GDG WHISTLEBLOWING POLICY

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Purpose

The purpose of this policy is to provide Götessons Design Group's internal and external stakeholders with a framework and system for reporting suspected misconduct within the company without fear of retaliation. The aim is also to encourage all employees and external stakeholders to report suspected or actual violations of law, company policies or internal procedures, so that issues can be addressed before potentially causing greater harm. Götessons Design Group strives for an open corporate culture where the reporting of misconduct is encouraged and appreciated.

This policy is in accordance with the European Parliament and Council Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons
who report breaches of Union law.

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Governance and Updates

The policy was adopted by the company's Board of Directors (hereinafter referred to as "the Board") on June 7, 2022. The Board is responsible for updating and revising the policy as necessary.

Scope

The policy applies to the entire Götessons Design Group group, regardless of geographic location

Implementation and Communication

This policy and the attached grievance system shall be implemented, distributed to, and made available to all relevant stakeholders. For employees, the policy is available in the management system and on the company intranet.

Götessons Design Group's CEO is responsible for ensuring that this policy is fully understood and implemented within the organization.

For external stakeholders, the whistleblower information and system are available on GDG's and each subsidiary's external websites.

External System Provider

The Board has decided to appoint KPMG as the provider of an external whistleblowing system. The external system is managed by experienced specialists to ensure anonymity and confidentiality. For more information on the reporting process, see the section "Reporting Misconduct"

Whistleblower Committee

The Whistleblower Committee within Götessons Design Group has been established to evaluate and investigate incoming whistleblower reports from the external system provider and provide recommendations on actions to the Board of Directors.

The Board has decided that the Whistleblower Committee shall consist of:

- Helen Swedberg (E-commerce Manager)
- Stellan Bygård (ESG Manager)
- Tommy Torwald (Accent Equity)

The chair of the committee is Tommy Torwald. The Board has also adopted instructions for the committee's work

Reporting Misconduct

Who can report

A whistleblower is a person who reports misconduct within the company's operations. A report may be submitted by employees, suppliers, contractors, subcontractors, self-employed individuals, volunteers and interns, shareholders, and individuals who are part of a company's administrative, management, or supervisory body operating within the company.

This policy also applies to external stakeholders as well as individuals who were previously employed by Götessons Design Group if the misconduct occurred during their employment. It also applies to individuals who have not yet started employment with Götessons Design Group but acquired information about violations during the recruitment process or other negotiations prior to entering into a contract.

What Can Be Reported

The whistleblowing system is intended for reporting actual or suspected misconduct within the Götessons Design Group and violations of laws and regulations. The reported information should be of interest to a broader group of people, not only to the whistleblower, and there should be a legitimate interest in disclosing the information. A whistleblower does not need to have concrete evidence to express a suspicion, but the report must be made in good faith (i.e., the whistleblower must have had reasonable grounds to believe the reported information was true at the time of the report)

Examples of reportable misconduct:

- Violations of the company's Code of Conduct or other policies and procedures
- Suspected corruption or conflicts of interest
- Risks related to product safety
- Deficiencies in the handling of personal data
- Serious environmental violations
- Other breaches of EU or Swedish law

How to Submit a Report

Götessons Design Group's whistleblowing system is a confidential reporting channel through which a whistleblower can report misconduct anonymously. The system is provided and managed by KPMG. Reporting can be done 24 hours a day, year-round. In addition to the web-based solution, a report may be made through a physical meeting or orally via telephone.

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The anonymous reporting function is accessible via: **https://wbreport.kpmg.se/5592036502**
To enable a thorough and accurate investigation of suspected misconduct, the whistleblower is encouraged to provide as much detail as possible about the incident

What Happens After a Report is Submitted

All reports received through the whistleblowing system are immediately reviewed by KPMG's experienced specialists. KPMG's specialists will provide an initial assessment and recommendation regarding the report and forward it to the Whistleblower Committee within Götessons Design Group.

If the reported matter qualifies as a whistleblower case, the Whistleblower Committee will forward the case, along with clear recommendations on actions, to the Chair of the Board. Depending on the nature of the case, it will be further investigated internally, handed over to the police or other law enforcement agencies, or subject to an independent external investigation.

KPMG and the Whistleblower Committee ensure that no report is forwarded to any individual within Götessons Design Group who may be the subject of the report

Acknowledgment of Receipt

The whistleblower shall receive confirmation of the report no later than 7 days after submission.

Feedback on Actions Taken

Within 3 months, the whistleblower shall receive feedback on the actions taken..

Reporting to Authorities

Whistleblowers should primarily use GDG's internal reporting channel. However, reports can also be submitted to an external reporting channel provided by a competent authority if it is not deemed appropriate to use the internal channel.

Protection Against Retaliation

Anyone who, in good faith, raises concerns about misconduct shall not suffer retaliation.
Whistleblowers will not be held liable for breaches of confidentiality provided that, at the time of reporting, they had reasonable grounds to believe the disclosure of the information was necessary to reveal the reported misconduct, in accordance with applicable law.
Individuals who knowingly submit false or misleading information are not protected against retaliation.

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Anonymous and Confidential Reporting

The whistleblowing system is provided by an external partner to ensure anonymity and confidentiality. Whistleblowers may choose to remain anonymous, and the solution ensures anonymity throughout the reporting process, any follow-up, and investigation.
All information disclosed during the investigation will remain confidential, except when disclosure is necessary to conduct the investigation and take corrective actions, in accordance with applicable laws.

Personal data will only be processed if necessary to follow up on the reported case. Only individuals designated to receive, follow up on, and provide feedback on reports will have access to personal data. Personal data in reports shall be deleted when no longer necessary or no later than two years after the case is closed. Information about the identity of the whistleblower shall be subject to the highest level of confidentiality.

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