



1 January 2024

## **Swedish Space Corporation's ("SSC") internal reporting channel for reporting misconduct**

**SSC strives to maintain a good management culture and counteract corruption and other irregularities. So-called whistleblowers play a central role in safeguarding and promoting important values in a democratic society, such as openness and transparency. SSC's whistleblower channel is part of the organisation's work to prevent and detect malpractice and to protect whistleblowers, who report malpractice. Via SSC's whistleblower channel, whistleblowers can report malpractices and irregularities within SSC, without having to worry about negative consequences.**

### **What can be reported?**

The whistleblowing must refer to irregularities in which there is a public interest in them being resolved. The information must therefore concern the public and not the reporting person's own working or employment conditions. Conditions that concern an individual may in some cases be of general interest if, for example, they are repeated or systematic violations that can be considered unacceptable from a broader societal perspective. Violations of internal regulations such as codes of conduct may in some cases be of general interest.

Whistleblowing may also refer to violations of certain EU rules and Swedish rules that implement or supplement the EU rules. The EU rules covered are listed in Annex 1 to Directive (EU) 2019/1936 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting infringements of Union law.

The reporting person does not need to have actual evidence, as reasonable concerns or suspicions are sufficient.

### **What should not be reported?**

The reporting channels should not be used for:

- General expressions of dissatisfaction. Such matters must be communicated to the immediate manager or the HR function.
- Reporting of security protection classified information.
- Information covered by a so-called qualified duty of confidentiality. This may be, for example, information concerning a country's relationship with foreign power where national security is in danger or certain secrecy within the authorities' personnel administration.

### **Who can report and get protection**

The persons protected by the Whistleblower Act are persons with a so-called work-related context to the business. These are employees or other persons who in one way or another are active in or in connection with the business where the

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malpractice occurs. It also includes part-time employees, jobseekers and people who have terminated their employment. The reporting person indicates affiliation to the group of persons in connection with reporting.

**What the protection entails**

The protection means that SSC is prohibited from a) preventing or attempting to prevent reporting and, due to reporting, taking b) reprisals. The protection also consists in c) freedom from liability and the right to damages in case of violation of the prohibitions. Preventive actions may consist of the business operator offering a benefit to someone not to consult with their workers' organisation.

- a) Retaliation is, for example, dismissal, non-promotion, changed work tasks, changed workplace, salary reduction and changed working hours.
- b) Protection in the form of discharge means that anyone who, by blowing a whistle according to the law, violates a duty of confidentiality, cannot be held liable for having violated the duty of confidentiality.

**Who administers the whistleblower system?**

SSC's internal reporting channel is a secure system provided by SSC's independent party KPMG AB ("KPMG"). KPMG's Whistleblower Service is completely independent of SSC's intranet and external website and can receive reports 24/7.

The reporting person may choose to report anonymously or to appear with their personal information. No account registration is required to make a report, but it further facilitates the investigation of the case and / or follow-up of the status of the case. To ensure the anonymity of the reporting person, KPMG AB does not save IP addresses or other metadata. The system also protects the report and any information about the person or persons whose identity appears in the report.

**How does reporting work?**

1. A report is submitted by the person who wants to report filling in an electronic form in KPMG's Whistleblower Service. Reporting can also be done via voicemail: +46771402103. Via KPMG's Whistleblower Service or voicemail solution, the reporting person can also request to report during a face-to-face meeting.
2. The reporting person is assigned a unique case number and password, in case the reporting person wishes to continue the dialogue and / or follow the status of the case. The information needs to be saved securely.
3. KPMG's reviewer unit receives the case (and send a confirmation to the reporting person that the report has been received if the person who reported it has created an account for further contact or provided contact information in another way).
4. KPMG's reviewer unit makes an initial assessment of the case.
5. The report and the initial assessment are forwarded to the pre-determined contact persons within SSC for further handling and action planning.



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KPMG ensures that a report is not forwarded to anyone within SSC who is affected by the report.

6. SSC decides on any remediation measures.
7. Feedback is provided to the person who reported, if the person has created an account or provided contact information in another way.

### **Right to confirmation and feedback**

Within seven days from reporting, the reporting person receives a confirmation from KPMG that the report has been received if it is not the case that the reporting person has renounced this confirmation or if there is reason to believe that a confirmation would reveal the person's identity.

KPMG provides reasonable feedback to the reporting person on what action has been taken and why, within three months from the time of reporting (or if no confirmation of receiving the report has been provided, seven days after the report has been received).

### **Different ways to report irregularities**

SSC's whistleblower channel is not intended to replace other reporting channels but serves as a complement to these. The person who wants to report a misconduct can choose the reporting channel that is most appropriate depending on the circumstances and their own assessment of the risk of retaliation. Other possible channels are:

- Internal reporting in other ways (for example, the immediate superior, the HR department or the organization's legal function),
- External reporting to authorities specifically appointed by the government in the respective country, for example tax authorities, competition authorities etc or EU institutions.