

Heimstaden

Policy – Whistle-blowing

We have zero tolerance for discrimination, harassment, corruption or any irregularities that violate our values or policies.

This whistle-blowing policy describes our routines for how we process any reported irregularities - internal at our workplace or business operations or externally. Whistle-blowers are always protected. Any negative consequences or behaviour from others as a result of whistle-blowing is a violation of our code of conduct and carries disciplinary actions.

Illegal activities must always be reported, as well as irregularities like threats against the environment, health and safety and inappropriate activities e.g. discrimination, bribery, abuse of power etc.

According to the authorities, whistle-blowing concern serious irregularities committed by persons in key positions or management within the company.

Before reporting any irregularity through our whistle-blowing function (internal or external), try solving the issue in dialogue with your line manager. If the issue is not taken seriously, or you feel uncomfortable raising it with your line manager – contact their boss, HR, safety officer if it falls within their area of responsibility, or your union. Any report regarding irregular actions by HR must always be sent to the CEO.

If you can't establish a dialogue with any of the above, please submit a formal report of irregularity through Heimstaden's whistle blowing function via our website , intranet or post; Heimstaden, HR-avdelningen, Östra Promenaden 7A, 211 28 Malmö - anonymously if you like.

To pursue the matter, we need as much information as possible like timings of the event(s), thoroughly description of what has been observed, knowledge of previous related incidents etc. Please be aware that information must not violate the data protection regulation. Reports of a private or inappropriate nature will not be processed.

Whistle-blowing process

If not reported anonymously, whistle-blowers receive confirmation that we have received the report.

Reports are processed by Heimstaden's local and central HR department, who makes an initial assessment of the case and stores documents digital accessible only for the HR department. If the case is not appropriate to pursue, the case is closed, and the documents are deleted, and the only item saved is a note that a report was submitted but not further processed due to insufficient cause.

If the case requires further processing, the senior management will immediately be informed that a report of an irregularity has been submitted, and the nature of the case. If it is an obvious suspicion of illegal activities a police report will be filed. When the case requires it, any affected manager(s) and employee(s) is told that a report of an irregularity has been submitted. In the following investigation, affected persons provide their perspective on the case.

When the investigation is concluded, the senior management group takes a decision on the case, including how the case is judged, consequences for affected parties, whether a report needs to be submitted to external authorities. Following a case closure, documents are stored during the period within which a legal dispute may be raised.