

Whistleblower Policy

Within the Awardit Group (Awardit AB, MBXP, Prämie Direkt GmbH, IPO PrämienServices GmbH, and Connex), we strive to maintain an open and transparent workplace, free from any misconduct. It is important for us to have a channel where any misconduct can be reported confidentially and securely.

1. Who Can Report?

An individual can report or disclose information about misconduct they have become aware of or acquired in a work-related context, belonging to or having belonged to any of the following categories of individuals: employees, volunteers, interns, individuals performing work under the control and direction of the company, self-employed individuals seeking or performing assignments, individuals serving on the company's management, leadership, or supervisory bodies, and shareholders active in the company.

2. What Can Be Reported?

In cases of suspected possible misconduct, legal and/or rule violations, we encourage you to report this as a whistleblower case. It is essential that, at the time of the incident, you had reasonable grounds to believe that the information about misconduct being reported was true. The assessment of whether reasonable grounds existed should be based on the circumstances and information available to you at the time of reporting.

2.1 Misconduct of Public Interest

You can report information about misconduct arising in a work-related context when there is a public interest in it being revealed.

Examples of serious misconduct that should be reported include:

- Deliberate incorrect accounting, internal accounting controls, or other financial crimes.
- Incidents of theft, corruption, vandalism, fraud, embezzlement, or data breaches.
- When someone is subjected to severe forms of discrimination or harassment.
- Other serious misconduct affecting the company's vital interests.

In the case of other types of personal complaints that do not have a public interest, such as disputes or complaints related to the workplace or working conditions, we encourage you to contact your manager, HR, safety representative, or another person you trust through our internal Incident Reporting.

2.2 Misconduct Contravening EU Law

Additionally, there is an option to report information about misconduct arising in a work-related context that contravenes EU legal acts or regulations. If you suspect this is happening, please refer to the Whistleblower Act Section 2 and Article 2 and Annex Part 1 of the Whistleblower Directive for applicable laws.

3. Reporting

3.1 Written Reporting

Our digital whistleblower channel is always accessible through the following link:

<https://awardit.visslan-report.se>

To ensure that appropriate measures can be taken, it is important to provide a detailed description of the incident. It is also possible to attach additional evidence, such as written documents, images, or audio files.

3.1.1 Sensitive Personal Data

Please refrain from including sensitive personal data about individuals mentioned in your report unless it is necessary to describe your case. Sensitive personal data includes information related to an individual's ethnic origin, political opinions, religious or philosophical beliefs, membership in a trade union, health, a person's sex life or sexual orientation, genetic data, biometric data used to uniquely identify a person.

3.1.2 Anonymity

You can maintain anonymity throughout the process without affecting your legal protection, but you also have the option to identify yourself under strict confidentiality. Anonymity can, in some cases, complicate follow-up possibilities and the actions we can take. In such cases, we may later request you to identify yourself under strict confidentiality.

3.1.3 Follow-Up and Login

After you have submitted a report, you will receive a 16-digit code that you can use to log in to your case in the future. It is important to keep the code as you will not be able to access your case without it. If you lose the code, you can submit a new report referring to the previous one.

Within seven days, you will receive confirmation that the case handler has received your report. The case handler is the independent and impartial party who receives cases in the reporting channel, whose contact details are provided below in Section 6.1. You will receive feedback within three months regarding any actions planned or taken as a result of the report.

It is essential that you, with your 16-digit code, log in regularly to respond to any follow-up questions from the case handler. In some cases, the case cannot proceed without responses to such follow-up questions from you as the reporting person.

3.2 Oral Reporting

Additionally, it is possible to conduct an oral case by uploading an audio file as an attachment when creating a case. You can select "Yes" to the question about providing evidence to upload your file. In the audio file, describe the circumstances and details as you would in a written case.

Furthermore, a physical meeting with the case handler can be requested via Visslan. This can be done most easily by either requesting it in an existing case or by creating a new report.

3.3 External Reporting

We encourage you to initially report any misconduct internally. However, if difficulties arise or it is deemed inappropriate, you may choose to pursue external reporting. In such cases, we refer you to contact the relevant authorities or, as applicable, EU institutions, bodies, or agencies.

4. What Are My Rights?

4.1 Right to Confidentiality

During the handling of a case, we will ensure that the identity of the reporting person is treated confidentially, and access to the case is restricted to authorized personnel. We will not disclose your identity without your consent unless required by applicable legislation, and we will ensure that you are not subject to reprisals.

4.2 Protection Against Reprisals

Whistleblowers are protected against negative consequences resulting from reporting misconduct, in the form of a prohibition against reprisals. This protection against reprisals also applies, where relevant, to individuals in the workplace who assist the reporting person, as well as to your colleagues, and relatives in the workplace, and legal entities that you own, work for, or are otherwise associated with.

This means that threats of reprisals and attempts at reprisals are not allowed. Examples of reprisals include termination, changes in job responsibilities, imposed disciplinary actions, threats, discrimination, blacklisting within your industry, or similar actions due to your whistleblowing.

Even if you are subjected to reprisals, you are still protected if you had reasonable grounds to believe that the misconduct being reported was true and within the scope of the Whistleblower Act.

Please note that this protection does not apply if it is a crime in itself to acquire or have access to the information being reported.

4.3 Public Disclosure of Information

Protection also applies when making a public disclosure. It is assumed that you have reported internally within the company and externally to an authority or directly to the public, and no appropriate action has been taken within three months (in justified cases, six months). Protection is also granted if you had reasonable grounds to believe that there is an imminent threat to the public interest if the information is not disclosed, such as in an emergency. The same applies when there is a risk of reprisals or it is unlikely that the misconduct will be effectively addressed, for example, in cases where evidence may be concealed or destroyed during external reporting.

Please note that this protection does not apply if you, as the reporting person, disclose information directly to the media in accordance with other applicable systems for protection of freedom of speech and information. Therefore, you still have whistleblower protection and source protection where applicable.

4.4 Right to Review Documentation during Meetings with Case Handlers

When we receive an internal report orally, we will document the report through a recording that can be preserved in a lasting and accessible form, or by creating a protocol.

If oral reporting occurs through means other than a physical meeting, the documentation requirement can also be fulfilled by producing a transcript of the recording or by another appropriate means. Your consent is required for the recording to be made.

Afterward, you will have the opportunity to review, correct, and approve a transcript or protocol through your signature.

5. GDPR and Handling of Personal Data

We always strive to protect you and your personal data. Therefore, our handling of personal data is always carried out in compliance with GDPR. In addition to this, any personal data that is irrelevant to the case will be deleted, and the case will only be retained for as long as necessary and proportionate. At most, a case may be processed for two years after its completion.

6. Further Contact

If you have any further questions about how we handle whistleblower cases, you are always welcome to contact:

Cecilia Asp: cecilia.asp@awardit.com

Charlotte Norrby: charlotte.norrby@awardit.com

Marissa Braun: marissa.braun@praemie-direkt.de

Medina Spahic: medina.spahic@connexgroup.net

Mikael Mellberg: mikael.mellberg@lindahl.se

Ellinor Söderberg: ellinor.soderberg@lindahl.se

For technical questions about the Visslan platform: clientsupport@visslan.com

6.1 Contact Information for Case Handlers

This whistleblower policy covers Awardit AB and its subsidiaries MBXP, Prämie Direkt GmbH, IPO PrämienServices GmbH, and Connex.

6.1.1 Recipient of Reports regarding Awardit AB (Sweden) is:

Name: Mikael Mellberg

Company/Position: Advokatfirman Lindahl KB, Lawyer/Partner

Email: mikael.mellberg@lindahl.se

Phone: +46 723 881 021

Name: Ellinor Söderberg

Company/Position: Advokatfirman Lindahl KB, Associate

Email: ellinor.soderberg@lindahl.se

Phone: +46 768 543 224

6.1.2 Recipient of Reports regarding MBXP (Denmark), Prämie Direkt GmbH, IPO PrämienServices GmbH (Germany), Connex (Austria), and/or unspecified locations is:

Name: Cecilia Asp

Company/Position: Awardit, CHRO, Chief Human Resources Officer

Email: Cecilia.asp@awardit.com

6.2 Contact Information for The Whistle Compliance Solutions AB Visslan

Email: clientsupport@visslan.com

Switchboard: +46 10-750 08 10

Visit Visslan's website for more information about Visslan.