

WHISTLEBLOWING POLICY

This Group-wide policy has been prepared by Balder's HR Department, Head of Personnel and Administration. The Group-wide policy provides guidance for all of Balder's subsidiaries, although local deviations may occur. The policy is reviewed annually and adopted by the company's Board of Directors.

1. BACKGROUND

Balder has a goal of maintaining a culture that is characterised by openness and being a long-term, responsible actor with sound business ethics. It is important that irregularities and cases of misconduct are highlighted and investigated as quickly as possible. The company believes that the engagement of employees and other stakeholders is an important part of this work. Balder would therefore like to promote a climate that encourages the reporting of misconduct as a natural and integral part of our business culture.

2. PURPOSE

The purpose of this policy is to ensure that the organisation's employees and other stakeholders feel safe and secure when reporting misconduct and other serious incidents, without fear of retaliation or other negative consequences. The purpose of the policy is also to ensure that whistleblowing reports are handled in accordance with our set procedures so that whistleblowers know that their reports are taken seriously and managed confidentially.

3. WHO IS COVERED BY THIS POLICY?

Anyone who, in a work-related context, has received or obtained information about an instance of misconduct and who belongs to one or more of the following business-related categories:

- a) employees;
- b) persons who enquire about or apply for a job;
- c) persons who apply for or perform voluntary work;
- d) persons who apply for or undertake a trainee position;
- e) persons who are otherwise available to perform or are performing work under the control and management of the business;
- f) self-employed businesspersons who apply for or perform assignments;
- g) persons who are available to be or are members of an administrative, management or supervisory body of the business;
- h) shareholders who are available to be or are active in the limited liability company; or
- i) persons who have belonged to one of the above business-related categories and have received or obtained the information during their time in the

business.

4. WHAT CAN BE REPORTED?

The whistleblowing service should be used to report information regarding irregularities or misconduct where the disclosure of such information is in the public interest. Examples of misconduct that would normally be applicable include violations of laws and regulations, corruption, bribery, financial crime, misuse of funds and serious instances of harassment. The whistleblowing service also exists for the reporting of violations in relation to a variety of laws and regulations based on EU law where disclosure is deemed to be in the public interest¹.

As a general rule, information that only concerns a personal work situation, such as dissatisfaction with salary or the like, does not constitute a whistleblowing case and should not be reported via the service. Please also note that there may be a reporting obligation which should be handled via other channels. The whistleblowing service should not be used for the disclosure of information in circumstances in which there is an obligation to report pursuant to business-specific laws or regulations (e.g. Lex Sarah or Lex Maria).

A person using the whistleblowing service does not need to have proof that what is being reported is true; it is sufficient that the concerns are being reported in good faith. Reporting may not, however, be based on rumours or hearsay, and it is not permitted to lie or knowingly provide false information.

5. PROTECTION IN CONNECTION WITH WHISTLEBLOWING

5.1 Protection in the form of discharge from liability

A reporting person may not be held liable for breaching a duty of confidentiality provided that the person in question, at the time of submitting the report, had reasonable grounds to believe that the report was necessary in order to disclose an instance of misconduct. This protection also applies under the same conditions when it comes to obtaining information for the purposes of the report, provided the reporting person does not become guilty of a crime by obtaining such information. Discharge from liability does not apply in circumstances involving a breach of a qualified duty of confidentiality pursuant to the Swedish Defence Inventions Act (1971:1078). Protection in the form of discharge from liability means that the reporting person cannot be held legally liable (i.e. in relation to criminal liability or liability for damages) for having breached a duty of confidentiality. Please note that the rules on discharge from liability do not entail a right to disclose documents from the business.

¹ These concern, among other things, public procurement, financial services/products and markets, prevention of money laundering, financing of terrorism, product safety/compliance, transport safety, environmental protection, radiation and nuclear safety, food and feed safety, animal health and welfare, public health, consumer protection,

privacy protection and protection of personal data, network and information systems, violations in relation to the EU's financial interests, violations of competition rules and regulations, and violations of rules and regulations relating to corporate tax.

5.2 Protection against preventive measures and retaliation

A business operator may not prevent or attempt to prevent or impede the reporting of misconduct, nor is it permitted to take retaliation due to the reporting of misconduct. In this context, the term retaliation refers to any direct or indirect action which is taken or not taken and which gives rise to or could give rise to loss, damage or detriment for the reporting person (e.g. suspension, lay-off, termination, changed work duties, reduction in salary, etc.). Furthermore, retaliation may not be directed against a person in the business who assists the reporting person with the report (such as an elected official or a health and safety officer), a person at the business operator (such as a relative or colleague), or a legal entity which the reporting person owns, works for or is otherwise associated with.

Gothenburg, 9 February 2024

Board of Directors of Fastighets AB Balder