



Title:	Diab Policy Whistleblowing - English	Owner: Approver:	Eva-Lotta Petersson Johan Arvidsson
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Diab Policy Whistleblowing - English

Whistleblowing policy within Diab

1. Introduction

Our company strives to achieve an open business environment and high business ethics. Our co-workers should all live up to our values – One Diab, and business ethical guidelines, described in our “Code of Conduct” and our policies.

There may sometimes be circumstances where co-workers suspects violations of our Code of Conduct and therefore there are opportunities to confidentially report these so-called whistleblowing without fear of reprisal.

Whistleblowing is a way to reduce business risks and gives all co-workers an opportunity to confidently report on things that can harm individuals, our company or the environment. It is an important tool to safeguard good corporate governance and preserve customers’ and the public’s confidence in us.

Whistleblowing matters will always be handled confidentially. We also provide an anonymous reporting channel provided by our external supplier Whistleblowing Centre. Whistleblowing Centre ensures anonymity/privacy and a secure, encryption-protected handling of whistleblowing reports.

2. When is whistleblowing needed?

Whistleblowing is an opportunity for all employees to report risks, suspicions or discoveries of anomalies that could harm individuals, our company or the environment:

- Violation of the law and/or the Code of Conduct
- Risks for health and safety or for the internal and external environment
- Unauthorized use of company funds/resources
- Fraud and/or corruption
- Illegal behavior such as discrimination or harassment

If a co-worker has discovered or suspected deviation from our values or code of conduct, there are different ways to report it. A whistler does not need evidence to express a suspicion. However reports shall be submitted in good faith, founded on facts. We encourage whistlers to report openly. Whistleblowing reports and discussions will remain confidential at all times.

This is how a co-workers can report:

Alternative 1: Verbally to a Manager within our organization

Can always be used and should always be used for less serious comments, queries and reports.

Alternative 2: Encrypted, anonymously if desired, through the reporting channel for whistleblowing, see chapter 3 below.

Can be used for reports of serious deviations/risks and if you are not comfortable with talking direct to a Manager.

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Reports by e-mail should be avoided.

3. How can whistleblowing channel be used?

If a co-worker wants to make an anonymous report, this is possible through the external web-based whistleblowing channel. The identity of the whistleblower will not be requested at any stage of the process. All information, reports and follow-up questions are encrypted and password protected. An external and impartial provider, who ensures encryption anonymous handling of whistleblowing reports, administers the whistleblowing channel.

Encryption reports can be sent in via link at Diab Portal, 1st page. Address to the report site is: <https://report.whistleb.com/diabgroup>

4. What can be reported?

Risks, suspicions and/or specific events or phenomena that should not occur according to the company's "Code of Conduct" should be reported. If the report is evaluated not to require any action it will be deleted without consequences for the whistleblower or other involved.

Intrusive information, such as information on health status, political or religious affiliation or sexual orientation shall not be included in a whistleblowing report.

Anonymity should not be misused to accusations without cause or knowing that the accusation is false. If the notification leads to lawsuit the whistleblower can be asked to come forward and testify.

5. The investigation process

Any processing of whistleblowing reports is confidential, regardless of the option the whistleblower used for reporting. Both whistler and other involved are protected by confidentiality.

The Whistleblowing team and responsibilities

Only our whistleblowing team has access to reports received through our encrypted whistleblowing channel. All team members are bound by a confidentiality agreement that ensures confidential handling of whistleblowing reports. When doing an investigation the team may include people that add information or expertise to the investigation. These people bind themselves to the confidentiality agreement.

Our whistleblowing team

Responsible for whistleblowing team and investigation officer is, Group Sustainability & EHSQ Manager. Team members are CFO and Group Sustainability & EHSQ Manager.

To secure that our process is as safe as possible the whistleblow report will also be received by our external company law firm Advokatfirman Lindahl.

If the whistle blow concerns anyone in the Executive Management Team the whistle blower have the possibility to contact our lawyer directly: isabelle.selemba@lindahl.se.



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Receiving a report

When receiving a report, the investigation officer decides if the report should be treated. If the report is accepted appropriate measures for the investigation will be taken. Depending on the nature of the matter, reports to management/board will be made.

Whistleblower protection in the case of non-anonymous whistleblowing

A whistler expressing a genuine concern or suspicion under this policy do not risk losing their job or suffering any form of penalties or personal disadvantage as a result of the whistleblowing report. It does not matter if the suspicion proves to be wrong, provided the whistleblower acted in good faith.

The whistleblower's identity will be kept confidential at all stages in the process, and in particular will not to be disclosed to third parties, to people specified in the report or to the employee's line manager.

Expression of results

At the end of the investigation, the investigative officer will report the findings to the CEO.

Statistics from whistleblowing channel may be reported to the Board (and to other stakeholders, e.g. in a sustainability report).

Deleting Data

All whistleblowing reports will, at the completion of the investigation, be archived in the external system without any names.

All documentation of reports and investigations that are saved will be made anonymous; they will not include sensitive or personal information from which individuals directly or indirectly can be identified.

6. For Whistleblowers in the EU

A whistleblower can always be anonymous but if he or she wants to be open with his or her identity then he or she has to give a written consent to Diab that his or her personal data can be used in the investigation process, in accordance with GDPR (General Data Protection Regulation). The purpose of registering personal data is to investigate alleged violations of our Code of Conduct which is in all co-workers, as well as Diab's, interest. The whistleblower always has the right to get incorrect personal data corrected as well as to request that data is permanently deleted.

GDPR is covering the right of a person who might be pointed out in a whistleblow process. The designated person is entitled to access information about themselves and may require changes if the information is inaccurate, incomplete or out of date. This right does not apply if it prevents the investigation or leads to a destruction of evidence, i.e. prevents Diab to take actions against violations of our Code of Conduct. Please also see more about how Diab processes personal data in its Privacy Policy at www.diabgroup.com