

# Whistleblowing Policy

Soundtrack Your Brand Sweden AB (incl. affiliates) (“SYB”) effective as of December 1, 2023

## Introduction – what is whistleblowing, and why is it important? When to blow the whistle?

SYB strives to achieve transparency and a high level of business ethics.

The purpose of the whistleblowing channel is to provide employees (as defined below) with support and guidelines to report severe misconducts which have occurred or very likely to occur in our organization in which an employee is or was in contact through their work, without a risk of being subject to retaliation. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act at an early stage.

These guidelines are based on the Swedish Act on Whistleblowing (2021:890) (Sw. Lag om skydd för personer som rapporterar om missförhållanden) (the “Act”), Directive (EU) 2019/1937 of the European Parliament and of the Council on the protection of persons who report breaches of Union law (the “Directive”) and applicable rules on data protection.

The principles set out in these guidelines apply to all of those who are, or have been, in a work-related context with us, including:

- employees, including trainees/students,
- self-employees/consultants,
- persons subject for recruitment
- volunteers
- shareholders and management who are active in the company, and
- other persons who are/have been in a work-related context with us, under our control and management (the above mentioned categories are hereinafter referred to as an “**employee**” or a “**reporting person**”).

All employees have a duty to be aware of the contents of these guidelines and any updates to them, and to comply therewith.

All reports made to the whistleblowing channel in accordance with these guidelines will be received, recorded (if orally reported) and processed by the whistleblowing team. The whistleblowing team consists of the People Manager and the Head of Legal of SYB.

## When to blow the whistle?

All employees may report suspected misconducts when a misconduct becomes apparent in our organization.

A “misconduct” means an act or omission occurred (or most likely to occur) in our organization which is considered as harmful to the *public interest*, which the employee has received knowledge of in a work-related context.

Reporting can also be made where an employee has received knowledge of acts or omissions which are deemed unlawful and constitute a breach according to the Directive, or such breach of regulations as further specified in the Act with reference to Chapter 8 of the Constitution of Sweden (Sw: Regeringsformen).

Examples of serious violations that can be reported:

- Bribery and corruption
- Fraud
- Conflicts of interest
- Unfair competitive behavior
- Theft and embezzlement
- Harassment
- Crime against human rights

If an employee has concerns about their own employment, we ask that the employee discuss the matter directly with their supervisor or HR representative and / or make a report in accordance with our policies. Matters relating to employment and labor law should normally not be reported or dealt with in the procedures of the whistleblowing channel.

## How to report

If an employee has *reasonable grounds* to believe that a misconduct has been made, we encourage all employees to report the matter immediately through our whistleblowing channel. An employee does not need proof for their suspicion but do however need reasonable cause to assume that the information is true at the time of reporting, and the employee needs to *act in good faith*. Allegations should not be made with the intent to cause harm. A report can be provided through the whistleblowing channel which may be found here: <https://soundtrackyourbrand.integrity.complylog.com/>

The channel allows to choose between the following alternatives:

- oral reporting
- written reporting

- reporting by requesting a physical meeting, which shall be enabled within a reasonable time.

It is possible to report anonymously (please note that the system does not provide voice distortion in the event of oral reporting).

Non-relevant information on health status, political or religious beliefs or sexual orientation shall not be included in the report.

## **Penalties for intentionally inaccurate reporting**

If an employee misuses the reporting procedure by knowingly making inaccurate or malicious allegations, this could be seen as a serious violation, which may result in disciplinary actions.

## **Prohibition of retaliation**

We are committed to a strict policy of non-retaliation, in accordance with applicable law.

The prohibition covers those who, in good faith, report suspected misconducts in accordance with these guidelines, where such misconducts have occurred in a work related context or participate in investigations into a matter of misconducts, except where such investigation entails a criminal offence. The prohibition also includes indirect retaliation, such as the employees' colleagues and family members.

Retaliation, termination of employment, dismissal, other unfavorable treatment or other adverse consequences of a person who, in good faith, has reported a misconduct or suspected misconduct in accordance with the provisions of these guidelines shall be considered as a prohibited retaliation.

It is also prohibited to hinder or attempt to hinder a reporting person from reporting information about a misconduct. The same applies if the reporting person contacts their union in order to discuss prior to reporting.

An employee is also protected when reporting is made internally but not through the established whistleblowing channel, if such whistleblowing channel is missing/ disabled, or is not established in accordance with the Act, or if the employee has not yet commenced their work (under recruitment).

## **The processing and investigation process**

### Authority to investigate reports

We are committed to ensure that all reports of suspected misconducts are treated confidential, efficient, and in accordance with our values and applicable law. The whistleblowing team has exclusive authority and responsibility for internal investigations and performs its duties impartially and independently. People outside the whistleblowing team will be hindered from accessing the reporting channel. However, during the investigation process, the whistleblowing team may also request information and expertise

from other individuals within or outside the company (e.g., experts and advisors), in which case the obligation to maintain secrecy and confidentiality also applies to them.

### **The investigation**

Reporting through the internal reporting channel is confidential. Information about the identity of the reporting person, the subject of the report and other persons mentioned in the report and other personal data shall be kept confidential.

Information about the identity of the reporting person will not be disclosed to a third party (authority or court), except if necessary, in case of a criminal offence.

The information in the report shall be processed as necessary to complete the investigation. Appropriate remedial action, to the extent necessary, shall always be based on the results of a thorough investigation.

In certain circumstances, the whistleblowing team may decide not to investigate the report. This can be the procedure, for example in the following situations:

- the information obtained is insufficient in order to carry out an adequate investigation and no further information is available,
- the report is made in the wrong channel, in which case the reporting person is directed to make the report to the correct party,
- the report is not provided in good faith, or
- if an investigation has already been made.

If the report is made anonymously, the whistleblowing team is prevented from further investigation of the identity of the reporting person.

In case of an anonymous report, such report may risk being dismissed if, for example, the information obtained is deemed insufficient in order to initiate an investigation or if the veracity of the information provided cannot be reliably established.

A person who is the subject of a report shall not participate in the investigation or decision-making of the report. If a member of the whistleblowing team is the subject of a report, they may not be involved in the investigation process.

### **Documentation and data processing**

The whistleblowing team is required to document all reports received through the whistleblowing channel and to make sure that the information received is being processed in accordance with the Act and applicable data protection regulations.

Personal data will not be kept longer than necessary, taking into consideration the purpose of handling processing in accordance with the Act.

Personal data shall be deleted after two (2) following finalized investigation. Finalized investigation will be presented to the management, or such other company representative where there is a risk of conflict.

### **Information to the reporting person and the person subject to the report**

Information to the employee shall be provided as follows:

- within seven (7) days following reporting, a confirmation will be sent by the whistleblowing team in order to confirm that the report has been received, except where the employee has expressly requested not to receive any confirmation, or if the whistleblowing team has reasons to believe that the identity would be revealed,
- the whistleblowing team will, to a reasonable extent, inform the reporting person, no later than within three (3) months upon confirmation, of the actions to be taken with regard to the report and the reasons why, and
- where applicable, the whistleblowing team will inform if the identity of the reporting person needs to be provided to an authorized third party, except where such information would hinder the investigation.

The person subject to the report shall also receive information on the processing of their personal data with regard to the report, except where such information would hinder the investigation (if so, information shall instead be provided at the latest when measures are being taken).

### **External reporting**

#### **Reporting to national authorities**

Except internal reporting, an employee may also decide to report externally to a designated authority's established whistleblowing channel, depending on the subject-matter of the report. Such authorities have an obligation to provide an external channel for reporting of certain misconducts, where there is a public interest.

When reporting externally, it is the relevant authority who is responsible for receiving the report, provide necessary information and follow-up. A report may be shared with another relevant institution when needed.

The centralized external reporting channel in Sweden is provided by the Swedish Work Environment Authority (Sw. Arbetsmiljöverket).

External reporting also includes protection from retaliation and covered by rules on confidentiality.

#### **Reporting to institutions within the EU**

Where the subject-matter of the report falls within the area of expertise of an EU institution, the employee may report directly to such institution. The right to receive protection is based on the same requirements as internal reporting, hence the reporting needs to be made in accordance with such guidelines as communicated therewith.

## Reporting through media

An employee may also receive protection when reporting publicly, provided that:

- a report has been made through an external reporting channel, without being appropriately addressed or investigated, or no appropriate remedial action has been taken within the set time frame,
- where reporting publicly is evident in order to safeguard an obvious risk for breaches relating to the health and safety of people or the environment (for example due to serious criminal offences relating to financing or the environment), or
- when the employee has valid reasons to believe that they would suffer retaliation in connection with the external reporting.

A reporting person may also report to media in accordance with their constitutional rights.

### Protection afforded by the Freedom of the Press Act, Fundamental Law on Freedom of Expression etc

A reporting person is always covered by the Freedom of the Press Act (Sw: Tryckfrihetsförordningen) which, subject to certain exceptions, declares the freedom of every Swedish citizen to publish their thoughts and communicate information on any subject) and the Fundamental Law on Freedom of Expression (Sw: Yttrandefrihetsgrundlagen) defined as a freedom to communicate information in speech, writing or image or in any other way and to express thoughts, opinions and feelings).

Reporting persons are also covered by the freedom of acquisition (meaning that the reporting person cannot be held responsible for acquiring information as long as it is obtained in good faith and where the person has reasons to believe that it is necessary in order to expose the misconduct) and prohibition of investigation (meaning that there is no right to investigate the identity behind a report).

### *Prohibition on further investigation and the right to report in publicly funded companies/ organizations*

The constitutional rights also include a right to remain anonymous. An authority is prohibited from further investigating the identity of the reporting person or take any action on retaliation where an employee has provided information based on the above-mentioned constitutional rights.

The same applies in private organizations which are publicly funded, part of the educational system, healthcare system or social services.

## Additions and changes

SYB may make updates and amendments to this Whistleblowing Policy. If any amendment or updates are being made SYB will inform you accordingly. If so, please read the updated Whistleblowing Policy carefully.