

# Whistleblowing Policy

Bilia strives to maintain a transparent corporate climate, to observe a standard of business ethics and to always see opportunities for improvement.

Anyone who suspects an irregularity that is in breach of the law or that the disclosure of which may be in the public interest has the opportunity to speak out with protection against retaliation. You can choose to provide your information anonymously.

## What can be reported?

- An irregularity that is in breach of the law
- An irregularity the disclosure of which is in the public interest

If the report does not fall within the framework of the above, the case must be reported in accordance with Bilia's internal guidelines, policies or procedures.

## Who can submit a report?

- employees
- volunteers and trainees
- persons who are performing work under the control and management of a business operator (e.g. hired consultants)
- shareholders who are actively involved in the company
- self-employed persons
- persons who are members of a company's administrative, management or supervisory body

## How can a report be made?

Report anonymously through the reporting tool for whistleblowing in accordance with the instructions below.

## Reporting tool

To guarantee a whistleblower's anonymity, a reporting tool is provided from an independent, external agent. The reporting channel is encrypted and password-protected. The whistleblower never needs to state their identity if they do not want to.

- The whistleblower does not need to have evidence for their suspicions, but no accusations may be made with malicious intent or in the knowledge that the accusation is false.

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- It is important that the whistleblower describes all the facts in the report, including any circumstances that are believed to be less important. Statements should be carefully considered and all documentation that may be relevant should be attached.

### Reporting via internal whistleblowing channels

Reporting can take place in writing via the website [wb.2secure.se](http://wb.2secure.se) or verbally by phone at **+46 771 77 99 77**. You can choose to remain anonymous in both of these reporting channels. If you would like to report via an in-person meeting, this can be requested by registering a report on the website [wb.2secure.se](http://wb.2secure.se). The in-person meeting will be held by agreement either with a representative from Bilia or with Bilia’s provider of whistleblowing services, 2Secure.

When registering a new report on [wb.2secure.se](http://wb.2secure.se), you must state the company-specific code **ndl302** to identify that the report is being made for Bilia. On the website, you will be asked to answer a number of questions about the matter to which the report relates. You can remain anonymous and are assigned a unique case number and password, which must be saved so that you can actively log in to the website, monitor the report and communicate with the case officer at 2Secure.

Once a report has been registered, it is processed by experienced case officers at 2Secure, who will contact Bilia’s primary contact person based on a predetermined contact list with several names. If the primary contact person is the subject of the report, another person on the contact list will be informed. It is always Bilia who ultimately assesses the report and decides what measures are to be taken.

### Reporting via external whistleblowing channels

In addition to reporting to Bilia's internal whistleblower channel, you can report externally to a competent authority within a specific area of responsibility or to one of the EU institutions, bodies and agencies. The competent authorities are designated under applicable local legislation.

### Who receives the report?

In whistleblowing matters, Bilia collaborates with 2Secure, which is an independent, external agent. All reports are received and handled by case officers at 2Secure. They have extensive experience of investigations and global capacity if necessary. 2Secure works in consultation with Bilia’s whistleblowing committee. All assessments and decisions on measures are made by Bilia’s whistleblowing committee. The whistleblowing committees are local in each country where Bilia operates, and HR Director at Bilia Group is a member of all local committees.

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## Confidentiality

Access to information within a case is strictly limited to those individuals who are directly involved in the assessment and handling of the matter. All reports are managed on a strictly confidential basis, and information is treated with the highest degree of care.

## Independence and objectivity

Persons involved in the assessment or decision-making may not participate in the handling of a case if they have a conflict of interest. Bilia ensures that follow-up is conducted in an objective, impartial and professional manner.

## Feedback

After registering a report, the whistleblower can log in again using their login details to see any follow-on questions/comments from the case officer at 2Secure. The report can be followed up on via [wb.2secure.se](https://wb.2secure.se) if the whistleblower has saved the case number and the password generated when the report was submitted.

## Non-retaliation

Bilia does not tolerate any form of retaliation against individuals who report concerns in good faith or who participate in the follow-up of a case. Retaliation includes any action that unfairly harms someone as a result of reporting.

## Personal data

Bilia processes all personal data in accordance with relevant policies and applicable laws. .

## Anonymity

As a whistleblower, you can choose either to provide your contact details or to remain anonymous. All reports are taken seriously regardless. It can facilitate the continued work of our external case officers if we can contact you to obtain supplementary information. Your contact details will therefore be requested. But providing these details is always completely voluntary.

## Information for the reported party

A person who is reported in the whistleblowing service will receive special information about this. If there is a risk that this may jeopardise the continued investigation, the information will not be provided until it is no longer deemed to be a risk. In addition, no access requests under applicable data protection laws will be provided during this period.

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### Local Laws

This policy works together with local whistleblowing laws, employment laws, and data protection and confidentiality rules in each country Bilias operates.

If there is any conflict between this policy and local mandatory law, local law will apply.

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