

Policy owner: Chief People & Culture Officer (CPCO)  
Approver: CEO

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## **1 Policy Owner Mandate**

This policy's main objective is to ensure that Heimstaden is transparent and compliant regarding reporting of irregularities (whistleblowing). Heimstaden's Code of Conduct includes a policy and routines for whistleblowing, and we tolerate no form of corruption or irregularities that violate our values and our policies. This policy is updated in accordance with the EU directive 2019, aiming to strengthen the protection of whistleblowers.

The CPCO is given mandate to administer the whistleblowing function. This policy affirms that you as an employee or external stakeholder of our company can safely report perceived irregularities, knowing that; 1. They will be processed in accordance with the routines outlined in Group Manual Whistleblowing, 2. They will be followed up, 3. The actions we take will be made transparent both to society at large and within our own organization.

## **2 Requirements from Group**

The CPCO, Whistleblowing Committee and local/Country whistleblowing contact persons shall ensure that the implementation of a whistleblowing function is compliant with EU directive/s and local legislation. The Whistleblowing Committee will act as support in whistleblowing matters and provide guidance if investigation of a matter is needed throughout the countries where Heimstaden is present.

Each Heimstaden company shall utilize the common whistleblowing tool, as further specified in Group Manual Whistleblowing.

We do not tolerate any reprisals for a report submitted in good faith, and you should feel safe in the knowledge that you will not be disciplined for reporting irregularities. Heimstaden is responsible for protecting the whistleblower from any negative consequences of reporting irregularities. Any bullying, "guilt-tripping," harassment, unfair treatment, punishment, or discrimination as a consequence of submitting a report is considered a violation of our code of conduct, and disciplinary action will be taken.

## **3 Reporting**

Reports should pertain to abuses within company operations. This includes business operations and how rules and regulations are followed and issues regarding the relationship between employer (us) and employee or other stakeholder (you). Any employee or external party can report in writing via the website <https://wb.2secure.se/wbui/> or verbally by phone at +46 771 77 99 77.

## **4 Reference Documents**

- Group Manual Whistleblowing
- Code of Conduct