

Whistleblower function and policy

The purpose of this whistleblowing policy and function is to simplify for staff and external parties to report cases of serious irregularities anonymously. The policy applies to all Studentbostäder in Norden (SBS) employees and partners and includes serious irregularities that may have a detrimental impact on the Company's business operations and which cannot be reported or handled the usual way.

If you suspect serious irregularities or crimes within SBS, you can report this to our whistleblowing function. The function can be used by the public, employees, suppliers, and other stakeholders.

If you would like to make pure complaints or dissatisfaction about accommodation, routines or the like, talk to your student host or contact us via our Housing Apps fault reporting function.

Safety and security as an employee, customer and tenant or partner of SBS is A and O. We cherish our values with ethics, openness, and trust in the organization. At SBS, we have zero tolerance for all types of crimes and irregularities within the company and it is a matter of course for us that everyone at SBS and our partners comply with laws and agreements.

What can be reported?

There are serious irregularities that can be reported.

- Financial crime – such as theft, corruption, bribery or someone with a senior or key position at SBS has abused their position
- Safety deficiencies or serious violations of the Work Environment Act
- Discrimination, harassment, or bullying
- Threats or violence

Your report should contain as much information as possible to facilitate the investigation of the case.

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Anonymity

You can choose to remain anonymous by not entering your name or other contact details. You will also not receive feedback on the case.

Reporting tool

In order to ensure the whistleblower's anonymity, a reporting tool is provided by an external and independent actor. The reporting channel is encrypted and password protected. The whistleblower never has to give his identity if he does not want to.

- The whistleblower does not need to have evidence of his suspicion, but no accusation may be made with malicious intent or knowing that the accusation is false.
- It is important that the whistleblower describes all the facts of the complaint, including the circumstances that are believed to be less important. Claims should be carefully developed and any documentation that may be relevant should be attached.

Reporting via SBS internal whistleblowing channels

Reporting is done in writing via the website wb.2secure.se orally by telephone at 0771-177 99 77.

You can choose to remain anonymous on both of these reporting channels. If you wish to report via physical meeting, it can be requested by registering a notification on the website wb.2secure.se. The physical meeting is held either with a representative from SBS or with SBS's whistleblowing service provider 2Secure by agreement.

When registering a new notification on wb.2secure.se, you must provide the company-unique code **stn908** to identify that it is for SBS notification is made. On the website, you are asked to answer a number of questions about what the notification relates to. You can be anonymous and be assigned a unique case number and password that must be saved in order to actively log in to the website and follow the notification and communicate with the administrator at 2Secure.

Once a notification is registered, it is processed by experienced agents at 2Secure, who contact SBS's primary contact person based on a predetermined contact list with multiple

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names. If the primary contact person is the subject of the notification, another person on the contact list will be informed. It is always SBS that finally assesses the notification and decides what measures to take. When you report to SBS's internal reporting channels, you are entitled to protection under the Act (2021:890) on the Protection of Persons Reporting Misconduct.

Reporting via external whistleblowing channels

In addition to reporting to SBS's internal whistleblowing channel, you can report externally to a competent authority within a particular area of responsibility or one of the EU institutions, bodies and agencies. Even when you report externally, you are entitled to protection under the Act (2021:890) related to protection of persons who report misconduct.

The following authorities have been appointed as competent authorities and established external reporting channels: the Swedish Work Environment Authority, the Swedish National Board of Housing, The Swedish Electrical Safety Authority, the Swedish Economic Crime Authority, the Swedish Real Estate Agency, the Swedish Financial Supervisory Authority, the Swedish Public Health Agency, the Swedish Agency for Marine and Water Management, the Integrity Protection Authority, the Swedish Inspectorate for Strategic Products, the Swedish Inspectorate for Health and Social Care, the Swedish Chemicals Agency, the Swedish Consumer Agency, the Swedish Competition Authority, the Swedish Food Agency, the Medical Products Agency, The county administrative boards, the Swedish Civil Contingencies Agency, the Swedish Environmental Protection Agency, the Swedish Post and Telecom Agency, the Government Offices, the Swedish Auditors' Inspectorate, the Swedish Tax Agency, the Swedish Forest Agency, the Swedish Gambling Authority, the Swedish Gambling Authority, the Swedish National Board of Agriculture, the Board of Accreditation and Technical Control, the Swedish Radiation Safety Authority and the Swedish Transport Agency.

About the statutory notification protection

Whistleblowing legislation, act (2021:890) on the protection of persons who report misconduct, gives you as a whistleblower a protection given certain conditions. In addition to the possibility to report suspected misconduct under whistleblowing legislation, there is also a right to freedom of information and procurement under the Freedom of the Press Act and the Fundamental Law on Freedom of Expression.

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This means that it is possible for an employee (with certain exceptions) in both the private and public sectors to provide otherwise classified information for publication to the mass media covered by the Freedom of the Press Act or the Fundamental Law on Freedom of Expression.

For employees in public activities or other activities where whistleblower protection applies under the Act (2017:151) on the protection of whistleblowers in certain individual activities or the Public Access to Information and Secrecy Act (2009:400), there is also increased protection. The increased protection relates to the prohibition of research and retaliation. The search ban means that an authority or other public body, as a general rule, may not investigate who has submitted a notice for publication.

The prohibition of retaliation means that the public may not take measures that have negative consequences for an individual because he or she has exercised his or her freedom of expression and communication.

Violations of the prohibitions on investigation and retaliation are punishable by a fine or imprisonment for a maximum of one year (Chapter 3, Section 4 TF and Chapter 2, Section 4 of the YGL).

Who can be reported?

All SBS employees and external parties contracted by SBS can be notified. It is therefore of the utmost importance that information is provided in good faith and that, to your knowledge, it is accurate.

Who receives the notification?

In whistleblowing cases, SBS cooperates with 2Secure, which is an external and independent actor. All notifications are received and handled by agents at 2Secure. They have extensive experience in investigations and have global capabilities if necessary. 2Secure works in consultation with SBS's whistleblowing committee. All assessments and decisions on measures are made by SBS's whistleblowing committee.

Feedback

After registering a notification, the whistleblower can log in again with their login details to see any follow-up questions/comments from the administrator at 2Secure. The notification can be followed up via wb.2secure.se if the whistleblower saved the case number and password generated when the notification was carried out.

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What happens to your report?

Your notification is received by the Chairman of the Audit Committee of SBS, and the Chairman decides whether the matter needs to be investigated and in what way. An investigation may, for example, lead to a police report being made, that the matter is submitted to SBS' board and management for handling or that the case is closed.

If you have provided contact information, you will be informed of what happens to your notification. We will treat your data and your notification with confidentiality. A report submitted in good faith will not have any negative consequences for the person who reports.

How SBS processes personal data in connection with a whistleblowing case can be read below:

PERSONAL DATA

When you use the whistleblowing service, you can remain anonymous. SBS takes great care of the protection of personal privacy. Below is a summary of some important points regarding the General Data Protection Regulation.

Personal data

At all times, SBS is obliged to comply with the legislation regarding the processing of personal data. It is important that you feel safe when you provide information about yourself and others in the whistleblowing system. We take great care of the protection of personal privacy.

Anonymity

As a whistleblower, you can choose whether you want to leave your contact details or if you want to remain anonymous. Regardless, all complaints are taken seriously. For our external administrators, it may facilitate further work if we can contact you for additional information; therefore, contact information will be requested. However, it is always completely voluntary to provide this information.

No IP addresses are recorded, and the system does not use cookies. However, if you are using a computer that is connected to SBS, it may be clear from the internet log that you have visited the page where the notification is made. If you don't want this to be visible, use a computer that is not connected to SBS network, or a personal smart phone or tablet.

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Personal data responsibility

SBS and the respective subsidiaries where the person being notified is employed are responsible for the processing of personal data by law.

The purpose of the registration

The personal data will only be used to conduct an investigation of what has been reported to the whistleblowing system. In the whistleblowing guidelines, you can read about the type of misconduct that can be reported. The Swedish Privacy Protection Authority regulates when other than authorities may handle personal data about violations of the law. If a notification is received that cannot be processed in the whistleblowing service because of this, or if the misconduct is not serious enough to be handled in the context of whistleblowing, the case will be closed and all personal data deleted. You will receive a notification in the whistleblowing system that this assessment has been made and information about where you can instead turn with your case.

Who accesses the personal data?

Personal data will only be used by the investigative function of the SBS Whistleblowing Committee and by the external company that has been commissioned to receive the notification. The data is only available to persons working on the current notification. The investigation may be handed over to the police or other authorities, such as the Swedish Economic Crime Authority.

What personal data are recorded?

Initially, the information that you as a notifier provides is recorded. In an investigation, the information needed to investigate the case will be recorded, which primarily includes name, position and suspicion of the misconduct that forms the basis for the notification. Information will then be retrieved from the sources deemed necessary to investigate the misconduct.

How long will the personal data remain?

Personal data is usually deleted three weeks after the case has been closed, but not more than 2 years after termination if special reasons exist.

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Information for the person being reported

A person who is reported in the whistleblowing service will receive special information about it. If this could jeopardize the further investigation, the information will not be provided until it is assessed that there is no longer any risk or danger. During that time, no register extracts are additionally provided.

Registry extract

As a notifier, you have the right to receive information about what personal data is registered about you in the whistleblowing service free of charge. Such a request for a register extract shall be in writing and signed. Send it to 2Secure, Data Protection Officer, Box 34037, 100 26 Stockholm. If any information is incorrect, incomplete, or misleading, you have the right to have it corrected upon request. A register extract to the notified person will not contain information that is related to you as a whistleblower, as the information may be summarized.

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