of risk exposure without disclosing the identity of the whistleblower. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Håndverksgruppen prohibits any retaliation against whistleblowers and will provide adequate measures to prevent retaliation within the organization. Retaliation is in itself a breach of the company rules and any such act may lead to appropriate sanctions as described above. Retaliation is any negative action, practice or neglect as a consequence of or reaction to the whistleblowing report, e.g. victimization, threats, harassment, discrimination, social exclusion, warnings, deprivation of work tasks, groundless redeployment, degradation, poor wage development, suspension, dismissal and/or disciplinary punishment.

Anyone who experiences retaliation must report this in accordance with this procedure.

4.7 Personal data

Handling of whistleblowing reports will be done in accordance with internal governing documents and applicable local laws and regulations as listed below:

- the Norwegian Personal Data Act of 15 June 2018
- the German Federal Data Protection Act of 30 June 2017
- the Swedish Data Protection Act (2018:218)
- the Danish Data Protection Act of 23 May 2018
- the Norwegian Working Environment Act of 17 June 2005.

4.8 Freedom of communication and freedom of procurement

The rights a person has under the Freedom of the Press Act (Sw. Tryckfrihetsförordningen) and the Fundamental Law on Freedom of Expression (Sw. Yttrandefrihetsgrundlagen) with regards to freedom of communication and freedom of procurement, are not limited by the Swedish Whistleblower law or this information.

5. Exceptions

There are no exceptions to this procedure. Any need of exceptions to this procedure must be clearly defined and documented. All exceptions shall be approved by the Board of Håndverksgruppen.

6. Related documents

- Code of Conduct
- Supplier Code of Conduct
- Sustainability Policy
- Sustainability Strategy and Goals
- HR Policy
- IT, Information Security and Data Protection Policy

7. Appendices

7.1 Appendix 1 – Instruction for handling whistleblowing reports

The purpose of this instruction is to establish internal detailed guidelines for how whistleblowing reports should be handled and documented.

7.1.1 Overview of the process of handling whistleblowing reports



All steps must be logged and documented in the template included in Appendix 2 to ensure proper documentation.

7.1.2 Whistleblowing report

If the whistleblower has requested a meeting, the meeting can be documented as a recording of the conversation in a durable and retrievable form or through accurate meeting minutes. The whistleblower must be given the opportunity to check, correct and agree to the minutes of the meeting and then sign them.

The recipient of the whistleblowing shall, if possible, confirm receipt of the whistleblowing within 7 calendar days, and inform the whistleblower that the report will be processed in accordance with Håndverksgruppen's Whistleblowing procedure and this instruction.

Anyone who receives a whistleblowing report shall handle it with the necessary confidentiality and in accordance with the Whistleblowing procedure and this instruction. If the whistleblower's identity is known, it shall only be disclosed to the extent necessary and with the express permission of the whistleblower. The whistleblower shall, if possible, be informed that the recipient and others involved in the investigation may be called as witnesses in a future legal process, and thus be asked to reveal the whistleblower's identity.

7.1.3 Initial assessment

The main purpose of the initial assessment is to carry out preliminary material and to determine who needs to be informed about the whistleblowing report.

The recipient of the whistleblowing report shall, to the extent that it is appropriate, forward the whistleblowing report to the CEO of Håndverksgruppen. The CEO is not authorized to receive or handle whistleblowing reports if he/she is the individual specifically named or accused within the context of said matter. Alternatively, the recipient shall forward the whistleblowing report to the Chairman of the Board of Håndverksgruppen, Compliance Officer of FSN Capital Partners AS or Fredrik Bergsmark Grimstad at PwC.

The CEO will make an initial assessment and decide who needs to be informed/involved and who will be responsible for handling the specific whistleblowing report. At the initial stage, it must also be confirmed that the whistleblowing report is reported in accordance with the local Personal Data Act.

Depending on the nature and severity of the whistleblowing report, the CEO must, at his own discretion, inform and advise the Chairman of the Board of Håndverksgruppen without undue delay. The CEO must always inform the Chairman immediately of all reported concerns or complaints relating to Håndverksgruppen's accounting practices, reporting procedures, internal control, or auditing.

7.1.4 Risk assessment and quality assurance

The purpose of the risk assessment and the quality assurance is to determine how a specific whistleblowing report should be handled. The CEO, or other if necessary, shall prepare a customized process plan, which also considers current privacy legislation.

The CEO must perform a risk assessment and quality assurance of the whistleblowing report. If necessary, an external advisor can be consulted.

The risk assessment involves a review and assessment of the whistleblowing report's possible consequences for Håndverksgruppen, such as reputation, personnel, operation, finances, and possible sanctions, based on the assumption that the content of the whistleblowing report is true. The risk assessment should also include an assessment of how the whistleblower should be protected. Whistleblowing reports of possible illegal or objectionable matters are of a sensitive nature that requires a focus on personal protection and confidentiality, and principles of independence, objectivity, and contradiction.

The quality assurance involves a preliminary assessment where a dialogue is attempted with the whistleblower for the collection of supplementary information, and if necessary, information is gathered from other sources (i.e. other witnesses, internal governing documents, payments and public registers).

Based on the risk assessment and quality assurance the CEO decides whether a more extended investigation should be conducted. In the event that the CEO is deemed to not be independent of the reported case, decisions shall be made by another appropriate individual in accordance with section 4.4.1 in the Whistleblowing procedure. If there is no need for further investigation, this must be logged and communicated in the final report.

The whistleblower must generally be informed if it is decided to conduct a more extended investigation.

7.1.5 Investigation

When a decision is made to conduct a more extended investigation due to the nature and/or severity of the whistleblowing report, the CEO is responsible for preparing a specific mandate for the investigation, as well as an assignment and progress plan and communication plan where deemed necessary. The mandate should be adopted to ensure that the investigation will address important questions based on the nature of the case. External advisors can be consulted to decide on further

actions, if necessary. The CEO together with the Chairman of the Board, monitors all internal and external communication related to a whistleblowing report.

The CEO must also consider whether the investigation should be conducted by an internal team or by external advisors. In the event that the CEO is deemed to not be independent of the reported case, the responsibility for handling such a case shall be assigned to another appropriate individual in accordance with section 4.4.1 in the Whistleblowing procedure. The decision on who will conduct the investigation will be based on the nature of the whistleblowing report, resources available as well as competence requirements. Generally, less severe cases can be handled in-house with local resources, while more severe cases should be handled by an assigned team or external advisors. Involvement of external advisors can in certain cases ensure impartiality and objectivity.

The investigation will normally consist of interviews with affected parties and witnesses, as well as gathering documentation. Applicable legislation for access to e-mail and electronic files on employee's computer must be considered.

Personal information that is clearly irrelevant for the handling of a particular report shall not be collected, or if such information has been collected by mistake, it shall be deleted without undue delay.

The parties who are interviewed must receive sufficient information to aim for their rights, and they have the right to object, i.e., to comment on and propose changes to the minutes from their interview. It is a fundamental principle that the process must be conducted in a fair, open, and objective manner.

The person whom the report relates to must, as a main rule, be informed about the report and its content and be given the opportunity to give their version of the matter ("the right to contradict"). The person concerned is not entitled to information about the whistleblower's identity.

7.1.6 Final report

The investigators shall analyze all the information collected and prepare a final report. The report shall include findings and observations related to the reported case, the process for handling the whistleblowing report, and the actions that have been recommended or applied. The final report shall respond to the mandate given. In addition, the report must contain a self-assessment of the process for the purpose of learning and identify changes necessary in the procedures etc.

As a main rule, involved parties must receive sufficient information to secure their rights and have the right to object to the parts in the final report that concern themselves.

Håndverksgruppen aims to complete the investigation and final report within a reasonable time after the whistleblowing report has been received. The final report will be reviewed by the Chairman of the Board, as determined during the initial assessment.

The whistleblower and the person the report concerns shall, as a minimum, receive information that the case has been assessed and closed, also in cases where no irregularities or questions about non-compliance with rules and guidelines are found in the investigation. When deciding what information that is to be shared, several questions must be considered, such as confidentiality and protection of

personal data, the whistleblower's need for information, creation of a culture that values whistleblowing, and planned internal and external sharing of information related to the case.

The Board will be informed at each board meeting about whistleblowing reports received and the result of any investigations. If an offense is discovered, the Board of Håndverksgruppen is responsible for evaluating if the company should report to the applicable state supervisory authority, such as the police.

The final report must be archived in accordance with internal archive procedures and privacy legislation as listed below:

- the Norwegian Personal Data Act of 15 June 2018
- the German Federal Data Protection Act of 30 June 2017
- the Swedish Data Protection Act (2018:218)
- the Danish Data Protection Act of 23 May 2018

7.1.7 Actions

Disciplinary actions

For employees, consequences may include verbal or written warnings or, if the matter is very severe, dismissal in accordance with applicable employee legislation.

Any disciplinary actions must be decided and implemented by the manager of the person the report concerns and HR, and if deemed necessary, with the approval of the CEO and/or the Chairman of the Board. The HR department must always be involved before a disciplinary process. Disciplinary actions as a result of an investigation must always be proportionate and in accordance with applicable laws and regulations as well as internal guidelines.

Employees who knowingly make a false report may also be subject to disciplinary actions.

Other actions

Based on the result of the investigation, the CEO or the Chairman of the Board shall take such actions and/or impose sanctions as are deemed appropriate and/or necessary, including any preventive actions or terminations of supplier contracts etc.

Retaliation

Håndverksgruppen will make every effort to ensure that no retaliation occurs and that it will not adversely affect the professional career for a person who reports misconduct in good faith. The leader of the investigation team should check with the whistleblower that no retaliation has taken place when the investigation has concluded, and again 6 months after the end of the case.

7.2 Appendix 2 – Template for documentation of the process handling whistleblowing reports

	Date	Responsible person	Comments / Outcome
Receipt of whistleblowing report			[letter, e-mail, phone] [Description of the whistleblowing report]
Dialog with the whistleblower			
Report sent to Chairman of the Board and/or others			
Initial assessment			
Risk assessment			Risks identified
Quality assurance			Preliminary evaluation
Is there a need for further investigation			Internal/external involvement Mandate Assignment plan Progress plan Communication plan
Investigation/findings			Interviews Documents Contradictions
Final report			Findings Observations Recommendations
Review of final report			
Actions			Disciplinary actions Other actions
Information to whistleblower and the person it concerns			

Other measures shall be included as needed.