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Whistleblowing Guideline

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1. Purpose

The purpose of this guideline is to explain that Northvolt encourages and protects employees and other stakeholders who raise concerns about misconduct in good faith while ensuring an appropriate and independent investigation process.

2. Scope

This guideline is applicable to all employees at Northvolt.

3. Definitions

Acronym/Abbreviation or term	Definition
N/A	N/A

4. Guidelines

4.1 Introduction

Northvolt strives to achieve the highest level of integrity and business ethics. A transparent culture of behaving with integrity is central to Northvolt. Since whistleblowing is the most important source of insight for revealing possible misconduct, Northvolt encourages all employees and other stakeholders to make a whistleblowing report if they suspect misconduct. We all have a responsibility for acting in an ethically correct manner and for letting the appropriate people know if someone is acting in breach of Northvolt's Code of Conduct or any law or regulation.

Whistleblowing is a possibility to alert the company 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 objective of whistleblowing and any investigation conducted by Northvolt is to find out the facts of what has happened, irrespective of where and at what level in the organization.

4.2 Where to report

If you are an employee, the first reporting line is through the line organization. We encourage you to report any suspected Code of Conduct breaches directly to your manager, your manager's superior, Human Resources, or to the Legal, Finance or Compliance Departments.

However, if you feel you cannot report to any of these resources, you can use the Northvolt's external whistleblowing channel where reports can be made anonymously. The link is available on Northvolt.com or our intranet. Although English is preferred, you can make the report in the language you feel most comfortable in.

The external whistleblowing channel allows anonymous messaging and is administrated by an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, the provider does not save IP addresses or other meta-data, (that is data that can be related to the person sending the message). The person sending the message can remain anonymous in the subsequent dialogue with the Compliance department. The whistleblowing line is available 24 hours a day, 7 days per week.

4.3 Who can report

All employees have the possibility to report suspected misconduct through the internal or external channels on the company intranet or on Northvolt.com.

Any other stakeholder can file a report on the external whistleblowing line, available on Northvolt.com. The channel is open for employees, consultants, suppliers, customers, or other business partners, to report possible violations of the law, Northvolt's Code of Conduct, Supplier Code of Conduct or policies and directives.

Reports can be filed for incidents that have taken place in all our locations, joint ventures, or subsidiaries.

4.4 What to report

Any suspected incident that you believe may violate Northvolt's Code of Conduct, Supplier Code of Conduct or other policies and directives can be reported. It may also be a violation of laws, rules, regulations and/or a direct threat to public interest.

Antitrust violations and corruption are examples of issues that should be reported. It may also relate to serious forms of discrimination or harassments.

For **employment related matters**, for example issues related to work performance, employees (and any other stakeholders) are asked to contact their manager, manager's supervisor or HR, as these issues cannot be investigated in the scope of the whistleblowing.

Matters that are related to **Health & Safety** should be reported in the IA/TIA tool or your HSE site team member.

Matters that are related to **Quality** should be reported in the JIRA tool or to the local quality staff.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden.

4.5 Confidentiality

Access to messages received through our whistleblowing communication channel is always restricted to appointed individuals within Northvolt with the authority to handle whistleblowing cases. This handling is on a strict need-to-know basis and confidential handling. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality. They will usually be a member of Northvolt's Legal, Compliance or HR departments depending on what the case concerns and where a violation may have taken place. Depending on the type of violation, other departments may also be involved and sometimes we need to bring in external expertise to help us in the investigation. The names of individuals during the course of an investigation are only communicated when necessary for performing an action, e.g., when disciplinary action is needed.

4.6 Whistleblower protection and non-retaliation policy

Northvolt strictly forbids any retaliation against a person who reports a concern in good faith. A person expressing genuine suspicion according to these guidelines will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith. Retaliation against a whistleblower is an action subject to disciplinary actions in itself. Any suspected retaliation should be reported so it can be investigated.

Persons protected include those with a range of profiles who could acquire information on breaches in a work-related context. This could include employees, unpaid trainees, shareholders with active assignments, and members of supervisory bodies (including the Board of Directors), independent third-party contractors, subcontractors, and suppliers. The whistleblower protection also applies to those assisting whistleblowers, such as colleagues and relatives.

4.7 Receiving the report

The reports made via the external whistleblowing channel are received by the Compliance department at Northvolt, where each report will receive a confirmation of receipt. Sometimes this confirmation will contain questions that would be helpful for the investigation.

It is important for the investigation that as much information as possible is provided to assist in the investigation (always helpful: “what, when, how, where” – “who” when necessary for solving the matter). Moreover, any documentation that can be provided will be helpful. If you remember something important about the issue after filing the report, you can return to the external reporting channel and access your original report. At that point, you can add more details or answer questions you may have received from the Compliance department.

Do not include sensitive personal information about anybody mentioned in your message if it is not necessary for describing your concern.

4.8 Investigating the report

Depending on what the report is about and where the conduct took place, different parts of the organization are responsible for the investigation. Reports concerning harassment,

discrimination, or fair employment, may typically be assessed by HR, while other categories of reports for example theft may be assessed by another part of the company like Security.

No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower. Those conducting investigations in Northvolt are independent in the handling and investigation of whistleblower reports.

Should a concern relate to a member of the management team, then the investigation shall, when possible, be coordinated by the Compliance Council (consisting of the Chief Financial Officer, Head of Legal, Head of HR and Head of Compliance).

4.9 Outcome of the report

The reporter will be notified upon closure of the investigation as soon as possible.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations.

If the allegation is substantiated, Northvolt will take appropriate action. This may include disciplinary action, up to and including termination and possibly legal action or filing of a police report, subject to applicable laws and depending on the circumstances. Northvolt may also take other actions to prevent recurrence such as re-training and improvement of policies and guidelines.

Northvolt does not tolerate non-compliant behaviour and will take action in the event of breaches of Northvolt's Code of Conduct or the law.

4.10 Data protection

Any data provided when leaving a message via the external whistleblower channel will be processed for the purpose of following up and investigating the reported message, in adherence with local legal obligations. The information will be stored no longer than is necessary for the purpose of handling the case. The processing of personal data through the whistleblowing system is strictly regulated under the General Data Protection Regulation (GDPR).

4.11 Other reporting channels

Northvolt's internal and external whistleblowing channels are the preferred reporting channels; however, you can also contact the Compliance department by email at compliance@nortvolt.com.

You can also contact a local resource in the Northvolt legal entities in each country or you can make a report to local authorities.

5. References and records

Document name	Document ID/Link
Code of Conduct	