

Whistleblowing Policy Ocab Group

Ocab strives to maintain a transparent corporate climate, to observe a standard of business ethics and to always see opportunities for improvement.

Anyone who suspects an irregularity that is in breach of Ocab's Code of Conduct, the law or that the disclosure of which may be in the public interest can speak out with protection against retaliation. You can choose to provide your information anonymously.

What can be reported?

- Misconduct in a work-related context that there is a public interest in the misconduct coming to light.
- Misconduct in a work-related context in accordance with 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.
- Violations of Ocab's Code of Conduct that cannot be reported to manager or immediate superior or through any other reporting channels.

If the report does not fall within the framework of the above, the case must be reported in accordance with Ocab's internal guidelines, policies or procedures.

Who can submit a report?

All persons who, through their work, have encounter a suspected misconduct can submit a report, for example:

- Employees
- Volunteers and trainees
- Persons who are performing work under the control and management of a business operator (e.g. hired consultants)
- Shareholders who are actively involved in the company
- Self-employed persons
- Persons who are members of a company's administrative, management or supervisory body

How can a report be made?

Option 1: Report to a manager within Ocab or to the corporate group's management

Option 2: Report anonymously through the reporting tool for whistleblowing in accordance with the instructions below

Reporting tool

To guarantee a whistleblower's anonymity, a reporting tool is provided from an independent, external agent. The reporting channel is encrypted and password protected. The whistleblower never needs to state their identity if they do not want to.

- The whistleblower does not need to have evidence for their suspicions, but no accusations may be made with malicious intent or in the knowledge that the accusation is false.
- It is important that the whistleblower describes all the facts in the report, including any circumstances that are believed to be less important. Statements should be carefully considered and all documentation that may be relevant should be attached.

Reporting via internal whistleblowing channels

Ocab provides the ability to report via external whistleblower channel. You can choose to report anonymously via **wb.2secure.se**, by phone or request a personal meeting. The in-person meeting will be held by agreement either with a representative from Ocab or with provider of whistleblowing services, 2Secure.

When registering a new report on **wb.2secure.se**, you must state the company-specific code to identify that the report is being made for Ocab. Each country must provide a separate reporting channel and unique code for reporting.

In accordance with legislation, Ocab has appointed impartial and independent persons authorized to maintain whistleblowing channels, ensure feedback and act on whistleblowing matters on behalf of the business. Each country has appointed a committee consisting of one representative from the Board of Directors of Ocab Group Holding AB and two representatives from the company (HR manager and country manager). Once a report has been registered, it is processed by experienced case officers at 2Secure. Reports regarding misconduct in a work-related context is transferred to respective countries HR manager who then convenes the HR committee. If the report concerns a member of the Group Management team or Country Management team the report is instead transferred to the Chair of the Board of Directors of Ocab Group Holding AB for further processing.

Reports of breaches of Ocab's Code of Conduct is transferred to the respective country's HR manager who will decide appropriate next step and take further action.

It is always Ocab who ultimately assesses the report and decides what measures are to be taken.

Reporting via external whistleblowing channels

In addition to reporting to Ocab's internal whistleblower channel, you can report externally to a competent authority within a specific area of responsibility or to one of the EU institutions, bodies and agencies.



In every country where Ocab operates, there are national rules for the citizen's rights to report externally to the press and/or media. You can find out about this right in each country's whistleblowing policy.

Personal data

In all cases, Ocab is obliged to comply with legislation regarding the processing of personal data. It is important that you feel secure when you provide information about yourself and others in the whistleblowing system. We take the protection of personal privacy extremely seriously. Ocab handles personal data in accordance with GDPR legislation and policy for handling personal data.

Personal data will only be used by the investigating function of Ocab's whistleblowing committee/ethics committee and by the external company that has been assigned to deal with the report. The personal data will only be used to investigate what has been reported to the whistleblowing system. The data are only accessible to people who are working on the report in question. The investigation may be handed over to the police or other authority in the country.

Anonymity

As a whistleblower, you can choose either to provide your contact details or to remain anonymous. All reports are taken seriously regardless. It can facilitate the continued work of our external case officers if we can contact you to obtain supplementary information. Your contact details will therefore be requested. But providing these details is always completely voluntary.

No IP addresses are registered and the system does not use cookies.

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