Whistleblowing policy

1. Introduction

At Absolent Air Care Group ("AACG"), we aspire to conduct our business ethically and we consider honesty and responsibility important requirements. We promote a business culture where everyone feels safe and is encouraged to act against and report irregularities that occur in our business activities. The whistleblowing procedure has been implemented to allow employees, shareholders, consultants, and other stakeholders to report irregularities in a safe and, if desired, anonymous manner. If serious irregularities are discovered at an early stage, AACG will be in a better position to prevent risks and limit potential damage. This is to the benefit of not only AACG, but of all our employees, shareholders and stakeholders. A person reporting a suspected irregularity or violation shall always be entitled to remain anonymous, it is strictly prohibited for our employees to research the identity of a reporting person. Further, it is prohibited for AACG and our employees to hinder or attempt to hinder reporting, as well as to in any way retaliate against a reporting person (or against a relative or other person connected to the reporting person). Group CEO is the owner of the policy and responsible for keeping the policy updated. The policy shall be available on the AACG intranet as well as on the Group companies' websites, and when there is an updated version of the policy, the Group companies shall be notified. The policy shall be approved by the AACG Board of Directors every year.

2. When to report?

Irregularities, violations and criminal acts shall primarily be reported internally, e.g. by contacting your supervisor or, if the matter is involving your supervisor, by contacting his/her superior. The whistleblowing procedure shall be used to report serious violations (see further below) when you are not able to use other internal reporting functions. This may be the case when you cannot openly report the information or if you are an external stakeholder and do not have an internal contact person to report to.

3. What to report?

The following are examples of such serious violations that may be reported:

- Breach of the AACG Code of Conduct or other Group policies
- Unlawful acts, or acts that are in breach of regulations or regulatory requirements
- Fraud, theft or embezzlement
- Acts that put the safety of others or the environment at risk
- Discrimination or harassment
- Bribery or corruption
- Unwarranted disclosure of confidential or insider information
- Attempts to hide or conceal any of the above.

4. How to report?

All reports shall be submitted in good faith. You must not be able to submit any evidence of the information you report, but you must have reason to believe that the information is correct, and you must not knowingly report incorrect or misleading information.

You may report in any of the following ways:

- Orally, by phone
- Sending an email
- Sending a letter
- By means of a physical meeting

If you want to report anonymously, sending a letter is the preferred way of reporting. When submitting a report, you can choose to provide your contact information or if you want to remain anonymous. Regardless, all reports are taken seriously and are investigated.

4.1. Reporting by phone

If you want to report an irregularity orally, you may do it by phone to AACG's Group CEO, at +46 (0) 510 48 40 00.

4.2. Reporting by email

If you want to report an irregularity by email, please send the email to whistleblowing@absolentgroup.com. This email address is managed by Group CEO.

4.3. Reporting by sending a letter

If you want to report an irregularity by sending a letter, please do so to the following address:
Absolent Air Care Group AB
Att: Peter Unelind, Group CEO
Karl Gustavsgatan 1A
411 25 Göteborg
Sweden

4.4. Reporting by means of a physical meeting

If you want to report an irregularity by means of a physical meeting, please contact AACG through any of the reporting channels above.

4.5. External reporting channels

We encourage whistleblowers to primarily use our internal reporting channels as described above. However, there is also possibility to report externally to an authority. If you want to report externally within Sweden, the government has appointed various authorities that you can contact depending on the nature and content of your report. Examples of these include the Swedish Work Environment Authority, the Swedish Tax Agency, and the Swedish Competition Authority. You can also submit your report to the EU institutions, bodies, offices or agencies if the report concerns EU law. You can find more information regarding the way to report at the respective authorities and EU bodies.

5. When a report has been made

Within seven days from the receipt of your report, you will receive an acknowledgement of receipt, depending on whether you have provided your contact details. When we have received and verified a matter, Group CEO will present the matter to the Board of Directors and recommend whether the matter should be further investigated or closed. A decision is taken by the Board of Directors.

You will, within three months from the acknowledgement of receipt of your report, be provided feedback to a reasonable extent regarding which measures have been taken to follow up your report, as well as the reasons for taking the measures.

6. Prohibition of retaliation

If you report in good faith, AACG will not retaliate in any way against the reporting person. Prohibition of retaliation is also applicable in relation to other persons that may have assisted or are related to the reporting person. However, if the reporting person commits a crime by making the report or by gathering information, the person is not protected against any retaliations.

7. Processing of personal data

For general information about our processing of personal data, please see https://www.absolentgroup.com/sv/privacy-policy/.

The legal basis for processing data in relation to whistleblowing matters is that processing is necessary for compliance with a legal obligation to which we, as controller, are subject. We only process personal data if it is necessary to follow up and investigate a matter. We may disclose personal data to be able to take action as a result of our investigation of a matter, to use reports as evidence in legal proceedings or if it otherwise is made in compliance with laws and regulations. Only authorized personnel will have access to personal data related to whistleblowing matters. Personal data which are manifestly not relevant for the handling of a specific report shall be deleted without undue delay. If we need to follow up a report, the personal data related to the report will be processed for the duration of the matter and will be deleted not later than two years after the matter has been closed.

8. Compliance

The MD of each Group company is responsible to ensure that all employees concerned in the company are aware of this policy and that the policy is followed, in so far as the policy is compliant with local laws and regulations in the country in which each company operates. Any exemptions from the policy must be approved by the Group CEO.