

Haglöfs Policy on Protected Disclosure (Whistleblowing)

Introduction - what is whistleblowing, and why is it important?

Haglöfs AB, together with its subsidiaries (in this policy all referred to as “Haglöfs”), strives to achieve transparency and a high level of business ethics. We understand that unethical/illegal behaviour affects not only us but society too. Therefore, we are committed to doing business ethically, complying with internal and external rules, and ensuring we operate within the applicable laws of every country where we do business.

The purpose of the whistleblowing channel is to provide employees 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, including breaches of our Code of Conduct, without a risk of being subject for 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.

This Policy is based on the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (“The Whistleblowing Directive”), the Swedish Act on Whistleblowing (2021:890) (Sw. Lag om skydd för personer som rapporterar om missförhållanden), and other applicable rules on whistleblowing and data protection as relevant to Haglöfs.

Some key definitions

- **Whistleblower(s)** are people from Haglöfs such as Officers, Employees, as well as external Business Partners, who disclose misconduct under this policy.
- **Misconduct** is when something – that either has occurred or is most likely to occur – is against the law or not in line with our policies. It also includes trying to cover up any of these actions.
- **Officer(s)** refers to members of our board of directors, auditors, and/or executive officers of Haglöfs.
- **Employees** are the people working for Haglöfs. This also includes consultants and those who are working outside the main office, too.
- **Business Partners** are the people and organizations we work with at Haglöfs. This includes suppliers, (sub)contractors, intermediaries, commercial agents, consultants, and other parties supporting us.
- **Other Stakeholders** refer to individuals such as candidates, former employees, voluntary workers, and interns. This could also be someone who assists a person in the reporting process in a work-related context, third persons connected with a reporting person who could suffer work-related retaliation (eg colleagues or relatives), etc. Such individuals can be Whistleblowers, too.

When to blow the whistle?

You may report suspected misconducts when such becomes apparent in our organization:

- Criminal offenses
- Misleading/dishonest financial practices
- Other intentional misrepresentations
- Intentional hiding of information
- Non-compliance with legal obligations
- Consumer protection breaches
- Protection of privacy and personal data, and security of network and information systems
- Serious threats to health and safety
- Environmental damage
- Fundamental control breaches
- Violations of our internal policies, such as Code of Conduct
- Fraudulent or corrupt behaviour

How to report?

If you have reasonable grounds to believe that a misconduct has been made, we encourage you to report the matter immediately through our Speak Up Channel.

You don't need proof for your suspicion, but however need reasonable cause to assume that the information is true at the time of reporting – in other words you need to act in good faith. Allegations should not be made with the intent to cause harm.

A report can be provided through the Haglöfs Speak Up Channel which can be found here:

<https://privacyportal-de.onetrust.com/whistleblower/9386c3ff-3267-4922-ae65-d86e8fc618e9/992796b2-af35-4830-b1c6-328256b5b4ab/form>

You have the option to report anonymously. Please note when reporting that due to privacy reasons, any non-relevant information on health status, political or religious beliefs or sexual orientation should not be included in the report.

You may also choose to report externally. For certain types of misconduct, especially those involving public interest, designated authorities provide external whistleblowing channels. For more information on how to report externally, including the appropriate authorities and the subject matter they handle, please refer to Appendix A.

Penalties for intentionally inaccurate reporting

It is important to use the reporting procedure responsibly. Knowingly submitting false or malicious allegations is considered a serious violation. Engaging in such conduct may lead to disciplinary action. We encourage accuracy and sincerity in all reports to maintain the integrity of the process.

Protection of Whistleblowers

Our commitment to protecting whistleblowers is fundamental, aligning with our core values and legal requirements. We strictly enforce a non-retaliation policy as mandated by law. This protection extends to individuals who report suspected misconduct in good faith, following these guidelines, and those involved in investigations, provided the misconduct is work-related. Protection against retaliation also covers indirect forms, safeguarding not only the employees but also their colleagues and family members.

Retaliation against anyone who, in good faith, reports a misconduct or suspected misconduct following these guidelines is strictly prohibited. This includes termination of employment, dismissal, unfavourable treatment, or any other adverse consequences. Additionally, any actions that obstruct or attempt to obstruct someone from reporting misconduct are not allowed.

To be granted protection under the Directive the reporting person must report either internally (i.e. within Haglöfs) or externally (to a competent authority) or make a public disclosure. An individual who makes an anonymous report must be given the protection of this Policy if they are later on identified and would suffer retaliation. 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, or if the employee has not yet commenced their work.

The processing and investigation process

We are committed to ensuring that all reports of suspected misconducts are treated confidentially, efficiently, and in line with our values and applicable law. The Whistleblowing Team (HR Manager and Head of Legal, jointly the Whistleblowing Team) has authority and responsibility for internal investigations and performs its duties impartially and independently. People outside the Whistleblowing Team have no access to the reporting channel. However, during the investigation process, the Whistleblowing Team may also request information and expertise from other individuals within or outside of Haglöfs (e.g., experts), in which case the obligation to maintain secrecy and confidentiality also applies to them.

All reports made through the internal reporting channel are treated with strict confidentiality. This includes the identity of the reporting person, the subject of the report, and any other individuals mentioned, as well as any other personal data involved. The identity of the reporting person will not be disclosed to third parties (authorities or courts), except when necessary for criminal offense investigations and only to the extent required.

Furthermore, any appropriate remedial action will always be based on the findings of a thorough investigation. We ensure that these actions are necessary and proportionate to the results of the investigation.

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

- the information 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.

When a report is made anonymously, our Whistleblowing Team will not attempt to uncover the identity of the reporting person. However, it's important to note that anonymous reports may face limitations. For instance, if the information provided is insufficient for initiating an investigation or if the reliability of the information cannot be established, the report may be at risk of being dismissed.

Additionally, to maintain impartiality, any person who is the subject of a report is excluded from participating in the investigation or decision-making process related to that report. This rule also applies to members of the Whistleblowing Team; if they are the subject of a report, they will be barred from involvement 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 applicable laws, including data privacy. Personal data will not be kept longer than necessary, taking into consideration the purpose of handling processing.

Personal data shall be deleted after two (2) years following finalized investigation.

Finalized investigation will be presented to the audit committee, or such other company representant where there is a risk of conflict.

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

Upon receiving a report, the following communication procedures will be followed:

- **Confirmation of Receipt:** Within seven days of reporting, the Whistleblowing Team will send a confirmation to acknowledge receipt of the report. Exceptions to this include cases where the employee has explicitly requested no confirmation.
- **Follow-Up Information:** No later than three months after sending the confirmation, the Whistleblowing Team will reasonably inform the reporting person of the actions planned in response to the report and the reasons for these actions.
- **Disclosure of Identity:** If necessary, the Whistleblowing Team will inform the reporting person if their identity needs to be disclosed to an authorized third party, unless such disclosure would impede the investigation.

Additionally, the person who is the subject of the report will be informed about the processing of their personal data in relation to the report. However, if providing this information could obstruct the investigation, it will be deferred until the latest stage when measures related to the report are being implemented.

Responsibility of Management

HR Manager and Head of Legal, jointly, are responsible for providing relevant training to Employees to ensure understanding and compliance with this Policy.

Communication and Training

Communication and training initiatives are implemented within Haglöfs to ensure full understanding of this Policy.

Monitoring and Review

The implementation of this Policy's effectiveness is regularly monitored and reviewed for suitability, adequacy, effectiveness, and compliance with applicable laws by HR Manager and Head of Legal, jointly.