

# BONNIER

## Bonnier Group Whistle Blowing Policy

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*Bonnier Group AB ("Bonnier") Last Modified: May 2021. Adopted by the Board of Directors of Bonnier Group AB 31 May 2021.*

*Mandatory Group policies are created and distributed by Bonnier Group AB and must be implemented by each Company.*

# BONNIER

## 1. Introduction

The Bonnier Groups reputation and how we behave constitute some of our most valuable assets. At the Bonnier Group and its companies, employees are expected not just to abide by the rules but also to point out when others do not.

When rules or laws are broken, you should report it to an immediate superior or another manager whom you trust within the same organization.

If this is not possible or would lead to unwanted consequences, instead you may provide the information to the Bonnier Groups Whistleblowing Channel. With this channel, we hope that rule breaking can be identified to the greatest possible extent and without fear of reprisal.

Please note that reports may primarily be made concerning senior executives and employees with key positions within the Bonnier Group (due to the Swedish Data Protection Authority's regulations on whistleblowing).

The Whistleblowing Channel should be used to report only on serious wrongdoings regarding:

- Serious irregularities that concern the Company's or the Bonnier Group's vital interests or the lives and health of individuals, such as discrimination and harassment of a serious nature, serious environmental crimes or major deficiencies in occupational safety.
- Accounting, internal accounting, auditing or bribery.
- Other serious violations of the Bonnier Group Code of Conduct

The Whistleblowing Channel should not be used to lodge complaints about lack of leadership or other operational issues. If your report is judged to fall outside the reporting parameters, your report will be deleted, and you will be notified via e-mail how to proceed with your case.

You do not need proof of your suspicions, but all reporting should be made in good faith in accordance with this policy.

Since Jan. 1, 2017, Swedish law requires increased protections for whistleblowers. Under this law, it is prohibited for employers to expose workers to reprisals as a consequence of reporting serious violations within a business. The law also prohibits more punitive punishments such as termination or reassignment. The law also covers temporary workers. The identity of those reporting on rule- or law-breaking should not be revealed unless absolutely necessary to investigate the case or if it is required by law.

**In order to strengthen the protection of whistleblowers, Bonnier Group AB has contracted with an external partner (whistleb.com) to manage the reporting system and to even better ensure that whistleblowers have the possibility to remain completely anonymous.**

The reporting channel is encrypted, and password protected, which means that the external partner cannot read the contents. However, the basic principle is continued transparency for those reporting, since this can facilitate investigation of the case. Whistleblowers may also choose to report anonymously if they wish.

# BONNIER

Erik Haegerstrand, together with an attorney from the law firm of Mannheimer Swartling, is responsible for reviewing all reports that come in. **Erica Wiking Häger** is the attorney currently assigned to the channel.

Whistleblowers can request that Erica Wiking Häger alone should review a case.

The information you report should, as far as you know, be accurate and relevant to the reported issue. Please do not include any sensitive personal data, such as race or ethnic background, political opinions, religious or other philosophical beliefs, membership in trade unions or information relating to an individual's health unless absolutely required for notification. All redundant personal data will be deleted.

Information may be provided to authorities and other third parties if deemed necessary for the investigation or for us to be able to take action in response to a report, such as for making a police report or if the information is required in the course of legal action.

**The HR manager at each workplace, or another person designated by the relevant CEO, is responsible for informing employees about the Bonnier Groups Whistleblowing Channel and providing information and linking to the tool appropriately, for example through the company's intranet or equivalent.**

Reports can be made at: <https://report.whistleb.com/en/bonnier>

## 2. Information about personal data

*The Personal Data Controller responsible for processing of personal data is Bonnier Group together with your employer. Processing of personal data is carried out in accordance with applicable laws and regulations.*

*The information collected via the Whistleblowing Channel will only be used for the purpose of administering and investigating reported incidents and for addressing detected violations.*

*The processing of personal data is based on legitimate interests required to recognize the interests of the Bonnier Group with subsidiaries and to protect their employees against inappropriate behavior and to investigate and prevent serious incidents or crimes. The Whistleblowing Channel is compliant with applicable laws and regulations.*

*The reports registered via the Whistleblowing channel may contain personal data that can be attributable directly or indirectly to a physical person; the reporting person, the person the report refers to or a third person. Typically the name, title and contact information to the reporting person, the person the report refers to or third parties are collected as well as information about the incident.*

*The information may be shared with authorities and other third parties required to investigate the reported incident or in order take actions such as filing a police report or initiating a legal process.*

*"TripleB" provides the Whistleblowing Channel web services via a subsidiary, "Whistleblowing Center". "TripleB" may use third parties to store data, translate information and for statistical purposes. "TripleB" has signed a Personal Data Processing Agreement limiting the right to process personal data only as instructed by Bonnier Group. Any third parties are bound by the terms of this agreement.*

*Any Personal Data will be deleted when an investigation is completed. You have the right to request any Personal Data processed and have it corrected and in some instances deleted. For more information contact Bonnier DPO Carin Wenner via [carin.wenner@bonnier.se](mailto:carin.wenner@bonnier.se) or Magnus Janson (see above).*