WHISTLEBLOWING POLICY

We at MW Group (559142-7629) are committed to the highest possible standards of transparency, honesty, and accountability. With the aim to ease and facilitate for our employees, and relevant third parties who deal with the Company, to come forward and voice all serious concerns about certain aspects of the Company's work, this Whistleblowing policy informs you as a whistleblower about how we support you so that you can safely express your concerns, know who to contact and know how to make a whistleblowing report.

The policy furthermore describes how we ensure that the support we give you is in a responsible manner and in accordance with the law, including the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (the "**Whistleblowing Directive**"). Finally, the policy also describes what rights you have and how you can exercise them.

If you have any questions about this Whistleblowing policy and/or how to file a Whistleblowing report, you can contact us via the contact details given below.

1. Who can be a whistleblower?

1.1 You as a whistleblower can be an employee to us or a person having self-employed status, a shareholder or person belonging to the administrative, management, or supervisory body of an undertaking, as well as a volunteer and paid or unpaid trainee. You as a whistleblower can also be any person working under the supervision and direction of contractors, subcontractors, and suppliers to us.

1.2 Please note that you may still be a whistleblower even though our work-based relationship has ended or if it is yet to begin.

2. Who is responsible for the Whistleblowing report?

2.1 The Company is responsible if you make a Whistleblowing report pursuant to this policy. As such, we have a responsibility to protect you, including not disclosing your identity to anyone beyond the authorized persons that receive your Whistleblowing report (unless you explicitly consent, or we are required to disclose you pursuant to law) and making sure you are not subject to retaliation.

2.2 However, please note that you also have a responsibility in this Whistleblowing policy. We expect you to only report information and personal data that is relevant for the handling of a specific Whistleblowing report. We also ask you to not report personal work-related grievances, such as interpersonal conflicts between you and other employees or a decision relating to your employment or engagement. Personal work-related grievances should be raised with HR personnel and/or your supervisor, manager, or the relevant person in charge.

3. What can be can be reported in a Whistleblowing report?

3.1 If you acquire information in a work-based relationship with us and have reasonable grounds to believe that there is, in relation to us, misconduct or actual breaches of applicable rules or regulations you are welcome to file a Whistleblowing report on that matter.

3.2 The Whistleblowing Directive particularly specifies the importance of reporting in the following areas: (i) public procurement; (ii) financial services, products, and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health, and welfare; (viii) public health (ix); consumer protection; or (x) protection of privacy and personal data, we strongly encourage you to file a Whistleblowing report on that matter.

3.3 Please note that reasonable grounds to believe means that, considering the circumstances and the information available to you at the time of filing a Whistleblowing report, you believe that the reported matter is true.

4. Where can you file a Whistleblowing report?

4.1 Filing a Whistleblowing report in writing is possible by using our external whistleblowing system *PreWoe*. The product is managed by the external party PreWoe AB and is available 24 hours a day. Please file a Whistleblowing report in *PreWoe* here: *https://app.prewoe.com/whistleblower/company/mwgroup*

4.2 We will acknowledge the receipt of the Whistleblowing report from you within seven days of the receipt. For your information, we have also designated a dedicated team, see contact details below, to following up on the Whistleblowing report. They will maintain communication with you and, where necessary, ask for further information from you and, at the latest three months from the acknowledgment of receipt, provide feedback to you.

4.3 In connection to filing a Whistleblowing report, we would also like to inform you that you can choose to file your Whistleblowing report anonymously. This does not affect your rights and protection in the EU Whistleblowing Directive. However, complete anonymity may make it more difficult for us to investigate the issue or take the action we would like to take.

4.4 Finally, we would also like to clarify that, if you have difficulties or if internal reporting would not be appropriate, it is possible to file a Whistleblowing report externally to competent authorities and, where relevant, to institutions, bodies, offices, or agencies of the EU.

5. Personal data

5.1 Our goal is to always protect the personal data we process to the best of our ability. This means that we always undertake to safeguard your privacy and comply with applicable personal data legislation, including but not limited to the General Data Protection Regulation (GDPR).

5.2 When you file a Whistleblowing report, we will process the personal data contained therein to fulfil our legal obligations according to, among other things, the Whistleblowing Directive. Please find more information about how we process personal data contained in a Whistleblowing report in our privacy policy.

6. What are your rights?

6.1 We are committed to implementing and maintaining necessary and adequate measures to prohibit any form of retaliation against you by reason of filing a Whistleblowing report, including threats of retaliation and attempts of retaliation.

6.2 To exemplify further, prohibition against retaliation by reason of filing a Whistleblowing report means, for instance, prohibition against (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where you had legitimate expectations that you would be offered permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to your reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that you will not, in the future, find employment in such sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a licence or permit; or (o) psychiatric or medical referrals.

Please note that, in addition to the information provided in this Whistleblowing policy, competent authorities provide comprehensive and independent information and advice, which is easily accessible and free of charge, on procedures and remedies available, as well as the protection against retaliation, and on the rights you have.

How do you contact us?

If you have any questions about this Whistleblowing policy and/or how to file a whistleblowing report, please contact us via the following contact information:

Company's contact information
whistleblower@mw.group

PreWoe's contact information
support@prewoe.com