LOGENT
SUPPORTING LOGISTICS

2024

Whistleblowing

Administered by: HR department
Approved by: CEO Logent Group
Valid from: 2024-11-01
Valid blank: Indefinitely

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Introduction

Logent is committed to maintaining an open and transparent business environment, guided by high ethical standards. We prioritise safety and demonstrate respect for all individuals affected by our operations.

To uphold this commitment, we provide a secure channel for reporting serious misconduct through our whistleblowing function. This channel is open to both employees and external stakeholders, offering everyone the opportunity to raise concerns regarding suspected serious irregularities.

When Can I Use the Whistleblowing Channel?

Whistleblowing refers to the reporting of serious misconduct that involves breaches of laws or regulations and is in the public interest. You do not need to have proof of your concerns, but all reports must be made in good faith.

The whistleblowing channel should be used for reporting suspected serious violations of internal rules, codes of conduct, or applicable legislation that may significantly impact the organisation, an individual's life, or their health.

Reports can be submitted via email to: **whistleblowing@logent.se**

Alternatively, suspected serious violations may also be reported directly to our Head of Legal:

Magnus Weidenhaijn
Phone: +46 70 240 91 71

Examples of reportable concerns include (but are not limited to):

- Corruption and financial misconduct: bribery, unfair competition, money laundering, fraud, or conflicts of interest.
- Health and safety violations: workplace conditions posing risks to life or health, or severe cases of discrimination or harassment.
- Environmental crimes: unlawful handling or disposal of hazardous materials or waste.
- Privacy breaches: improper use of personal data, especially in violation of GDPR.

Irregularities may also be reported externally to a competent authority capable of receiving, providing feedback on, and following up whistleblowing cases, or where applicable, to EU institutions, bodies, or agencies.

Please note: Issues solely related to personal dissatisfaction—such as salary disputes or employment terms—are **not** considered whistleblowing matters and should be addressed through internal channels like HR or your line manager.

Handling of Whistleblowing Reports

All whistleblowing reports are treated with strict confidentiality, and Logent guarantees protection against retaliation for individuals reporting in good faith. This protection also extends to any Logent personnel assisting or connected to the whistleblower, as well as legal entities owned by, employing, or otherwise linked to the whistleblower.

All reports are prioritised and processed in compliance with whistleblowing guidelines. Reported cases are managed by our Head of Legal, and a thorough investigation is

always conducted when misconduct is suspected. During the investigation process, we will not attempt to identify the whistleblower.

Reports are never investigated by individuals involved in or connected to the alleged misconduct. Whistleblowing cases are handled confidentially by authorised parties.

Cases will not be investigated if:

- The alleged behaviour does not fall within the scope of reportable matters under these whistleblowing guidelines.
- The report is malicious or not submitted in good faith.
- The information provided is insufficient for further investigation.
- The matter has already been resolved.

Protection and Confidentiality

Whistleblowers may choose to remain **fully anonymous**. There is no requirement to disclose personal information. Regardless of whether the report proves accurate, individuals acting in good faith will not face disciplinary action or negative consequences.

The whistleblower will be kept informed of the progress of the investigation, where possible and appropriate. In cases involving suspected criminal offences, the whistleblower will be informed if disclosure of their identity becomes necessary as part of legal proceedings.

Processing of Personal Data

Personal data may be processed via the whistleblowing email concerning the individual(s) named in a report, the sender (if not submitted anonymously), and any third parties involved. This processing is conducted to enable factual investigations into alleged violations or inappropriate conduct that contravenes our Code of Conduct or internal guidelines. The legal basis for processing personal data includes the data controller's statutory obligations and the legitimate interest of mitigating risks to the company's reputation and promoting ethical business practices.

In accordance with applicable data protection legislation, you have the right to exercise your rights regarding access, rectification, objection, and restriction of processing of your personal data. However, these rights are subject to safeguards designed to prevent the destruction of evidence or other obstruction of ongoing processing and case investigations. All data is processed and stored within the EU.

Data Deletion and Retention

Personal data included in whistleblowing reports or related investigations will be deleted after the conclusion of the investigation unless retention is required under other legal obligations.

All archived whistleblowing cases are **anonymised** in accordance with GDPR. No personal information that can directly or indirectly identify individuals will be retained beyond the necessary period.

Standard deletion timeline:
24 months after the investigation is finalised.