

Do you have something you want to tell us?
We want to listen!

We care about a healthy and open culture, where each employee has a responsibility to comply with applicable regulations and to act ethically. We can resolve many situations by talking to each other as soon as they arise. However, sometimes things can happen that require a completely different kind of management.

Nevertheless, it is important for us that problems or more serious issues are disclosed, so that we, as an organization, have the opportunity to act. In more serious case, such as various types of misconduct, or where health and life may be at risk, it is important that this is revealed as soon as possible.

As an employee or partner, you are a key factor in this work. This is why we are offering you this opportunity to file whistleblower reports to an external, independent consultant, with the opportunity to be subject to full anonymity.

The following information describes the whistleblower process in further detail. For a more detailed and comprehensive description, please refer to our Whistleblower Policy.

Whistleblower reports

Sometimes the nature of a whistleblower report does not make it appropriate to raise the problem via the customary channels in our organization. This is why we offer you the opportunity to use a secure whistleblower scheme. This is an important safety valve for both us and you as an employee. For this reason we use Trumpet, a whistleblower scheme whereby you can report any misconduct anonymously and confidentially.

What can be reported?

There are legal restrictions concerning what may be handled under a whistleblower scheme. Consequently, under the whistleblower scheme you may only report matters which constitute misconduct that should be disclosed in the public interest (or breaches of certain other legislation) of which you have become aware during your work for us. Our whistleblower channel may only be used to report misconduct within our own organization. As a general rule, general dissatisfaction with how the business is run, leadership, pay or other HR matters is not misconduct to be reported under a whistleblower scheme. Misconduct that should be disclosed in the public interest is typically misconduct that affects the general public to a wider extent, such as financial crime, environmental crime and misconduct that presents an imminent risk to people's lives and health. If you are uncertain, you can, for example, consult your trade union.

A report via the Trumpet whistleblower scheme must be based on concrete suspicions. You do not need to have evidence for your suspicion, but no allegation may be made with malicious intent or in the knowledge that the allegation is false. False or malicious allegations are a serious breach of the employment contract. Nor may whistleblower reports be based solely on rumors or hearsay. Read more in our [Whistleblower Policy](#).

Who can file a report?

A whistleblower report can be filed by anyone who in any way represents or is professionally active in our organization. This includes Board members, shareholders working in the business, all employees (permanent employees, probationary employees, fixed-term employees, and full-time and part-time employees), consultants, trainees, volunteers and hired employees (crew personnel).

How reports are handled

Trumpet is an external whistleblower scheme that provides you with a secure process in which you, as a whistleblower, can remain completely anonymous. If you do not state your name in the report, it will not be possible to see who filed the report in the system. Trumpet has been developed on the basis of the highest standards of confidentiality and security:

All cases are received by independent external case officers with sound experience from assessing, investigating and helping organizations to handle various types of irregularities. [More information about Trumpet can be found here.](#)

Trumpet is compliant with the EU's General Data Protection Regulation (GDPR) and the Swedish Act on the Protection of Whistleblowers.

The process, step by step:

1. By reporting in Trumpet, you can make sure that you remain fully anonymous – no one knows your identity as a whistleblower, unless you choose to be open about your identity.
2. When you report an incident in the whistleblower scheme, an encrypted case is created in the whistleblower system, for which you receive a unique encryption key.
3. An independent external expert – case officer in the Trumpet whistleblower scheme – will always receive your case and make the first assessment. Only you and your case officer may access your report using your encryption keys.
4. To facilitate the process, you can actively choose to reveal your identity to the independent case officer – but not to our organization. In this way, you and your case officer can have an effective and secure dialogue – and no one else can find out who you are. (It is also possible for you to choose to disclose your identity to our organization.)
5. After your case officer has made an assessment, a recommendation is made to our organization's Whistleblower Committee. If any member of the Committee is affected by your report, this person will be excluded by the case officer before the Committee is given access to the report and the case officer's recommendations. The members of our Whistleblower Committee are listed below. The Whistleblower Committee in turn decides how the case is to proceed and the measures to be taken. In our [Whistleblower Policy](#) you can read about how the committee works and about its membership.
6. The case officer communicates the status of the case and the Committee's decision to you via the secure encrypted login to Trumpet. It is therefore important that you save the encryption key appropriately.

How to report

Go to a website in the Trumpet whistleblower system and select whether you wish to submit your report via a web form, or by phone or letter. Reports can be filed 24 hours a day, 7 days a week. A report filed through Trumpet is always handled with the same degree of anonymity and the highest level of confidentiality. If you wish to ensure that no-one can trace your activity, you should use a private computer or mobile phone, and visit the whistleblower service from a network you trust, such as your home network.

- Start your report in the Trumpet whistleblower scheme by clicking on the button “Start your report”.
- You can also start your report by typing the address dafo.trumpet-whistleblowing.eu/ on any device (computer, tablet or mobile phone) to access the whistleblower site.

The Trumpet system provides clear guidance throughout the entire process. Answers to the most frequently asked questions can be found at each step.

If you choose to submit your report by phone or letter, it is important that you provide contact details in some form, so that the case officers can provide you with your login details for the case handling site in Trumpet. On the case site, the case officers will provide feedback on the progress of the case. If you also wish to remain anonymous in relation to Trumpet, it is important to consider carefully which contact details you provide.

You can also make your report at a physical meeting. If you wish to request a physical meeting, you can contact Trumpet via the web form, or by phone or letter. If you wish to make a report at a physical meeting, your anonymity will not be protected, and you should be aware that the person you meet may be directly employed by us.

Our Whistleblower Committee



Jon Lind

Chairman of the committee

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Maria Berglund

Contact person of the committee

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Josephine Skantze

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Anders Lindqvist

Chairman of the Board of Directors

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Reporting to authorities

You will also have the opportunity to submit your report to the authorities. We will get back to you with this information when the authorities have made such information public.

Freedom of disclosure and freedom of procurement, and prohibition of investigation and prohibition of reprisals

In Sweden, there is freedom of disclosure. This is part of the freedom of expression and applies to all persons who provide information for the purpose of it being published and made available to the general public. Freedom of disclosure entails that the general public – i.e. state, region and municipalities – may not penalize the person who disclosed the information that has been published. The freedom of disclosure only applies if the information is shared with the originator of books, newspapers, TV and radio programs or a similar publication medium. It must be emphasized that freedom of disclosure is subject to certain limitations – there is no impunity, for example, if any disclosure is in breach of qualified confidentiality obligations.

In addition to the freedom of disclosure, freedom of procurement also applies. Freedom of procurement entails that anyone may search for information on any subject for the purpose of publishing it or to exercise their freedom of disclosure, without the person being penalized by a public authority. The freedom of procurement is limited, however, since the information may not be procured through certain criminal acts, such as theft or data breaches.

In addition to the freedom of disclosure and freedom of procurement, persons within our activities who use their freedom of disclosure to provide information about our activities are protected under a “prohibition of investigation”. This entails that we are prohibited from seeking to discover who in the Company has exercised their freedom of disclosure. There is also a prohibition of reprisals, which means that no one may be subject to reprisals for exercising their freedom of disclosure. It should be noted that the prohibition of information entails a breach of qualified confidentiality obligations, or other confidentiality obligations that may not be breached on the freedom of disclosure.