

Policy for whistleblowing

Purpose and application

This whistleblower policy is established to encourage and enable the reporting of misconduct relating to Northclean Facility Services AB (hereinafter referred to as "the Company"). This policy is intended to ensure that such reports can be made anonymously, in writing or verbally and that they are handled in a professional and fair manner.

Division of responsibilities

Employees

All employees at the company must comply with our common rules in this policy.

Managers

Employees who also have an assignment as a manager are responsible for ensuring that the policy is noticed and complied with within their area of responsibility.

Guidelines

Definition of whistleblowing

Whistleblowing under this policy is defined as reporting misconduct relating to:

- a) Public interest: Situations where actions, omissions, or other circumstances are of public interest and may adversely affect the Company or its stakeholders. This includes, but is not limited to, illegal activities, fraud, corruption, unethical behaviour, discrimination, and hazardous working conditions.
- b) General complaints: about colleagues, salary, or other matters that may be of great importance internally, but not externally to third parties, are generally not considered whistleblowing. These matters should first be raised with the immediate manager.

Reporting channels

The Company provides all channels for whistleblowing required by law:

- a) Anonymous reporting: The company has established an anonymous reporting system where employees, suppliers, customers, and other stakeholders can report misconduct without revealing their identity. Reporters are encouraged to be as detailed as possible to facilitate the investigation. The anonymous whistleblowing channel is secure, with no personal information shared with us as recipient, while allowing us, the company, to communicate with the whistleblower.
- b) Verbal reporting: Employees have the right to report misconduct verbally to their immediate manager, senior manager, or the independent group responsible for handling whistleblowing. Verbal reports must be documented and treated confidentially. Through our function, the whistleblower submits their audio file, and feedback is provided in writing.

Independent group

The Company has appointed an independent group consisting of qualified and impartial individuals who are responsible for investigating and handling whistleblowing. This group has the right to engage lawyers and attorneys to support the investigation as necessary. Our group consists of: HR-Manager and Quality responsible within the company.

Confidentiality and integrity

All information collected in connection with whistleblowing, including the identity of the reporter, shall be treated confidentially and only disclosed to the extent necessary to conduct a thorough investigation. Measures to protect the integrity of the reporter will be taken.

Protection against retaliation

The Company undertakes to protect whistleblowers against retaliation, harassment, or discrimination because of their whistleblowing. All such incidents shall be dealt with promptly and consistently.

All information collected in connection with whistleblowing, including the identity of the reporter, shall be treated confidentially and only disclosed to the extent necessary to conduct a thorough investigation. Measures to protect the integrity of the reporter will be taken.

Actions and consequences

a) If the investigation confirms the misconduct: appropriate measures will be taken to rectify the situation and, if necessary, report it to the authorities. The reporter will be informed of the outcome of the investigation within a reasonable time.

b) Legal timeline: Our whistleblower function confirms receipt in accordance with the "7-day rule." This is done to confirm that no system errors have occurred, while our designated whistleblowing team is informed. We as a company will then handle the matter and decide on individual cases within 3 months.

Evaluation and updates

This policy will be evaluated and updated regularly to ensure that it is effective and complies with laws and regulations regarding whistleblowing.

Contact information

To report misconduct, use one of the reporting channels listed. General complaints should not be reported through the whistleblowing channel. This policy is intended to encourage and support a culture of honesty, integrity, and accountability within Northclean Facility Services. We encourage all stakeholders to actively participate in ensuring that our company remains a place where misconduct can be reported safely and fairly.

This policy was adopted: 2025.12.18 by: HR-Manager Anders Lang and CEO Marco von Peltzer. Northclean Facility Services reserves the right to update this policy. Last updated: 2026.01.19