

Guidelines for whistleblowing

1. Introduction

Fabege has requirements from owners, investors, the Board of Directors and customers to comply with applicable laws and rules, as well as to practice good business ethics. Fabege's Code of Conduct, which was adopted by the Board of Directors and covers all employees, includes rules and guidelines specifically on business ethics. Our employees play a key role in identifying any deviations from our values and Code of Conduct.

Our whistleblower service offers an opportunity to report suspicions of serious irregularities.

The whistleblower service is important for reducing risks and for promoting high business ethics and thereby maintain the trust of our customers and the public in our business. Whistleblower reports can be submitted openly or anonymously.

The purpose of these guidelines is to enable employees to report suspicions of deviations from our business ethics guidelines, without risk of reprisals.

2. When can the whistleblower service be used?

The service provides all employees (and the public) with an opportunity to report serious risks, that can harm individuals, Fabege or the environment, such as:

- irregularities related to accounting, internal accounting control, audits, bribery, banking and financial crime, or
- other serious irregularities that affect the vital interests of the company or the Group, and/or that may pose a threat to the life or health of an individual, such as serious environmental crimes, major shortcomings in workplace safety and extremely serious forms of discrimination and harassment

For questions concerning dissatisfaction in the workplace, please contact your immediate superior or any member of the Group management team.

Whistleblowers do not need to have evidence to report their suspicion. However, no accusations may be made with malicious intent or with the knowledge that the accusation is false.

Pursuant to the applicable legislation, the only personal data processed are those that have to do with criminal acts by key personnel or persons in senior executive positions.

3. How can the whistleblower service be used?

Employees who suspect deviations from our values or business ethics guidelines have various options for reporting the matter. See options 1–3 below.

- Option 1: Contact a supervisor within our organisation

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- Option 2: Contact someone from the whistleblower service working group, i.e., the head of HR, CFO and the Corporate Lawyer.
- Option 3: Report anonymously through the whistleblower service.

Option 3 (report anonymously)

An employee who wants to report anonymously may do so through the external web-based reporting channel. Reports and subsequent discussion between Fabege and the whistleblower are encrypted and password-protected. The whistleblower service is managed by WhistleB, an external provider that ensures anonymity. WhistleB does not save metadata and cannot trace the IP address of a whistleblower.

The service offers the option of discussion between Fabege’s working group for the whistleblower service and an anonymous whistleblower.

4. Investigation process

Responsibilities and areas of responsibility

Only Fabege’s working group for the whistleblower service has access to reports submitted through our reporting channel for anonymous reporting. The group consists of the CFO, the head of HR and the Corporate Lawyer. All individuals are bound to secrecy which ensures confidential handling of whistleblower cases. An investigation may include individuals who provide information or expertise. These individuals are also bound to secrecy.

Receipt of reports

Upon receipt of a report, those responsible for the whistleblower service decide whether to approve or reject the report in accordance with applicable legislation. If the report is approved, appropriate measures are taken for investigation. See under “investigation” below.

The working group may refuse to receive a report if:

- the report does not fall within the scope of what may be reported in a whistleblower service,
- the report has not been made in good faith or is malicious,
- there is insufficient information to investigate the matter, or
- the matter that the report concerns has already been addressed.

Privacy-sensitive information, such as information on political or religious affiliation or sexual orientation, should not be included in an investigation based on a whistleblower report.

Investigation

All whistleblower reports are treated seriously and in accordance with these guidelines.

- Reports are handled confidentially.

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- A report is not investigated by anyone who is affected or involved in the case.
- If necessary, Fabege’s working group for the service may send follow-up questions through the reporting channel for anonymous reporting to the whistleblower. The anonymous discussion is made possible by the external service provider WhistleB.
- No one who is responsible for the service or anyone else participating in the investigation process will try to identify the whistleblower.

Protection for the whistleblower in open reporting

Whistleblowers who express a genuine concern or suspicion under these guidelines do not risk losing their job or suffering any form of sanctions or personal disadvantages as a result of their reporting. It does not matter if the suspicion turns out to be wrong, provided the whistleblower acted in good faith.

In cases where the whistleblower chooses to disclose his or her identity, he or she will be informed of how the investigation proceeds, unless it is not inappropriate to do so with regard to the privacy of the person who has been reported and other confidentiality issues.

In case of suspected crime, the whistleblower will be informed if his or her identity may be disclosed during court proceedings.

Protection of, and information to, a person who is the subject of a whistleblower report

The person who has been reported has the right to access information about him/herself and may require changes if the information is incorrect, incomplete or outdated. This right applies provided that it does not result in interference with the investigation or destruction of evidence.

Deletion of data

Personal data included in a whistleblower service is deleted upon completion of the investigation. Deletion occurs within one month (30 days) after completion of the investigation. The documentation from reports and the investigation that is saved must not contain personal data through which individuals can be directly or indirectly identified.

5. Legal basis for the guidelines

These guidelines are based on the Swedish Personal Data Act, PUL and the guidance of the Swedish Data Protection Authority for companies on the responsibility for personal data handled in whistleblowing systems. DIFS 2010:1.

6. Transfer of personal data outside the EEA

There is a general ban on the transfer of personal data from the European Economic Area (EEA), unless specific provisions on data protection can be guaranteed. The scope of these guidelines does not include the transfer of personal data from the EEA to operators outside the EEA.

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