



Whistleblowing policy

GREENGOLD

GreenGold Group Whistleblowing policy

GreenGold Group (the “Company”) strives to foster a transparent business environment. Therefore, the Company follows a number of clear ethical guidelines based on the idea that GreenGold Group should conduct a profitable business at the same time as ethical rules are followed. It is of the utmost importance for GreenGold Group that the entire Company's operations are conducted in line with the highest possible standards of responsibility, openness and honesty. Any suspicion of fraudulent conduct, bribery, or other similar situations witnessed, must be reported without delay. GreenGold Group strives for a business climate where whistleblowers feel that they can report irregularities safely and without fear.

GreenGold Group believes that there is an obligation to deal with irregularities, and that irregularities are reported in line with the company's ethical guidelines. In addition, GreenGold Group believes that whistleblowers who report irregularities are exemplary citizens because they help GreenGold Group to work for honesty, responsibility and good management.

When a whistleblower reports irregularities, GreenGold Group's management undertakes to:

- Protect the whistleblower from any adverse consequences of reporting the irregularities. Bullying, harassment, unfair treatment, punishment or discrimination as a result of a report are treated as a violation of GreenGold Group's disciplinary procedures
- Review the report thoroughly and objectively
- If irregularities occur, do what is necessary to correct them. Keep the whistleblower informed about the process and the result (given that the whistleblower is not anonymous)

The owner of this policy is GreenGold Group's CEO.

Who is covered by this policy?

This policy shall be implemented by, distributed to and made available to all whom may be concerned:

- Permanent employees, whether he or she works full-time or part-time
- Consultants working for the Group
- Subcontractors working for the Group, which includes employees of the subcontractor
- Suppliers for whom GreenGold Group's business ethics regulations and whistleblowing policy are part of the agreement

All those listed above have the opportunity to use GreenGold Group's irregularity reporting system on a voluntary basis.

Reporting channels

If you become aware of anything that you perceive as illegal or a violation of GreenGold Group's business ethics or other internal guidelines, you should first contact your manager or the finance department. They are required to take appropriate action to properly address the issues that you raise with them.

However, if you have information about serious violations / violations of the law, and you have good reason to assume that your concerns will not be dealt with properly, you can make a report in the whistleblowing system.

When to use the whistleblowing system

Unlike normal reporting procedures, the whistleblowing system should only be used if the suspicions concern employees with important and sensitive positions, which are those who hold positions of trust and sensitive tasks. These employees, positions or roles can significantly affect GreenGold Group or GreenGold Group's operations, risk and security situation. In case you have suspicious concerns regarding a colleague or a situation regarding an employee who's not in a sensitive position, you should instead raise your concern to your manager.

It is advisable to use the whistleblowing system if your concerns relate to one of the following situations:

- Serious irregularities involving persons in key positions or senior positions within the GreenGold Group
- The process can only concern serious irregularities that may involve illegal activities, such as:
 - An illegal act
 - Serious violation of GreenGold Group's business ethics regulations
 - Deliberate violation of local laws and regulations in a country
 - Doubtful accounting or accounting methods, or fraudulent methods
 - Methods that are likely to cause physical harm to persons or property
 - Methods that are likely to cause danger to the environment
 - Abuse of power for unauthorized or covert purposes
 - Unfair discrimination as discrimination based on age, ethnicity, sex, religion, sexual orientation, marital status or maternity, political opinion or origin during employment or the provision of services
 - Conflicts of interest
 - Manipulation of company data / accounting / systems

This list is not exhaustive but is intended to give an example of the type of behaviour that can be considered as irregularities.

How to file a report

A whistleblowing report can be made either by e-mail or by letter, using the following contact details:

E-mail: whistleblow@greengold.se. Information sent via e-mail will be encrypted.

Mail: GreenGold Group, Box 7331, 103 90 Stockholm, Sweden

Your report is preferably written in English, but can also be written in Estonian, Finnish, Latvian, Lithuanian, Romanian, or Swedish.

The report should include the following information:

- What type of irregularity that has been observed
- The individual(s) suspected of the irregularities

You should provide as detailed information as soon as possible to ensure that the report can be handled securely and efficiently. You can choose whether you want to provide your name and contact information when filling out the report. If you do, you may be contacted to provide further information.

A report in the whistleblowing system is treated completely confidentially. You can make a report and feel confident in the knowledge that GreenGold Group will prioritize resolving the issue.

Anonymous reports and further investigation

All reasonable efforts will be made to maintain the confidentiality of the person who made the report. The person's identity will not be revealed without his or her permission, unless this is required or needed in order to conduct a proper investigation or to meet legal or regulatory requirements.

Regardless of whether the investigation confirms the accusations or not, a person who makes a report in good faith will never be subject to disciplinary action or other punitive measures, solely because he or she has filed a report. However, a person who abuses the procedures by making a false report or using the process for improper purposes will be subject to disciplinary action.

If you have been involved in the irregularities yourself, you should be aware that you are not protected from disciplinary or legal action as a result of making a report. GreenGold Group appoints external or internal investigators who are independent and not involved in the allegations. GreenGold Group determines: a) whether it is appropriate to conduct an investigation; b) the scope of the investigation; c) what form the investigation should take; and d) to whom the report on the observations is to be sent.

The whistleblower will be informed of any measures taken as a result of his or her report (given that the whistleblower is not anonymous).



GREENGOLD