

# WHISTLEBLOWING INSTRUCTION

## 1. INTRODUCTION

Novedo Holding AB (publ), together with all subsidiaries ("Novedo" or the "Novedo Group"), strives to maintain a transparent business environment and strong business ethics in line with our Code of Conduct. We care about safety and respect for all people affected by our operations. Therefore, the Novedo Group should be an open workplace where misconduct does not occur. You play an important role by raising concerns about misconduct that should be corrected. This document contains information on how to report confidentially and securely.

*Primarily*, if you suspect ongoing or past misconduct, you are encouraged to report this internally to your immediate manager or the managing director of the company you are employed in. Cases involving poor leadership, inefficient systems or other operational aspects, alcohol or drug problems, minor workplace theft, minor workplace safety issues, or similar matters should always be reported in this manner

*Secondarily*, if you feel that you cannot be open about your information or if you wish to remain anonymous for fear of retaliation, you can report internally through Novedo's whistleblowing system, available at <https://novedo.visslan-report.se/> (the "Whistleblowing System"). The conditions for submitting a report through the Whistleblowing System are limited to circumstances described in sections 2 and 3 of this document.

This whistleblowing instruction applies to all companies within the Novedo Group:

Company name	Corporate identity number	Country
AO Entreprenadtjänst i Stockholm AB	556995-2269	Sweden
BATAB Bygg & Akustik teknik AB	556133-7642	Sweden
Borrspecialisten Sverige AB	556929-2591	Sweden
Bra Tak Entreprenad Skåne AB	556889-9362	Sweden
CX Ventilation AB	556846-1882	Sweden
Deramont Entreprenad AB	556803-5421	Sweden
Ekoion AB	556700-0814	Sweden
Elarbeten Helsingborg AB	556464-1354	Sweden
Elforum Göteborg AB	559133-4031	Sweden
Elinzity AB	556694-5878	Sweden
Elinzity Förstärkning AB	556187-5088	Sweden
GBB Holding AB	556910-5652	Sweden
GBB Syd AB	559234-7297	Sweden
Gnesta Bergbyggare AB	556599-9355	Sweden
Hansson & Ekman Isolerings Aktiebolag	556459-0379	Sweden
Helsingborgs Byggplåt AB	556722-7532	Sweden
IMPAB DUNDERTECH AB	556718-1069	Sweden
KG Vent AB	559000-5921	Sweden
Kulturmålarna i Linköping AB	559203-8177	Sweden
Kulturmålarna i Norrköping Aktiebolag	556435-2887	Sweden

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Nordkabel A/S	DK 28851782	Denmark
Nordsign AB	556699-2706	Sweden
Novedo AB	559264-9841	Sweden
Novedo Danmark OpCo ApS	43529374	Denmark
Novedo Holding AB (publ)	559334-4202	Sweden
Novedo Norge OpCo AS	933 987 469	Norway
Novedo OpCo AB	559334-8344	Sweden
Novedo OpCo Germany GmbH	HRB 131390	Germany
Novedo ST Holding AS	934157761	Norway
Nørgaard Anlæg ApS	14546294	Denmark
Nørgaard Anlæg Holding ApS	37418226	Denmark
Nørgaard Anlæg Maskinudlejning ApS	36507063	Denmark
Nørgaard Anlæg Miljø ApS	37638846	Denmark
Olle Timblads Målerifirma AB	556688-5488	Sweden
OVKservice Syd AB	556795-9308	Sweden
Persiennteamet Stockholm Aktiebolag	556758-5392	Sweden
ProvideU AB	556754-0231	Sweden
ProvideU Assembly OÜ	11066054	Estonia
Provideu Electronics AB (f.d. EMAB)	556506-1560	Sweden
RC El & Styrinstallationer Zeus AB	556310-2010	Sweden
Sentexa AB	556637-4921	Sweden
Skanstulls Måleri AB	556543-8974	Sweden
ST Entreprenør AS	926678779	Norway
Stantreak A/S	12630077	Denmark
Sydvestjyllands Miljø og Genbrug ApS	37523763	Denmark
Total Fasad Stockholm AB	559004-4375	Sweden
Total Fönsterrenovering i Stockholm AB	559133-9444	Sweden
Tyresö Målericentral AB	556909-8725	Sweden
Uni-Vent Rör AB	556665-6889	Sweden
Utleigesenteret AS	926678426	Sweden
Valter Eklund Stenentreprenader AB	556071-7463	Sweden
VE Sten AB	556143-4126	Sweden
Ventera i Göteborg AB	559453-8489	Sweden
Ventilationskontroll Aeolus Aktiebolag	556211-1343	Sweden

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## 2. CAN I BE A WHISTLEBLOWER?

In accordance with the Whistleblower Directive (EU Directive 2019/1937), you have the right to whistleblow and receive legal protection if you belong to any of the following categories in relation to a company within the Novedo Group:

- a) employees,
- b) volunteers,
- c) interns,
- d) self-employees/consultants,
- e) other persons who are/have been in a work-related context with us, under our control and management,
- f) persons part of a Novedo management or supervisory body, or
- g) shareholders active within the Novedo Group.

The Whistleblower Directive is implemented in Sweden by *lagen om skydd för personer som rapporterar om missförhållanden*, in Denmark by the *lov om beskyttelse af whistleblowere*, and in Germany by the *Hinweisgeberschutzgesetz*. Estonia has not yet implemented Whistleblower Directive to national law and neither has Norway.

It is not an obstacle for reporting if your employment relationship with us has ended or not yet begun. Suppliers, subcontractors and other contractors to us who have become aware of misconduct within a company within the Novedo Group can also be whistleblowers.

## 3. WHAT CAN I WHISTLEBLOW ABOUT?

You can whistleblow and report misconduct that has occurred in a work-related context and there is a public interest of this being discovered. Other types of personal complaints that do not serve a public interest, such as conflicts or complaints regarding the workplace or work environment, we encourage you to instead contact your immediate supervisor or the CEO of the company concerned.

Examples of misconduct that you blow the whistle about:

- Deliberate misstatement in accounting, internal accounting controls, or other financial crimes.
- Theft, corruption, vandalism, fraud, embezzlement, or data breaches.
- Environmental crimes or significant workplace safety deficiencies.
- Discrimination or harassment.
- Misconduct affecting individuals' lives or health.
- Violations of the Novedo's Code of Conduct.
- Other serious misconduct affecting the Novedo's material interests

Additionally, it is possible to report information about misconduct discovered in a work-related context that breaches EU legal acts or regulations.

You do not need proof of your suspicions, but all reporting must be made in good faith. This means you should have reasonable grounds to believe that the reported information about misconduct is true.

## 4. HOW DO I WHISTLEBLOW?

### 4.1 Internal reporting; written procedure

You can report internally in writing. In order to protect whistleblowers and ensure confidential handling of your report, Novedo uses a digital whistleblower function provided by the third-party supplier Visslan. The Whistleblower System is always available at <https://novedo.visslan-report.se/>. Please describe what has happened in as much detail as possible to ensure that appropriate measures can be applied. It is possible to

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attach evidence such as written documents, images, or audio files. Always specify which company within the Novedo Group the report concerns.

Please do not include sensitive personal data about persons mentioned in your report unless necessary to describe your case correctly. Sensitive personal data includes information about ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, a person's sex life or sexual orientation, genetic data, or biometric data used to uniquely identify a person.

#### **4.2 Internal reporting: oral procedure**

You can also report internally orally. This is done by uploading an audio file as an attachment when creating a case in the Whistleblower System. You select "Yes" on the question about evidence to be able to upload your file. In the audio file, you describe the same circumstances and details as you would in a written case.

Furthermore, you can request a physical meeting in the Whistleblower System. This is done by either requesting it in an existing case or creating a new report. If you whistleblow at a physical meeting, a complete and accurate record of the meeting will be preserved in a permanent and accessible form with your consent. This may occur through recording the conversation or through meeting minutes (if the conversation is not recorded, we have the right to document it through minutes). Afterwards, you will have the opportunity to review, correct, and approve the meeting minutes by signing them. We recommend that the documentation be uploaded to the Whistleblower System.

#### **4.3 Login code after reporting**

After reporting internally, either in writing or orally, you will receive a sixteen-digit code that you can use to log into the Whistleblower System at <https://novedo.visslan-report.se/>. It is important that you save the code, as you will not be able to access the case again without it. If you lose the code, you can submit a new report referring to the previous one.

#### **4.4 External reporting**

We encourage you to always report misconduct internally first, but if difficulties arise or if it is deemed problematic, it is possible to report externally instead. In such cases, we refer you to contact the competent authorities or, where applicable, EU institutions, bodies, or agencies. Contact details for relevant authorities can be found in Appendix 1.

## **5. WHAT ARE MY RIGHTS?**

#### **5.1 Right to anonymity**

As a whistleblower, you have the right to remain anonymous. During the case handling process, it will be ensured that your identity as the reporting person is kept confidential and that unauthorized personnel cannot access the case. We will not disclose your identity without your consent unless required by applicable law.

#### **5.2 Protection against retaliation**

As a whistleblower, you have the right not to suffer any retaliation due to your whistleblowing. This means that threats of retaliation and attempts at retaliation are not allowed. Examples of such retaliation include dismissal, changes in job duties, disciplinary actions, threats, discrimination, or similar actions due to your whistleblowing.

Protection against retaliation also applies to individuals in the workplace who assist the reporting person.

#### **5.3 Protection when publicly disclosing information**

The protection against retaliation also applies if you publicly disclose information about misconduct. However, this requires that you have first reported internally within the Novedo Group and externally to an authority, or directly externally, and that no appropriate action has been taken within three months (in justified cases, six months).

This protection also applies in situations where you had reasonable grounds to believe there was an obvious risk to the public interest if the information was not disclosed, such as in an emergency. Legal protection is also

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granted when publicly disclosing information if there was a risk of retaliation or if it was unlikely that the misconduct would be effectively addressed, for example, due to the risk of evidence being concealed or destroyed.

#### 5.4 Right to not be held accountable

As a whistleblower, you have the right not to be held liable for breaching confidentiality obligations, provided that at the time of reporting, you had reasonable grounds to believe that reporting the information was necessary to disclose the reported misconduct. This does not grant you the right to disclose written documents however.

## 6. WHAT HAPPENS AFTER WHISTLEBLOWING?

### 6.1 Who reads your report

Novedo applies common channels for internal reporting for all companies within the group. This means that all whistleblowing cases are initially received and read by the same contact person at Novedo. To ensure independent handling of whistleblowing cases, all incoming reports are also read by the external Swedish law firm Gernandt & Danielsson Advokatbyrå. Contact details for the contact person at Novedo and Gernandt & Danielsson Advokatbyrå can be found in section 8.1.

If the case concerns the management or board of directors of Novedo Holding AB (publ), Gernandt & Danielsson Advokatbyrå will take appropriate measures to handle the matter. If the case concerns a subsidiary, the contact person will, depending on the type of misconduct and which company within the Novedo group which the report relates to, involve appropriate case handlers within the Novedo group. A case handler is an independent and autonomous person responsible for investigating and managing the reported misconduct in an appropriate manner.

This ensures that no cases are handled by individuals where a conflict of interest may arise. Typically, this means that cases are handled by someone one level above the person responsible for the reported misconduct. When submitting your report, you can also request that a specific person is not given access to your report.

### 6.2 Follow-up and investigation

If your report falls within the scope of the Whistleblower Directive and this whistleblowing instruction, you will receive a confirmation in the Whistleblower System within **seven days** that a case handler has received your report. If you have any questions or concerns, you and the contact person and/or case handler can communicate through the platform's built-in anonymous chat function.

The appointed case handler(s) will review your report and decide on appropriate measures. Such a review may include examining internal documentation, communication, and conducting interviews with involved parties and witnesses. Further investigation may require the involvement of other corporate functions or external experts, such as legal advisors, auditing firms, or forensic investigation companies. You will receive feedback within **three months** and a notification when the investigation is complete in the Whistleblower System. The notification will contain information about the actions taken as a result of the report and the reasons for these actions.

It is important that you log in regularly in the Whistleblower System using your sixteen-digit code to respond to any follow-up questions from the contact person. In some cases, the matter cannot proceed without answers to such follow-up questions from you as the reporting person.

### 6.3 Retention of reports and other documentation

All reports, investigations, and communication regarding the reported misconduct will be retained as long as necessary, but no longer than two years after a follow-up case has been closed.

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## 7. GDPR AND HANDLING OF PERSONAL DATA

We always do our utmost to protect you and your personal data. We ensure that our handling of personal data is always in accordance with the General Data Protection Regulation ((EU) 2016/679) (“GDPR”)

### 7.1 Categories of personal data

Whistleblower reports typically contain personal data relating to the reporting individual, the suspected individual, and other individuals such as witnesses. Processed personal data may include names, roles or functions, contact information, alleged violations, and other types of personal data collected during the investigation, such as phone logs, data files, and correspondence.

### 7.2 Purpose of processing and legal basis

Personal data will be processed to detect, investigate, and address misconduct within the Novedo group. The processing is based on Novedo’s legitimate interest in ensuring that its business operations comply with applicable laws, business ethics principles, and internal policies and procedures.

Personal data that is clearly irrelevant to the handling of a whistleblowing case will be deleted as soon as possible if collected by mistake.

### 7.3 Retention period

Personal data will only be stored for as long as necessary to investigate a whistleblowing report and to take relevant measures in relation to the outcome of such an investigation. Personal data in a whistleblowing case may not be processed for longer than two years after the case has been closed.

### 7.4 Access to personal data

Access to personal data is restricted to what each individual needs to fulfill their job duties. Only the contact person, case handlers, and those assisting them have access to the personal data processed in a whistleblowing case.

### 7.5 Information to, and rights of, the data subject

If we receive a whistleblower report containing your personal data or if your personal data is collected during an investigation, we will inform you if possible. However, if providing such information could jeopardize the investigation, you will instead be informed as soon as possible after the investigation has reached a stage where such risk no longer exists. At the latest, you will be informed when your personal data is used to take actions related to you.

You have the right to know what personal data we process about you and may request a copy of such data. However, please note that if disclosing your personal data could jeopardize an investigation, we may not be able to fulfill your request. You have the right to have incorrect personal data about you corrected, and in certain cases, you can request that we delete your personal data. You also have the right to object to certain processing of your personal data and can request that the processing of your personal data be restricted.

### 7.6 Data Controller

The data controller for the personal data processed in connection with whistleblowing is Novedo Holding AB (publ), reg. no. 559334-4202, Linnégatan 18, 114 47 Stockholm, email address [edward.af.sandeberg@novedo.se](mailto:edward.af.sandeberg@novedo.se) (Novedo’s inhouse legal counsel). If you have questions regarding how we process your personal data, you can contact us using the contact details provided below. If you have any objections or complaints regarding how we process your personal data, you have the right to report your complaint to the Swedish Authority for Privacy Protection.

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## 8. FURTHER CONTACT

If you have any further questions regarding how we handle whistleblower cases, you are always welcome to contact the internal contact person.

For technical questions about the Whistleblower System, please create a case at <https://novedo.visslan-report.se/>. If this is not possible, please contact The Whistle Compliance Solutions AB, which developed Visslan. Contact details are below.

### 8.1 Contact details

#### *Internal contact person*

Name: Edward af Sandeberg

Company/Position: Novedo AB, inhouse legal counsel

E-mail: [edward.af.sandeberg@novedo.se](mailto:edward.af.sandeberg@novedo.se)

Telephone: 0760152400

#### *External law firm*

E-mail: [novedo.visselblasning@gda.se](mailto:novedo.visselblasning@gda.se)

#### *The Whistle Compliance Solutions AB*

E-mail: [clientsupport@visslan.com](mailto:clientsupport@visslan.com)

Telephone: +46 10-750 08 10

Direct telephone (Daniel Vaknine, MD): +46 73 540 10 19

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## APPENDIX 1 - CONTACT DETAILS FOR EXTERNAL WHISTLEBLOWING IN

### DENMARK

Authority	Contact information
<i>Datatilsynet</i>	<u>(Link to website)</u>
<i>Politiets Efterretningstjeneste (PET), Justitsministeriet</i>	<u>(Link to website)</u>
<i>Forsvarets Efterretningstjeneste (FE), Forsvarsministeriet</i>	<u>(Link to website)</u>
<i>Finanstilsynet (the financial sector)</i>	<u>(Link to website)</u>
<i>Erhvervsstyrelsen (the auditing sector)</i>	<u>(Link to website)</u>
<i>Arbejdstilsynet (regarding health and safety on offshore installations)</i>	<u>(Link to website)</u>
<i>Miljøstyrelsen (including environmental problems on offshore installations)</i>	<u>(Link to website)</u>

### SWEDEN

Authority	Contact information for whistleblowing
<i>Arbetsmiljöverket</i>	Telephone: 010-730 99 30  Letter: Arbetsmiljöverket Att: ER Box 9082 171 09 Solna <u>(Link to website)</u>
<i>Boverket</i>	<u>(Link to website)</u>
<i>Ekobrottsmyndigheten</i>	Telephone: 010-562 91 11  Letter: ”Visselblåsare/EU” Ekobrottsmyndighetens huvudkontor Box 22098 104 22 Stockholm <u>(Link to website)</u>
<i>Elsäkerhetsverket</i>	<u>(Link to website)</u>

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<b><i>Fastighetsmäklarinspektionen</i></b>	Telephone: 010-490 01 00 Letter: Fastighetsmäklarinspektionen Box 5045 650 05 Karlstad ( <a href="#">Link to website</a> )
<b><i>Finansinspektionen</i></b>	Email: visselblasare@fi.se (if the report concerns companies subject to FI supervision) visselblasare.mar@fi.se (if market abuse is suspected) Telephone: 08-408 986 70 (if the report concerns companies subject to FI supervision) 08-408 986 90 (in cases of suspected market abuse) Letter: Finansinspektionen Box 7821 103 97 Stockholm
<b><i>Folkhälsomyndigheten</i></b>	Telephone: 010-205 20 00 Letter: Visselblåsarfunktionen Tobak Folkhälsomyndigheten 171 82 Solna Alt. Visselblåsarfunktionen Tobak, Folkhälsomyndigheten Box 505 831 26 Östersund ( <a href="#">Link to website</a> )
<b><i>Havs- och vattenmyndigheten</i></b>	Telephone: 010-698 60 00 ( <a href="#">Link to website</a> )
<b><i>Inspektionen för strategiska produkter</i></b>	( <a href="#">Link to website</a> )
<b><i>Inspektionen för vård och omsorg</i></b>	Telephone: 020-140 47 00 Letter: Inspektionen för vård och omsorg (IVO) Mottagargruppen Box nr 45184 104 30 Stockholm ( <a href="#">Link to website</a> )
<b><i>Integritetsskyddsmyndigheten</i></b>	Telephone: 08-657 61 53 Letter: Integritetsskyddsmyndigheten Box 8114 104 20 Stockholm ( <a href="#">Link to website</a> )
<b><i>Kemikalieinspektionen</i></b>	Telephone: 08-519 41 00

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	<p>Chefsjuristen (Legal counsel)  Kemikalieinspektionen  Box 2  172 13 Sundbyberg  <a href="#">(Link to website)</a></p>
<b><i>Konkurrensverket</i></b>	<p>Email: <a href="mailto:euvisseblasare@kkv.se">euvisseblasare@kkv.se</a>  Telephone:  08-700 16 00  Letter:  Konkurrensverket,  103 85 Stockholm  Visiting address:  Ringvägen 100  118 60 Stockholm  <a href="#">(Link to website)</a></p>
<b><i>Konsumentverket</i></b>	<p>Telephone:  0771 - 42 33 00  Letter:  Elin Söderlind  Konsumentverket/KO  Box 48  651 02 Karlstad  <a href="#">(Link to website)</a></p>
<b><i>Livsmedelsverket</i></b>	<p><a href="#">(Link to website)</a></p>
<b><i>Länsstyrelsen Skåne län</i></b>	<p>Telephone:  010-224 10 00  Letter:  Länsstyrelsen Skåne  205 15 Malmö  Visiting address:  Södergatan 5  205 15 Malmö  <a href="#">(Link to website)</a></p>
<b><i>Länsstyrelsen Stockholm</i></b>	<p>Telephone:  010-223 10 00  Letter:  Länsstyrelsen Stockholm  Box 22067  104 22 Stockholm  <a href="#">(Link to website)</a></p>
<b><i>Länsstyrelsen Västra Götalands län</i></b>	<p>Letter:  Länsstyrelsen Västra Götalands län  403 40 Göteborg  <a href="#">(Link to website)</a></p>
<b><i>Läkemedelsverket</i></b>	<p>Telephone:  018-18 36 96  Letter:  Läkemedelsverket  Box 26  751 06 Uppsala</p>

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	<a href="#"><u>(Link to website)</u></a>
<b>Myndigheten för samhällsskydd och beredskap</b>	Telephone: 020-34 70 10 Letter: Myndigheten för samhällsskydd och beredskap 651 81 Karlstad <a href="#"><u>(Link to website)</u></a>
<b>Naturvårdsverket</b>	Telephone: 010-698 14 00 Letter: EVB, Naturvårdsverket 106 48 Stockholm <a href="#"><u>(Link to website)</u></a>
<b>Post- och telestyrelsen</b>	Telephone: 08-586 273 14 Letter: Post- och telestyrelsen (PTS) Box 6101 102 32 Stockholm <a href="#"><u>(Link to website)</u></a>
<b>Regeringskansliet</b>	Letter: Regeringskansliets externa rapporteringskanal FA RS 103 33 Stockholm <a href="#"><u>(Link to website)</u></a>
<b>Revisorsinspektionen</b>	Email: <a href="mailto:visselblasare@revisorsinspektionen.se"><u>visselblasare@revisorsinspektionen.se</u></a> Telephone: 08-738 46 00 <a href="#"><u>(Link to website)</u></a>
<b>Skatteverket</b>	Telephone: 08-411 0420 Address to submit form SKV 1891: Skatteverket Box 6037 171 06 Solna <a href="#"><u>(Link to website)</u></a>
<b>Skogsstyrelsen</b>	<a href="#"><u>(Link to website)</u></a>
<b>Spelinspektionen</b>	Email: <a href="mailto:visselblasare.extern@spelinspektionen.se"><u>visselblasare.extern@spelinspektionen.se</u></a> Telephone: 0152-50 69 50 <a href="#"><u>(Link to website)</u></a>
<b>Statens energimyndighet</b>	Telephone: +46 (0)16 – 542 06 13. <a href="#"><u>(Link to website)</u></a>
<b>Statens jordbruksverk</b>	<a href="#"><u>(Link to website)</u></a>
<b>Strålsäkerhetsmyndigheten</b>	Telephone:

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	08-799 40 00 Letter: Strålsäkerhetsmyndigheten 171 16 Stockholm ( <a href="#">Link to website</a> )
<b><i>Styrelsen för ackreditering och teknisk kontroll</i></b>	Telephone: 0771-183906 (to leave a message on the answering machine ) 0771-183906 (callback for reports by telephone) Letter: Swedac, Box 878, 501 15 Borås ( <a href="#">Link to website</a> )
<b><i>Transportstyrelsen</i></b>	( <a href="#">Link to website</a> )

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