

Procedure owner: Group CEO
Approver: Board of Directors

Group Policy – Whistleblowing

1. Purpose and Scope

This whistleblowing policy defines the Group's commitment on protecting whistleblowers and sets the principles in accordance with which the Group's whistleblowing channels must operate.

This policy shall apply to Boozt AB and any subsidiary in which Boozt AB directly or indirectly owns more than 50% of the voting shares or in which the power of control is possessed and exercised by or on behalf of Boozt AB.

2. Main Principles

2.1. Introduction

The Group aims to encourage a transparent business environment and consequently abides to the Code of Conduct that is based on the idea that the Group should operate profitably, while maintaining good ethics.

It is of the utmost importance to the company that all of the Group's business operations are characterized by the highest possible standards of responsibility, openness and honesty.

Any suspicion of fraudulent conduct, corruption or other similar situations that are witnessed must be reported without delay.

Normal reporting procedure is to address concern to your manager, the Group Counsel, or the Chief Human Resource Officer. The whistleblower channels, which is voluntarily to use, should only be considered when normal reporting lines couldn't be used. This is described further in the Group Procedure - Whistleblowing.

The Group believes that there is an obligation to deal with wrongdoing, and that reporting wrongdoing is in accordance with our ethical guidelines. Further, the Group believes that whistleblowers who come forward with reports of wrongdoing are acting as exemplary organizational citizens by assisting us in promoting integrity, accountability and good management.

2.2. Commitment

The Group aspires to an organizational climate where whistleblowers must feel confident and comfortable about reporting wrongdoing and therefore the Group commits to:

- Comply with Swedish regulations regarding whistleblowing, in particular, Swedish Whistleblowing Act (Protections for Persons Reporting Irregularities Act (SFS 2021:890));

- Protect the whistleblower from any adverse action taken as a result of making the report. Any bullying, harassment, unfair treatment, victimization or discrimination that results from a report being made will be treated as a breach of our disciplinary procedures;
- Provide a safe whistleblower channel where the whistleblower can report wrongdoings;
- Deal with the report thoroughly and impartially;
- Where some form of wrongdoing has been found, the Group will take appropriate action to rectify it; and
- Keep the whistleblower informed of progress and the outcome if applicable (e.g. given that the whistleblower is not anonymous).

3. Roles and responsibilities

The Group CEO is responsible for this policy. The Board of Directors is the authorized approver of the Group Policy – Whistleblower.

4. Implementation and Compliance

4.1. Implementation of Main Principles

The main principles shall be implemented as described in this policy. The Group CEO is responsible for the implementation of this policy.

4.2. Monitoring of Compliance

The Group CEO shall monitor compliance for this policy by reporting all malpractices to the Board of Directors.

4.3. Deviation Handling

Deviations from main principles and/or procedural action steps can be exceptions or breaches. A deviation can either be permitted, and is then referred to as an exception, or not permitted, and is then referred to as a breach.

Exceptions shall not be granted, unless exceptional conditions exist. The Group CEO shall address any request for exception in writing to the Board of Directors. The Board of Directors shall assess and decide on each request individually. The assessment shall take both local and group-wide risks into consideration. Exceptions shall be documented and stored by the Business Unit.

The Group CEO shall immediately report any significant or material breach to the Board of Directors with a copy to General Counsel and Chief Human Resource Officer. The Board of Directors shall initiate appropriate actions and/or decide whether sanctions are required.

5. References

- Code of Conduct
- Group Procedure – Whistleblowing

Boozt

Company INTERNAL
Valid from: 01.05.2022
Page: 1 of 2

6. Revision log

| Volume - Valid from | Revision Category | Description of main revisions |
|---------------------|-------------------|--|
| 01.05.2022 | Update | Updated to include the reference to the new legal act; Updates to the chain of deviation reporting. |
| 01.05.2016 | New | New |