

Northvolt AB – whistleblower reporting

1. Introduction – what is whistleblowing, and why is it important?

Northvolt AB strives to achieve transparency and a high level of (business) ethics.

Our whistleblowing service offers a possibility to alert the company/organisation about suspicions of misconduct in confidence. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage.

Whistleblowing can be done openly or anonymously.

The purpose of these Whistleblowing guidelines is to encourage external stakeholders to blow the whistle on suspected misconduct without any risk of retaliation, as well as to ensure an appropriate investigation process.

2. When can I use the Whistleblowing service?

Whistleblowing can be used to inform on a concern about something that is not in line with our values and ethical code, Code of Conduct, and that may seriously affect individuals, our company/organisation, the society or the environment.

You do not need to proof your suspicions but must be made in good faith.

The processing may only refer to data about serious misdeeds concerning:

- accounting, internal accounting controls, auditing matters, fight against bribery, banking- and financial crime, or
- other serious improprieties concerning the company's or the group's vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies that regard the security at the place of work and very serious forms of discrimination or harassments.

Please note there are restrictions on the use of a whistleblowing service in certain countries.

3. How can I report?

Reports can be made through the Communication channel, allowing anonymous messaging and dialogue:

<https://report.whistleb.com/northvolt>

The Communication channel can be reached on any device, including smart phones. We recommend that you access the Communication channel from a device that is not connected to our intranet.

4. Your message will be securely handled

The whistleblowing channel allowing anonymous messaging is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB does not save IP addresses or other meta-data, (it means data that can be used to identify the person sending the message). The person sending the message may also remain anonymous in the subsequent dialogue with the company/organisation's whistleblowing team.

Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, except for when personal data must be maintained according to other applicable laws. Deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower messages that are archived should be anonymised; they should not include personal data through which persons can be directly or indirectly identified.

5. Legal basis of the Whistleblowing guidelines

This policy is based on the EU General Data Protection Regulation and European Union Directive and guidelines on whistleblowing.