



# Whistleblower Policy

Midway Holding AB (publ)

556323-2536

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Established by the Board: 2021-04-21  
Document Owner: Sverker Lindberg

## Table of Contents

1. Purpose of Our Whistleblower System	3
2. Who Can File a Complaint?	3
3. What Can Be Reported?	3
4. What Should Not be Reported?	4
5. How to File a Complaint?	5
6. What Should a Complaint Contain?	5
7. Handling of Complaints	5
8. Protective Measures for the Whistleblower	6
9. Information on Handling of Personal Identifiable Information	6

## **1. PURPOSE OF OUR WHISTLEBLOWING SYSTEM**

- 1.1. This whistleblower policy aims to handle complaints that are made through Midway Holding's ("the Company") whistleblowing system Trumpet ("Trumpet") that is administered by the independent actor Whitepaper Advisors Sweden AB ("WPA").
- 1.2. For the Company it is important that the actions that violate laws, regulations, internal rules or guidelines become known as early as possible so that the risk for personal, material and intangible damages, as well as damages to the Company's standing, are mitigated. With this policy, whistleblowers that are prepared to report gross misconduct and/or irregularities should be aware that these are important resources for the Company. And that the Company strives to ensure an organizational climate that allows whistleblowers to feel safe and without fear to report irregularities.
- 1.3. The starting point should be that any gross misconduct and/or irregularities should be brought to the attention of your immediate supervisor and/or manager within the Company. All supervisors and managers are required to handle and resolve any reasonable suspicions of misconduct. If, for any reason, one does not determine it appropriate to report the complaint to a supervisor and/or manager, one may turn to another individual that holds a supervisory and/or managerial position within the Company. Alternatively, this could also be reported to human resources.
- 1.4. For circumstances where you may have information about an individual that holds a leadership position (e.g. board director) and/or an individual in a management position (e.g. CEO, executive) within the Company, that has been engaged in criminal activity and/or some form of gross misconduct and you have reasonable suspicion that your misgivings will not be handled in the correct manner, you can then instead file your complaint with Trumpet.
- 1.5. Further information can be found within the Company's Code of Conduct.

## **2. WHO CAN FILE A COMPLAINT?**

A complaint through Trumpet can be filed by anyone who in any capacity represents the Company. This includes members of the board, any type of employee (permanent employees, at-will employees, temporary employees, full-time and part-time employees), interns and labor contractors in the Company. Even the employees of our customers, suppliers, consultancies and partners to the Company have this opportunity.

## **3. WHAT CAN BE REPORTED?**

- 3.1. A complaint submitted through the whistleblower system Trumpet should be based on reasonable suspicion. You do not need to have any evidence for your suspicions, however no accusation(s) is to be made with malicious intent and/or under false pretenses. False and/or malicious accusations is a serious violation against the terms of the employment contract.

For a complaint to be submitted through Trumpet it is required that there exists reasonable suspicion about an event that fulfills the following two criteria:

- that it refers to a gross irregularity (see Section 3.2), and

- that the irregularity has been committed by an individual within the Company's leadership or in another key position (see Section 3.3).

A complaint that fulfills both of the criteria above is referenced within the Company's framework for internal regulations of eligible complaints or whistleblowing.

3.2. With concern to gross irregularities:

- financial criminality such as bribery, theft, fraud, forgery, corruption, and other violations of accounting and tax legislation, as well as
- other gross irregularities relating to the vital interests of the Company and/or individual(s) safety and health. For example, serious environmental crimes and shortcomings in safety at workplaces, including severe forms of discrimination and harassment.

3.3. The Company's management and/or other key personnel are consider the following within the Company:

- chief executive officer of Midway Holding
- member of executive leadership team of Midway Holding
- chief executive officer in a relevant subsidiary of Midway Holding
- member of executive leadership team in a relevant subsidiary of Midway Holding
- human resource representative in HAKI AB

#### **4. WHAT SHOULD NOT BE REPORTED?**

4.1. Matters other than those that appear above in Section 3 should be reported to one's immediate supervisor/manager, or to their respective supervisor/manager or to another individual holding a senior position.

4.2. Matters that will not be handled by Trumpet could include:

- matters that do not constitute a gross irregularity in accordance to Section 3.2 above, for example: general discontent with the organization, leadership, compensation and/or other personnel issues, and/or
- gross irregularities that are committed by individuals who are not a member of the Company's leadership and/or other key personnel in accordance with Section 3.3 above.

4.3. A complaint that does not fulfill the criteria for a submission in the whistleblower system in accordance with Section 3 above is referenced within the Company's framework of internal regulations for unqualified complaint filing. An unqualified filing will not be treated as a whistleblowing complaint. If you were to file an unqualified complaint you will be informed of this and the complaint will be removed from Trumpet within three (3) weeks.

## 5. HOW TO FILE A COMPLAINT?

Reasonable suspicion regarding gross irregularities can be reported anonymously and confidentially to Trumpet through Trumpet's website, by telephone or by mail. Submissions can be made twenty-four (24) hours a day, seven (7) days a week, in both Swedish and English.

### Submitting complaint through website

A complaint made through Trumpet's website, using any internet-enabled device, can be found on the Company's website, [Whistleblowing](http://www.trumpet-whistleblowing.eu). Alternatively, you can fill in the following web address into a web browser's address bar: [www.trumpet-whistleblowing.eu](http://www.trumpet-whistleblowing.eu). Once you have accessed the web page, you need to log in to the whistleblower page, here you will be prompted to fill in the Company's registration code: **MIHWB**

### Submitting complaint by telephone

A complaint made by telephone from within Sweden can be done by dialing:

**020 – 10 30 91**

A complaint made by telephone from outside of Sweden can be done by dialing:

**+46 20 10 30 91**

(Calling toll-free numbers from outside of Sweden requires alteration to the 020 prefix by adding Sweden's country calling code +46, alternatively using the international prefix 0046)

### Submitting complaint by mail

Submissions by mail can be made by sending correspondence to the following address:

Trumpet, Box 479, 201 24 Malmö, Sweden

## 6. WHAT SHOULD A COMPLAINT CONTAIN?

In your complaint you should list and describe all facts, expand on your statement with as much detail and information as possible. Also make an account for anything that has any relevance to the complaint. The information you provide needs to be as correct and detailed as possible. A complaint should, if possible, include the following:

- what the complaint refers to,
- who is involved,
- where the incident occurred, and
- if it was a one-time occurrence or if the issue is ongoing and/or recurring.

## 7. HANDLING OF COMPLAINTS

7.1.1. Complaints filed through Trumpet will be handled by a limited amount people who are bound under strict confidentiality agreements. This limited group of people includes:

- specially qualified personnel of WPA, as well as

- the Company's Whistleblower Committee in accordance with Appendix 2 – Mission Description for Whistleblower Committee (“the Whistleblower Committee”).

If the complaint involves an individual on the Whistleblower Committee, an alternative committee will be established wherein said individual will be excluded.

- 7.2. A complaint will be handled with respect, prudence, confidentiality and in consideration of all involved individuals' integrity. Furthermore, a complaint will be handled expeditiously and decisive action will be made swiftly. Though never at the expense of quality and legal certainty for the individual(s) that are subject to the complaint.
- 7.3. Further information on how complaints are handled can be found in Appendix 1 – Case Management Procedure for Whistleblowing.

## **8. PROTECTIVE MEASURES FOR THE WHISTELBLOWER**

- 8.1. Complaints can be submitted to the whistleblowing program in the following ways:
  - completely anonymously,
  - anonymously with the Whistleblower Committee/alternative committee and the Company, but disclosed to the WPA, or
  - complete disclosure to WPA, the Whistleblower Committee/alternative committee and the Company.
- 8.2. Communication can be maintained with anonymity and in secrecy through Trumpet's web page.
- 8.3. If the complaint filer decides to remain known then the complaint filer's information will be kept confidential and in secret for as long as legally permissible. If a filed complaint leads to a report filed with law enforcement, or other legal action taken, the Company and/or WPA could be obligated to disclose the complaint filer's personal identifiable information (for example, if they are asked to give testimony in court as a witness). In this type of situation, the complaint filer will always be informed if their personal identifiable information is given out.
- 8.4. Anyone who submits a complaint will not result in negative consequences in regards to work assignments, terms of employment contract or general working conditions, neither at submission of complaint nor at any later stage.
- 8.5. If the submitter of the complaint determines that they have been subjected to reprisals despite a complaint being filed in good faith, after having reported to and/or engaged in an investigation they should immediately report this to human resources. Every reported complaint of this nature will be investigated with confidentiality.

## **9. INFORMATION ON HANDLING IF PERSONAL IDENTIFIABLE INFORMATION**

- 9.1. Personal identifiable information (PII) that has been submitted through Trumpet will be treated in accordance with the terms set forth in the General Data Protection Regulation (GDPR), any other applicable legislation, as well as the Company's own policy on personal data. For personal data the Company will be the data controller and WPA will be the data processor. This will include the PII of the complaint filer if they were to decide to not be anonymous with the Whistleblowing Committee/alternative committee and the Company.
- 9.2. If the complaint filer were to choose to remain anonymous with the Whistleblowing Committee/alternative committee and the Company, but not with WPA, WPA will become the data processor of the complaint filer's PII. This data will then be handled in accordance with the PII policy of WPA, this policy is available on their web page: [www.whitepaperadvisors.se/personuppgiftspolicy](http://www.whitepaperadvisors.se/personuppgiftspolicy). If the complaint filer decides at a later stage to disclose their identity to the Whistleblowing Committee/alternative committee and the Company, the Company will then become the data processor for the complaint filer's PII. WPA will then become the data controller, in accordance with Section 9.1 above.