Whistleblower

BUE4B

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1. Background and purpose

This Policy ("Policy") applies to all Group Companies ("we/us"). The purpose of this Policy is to document the Whistleblowing Channel. The Policy describes the overall reporting process and responsibilities regarding any received Reports as well as subsequent investigations. The Policy provides a benchmark for all Group Companies on how to implement the Whistleblowing Channel effectively and fairly. The Policy must be read in conjunction with and is subject to local practices and local laws applicable for each Group Company. Consequently, there may be additional requirements, not mentioned in the Policy that a Group Company needs to consider. (For example, under the Norwegian Company Employment Act employees have a special duty to inform the employer of harassment or discrimination in the workplace.)

If there are any questions about how a Group Company shall handle its Whistleblowing Channel, questions regarding specific situations or an uncertainty regarding applicable local laws and practices, please contact Global HR Business Partner & Communications Director

2. Audience

The policy does not only apply to all entities within the Group, which includes all personnel including management and board members of the parent company as well as all Bufab companies "sister companies". The MD of each company in the Bufab Group is responsible for ensuring that employees understand the content of this policy.

The policy is also meant for all third parties who may witness or want to report misconduct within the organization such as:

- Former employees
- Contractors & suppliers
- · Board members & executives
- Volunteers & interns
- Customers & stakeholders

3. Policy statement

Bufab Group is committed to maintaining the highest standards of integrity, ethics, and accountability in all aspects of our operations. We encourage (former) employees, contractors, suppliers, customers and other stakeholders to report any concerns regarding unethical behavior, misconduct, fraud, or violations of company policies and laws.

We are committed to ensuring that all reports are handled confidentially and that whistleblowers are protected from retaliation. Reports will be investigated promptly, fairly, and impartially. Any form of retaliation against a whistleblower will not be tolerated and may result in disciplinary action.

This policy reinforces our commitment to a transparent and ethical work environment where concerns can be raised without fear.

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4. Definitions

- "Company" means Bufab AB (publ), Reg. No. 556685-6240.
- "Group Company" means each company within the Bufab AB group of companies.
- "Policy" means this Policy.
- "Irregularities" means irregularities, suspected or established, as further set out in Section 5.2.
- "Relevant Person" is defined in Section 8.2.
- "Report" means a report received through the Whistleblowing Channel.
- "Reporting Person" means a person who, in a work-related context, reports (suspected or established) Irregularities as set forth in Section 5.3.
- **"Whistleblower Act"** means the Swedish Act (2021:890) on the Protection of Persons Reporting Irregularities or, as relevant, other applicable EU member state local act or ordinance that implements the obligation to establish internal reporting channels according to the EU Whistleblowing Directive (Directive (EU) 2019/1937).
- **"Whistleblowing Channel"** means Company and respective Group Company's internal whistleblowing channel, established in accordance with the requirements of the Whistleblower Act.
- "Whistleblowing Team" is defined in Section 6.1.

5. The design of our Whistleblowing channels

5.1. Obligation to have channels and procedures

Each Group Company shall establish a Whistleblowing Channel, to be able to receive reports about serious irregularities.

The Whistleblowing Channels shall be used to alert us about serious risks of wrongdoing affecting people, our organization or business, the society or the environment.

This Whistleblowing Policy and this Policy documents the design of the Whistleblowing Channels and applicable procedures, including procedures for reporting, receipt of reports, follow-up procedures (investigations) and contacts with the reporting person as well as matters of confidentiality, non-retaliation and the processing of personal data.

The Whistleblowing Channels shall be made available to:

- Directors (persons who are part of the administrative, management or supervisory body of a Group Company)
- Employees
- Volunteers, trainees and persons with similar positions
- Persons who otherwise carry out work under the Group Company's control and management; including self-employed persons.

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It is the responsibility of each Group Company to distribute relevant information about the established Whistleblowing Channels within their respective organizations, in accordance with guidelines provided by the Company.

Information on the Whistleblowing Channels shall always be available on: (i) SolutioNET; (ii) www.bufab.com and www.bufabgroup.com; and (iii) in printed format at the workplace.

5.2. When to report?

If you suspect that a Group Company or anyone acting on behalf of a Group Company is acting in violation of applicable law, our policies or internal routines, you are encouraged to report such suspected misconduct. If the suspected misconduct concerns serious irregularities, then you are required to report the matter in the Whistleblowing Channel.

A reporting person does not need to have firm evidence for expressing a suspicion. However, reporting must always be made in good faith. Abuse of the whistleblowing service by deliberately reporting false or malicious information is not permitted and constitutes a serious disciplinary offence.

Matters that <u>must be reported</u> into the Whistleblowing Channel are information concerning serious irregularities in the public interest and acts or omissions that violates EU law that are harmful to the public interest, such as within the areas of:

- Public procurement
- Financial services
- Safety of products
- Diversion of firearms and defence-related products
- Protection of the environment
- Nuclear safety
- Food and feed safety
- Respect for privacy and protection of personal data
- Fight against fraud
- Corruption and other illegal activity affecting EU Union expenditure
- Funds or assets
- Breaches relating to the internal market and the enforcement of EU competition law, including state aid, breaches of corporate tax law and tax evasion

all as further set out and detailed by the EU Whistleblowing Directive.

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Examples of information concerning Irregularities (serious irregularities in the public interest) are, for instance:

- Corruption
- Money laundering
- Financing of terrorism
- Bribes
- Fraud and other financial irregularities
- Serious health and safety and environmental violations, such as workplace health and safety
- Product safety and treatment of hazardous substances
- Violation of antitrust regulations, such as cartels and price fixing
- Serious privacy violations, for example improper use of personal data
- Discrimination and harassment that are against the law or otherwise unethical
- Other unlawful or seriously unethical conduct, such as the use of child labour, modern slavery, other unlawful use of work force
- Human rights violations
- Other serious breaches of Bufab's Code of Conduct and other Bufab Policies.
- Complaints and matters such as general dissatisfaction in the workplace
- Poor management or leadership
- General discontent with work assignments

Salary or working conditions that does not constitute serious health and safety violations or illegal discrimination or harassment, shall not be reported in the Whistleblowing Channel. Matters that shall not be reported in the Whistleblowing Channel, will normally be referred to other appropriate channels.

If a manager receives information that according to the Policy must be reported in the Whistleblowing Channel, it is the obligation of such manager to instruct the Reporting Person to report the (suspected) misconduct in the Whistleblowing Channel, or the manager must himself/herself report the (suspected) misconduct into the Whistleblowing Channel.

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5.3. How to report

A Report can be submitted in the Whistleblowing Channel as follows:

- By submitting an anonymous or confidential Report through the online Whistleblowing Channel to the relevant Whistleblowing Team: https://bufab.speakup.report/en-GB/bufab/home;
- 2. By contacting the relevant Whistleblowing Team directly by emailing or telephoning *Global Knowledge & Communications Director* Martijn van Daal, at martijn.vandaal@bufab.com or +31 6 55 14 83 55;
- 3. By requesting a physical meeting, by contacting Martijn van Daal
- 4. By reporting to an external channel maintained by a competent authority: (see Schedule 3)

The messaging web-based platform is administrated by *SpeakUp*, an external service provider. All messages are encrypted. To ensure the anonymity of persons sending a message, *SpeakUp* [deletes all meta data, including IP addresses]. The person sending the message may remain anonymous in the subsequent dialogue with the relevant Whistleblowing Team.

If you wish to report (suspected) irregularities or misconduct that shall not be reported in the Whistleblowing Channel, you are asked to contact your immediate manager, any other manager who you trust or your local HR department. You may always contact Eva Nilsagård member of Bufab's Board of Directors at eva@nilsagard.com or +46 (0)707-22 67 99.

Examples of information that should be included in a Report are:

- Date, time and place of the incident
- Whether or not the wrongdoing is still on-going or is likely to take place
- If relevant, information about your part in the reported incident or other information about the circumstances along with any supporting documentation
- If the misconduct has already been disclosed and if so to whom, when and what action was taken
- Information on how the incident was discovered
- The names and positions of the persons involved
- Witnesses, if anv
- Other useful information to understand the incident and to process the Report.

To help investigate the report, it is encouraged to be as specific as possible. If the information provided is too general, the Reporting Person may be asked to provide additional information. Avoid speculation, personal attacks and emotive language.

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6. Whistleblowing teams and case management

6.1. Appointment of competent persons

Each Group Company shall appoint *competent persons* that will be authorized on behalf of the Group Company to:

- Receive Reports and have contact with the reporting person
- Follow up (investigate) what has been reported
- · Provide feedback to reporting persons
- Communicate information about the investigated assertions for further measures.

Competent persons shall be persons who are autonomous and independent. Appointed competent persons shall jointly form the whistleblowing team ("Whistleblowing Team") of the Group Company. A current list of Whistleblowing Teams with contact details are included in Schedule 1. It is the responsibility of the Global HR Business Partner & Communications Director to update this list regularly.

The Whistleblower Teams make independent decisions. The Whistleblower Teams shall independently initiate and conclude investigations and independently draw conclusions regarding the further handling of a Report. No one may seek to unduly influence the work of the Whistleblowing Teams. No punitive measures shall be taken against a *competent person* for the good faith performance of the Whistleblowing Team's duties within its area of competence. The autonomy and independence of the Whistleblowing Teams is central to maintaining the trust and credibility of the teams.

If a member of the Whistleblowing Team is personally affected by a Report or otherwise has a conflict of interest, that person is strictly forbidden to participate in the investigation or otherwise have access to the case.

6.2. Case management

A Reporting Person shall receive confirmation that the Whistleblowing Team has received the Report within seven days of submission of the Report.

In the event that a Report received falls outside the scope of the Whistleblowing Channel, the Whistleblowing Team shall without undue delay inform the Reporting Person hereof and shall, where possible, direct the Reporting Person to other appropriate channels.

Where repetitive reports of similar nature occur, they may be closed after an initial assessment if the newly reported disclosure does not contain any additional or meaningful information about the relevant wrongdoing, compared to previous reports which are ongoing or have since been concluded.

The Whistleblowing Team shall diligently take measures to assess the correctness of the assertions made in the Report and take appropriate investigative measures. Where deemed appropriate, the Whistleblowing Team may engage external service providers, such as legal counsels, forensic services or similar.

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The Reporting Person shall receive, to a reasonable extent, feedback regarding the follow up measures taken as a consequence of the Report and the reasons for them. Feedback shall be provided within three months from the receipt of the Report. The appropriate way and scope of the feedback may be decided on a case-by-case basis, but with the overall aim of telling the Reporting Person what has been done in the investigation or what is planned to be done in the future, however with due consideration of the privacy of the persons(s) subject to an investigation. Feedback should always be provided; if an internal investigation has been opened and if/when the case has been closed. The information shall be provided in such a way that it is easily accessible to the Reporting Person.

If the matter has been referred to a competent authority for further investigation, feedback shall only be provided to the extent that such information would not hinder the investigation or affect the rights of the Reporting Person.

7. Whistleblower protection and confidentiality

7.1. Whistleblower protection and non-retaliation

If a Report is submitted anonymously, seeking the identity of the Reporting Person is not permitted.

No Group Company or representative of a Group Company may retaliate against a Reporting Person (or anyone assisting the Reporting Person or being otherwise associated with the Reporting Person), for submitting a Report in good faith, in accordance with national laws on whistleblowing, the Bufab Whistleblowing Policy and/or this Policy. Anyone who unlawfully retaliates against a Reporting Person, or any other party involved (i.e. witness), will be subject to disciplinary action, such as dismissal.

If the Reporting Person believes they have been penalized or treated unfairly because of a Report, they should submit a Report hereof in the Whistleblowing Channel, or raise a grievance in accordance with local procedures, as relevant.

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7.2. Confidentiality

Only persons appointed as *competent persons* may access personal data processed in an investigation and may not for unauthorized purposes divulge information that could reveal the identity of the Reporting Person or any other person involved in the matter.

There may be situations where disclosure of information is authorized, for instance:

- As necessary, in taking reasonable measures to assess the correctness of the reported matters, such as necessary in investigating the matter, in contacts with (potential) witnesses, IT expertise, legal advisors, auditing firms or forensic service providers etc.
- As necessary, when communicating information about the investigated assertions for further measures, such as bringing the irregularities to an end, including but not limited to HR-related measures, reporting to the police or other relevant authority.
- Where the relevant person consents to the disclosure of the protected information.
- Where disclosure is authorized by applicable laws and regulations.

8. Processing of personal data

8.1. Contact details and personal data controller

Each Group Company is the personal data controller for the personal data processed in its internal Whistleblowing Channel. For reports made to the Whistleblowing Channel created by the Company, the Company is the controller. See <u>Schedule 2</u> for the contact information to each of the controllers.

For questions regarding how we process personal data, contact us as set out above. If any objections or complaints about the way Bufab and its Swedish subsidiaries process your personal data arises, it is possible to file a complaint to the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*).

Please note that if a Report is sent in via an external reporting channel, such relevant authority is the personal data controller for the personal data processed in their whistleblowing functions. In these cases, please read the information provided by each authority.

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8.2. Categories of personal data and data subjects

Whistleblowing reports typically contain personal data, which directly or indirectly pertain to a physical person. The information can be attributable to a Reporting Person, the alleged person and to other individuals mentioned in the report, such as witnesses (all "Relevant Person(s)").

Personal data that may be processed about Relevant Persons in connection with a report and an investigation typically include:

- Name, address, city, gender, nationality, roles or functions, contact information (including telephone number), details of the reported event, measures taken, investigation reports and other types of personal data collected within the scope of the investigation, e.g. at interviews but also via e.g. phone records, computer files, audio files, IP-addresses and other technical data, as well as e-mails; and
- Details of the suspected misconduct, including violations of law that include suspected or confirmed crimes may be processed.

Depending on the nature of the matter, we may process special categories of personal data about Relevant Persons, such as data about race or ethnic origin, political opinions, religious or philosophical beliefs, union membership and data about health or sex life. When submitting a report, the reporting person should to the degree possible avoid disclosing such sensitive personal data that is not relevant to the case.

Only process personal data that is correct and relevant to the investigation will be processed. Superfluous personal data will not be processed and erased as soon as possible. Sensitive personal data may not be submitted unless essential for the reported issue and will be erased unless legal to process and deemed absolutely necessary for the investigation.

8.3. Purposes of processing and legal basis

Personal data collected via the Whistleblowing Channel or during the investigation of the alleged misconduct is processed primarily for the purpose of processing and investigating a follow-up case, that is administering and investigating allegations raised, as described in this Whistleblowing Policy. Personal data processed for this purpose may also be processed for the purpose of fulfilling a disclosure that; (i) is necessary in order to take action in connection with what has emerged in a matter; (ii) is necessary for reports to be used as evidence in legal proceedings; and (iii) is otherwise in accordance with applicable laws and regulations.

The legal basis for the processing of personal data is our legal obligation to provide a Whistleblowing Channel and procedures for reporting and follow-up under the Swedish Whistleblower Act. The legal basis for our processing of special categories pf personal data is that the processing is necessary in the interests of a substantial public interest, on the basis of Union law or the national legislation of the Member States. In some cases, we may also process sensitive personal data when it is necessary for us to be able to fulfil our obligations and exercise specific rights within the fields of labour law, social security and social protection.

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We may also process personal data on violations of the law that include suspected or confirmed crimes. Such processing is necessary to fulfil our legal obligation to provide a whistleblowing channel in accordance with the Whistleblower Act.

We may in some cases also process personal data in order to take action in response to a report. We then rely on our legitimate interest in processing personal data in order to be able to take action in connection with the report and to address discovered misconduct. To the extent special categories of personal data or data relating to criminal convictions or offence, this is done on the grounds that it is necessary to establish, assert or defend a legal claim.

8.4. Retention period

The personal data will only be stored by us for as long as necessary to investigate a report and take relevant measures in relation to the result of such investigation. Personal data that occurs in a follow-up matter is never processed for longer than two years after the matter is closed. Superfluous personal data and personal data that is not relevant to the reported event will be deleted or anonymized as soon as possible.

Personal data processed to establish, assert or defend a legal claim will be stored until the legal proceedings are completed and during the subsequent limitation period.

8.5. Sharing of personal data and transfers of personal data

Data that emerges from a report and in a follow-up matter will be treated with the greatest possible confidentiality, and will not be disclosed to more persons than is necessary with regard to the purposes of the processing. The Company and the Group Companies have taken technical and organizational measures to protect the personal data from loss, destruction, damage and unauthorized access or disclosure. Only authorized employees and contractors have access to personal data in reports and follow-up cases.

Personal data in reports and investigations will not be disclosed to others than what is necessary for the purposes of the processing. In order to fulfil the purposes of the processing of personal data, personal data may need to be transferred to third parties, such as external legal advisers, accounting firms, forensic investigation companies or other service providers that are necessary to detect, investigate and rectify serious breaches. We may also share personal data with police authorities and/or other relevant authorities, regulators or courts to safeguard our interests or exercise our rights.

If third parties act as data processors for the Company or the Group Companies, we will enter into the necessary data processing agreements with these parties.

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8.6. Information to data subjects and data subjects' rights

You are entitled to know what personal data we are processing about you, and you can request a copy of such data. Please note that to the extent that the disclosure of your personal data may compromise an investigation, we may not be able to meet your request. You are entitled to have incorrect personal data about you rectified, and in some cases you may request that we delete your personal data. You are also entitled to object to certain processing of your personal data, and request that the processing of your personal data should be restricted. You are also entitled to submitting complaints regarding Bufab and our Swedish subsidiaries' processing of personal data to the Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndigheten).

We are committed to ensuring that your data is handled with a high level of security. We have therefore taken specific technical and organizational security measures to process your personal data in accordance with current and modern technology to protect the data from loss, destruction, misuse and unauthorized access or disclosure.

9. Roles and responsibilities

The CEO, who is also the decision-maker on matters affecting Bufab, bears ultimate responsibility for the company's operations, including HR and Whistleblowing. The CEO has delegated operational responsibilities to appointed Group and BU (Business Unit) managers. To achieve Sustainable Leadership, the Global HR Business Partner oversees that plans and actions are in place for the group to reach its targets.

10. Exceptions

There are no exceptions to this policy. Any need of exceptions to this policy must be clearly defined and documented. All exceptions shall be approved by the Board of Directors of Bufab AB.

11. Monitoring and compliance

The Board of Directors is ultimately responsible for Bufab Group strategy and organization and shall ultimately monitor the administration of and compliance with the Whistleblower Policy. The MD of each subsidiary within the Group shall annually report on policy compliance to their respective Regional Director and CEO. Internal audits to monitor compliance are performed periodically.

12. Bufab Best Practice

Within Bufab Best Practice there is a section on Whistleblowing. Here you can find information on the whistleblowing process and global documentation.

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13. References to associated documents

Within Bufab Best Practice there is a section on our Whistleblowing: https://bufabcom.sharepoint.com/sites/BP-Whistleblowerprocess

All different Bufab policies can be found within Policies: https://bufabcom.sharepoint.com/sites/BP-Policies

14. Schedule 1

Competent persons / WHISTLEBLOWING TEAMS
The list below indicates all competent persons appointed for the relevant Group Company.

Company	Competent persons	Contact details
		(e-mail/phone number)
	Martijn van Daal	martijn.vandaal@bufab.com
Bufab Sweden	Eva Nilsagård	eva@nilsagard.com
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	Martijn van Daal	martijn.vandaal@bufab.com
Bufab Finland	Eva Nilsagård	eva@nilsagard.com
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	Martijn van Daal	martijn.vandaal@bufab.com
Kian Soon Philippines	Eva Nilsagård	eva@nilsagard.com
	Sheron Liang	sheron.liang@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
Puresys	Eva Nilsagård	eva@nilsagard.com
l alooyo	Sheron Liang	sheron.liang@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
		-
Apex	Eva Nilsagård	eva@nilsagard.com
	Yvonne Messenger	yvonnem@timco.co.uk
	Charlotte Okell	charlotte.okell@timco.co.uk
	Martijn van Daal	martijn.vandaal@bufab.com
Bumax	Eva Nilsagård	eva@nilsagard.com
Barriax	Malin Tengelin	malin.tengelin@bufab.com
	Hanna Skogefors	hanna.skogefors@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
Bufab Ireland	Eva Nilsagård	eva@nilsagard.com
Dulab li elaliu	Yvonne Messenger	<u>yvonnem@timco.co.uk</u>
	Charlotte Okell	charlotte.okell@timco.co.uk
	Martijn van Daal	martijn.vandaal@bufab.com
T :	Eva Nilsagård	eva@nilsagard.com
Timco	Yvonne Messenger	yvonnem@timco.co.uk
	Charlotte Okell	charlotte.okell@timco.co.uk
	Martijn van Daal	martijn.vandaal@bufab.com
Bufab USA	Eva Nilsagård	eva@nilsagard.com
Baids 667 (Heather Dunbar	heather.dunbar@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
Bufah Mayiga		
Bufab Mexico	Eva Nilsagård	eva@nilsagard.com
	Heather Dunbar	heather.dunbar@bufab.com
Component Solution Group	Martijn van Daal	martijn.vandaal@bufab.com
	Eva Nilsagård	eva@nilsagard.com
	Heather Dunbar	heather.dunbar@bufab.com
A1 Fastener &	Martijn van Daal	martijn.vandaal@bufab.com
	Eva Nilsagård	eva@nilsagard.com
Components	Heather Dunbar	heather.dunbar@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
Perlane Sales	Eva Nilsagård	eva@nilsagard.com
	Heather Dunbar	heather.dunbar@bufab.com
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	Mantila van Daal	una milia vanada al Obvitale asias
Blue Grass	Martijn van Daal	martijn.vandaal@bufab.com
_	Eva Nilsagård	eva@nilsagard.com
Manufacturing	Heather Dunbar	heather.dunbar@bufab.com
American Bolt &	Martijn van Daal	martijn.vandaal@bufab.com
Screw	Eva Nilsagård	eva@nilsagard.com
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HT Bendix	Eva Nilsagård	eva@nilsagard.com
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	Martijn van Daal	martijn.vandaal@bufab.com
Bufab Ningbo	Eva Nilsagård	eva@nilsagard.com
	Sheron Liang	sheron.liang@bufab.com
	Martijn van Daal	martijn.vandaal@bufab.com
Bufab International	Eva Nilsagård	eva@nilsagard.com
	Mette Bloch	mette@ht-bendix.dk

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15. Schedule 2

Peronsal data controllers

Company	Contact information to
	personal data controller
Bufab Group	par.ihrskog@bufab.com +46 706371734

16. Schedule 3

External Reporting Channels.

In the table below, the competent authorities appointed by the Swedish government to set up and manage external reporting channels are listed.

Competent authority	Area of responsibility	Reporting channel
Swedish Work Environment Authority (Sw. Arbetsmiljöverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities that are not covered by any other competent authority's area of responsibility.	Information (in Swedish only): https://www.av.se/om- oss/visselblasarlagen/exte rn-rapporteringskanal/ Post: Arbetsmiljöverket Att: ER Box 9082 171 09 Solna Sweden Telephone: (+46) 10-730 99 30 Physical meeting: make an appointment by calling the telephone number above.
Swedish National Board of Housing, Building and Planning (Sw. <i>Boverket</i>)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility.	Information (in Swedish only): https://www.boverket.se/s v/om- boverket/visselblasning/ Link to the reporting channel: https://wbreport.amo.kpmg .se/20210039891
Swedish Economic Crime Authority (Sw. <i>Ekobrottsmyndigheten</i>)	Irregularities in the area of the EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards anti-fraud.	Information (in Swedish only): https://www.ekobrottsmyndigheten.se/visselblasarfunktion-eu-medel/ Link to the reporting channel: https://www.ekobrottsmyndigheten.se/wp-content/uploads/2021/12/visselblasarblankett-ebm-211209.pdf The form is sent by post to: "Visselblåsare/EU" Ekobrottsmyndigheten

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Competent authority	Area of responsibility	Reporting channel
		Box 22098 104 22 Stockholm Sweden Telephone: (+46) 10-562 91 11 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Electrical Safety Agency (Sw. Elsäkerhetsverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility.	Information (in Swedish only): https://www.elsakerhetsverket.se/yrkespersoner/tillverka-och-salja-elprodukter/sla-larm-ommissforhallanden/Link to the reporting channel: https://wbreport.amo.kpmg.se/02021004466 Telephone: (+46) 771-4016472 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Estate Agents Inspectorate (Sw. Fastighetsmäklarinspektionen)	Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://fmi.se/det-har-ar-fmi/kontakta-oss/visselblasning-om-penningtvatt/ Telephone: (+46) 10-490 01 00 Post: Fastighetsmäklarinspektionen Box 5045, 650 05 Karlstad Physical meeting: make an appointment by using the options detailed above.
Swedish Financial Supervisory Authority (Sw. <i>Finansinspektionen</i>)	Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility. Irregularities in the area of consumer protection and	Information (in Swedish only): https://www.fi.se/sv/om-fi/kontakta-oss/visselblasare/ Post: Finansinspektionen Box 7821 103 97 Stockholm Sweden

Whistleblower

Competent authority	Area of responsibility	Reporting channel
	which are covered by the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	E-mail: If the report concerns entities under the authority's supervision: visselblasare@fi.se If the report concerns suspected market abuse: mar@fi.se Telephone: If the report concerns entities under the authority's supervision: (+46) 8-408 986 70 If the report concerns suspected market abuse: (+46) 8-408 986 90 Physical meeting: make an appointment by using one of the options detailed above.
Public Health Agency of Sweden (Sw. Folkhälsomyndigheten)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of public health and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.folkhalsomynd igheten.se/livsvillkor-levnadsvanor/andts/regler-for-tillverkning-handel-och-hantering/visselblasning-tobaksomradet/ Post: Visselblåsarfunktion Tobak Folkhälsomyndigheten 171 82 Solna Sweden Visselblåsarfunktion Tobak Folkhälsomyndigheten 170bak Folkhälsomyndigheten Box 505 831 26 Östersund Sweden Telephone: (+46) 10-205 20 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Agency for Marine and Water Management	Irregularities in the area of environmental protection and which are covered by	Information (in Swedish only): https://www.havochvatte
(Sw. Havs- och vattenmyndigheten)	the authority's supervisory responsibility.	n.se/om-oss-kontakt- och-karriar/om-

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Competent authority	Area of responsibility	Reporting channel
		oss/visselblasarfunktion .html E-mail: visselblasarfunktionen@h avochvatten.se Telephone: (+46) 10-698 60 00
Swedish Inspectorate of Strategic Products (Sw. Inspektionen för strategiska produkter)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility.	Information (in Swedish only): https://isp.se/om-isp/visselblasning-till-isp/hur-rapportering-ska-ske/ Post: ISP (VB) Box 6086 171 06 Solna Sweden E-mail: visselblasning@isp.se Telephone: (+46) 8-406 31 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Health and Social Care Inspectorate (Sw. Inspektionen för vård och omsorg)	Irregularities in the area of public health and which are covered by the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.ivo.se/om-ivo/kontakta-oss/visselblasning/extern-rapporteringskanal/ Link to the reporting channel: https://www.ivo.se/globalassets/dokument/publicerat/blanketter/visselblasning/visselblasning extern 2022-10-17.pdf The form is sent by post to: Inspektionen för vård och omsorg Mottagargruppen Box nr 45184 104 30 Stockholm Sweden Telephone: (+46) 20-140 47 00 Physical meeting: make an appointment by using

Whistleblower

Competent authority	Area of responsibility	Reporting channel
		one of the options detailed above.
Swedish Authority for Privacy Protection (Sw. Integritetsskyddsmyndighe ten)	Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.imy.se/privatperson/utfora-arenden/visselblasning/ Post: Integritetsskyddsmyndigheten Box 8114 104 20 Stockholm Sweden Telephone: (+46) 8-657 61 53 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Chemicals Agency (Sw. Kemikalieinspektionen)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.kemi.se/om-kemikalieinspektionen/kontakta-oss/extern-kanal-forvisselblasning Post: Chefsjuristen/behörig person Kemikalieinspektionen Box 2 172 13 Sundbyberg Sweden Telephone: (+46) 8-519 41 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Competition Authority (Sw. Konkurrensverket)	Irregularities in the area of public procurement and which are covered by the authority's supervisory responsibility. Irregularities in the area of the internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards the competition area.	Information (in Swedish only): https://www.konkurrensverket.se/tipsa-oss/visselblasarfunktion/ Post: Konkurrensverket 103 85 Stockholm Sweden Post can also be delivered to the Swedish Competition Authority at

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Competent authority	Area of responsibility	Reporting channel
		Ringvägen 100, Stockholm E-mail: euvisselblasare@kkv.se Telephone: (+ 46) 8-700 16 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Consumer Agency (Sw. Konsumentverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of public health and which are covered by the authority's supervisory responsibility. Irregularities in the area of consumer protection and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.konsumentverket.se/om-konsumentverket/var-verksamhet/visselblasning/extern-kanal-for-visselblasning/Post: Elin Söderlind Konsumentverket/KO Box 48 651 02 Karlstad Sweden Telephone: (+46) 771-42 33 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Food Agency (Sw. Livsmedelsverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility. Irregularities in the area of radiation protection and nuclear safety and which are covered by the authority's supervisory responsibility. Irregularities in the area of food and feed safety, animal health and well-being and which are	Information (in Swedish only): https://www.livsmedelsverket.se/om-oss/kontakt/visselblasning-rapportera-om-missforhallanden Link to the reporting channel: https://whistle.qnister.com/livsmedelsverket Telephone: (+46) 36-330 07 41 Physical meeting: make an appointment on phone number (+46) 36-330 07 40 To whisleblow, you can also scan the QR code available at the website.

Whistleblower

Competent authority	Area of responsibility	Reporting channel
	covered by the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	
Swedish Medical Products Agency (Sw. Läkemedelsverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of public health and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.lakemedelsverket.se/sv/om-lakemedelsverket/kontakta - oss/visselblasning#hmain body3 Post: Läkemedelsverket Box 26 751 06 Uppsala Sweden Telephone: (+46) 18-18 36 96 Physical meeting: make an appointment by calling the telephone number above.
County Administrative Board of Skåne (Sw. Länsstyrelsen Skåne län)	Irregularities in the area of product safety and product conformity and which are covered by the authority's responsibility for supervisory guidance. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility. Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.lansstyrelsen. se/skane/om- oss/kontakta-oss/kanal- for-visselblasning-och- rapporter-om- missforhallanden.html Post: Länsstyrelsen Skåne 205 15 Malmö Sweden A physical letter can also be left in the County Administrative Board's public mailbox at Södergatan 5 in Malmö. Telephone: (+46) 10-224 10 00 Physical meeting: make an appointment by using

Whistleblower

Competent authority	Area of responsibility	Reporting channel
		one of the options detailed above.
County Administrative Board of Stockholm (Sw. Länsstyrelsen Stockholm)	Irregularities in the area of product safety and product conformity and which are covered by the authority's responsibility for supervisory guidance. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility. Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.lansstyrelsen.se/stockholm/om-oss/kontakta-oss/kanal-for-visselblasning-och-rapporter-om-missforhallanden.html Post: Länsstyrelsen Stockholm Box 22067 104 22 Stockholm Sweden A physical letter can also be left at the County Administrative Board's reception, the letter shall be addressed the general counsel or HR manager. Telephone: (+46) 10-223 10 00 Physical meeting: make an appointment by using one of the options detailed above.
County Administrative Board of Västra Götaland (Sw. Länsstyrelsen Västra Götaland)	Irregularities in the area of product safety and product conformity and which are covered by the authority's responsibility for supervisory guidance. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility. Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.lansstyrelsen.se/vastra-gotaland/om-oss/kontakta-oss/kanal-for-visselblasning-och-rapporter-om-missforhallanden.html Post: Länsstyrelsen Västra Götalands län 403 40 Göteborg Sweden Telephone: (+46) 10-224 40 00 Physical meeting: make an appointment by using one of the options detailed above.
The County Administrative Boards (Sw. <i>Länsstyrelserna</i>)	Irregularities in the area of product safety and product conformity and which are covered by the authority's	For information on reporting, please visit the website of the County Administrative Board in

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Competent authority	Area of responsibility	Reporting channel
	responsibility for supervisory guidance. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility.	the relevant area: www.lansstyrelsen.se
Swedish Civil Contingencies Agency (Sw. Myndigheten för samhällsskydd och beredskap)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility.	Information (in Swedish only): https://www.msb.se/sv/om -msb/kontakta- oss/visselblasning rapporteraom- missforhallanden/visselbla sningrapporteraom- missforhallanden-inom- omradet-produktsakerhet- och- produktoverensstammelse / Post: Myndigheten för samhällsskydd och beredskap 651 81 Karlstad Sweden Telephone: (+46) 20-34 70 10 Physical meeting: make an appointment by calling the telephone number above.
Swedish Environmental Protection Agency (Sw. Naturvårdsverket)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.naturvardsverket.se/om-oss/kontakt/visselblasning/rapportera-missforhallanden-inom-vissa-tillsynsomraden/Post: Funktionen EVB Naturvårdsverket Forskarens väg 5 831 40 Östersund Sweden Telephone: (+46) 10-698 14 00 Physical meeting: make an appointment by using

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Competent authority	Area of responsibility	Reporting channel
		one of the options detailed above.
Swedish Post and Telecom Authority (Sw. Post- och telestyrelsen)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.pts.se/sv/priva t/internet/integritet/visselbl as-spegling/ Post: Post- och telestyrelsen (PTS) Box 6101 102 32 Stockholm Sweden Telephone: (+46) 8-586 273 14 Physical meeting: make an appointment by using one of the options detailed above.
Government Offices of Sweden (Sw. Regeringskansliet)	Irregularities in the area of the EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards state aid. Irregularities in the area of the internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards state aid.	Information (in Swedish only): https://www.regeringen.se/ om- webbplatsen/rapportera- missforhallanden-om- statsstod/ Post: Regeringskansliets externa rapporteringskanal FA RS 103 33 Stockholm Sweden Telephone: (+46) 8-405 10 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Inspectorate of Auditors (Sw. <i>Revisorsinspektionen</i>)	Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.revisorsinspek tionen.se/tillsyn/rapporteri ng-om-missforhallanden/ Link to the reporting channel: https://www.revisorsinspek tionen.se/globalassets/we bbplatsen/tillsyn/formular. pdf

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Competent authority	Area of responsibility	Reporting channel
		The form is sent by e-mail to: visselblasare@revisorsins pektionen.se Telephone: (+46) 8-738 46 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Tax Agency (Sw. Skatteverket)	Irregularities in the area of the EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards taxation. Irregularities in the area of the internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards corporate taxation.	Information (in Swedish only): https://www.skatteverket.se/omoss/varverksamhet/styrningochuppfoljning/skattekontroller/rapporteraommissforhallandeninomskatteomradet.4.1df9c71e181083ce6f636e5.html?q=visselbl%C3%A5sningLink to the reporting channel: https://www.skatteverket.se/privat/etjansterochblanketter/blanketterbroschyrer/blanketter/info/1891.4.1df9c71e181083ce6f626c2.html?q=visselbl%C3%A5sningThe form is sent by post to: SkatteverketBox 6037171 06 SolnaSwedenTelephone: (+46) 8-411 04 20 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Forest Agency (Sw. Skogsstyrelsen)	Irregularities in the area of environmental protection and which are covered by the authority's supervisory responsibility.	Information (in Swedish only) and reporting form: https://www.skogsstyrelse n.se/kontakt/visselblasarfu nktion/ Post: Skogsstyrelsen 551 83 Jönköping Sweden

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Competent authority	Area of responsibility	Reporting channel
		E-mail: visselblasarfunktionen@sk ogsstyrelsen.se Telephone: (+46) 36-35 93 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Gambling Authority (Sw. Spelinspektionen)	Irregularities in the area of financial services, products and markets and the prevention of money laundering and terrorist financing and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.spelinspektion en.se/lagar forordningar/penningtvatt/ visselblasarfunktion/ Link to the reporting channel: https://www.spelinspektion en.se/lagar forordningar/penningtvatt/ visselblasarfunktion/vissel blasarfunktion form/ E-mail: visselblasare.extern@spel inspektionen.se Telephone: (+46) 152-50 69 50 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Energy Agency (Sw. Statens energimyndighet)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://report.whistleb.com/sv/Energimyndigheten Link to the reporting channel: https://report.whistleb.com/sv/message/Energimyndigheten Telephone: (+46) 16-542 06 13
Swedish Board of Agriculture (Sw. Statens jordbruksverk)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of environmental protection	Information (in Swedish only): https://jordbruksverket.se/ e-tjanster-databaser-och- appar/ovriga-e-tjanster- och-databaser/anmal-

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Competent authority	Area of responsibility	Reporting channel
	and which are covered by the authority's supervisory responsibility. Irregularities in the area of food and feed safety, animal health and wellbeing and which are covered by the authority's supervisory responsibility.	offentliga-kontroller- visselblasarfunktion Link to the reporting channel: https://eformular.funktionst janster.se/eforms/eforms.h tml:jsessionid=AA3617A7 9761821B4D9990E3B0D0 6B96.tomcat-eforms- fe1?eformid=8211b196- 1553-49c7-a188- 631d29a6383f&pageNam e=Overtradelser&kommun id=309
Swedish Radiation Safety Authority (Sw. Strålsäkerhetsmyndighete n)	Irregularities in the area of radiation protection and nuclear safety and which are covered by the authority's supervisory responsibility.	Information (in Swedish only): https://www.stralsakerhets myndigheten.se/kontakt/vi sselblasarfunktion/ Post: Strålsäkerhetsmyndighete n Chefsjurist 171 16 Stockholm Sweden E-mail: visselblasning@ssm.se Telephone: (+46) 8-799 40 00 Physical meeting: make an appointment by using one of the options detailed above.
Swedish Board for Accreditation and Conformity Assessment (Sw. Styrelsen för ackreditering och teknisk kontroll)	Irregularities in the area of product safety and product conformity and which are subject to the authority's supervisory responsibility.	Information (in Swedish only): https://www.swedac.se/visselblasning/# ftn1 Link to the reporting channel: https://www.swedac.se/visselblasning/# ftn1 Post: Swedac Box 878 501 15 Borås Sweden E-mail: registrator@swedac.se Telephone: (+46) 771-18 39 06
Swedish Transport Agency	Irregularities in the area of product safety and product	Information (in Swedish only):

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Competent authority	Area of responsibility	Reporting channel
(Sw. Transportstyrelsen)	conformity and which are subject to the authority's supervisory responsibility. Irregularities in the area of transport safety and which are covered by the authority's supervisory responsibility. Irregularities in the area of protection of privacy and personal data as well as security of network and information systems and which are covered by the authority's supervisory responsibility.	https://www.transportstyrel_sen.se/sv/ Link to the reporting channel: https://wb.2secure.se/wbui_/ Telephone: (+46) 771-77 99 77 Physical meeting: make an appointment by using one of the options detailed above.

Erik Lundén

CEO, Bufab Group

Martijn van Daal

Global HR Business Partner & Communications

Director

Whistleblower

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17. Log of updates

Revision	Date	Update
1.0	2024.12	Implementation of Whistleblower policy