



Whistleblowing Guidelines

REGEL/RIKTLINJE

Reporting of violations

Corporate Governance and Compliance

This document has been translated from Swedish

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1. WHY DO WE HAVE WHISTLEBLOWING GUIDELINES?

Whistleblowing is a method that Peab uses to protect the company against unethical behavior and to ensure high ethical standards and a healthy corporate culture. By reporting violations of codes, guidelines, and laws, also known as "whistling," whistleblowers play a crucial role in exposing and preventing such violations. Peab encourages all employees and others present at our workplaces to blow the whistle. This way, we can address problems at an early stage and prevent harm.

Whistleblowers should feel secure and confident knowing that their concerns are taken seriously and that they can act without fear of negative consequences.

2. THESE ARE THE INDIVIDUALS WHO CAN BLOW THE WHISTLE AT PEAB

A whistleblower is a person who works for Peab or is in contact with Peab in their work. They are often the first to become aware of misconduct at Peab. Examples of persons who can blow the whistle/report at Peab include:

<ul style="list-style-type: none"> ✓ Employees ✓ Apprentices and interns ✓ Persons who otherwise perform work under Peab's control and management (such as hired personnel) ✓ Consultants 	<ul style="list-style-type: none"> ✓ Persons who are part of Peab's management, leadership, or supervisory bodies ✓ Shareholders who are active in the company ✓ Subcontractors ✓ Suppliers
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3. REPORTABLE MATTERS: WHAT YOU CAN BLOW THE WHISTLE ABOUT

The whistleblower should, at the time of blowing the whistle, have a reasonable belief that the information about the misconduct is true. Furthermore, it should be of public interest. This means that not everything that feels wrong is a whistleblowing matter.

Public interest should not be confused with curiosity, and one should ask oneself, "Is this important from a societal perspective, or is it just gossip or fun to know?" It should be important from a societal perspective.

Examples of issues that should be reported include:

- ✓ Bribery/corruption
- ✓ Fraud
- ✓ Tax/VAT and customs violations
- ✓ Forgery
- ✓ Significant deficiencies in workplace safety.
- ✓ Environmental pollution
- ✓ Serious forms of discrimination
- ✓ Unethical employment conditions
- ✓ Financial gain for an individual/individuals

4. CONSEQUENCES OF SPREADING FALSE INFORMATION

Whistleblowers must not make any accusations with the knowledge that they are false. A whistleblower report must be honest.

Whistleblower protection laws do not apply to individuals who intentionally and knowingly report false or misleading information, which means they are not protected against retaliation.

Additionally, such individuals may be prosecuted for defamation and may be required to pay damages.

5. TIPS WHEN BLOWING THE WHISTLE

To increase the chances of a successful investigation, it is important to be as clear as possible and include all relevant details of the case. This provides investigators with more information to work with.

However, it is important not to include any privacy-infringing information, such as health status, political or religious affiliation, or sexual orientation. If such information is included, it will not be considered in any ongoing investigation.

6. HOW TO BLOW THE WHISTLE INTERNALLY AT PEAB

Peab offers several options for internal whistleblowing, including open or anonymous whistleblowing. Whistleblowers are free to choose how they want to blow the whistle, whether it is through phone, mail, email, meeting, or using the web-based whistleblowing service, and to whom they want to report.

Blow the whistle to Peab's whistleblowing contacts

Within the company group, specially selected whistleblowing contacts handle whistleblowing reports in Peab companies with more than 250 employees. For companies with fewer employees, the whistleblowing reports are managed by Peab AB's Whistleblower Council. Starting from December 2023, the threshold for companies with their own whistleblowing contacts will be adjusted to those with more than 50 employees.

You can easily locate the contact information for the whistleblower contacts by going to the intranet homepage and clicking on the prominent orange box marked "Whistleblowing" or (SWE) "Visselblåsning".

If you are not employed by Peab and/or do not have access to the intranet, but still wish to blow the whistle to one of the whistleblowing contacts in the group, you can request the contact details via our web-based whistleblowing service.

We have decided not to publish the contact details of the whistleblowing contacts externally on our website. Instead, describe your request directly in the web-based whistleblowing service.

Blow the whistle via our web-based whistleblowing service

Peab encourages employees to use this whistleblowing service. Reports and subsequent dialogue between Peab and the whistleblower are encrypted and password-protected. No one within Peab can find out who submitted the report if the whistleblower does not provide this information.

The service can be accessed on Peab's external website, through the "contact" tab, as well as internally on our intranet. The whistleblower reports anonymously or openly, in the desired language, and the report is handled by Peab AB's Whistleblower Council.

This is what the entrance looks like:



The service is provided by an external supplier, WhistleB, which guarantees secure handling of the reports submitted through the system.

Blow the whistle anonymously

You can always choose to blow the whistle anonymously by sending a regular physical letter addressed to one of the whistleblower contacts, with the subject "Whistleblowing" above the recipient and address, or by using the web-based whistleblowing service.

Keep in mind that if you choose to be anonymous and do not communicate through the web-based whistleblowing service, Peab will not be able to provide you with feedback on the decision.

Avoid providing details that could potentially reveal your identity.

Blow the whistle orally

If you choose to blow the whistle orally, it is advisable to do so with the group's whistleblower contacts. The whistleblowing will then be documented through a recording or a written protocol. Recording means that the entire conversation is recorded to be stored in a permanent form. Protocol means a written account of the information provided and should cover the factual information provided.

To record the whistleblowing, your consent is required. Such consent must be obtained before the recording begins.

You will be given the opportunity to review, correct, and approve a transcript or a protocol through your signature.

7. WHO WILL HAVE ACCESS TO YOUR REPORT?

If you choose to blow the whistle directly to one of the whistleblower contacts associated with the company your whistleblowing concerns, these individuals will handle your whistleblowing in the first instance. If your whistleblowing is of a serious nature and requires further action within the group, the companies within the group allow, through specific agreements, the handling of the report by a select group of individuals at the group level – the Peab AB's Whistleblower Council. It is an independent and autonomous function within Peab AB responsible for handling these reports.

The Peab Whistleblower Council consist of:

1. Karin Malmgren, General Counsel - Corporate Governance and Compliance, responsible and convener
2. Gunnar Wannehag, Group HR Manager
3. Cecilia Wersäll, Corporate Legal Counsel - Corporate Governance and Compliance
4. Petter Elfström, Group Security Manager, responsible for investigations

Note that a whistleblowing report will not be handled/investigated by anyone who is affected by or involved in the matter.

8. YOU WILL RECEIVE FEED-BACK

You will receive confirmation within seven (7) days that your whistleblowing report has been received. This does not apply if confirming receipt would disclose your identity against your will.

As follow-up, within three (3) months, you will receive feedback to a reasonable extent on the actions taken. You will be provided with information on the follow-up in the most comprehensive manner possible. However, this does not necessarily mean that you have the right to receive information on all the actions taken as part of the follow-up and the reasons for them. There may be obstacles to providing feedback, such as confidentiality obligations or data protection regulations.

9. HOW TO BLOW THE WHISTLE EXTERNALLY

Blow the whistle to authorities

If you want to blow the whistle to an authority, there is no requirement for you to blow the whistle internally first. You can blow the whistle to an authority if you do not believe that whistleblowing through Peab's whistleblower channel would result in an objective and fair handling. This applies to matters falling within the competent authority's scope and thus connected to the law. You should be able to blow the whistle to them in writing and orally, and if desired, even through a physical meeting.

You can, among other options, blow the whistle to:

Arbetsmiljöverket
(Swedish Work Environment
Authority):

www.av.se/om-oss/kontakta-oss/kontaktformular/

Phone: 010-730 90 00

Ekobrottsmyndigheten
(Swedish Economic Crime Authority):

<https://www.ekobrottsmyndigheten.se/visselblasarfunktion-eu-medel/>

Phone: 010-562 91 11

Blow the whistle to media – public disclosure

As an employee, you have a duty of loyalty to Peab, which means that you should not blow the whistle in a way that can unnecessarily harm the company. Instead, Peab encourages you to report any misconduct internally first and escalate it to the Corporate Governance and Compliance department (compliance@peab.se) if necessary, so that we can take timely action. Peab has a great interest in receiving early signals of any misconduct in its operations.

If you wish to publicly disclose a misconduct, such as going to the media, you must first have reported it internally at Peab as outlined in section 6. You are protected against retaliation on the condition that you have either first raised the alarm internally without Peab taking reasonable measures in response to the alarm and informing you to a reasonable extent about the actions taken, or for any other reason had justifiable grounds to sound the alarm externally.

If you believe that Peab is not taking sufficient measures, not providing feedback within three months, or if you believe that the misconduct you reported poses a danger to life, health, safety, or the environment, or if you have reasonable grounds to believe that you may be subjected to retaliation, you have the right to blow the whistle externally.

10. YOUR REPORT CONTRIBUTE TO CONTINUOUS LEARNING

Peab's whistleblowing management is designed to improve our operations through continuous learning. We regularly identify and analyze the frequency, patterns, and causes of the reports to prevent future issues. A compilation of incoming cases is reported to the board of directors of Peab AB annually and to the group management semi-annually.

Peab welcomes feedback from users and potential users and strives to adjust trainings, policies, and guidelines based on identified trends.

11. HOW YOUR PERSONAL DATA IS PROCESSED

Peab Group values the privacy of its employees and always strives to protect personal data in the best possible way, following applicable laws and regulations on data protection. Transparency and openness are important to us. Peab clearly specifies how personal data is collected and processed in relation to whistleblowing. For more information, refer to "*Whistleblowing Reporting - How is my personal data processed?*".

12. PEAB ALSO HANDLES EXTERNAL COMPLAINTS (GRIEVANCE MECHANISM)

The whistleblowing function can also be used as a general mechanism for external stakeholders to submit complaints. In such cases, the report is referred to as a complaint rather than a whistleblowing report. We handle all complaints in the same manner as whistleblowing reports – seriously and confidentially, through Peab's Whistleblower Council.

If your report is not considered a whistleblowing report according to the legislation and does not require confidentiality, we will inform you where to address your concerns.

By addressing these complaints, we can improve our operations and ensure that we uphold high ethical and sustainable standards.

13. GOVERNING DOCUMENTS AND PROCESSES

Code of Conduct	Whistleblowing Reporting - How is my personal data processed?
Supplier Code of Conduct	Mission and purpose of the Ethical Council
Peab AB's Whistleblower Council	Members of the Ethical Council

14. RESPONSIBILITY FOR THE INTERNAL WHISTLEBLOWING CHANNEL

According to the instructions and responsibility matrix of Peab's Whistleblower Council, the General Counsel Corporate Governance and Compliance at Peab AB is responsible for our internal reporting channel and has the authority to determine how reporting and follow-up are conducted in accordance with the whistleblowing legislation. To ensure independent and objective handling, we have clear processes and procedures for managing whistleblowing reports and complaints.

15. QUESTIONS

These guidelines are developed by the Corporate Governance and Compliance function at Peab AB. We appreciate any questions or suggestions you may have, which can be directed to compliance@peab.se.