

## WHISTLEBLOWING POLICY

### 1. Who may submit a report through the whistleblowing channel?

1.1. Do you have knowledge of a serious wrongdoing conducted in relation to TreeToTextile's, org. nr. 556989-2648 ("TreeToTextile") business? Does the wrongdoing concern a person in a key position or a leading position in TreeToTextile? If so, you may use our whistleblowing channel for making this wrongdoing known. The internal whistleblowing channel is available to;

- workers/employees,
- volunteers,
- trainees,
- persons otherwise performing work for TreeToTextile,
- self-employed persons,
- shareholders and persons belonging to the administrative, management or supervisory body of TreeToTextile,
- shareholders who are active in TreeToTextile's business.

### 2. Other avenues for raising concerns

2.1 TreeToTextile strives to offer a safe working environment where each and every one should feel comfortable voicing their opinion. If you are comfortable doing so, you can always raise any concerns with your closest superior, HR or someone in management. HR can be reached at [Viktoria.Flygare@treetotextile.com](mailto:Viktoria.Flygare@treetotextile.com), phone number +46 70 210 48 80. If the information you want to bring forward is not such that it would fall within the scope of what may be reported. Such information may include instances of salary dissatisfaction or cooperation difficulties with a co-worker.

### 3. Whistleblowing channel

3.1 Reporting through the whistleblowing channel is limited to reporting on serious wrongdoings concerning persons in key or leading positions within TreeToTextile. The information should concern a wrongdoing related to accounting, bribes, financial crimes or other wrongdoings that may be considered vital to TreeToTextile or that concerns the life or wellbeing of an individual. If you are unsure if the information you want to report would fall within this scope we encourage you to report anyway.

3.2 You can submit your report in written format, orally or through the means of a physical meeting. When you choose to submit your report orally or through the means of a physical meeting, the conversation will normally be recorded. However, recording will only take place if you consent. The information you choose to submit will always be documented. When you submit a report through the internal channel, your identity will always be protected by confidentiality. In order to enable investigation of your report, you are always encouraged to include your contact details in the report.

- 3.3 To report on a wrongdoing orally, please leave a message on TreeToTextiles whistleblowing voicemail. If you want to report orally without being recorded or if you want to book a physical meeting, please leave your contact details on the voicemail and your phone call will be returned. The voicemail can only be accessed by attorney Peter Lexenberg at Wistrand law firm. You can reach the voice mail at phone number +46850720002.
- 3.4 To report a wrongdoing in writing, please send a letter to Peter Lexenberg, Wistrand law firm, PO Box 7543, 103 93 Stockholm.
- 3.5 You have a right to confirmation of receipt of your report has been received within seven days after submitting it, unless you have declined such confirmation. Within three months of submitting your report you will receive information on the follow-up of your report. The documentation of your report will be kept as long as necessary, however no longer than two years after the follow-up of your report has been concluded.

## 4. Protection of whistleblowers

- 4.1 Whistleblowers who submit a report through the internal whistleblowing channel, are protected from retaliation as a result of their report.
- 4.2 Retaliation may include, for example, suspension, lay-off, dismissal, demotion or withholding of promotion, transfer of duties, change of location of place of work, reduction in wage, change in working hours or a negative performance assessment or employment reference.

## 5. External whistleblowing channels

- 5.1 In addition to the internal channel described above, you have a right to report wrongdoings through external whistleblowing channels by contacting the relevant authority. A list of the relevant authorities can be found in the annex to Ordinance (2018:219) with supplementary provisions to the General Data Protection Regulation.
- 5.2 You can read more about whistleblowing on the Swedish Work Environment Authority's website [www.av.se](http://www.av.se) where you can also file a report..

## 6. Personal data in the whistleblowing channel

- 6.1 TreeToTextile is the controller of personal data processed through the internal whistleblowing channel, for example when reports are received, stored, investigated or deleted.

- 6.2 If you have any questions regarding our personal data processing, please contact us through:

Email: [Viktoria.Flygare@treetotextile.com](mailto:Viktoria.Flygare@treetotextile.com)  
Phone: +46 70 210 48 80

- 6.3 Personal data will be processed in the whistleblowing channel based on Article 6(1)(f) GDPR (legitimate interest assessment) and the purpose of the processing is to enable the reporting of wrongdoing related to TreeToTextile's business.

- 6.4 TreeToTextile may process personal data relating to criminal convictions and offences. Such processing is based on Ordinance (2018:219) with supplementary provisions to the General Data Protection Regulation and the Swedish Data Protection Agency's (IMY) provisions DIFS 2018:2.

- 6.5 The processing of sensitive data is based on Article 9(1)(g) GDPR.
- 6.6 The personal data processed through the internal whistleblowing channel is mainly processed by TreeToTextile and Wistrand Law firm. If a report submitted through the system concerns a crime, the information may be handed over to the Police Agency or other relevant authority.
- 6.7 TreeToTextile does not transfer data outside of the EU/EEA. All personal data is stored on servers in the EU.
- 6.8 The personal data processed through the internal whistleblowing channel will be processed for as long as necessary, although no longer than two years after the conclusion of the follow-up of your report.
- 6.9 According to the GDPR you have a right to request access to and rectification or erasure of personal data as well as restriction of processing. You also have a right to object to processing as well as the right to data portability. Please note that, due to the context in which this personal data is processed, these rights may be limited.
- 6.10  
If you are employed with TreeToTextile and you would like further information on our processing of personal data in general, please see documentation on GDPR in SharePoint.
- 6.11  
If you are dissatisfied with our processing you may lodge a complaint with IMY.
- 6.12  
Personal data is primarily collected from the reporting person. However, personal data may also be collected from other sources during the course of the investigation.