

**WHISTLEBLOWER POLICY REGARDING FORENEDE CARE AB'S  
WHISTLEBLOWER ARRANGEMENT**

Dated: 1 January 2026

## WHISTLEBLOWER POLICY

### 1. INTRODUCTION AND PURPOSE

- 1.1 This Whistleblower Policy describes the purpose of Forenedede Group's (hereinafter referred to as **"Forenedede"**) having introduced a Whistleblower Arrangement (hereinafter referred to as the **"Arrangement"**), how it works, who can make use of the Arrangement, and what may be reported through the Arrangement.
- 1.2 The following companies fall within the scope of the Arrangement:
- Forenedede Care AB
  - Adium Omsorg AB
  - A&O Ansvar och Omsorg AB
  - A&O Temabo AB
  - Solhaga Vårdhem AB
  - Hela Sveriges Assistans AB
- 1.3 The purpose of the Arrangement is to ensure that a Whistleblower, as defined in this Whistleblower Policy, is protected under the Swedish Act on protection of persons reporting irregularities (hereinafter referred to as the **"Whistleblower Act"**) when he or she reports violations or potential violations, allowing an independent and autonomous whistleblower unit to assess which steps are required in this respect. The protection applies within companies that are obliged to provide internal reporting channels, i.e. Forenedede Care, A&O, A&O Ansvar och Omsorg AB, A&O Temabo AB och Hela Sveriges Assistans AB. Companies within Forenedede that have implemented a voluntary reporting channel in accordance with this policy, i.e. Adium Omsorg AB and Solhaga Vårdhem AB cannot guarantee the same level of protection,

### 2 WHO CAN USE THE ARRANGEMENT?

- 2.1 The Arrangement can be used by persons who report information on violations to which the person in question has gained access in connection with his or her work-related activities, and who belong to the following categories of persons (hereinafter referred to as **"Whistleblower"**):
- (i) Employees
  - (ii) Volunteers,
  - (iii) Trainees,
  - (iv) Persons otherwise carrying out work under an operator's supervision and direction,
  - (v) Self-employed persons,
  - (vi) Persons standing ready to take part in an enterprise's administrative, management or supervisory body or who already do so
  - (vii) Shareholders standing ready to be actively involved in any of the companies or who already are
- 2.2 Persons listed under section 9.5 can also file reports under the Arrangement.
- 2.3 Persons not included in the categories of persons stated in sections 2.1 or 9.2.4 cannot file reports under the Arrangement but have to report through ordinary communication channels. If the conditions are otherwise fulfilled in this respect, reports can be filed through the appropriate external whistleblower system designated by the Swedish Government (see <https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som-sfs-2021-949>), as described in section 11.

### **3 WHAT MAY BE REPORTED THROUGH THE ARRANGEMENT?**

- 3.1 The Arrangement is open for the reporting, in work-related contexts, of information concerning irregularities consisting of any act or omission that violates (i) a directly applicable legal act of the European Union within the scope of application of the Whistleblower Directive, (ii) violates laws or other statutes that implement or supplement an EU legal act within the scope of application of the same Directive as well as iii) information regarding irregularities for which public interest necessitates disclosure.
- 3.2 For companies within Forenede that have implemented a voluntary reporting channel, the following applies: information regarding irregularities may be reported provided that the information concerns individuals in key positions or other leading positions within the company or within the Forenede Group, and the irregularities relate to serious misconduct involving accounting, internal accounting controls, auditing, anti-bribery measures, criminal activity in the banking and financial sector, or other serious misconduct affecting the organization's vital interests or the life and health of individuals.
- 3.3 Any information may be reported, including reasonable suspicion about actual or potential violations or serious matters which have occurred or most probably will occur at Forenede, as well as any attempts to cover up such violations.
- 3.4 The Arrangement may only be used for reporting violations or potential violations in that have occurred or most probably will occur in Forenede's organisation, committed for instance by employees, executive board, or members of the board of directors of Forenede. In connection with reports on incidents committed by Forenede, please note that such incidents may be reported although the incident cannot be attributed to an individual person but may be due to a basic systemic failure at Forenede.
- 3.5 Offences that are not comprised by the Arrangement must be reported through ordinary communication channels. If the conditions are otherwise fulfilled in this respect, reports can be filed through the appropriate external whistleblower system provided by certain Swedish authorities (see <https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som-sfs-2021-949>), as described in section 11.

### **4 CONTENTS OF THE REPORT**

- 4.1 To facilitate further investigation of the reported issue, and to be able to identify the offence, it is important that the Whistleblower describes the offence in the best possible way. It is thus not possible to make any further investigations of a report if the report is not specified or if it only contains very general allegations without any further clarification.
- 4.2 Therefore, it is important that the Whistleblower - to the utmost extent - provides the following information:
- a description of the matter;
  - the person(s) involved;
  - whether others are aware of the suspicion about the matter;
  - whether the executive board knows about the matter;
  - whether documents exist that support the matter;
  - whether and where further information may be found about the matter;
  - for how long the matter has gone on; and
  - whether the Whistleblower knows about any attempts to hide the offence.
- 4.3 Manifestly unfounded reports will not be investigated further.

## 5 HOW CAN A REPORT BE SUBMITTED AND WHO IS TO RECEIVE THE REPORT?

5.1 Forenedecare has appointed a whistleblower unit that:

- (a) will receive the reports and be in contact with the Whistleblower;
- (b) will follow-up on the reports; and
- (c) give feedback to the Whistleblower.

5.2 The whistleblower unit in charge of the tasks mentioned in section 5.1 consists of the law firm Bech-Bruun, and partly of an impartial group of persons within each respective company in the Forenedecare Group.

5.3 Written reports are made to Bech-Bruun while oral reports are made either to Bech-Bruun or a competent person employed by the Forenedecare Group according to below. Once the report has been received, a legal capacity assessment of the persons of the whistleblower unit who are able to process the report will be made, after which the report will be forwarded to the relevant persons (hereinafter referred to as “**Case Managers**”) at Forenedecare. Before forwarding the report, Bech-Bruun will assess whether the report falls within the scope of application of the Arrangement.

5.4 The whistleblower unit will treat all reports as confidential.

5.5 The Case Managers appointed to receive and follow up on the reports are subject to a duty of confidentiality regarding the information contained in the reports.

5.6 There are different ways to report internally:

### 5.6.1 Alternative 1

Written reports are submitted to Bech-Bruun through a link that can be found on Forenedecare's website and intranet: <https://www.forenedecare.se/om-oss/visselblasarfunktion/>

### 5.6.2 Alternative 2

Oral reports are submitted either to Bech-Bruun by phone or to a competent person in each respective company, either by phone or, upon the Whistleblower's request, at a physical meeting.

The number of Bech-Bruun are: +45 7227 3010

Lotti Klefström, Head of People & Culture + 46 70 606 29 78

Kristina Gärtze, HR Business Partner + 46 73 901 57 32

Sonja Hajen, Region Manager "Hela Sveriges Assistans" + 46 70 100 84 10

Oral reports will be documented through either a recording, a transcript of a recording, in a protocol or by other appropriate means. The reporting will only be recorded if the reporting person consents to it. The reporting person will furthermore be given the opportunity to check, correct and approve any transcript or protocol.

## 6 ANONYMITY

6.1 A Whistleblower who wants to submit a report through the Arrangement may do so anonymously through Alternative 1 (written reports).

6.2 Forenedecare encourages the Whistleblower to state his or her name when submitting a written report so that the Case Managers are able to ask clarifying questions and subsequently provide feedback on the further course of the investigation. However, anonymous communication between Bech-Bruun and a Whistleblower is possible if the Whistleblower chooses to be anonymous (see sections 6.3 and 6.4).

6.3 If the Whistleblower chooses to submit an anonymous report, it is recommended - to ensure full anonymity - that the Whistleblower uses a private PC or, for instance, a PC located at a public library.

6.4 To ensure the Whistleblower's anonymity towards Forenede, it is also possible - by means of a communication module in the reporting channel - to provide Bech-Bruun with additional information about the reported matter, which Bech-Bruun will then pass on to the Case Managers. Thus, it is possible by means of the communication module in the Arrangement to provide additional information and remain anonymous. In connection with the reporting, a one-off code is generated which, in order to safeguard the anonymity, cannot be re-created. Therefore, it is **important** that the Whistleblower keeps the code and remembers to log on the communication module to communicate with the whistleblower unit.

6.5 The communication module can be accessed through the above-mentioned link under the Arrangement to log on the communication module. It is important that the Whistleblower regularly enters the communication module to check whether Bech-Bruun has asked any questions. Bech-Bruun is not able to come into contact with the Whistleblower in any other ways, for instance to inform the Whistleblower that additional questions etc. have been submitted.

## 7 INFORMATION TO THE WHISTLEBLOWER

7.1 The Whistleblower will receive:

- a) an acknowledgement of receipt of a written report within three (3) days of that receipt and an oral report within seven (7) days of that receipt; and
- b) feedback soonest possible and in principle within three (3) months from the acknowledgement of receipt of the report.

7.2 "Feedback" means a notification about the measures taken by Forenede to assess the correctness of the allegations made in the report and, where relevant, to counter the reported offence. The feedback provided by the whistleblower unit must, at any time, observe the rules under data protection law, which may entail limitations in relation to the contents of the feedback to the Whistleblower.

7.3 Depending on the circumstances, an extension of the timeframe for the feedback may be required, where necessary due to the specific circumstances of the case, in particular the nature and complexity of the report, which may require a lengthy investigation. If this is the case, the Whistleblower must be notified in this respect.

## 8 INFORMATION TO THE REPORTED PERSON

8.1 After a preliminary investigation has taken place and all relevant evidence has been secured, the reported person will for instance be informed about:

- the identity of the Case Manager(s) responsible for the investigation of the report; and
- the issues of the report.

8.2 Reference is also made to Forenede's Privacy Policy for the Whistleblower Arrangement which can be found under <https://www.forenedecare.se/om-oss/visselblasarfunktion/>, containing further information on the processing of personal data and the rights of the data subject.

## 9 PROTECTION OF THE WHISTLEBLOWER

9.1 Pursuant to the Whistleblower Act, Whistleblowers are protected against retaliation when submitting a report to the Arrangement. Such protection only applies if the following conditions are fulfilled:

- a) The person submitting the report meets the conditions to be considered a whistleblower (see section 2).
- b) The Whistleblower had reasonable grounds to believe that the reported information was correct at the time of reporting.

- c) The reported information falls under the scope of application of the Whistleblower Act (see section 3.4).
  - d) The Whistleblower has submitted a report to a company within Forenede that is obliged in accordance with the Whistleblower Act, to provide internal reporting channels (see section 1.3).
- 9.2 "Retaliation" means unfavourable treatment or unfavourable consequences as a reaction to a report. This may be suspension, dismissal, demotion, or equivalent measures.
- 9.3 In addition to the protection against retaliation which follows from the Whistleblower Act, there is also a right to freedom of information and freedom of acquisition under the Freedom of the Press Act and the Fundamental Law on Freedom of Expression. This means that it is possible for an employee (with certain exceptions) in both the private and public sectors to provide otherwise confidential information for publication to the mass media covered by the Freedom of the Press Ordinance or the Freedom of Expression Act. For employees whose employers are covered by the Whistleblower Act in certain individual businesses or the Public Access to Information and Secrecy Act, there is also prohibition of exploration and prohibition of retaliation. The prohibition of exploration means that the employer may not investigate who has submitted information to the press on the basis of freedom of information and prohibition of retaliation means that the employer is prohibited from punishing employees who have used their freedom of information/ freedom of acquisition.
- 9.4 If the Whistleblower submits a report in bad faith and is fully aware of the fact that the reported information is not correct, the Whistleblower is not protected against retaliation. Depending on the circumstances, it can constitute a criminal offence and the Whistleblower can also be liable for damages if he or she has deliberately submitted false reports. If the Whistleblower is employed by Forenede, it may also have employment-related consequences, entailing inter alia the summary dismissal of the Whistleblower.
- 9.5 In addition to the group of persons mentioned in section 2.1, the protection described in this section 9 also applies to the following persons or entities:
  - 1) Intermediaries
  - 2) Third parties who are connected to the Whistleblower and risk being subject to retaliation in a work-related context (for instance a colleague).
  - 3) Undertakings and authorities which the Whistleblower owns or works for or is otherwise connected with in a work-related context (for instance an undertaking owned by the Whistleblower).
- 9.6 Information about the identity of the Whistleblower or any other information that directly or indirectly may reveal the Whistleblower's identity will only be disclosed to other persons than the whistleblower unit after having obtained prior explicit consent from the Whistleblower.
- 9.7 However, information on the Whistleblower's identity may be revealed without consent to other public authorities where this is necessary for the prevention of offences (e.g. a criminal act that has not yet been committed), or with a view to safeguarding the rights of defence of the persons concerned. If the identity of the Whistleblower is disclosed without consent, the Whistleblower will be informed accordingly and be provided with the grounds for the disclosure, unless such information would jeopardize the related investigations or judicial proceedings.
- 9.8 The identity of the Whistleblower may also be revealed in connection with legal proceedings regarding the reported matter.
- 9.9 Other information from the report, i.e. information not revealing the Whistleblower's identity, will only be disclosed to persons outside the whistleblower unit as part of a follow-up on the report or for the purpose of preventing a potential offence in relation to the issues described in section 3.

## **10 PROTECTION OF THE PERSON CONCERNED**

- 10.1 The person concerned, i.e. the person affected by the report, is entitled to protection of his or her identity during the investigation and has a right to effective defence.
- 10.2 Further, Forenede will observe the rights of the person concerned in accordance with the General Data Protection Regulation, see Forenede's Privacy Policy for the Whistleblower Arrangement <https://www.forenedecare.se/om-oss/visselblasarfunktion/>.

## **11 EXTERNAL WHISTLEBLOWER SYSTEMS**

- 11.1 A Whistleblower who intends to submit a report under Arrangement may instead choose to file the report through the appropriate external whistleblower system provided by certain Swedish authorities (see <https://www.riksdagen.se/sv/dokument-lagar/dokument/svensk-forfattningssamling/forordning-2021949-om-skydd-for-personer-som-sfs-2021-949>) - for instance, if the Whistleblower fears retaliation.
- 11.2 It is emphasized that the Whistleblower is free to choose to submit a report through the Arrangement or through the external whistleblower system.

## **12 DATA SECURITY AND DATA STORAGE**

- 12.1 Reports are stored as long as necessary and proportionate in order to comply with the requirements imposed by Swedish law.
- 12.2 Forenede and Bech-Bruun will process all information reported through the Arrangement, including information on persons reported through the Arrangement, in accordance with applicable law in force at any time.
- 12.3 All reports will be stored properly, and it will only be possible for relevant persons of the whistleblower unit to access the information.
- 12.4 A report falling outside the scope of the Arrangement will be immediately forwarded to Forenede's Head of People & Culture and closed in the Arrangement.
- 12.5 In principle, reports will be deleted from the Arrangement 45 days after Forenede has finalized the processing, unless Forenede has legitimate reasons to continue the storage, e.g. if required by other legislation, or if there is reason to believe that the report may be corroborated by subsequent reports on the same issue.
- 12.6 If the matter is reported to the police or another authority, the report will be closed in the Arrangement immediately after the case has been closed by the authorities in question.
- 12.7 If - on basis of the collected data - a disciplinary sanction is implemented against the reported person, or if there are other grounds justifying and requiring the continued storage of the data on the person concerned, such data will be stored, where an employee is involved, in the employee's personnel file.
- 12.8 Otherwise, the information is stored in accordance with Forenede's deletion policy.

## **13 QUESTIONS**

- 13.1 If you have any questions regarding this Whistleblower Policy, you are welcome to contact Forenede's Head of People & Culture.

## **14 UPDATING**

- 14.1 This Whistleblower Policy has been updated on: 1 January 2026

## PRIVACY POLICY FOR WHISTLEBLOWER ARRANGEMENT

### FORENEDE CARE GROUP

This Privacy Policy explains how the Swedish entities with Foreneade Group ("**Foreneade**"), "**we**" or "**us**") processes personal information in connection with reports to Foreneade's Whistleblower Arrangement.

Below is a description of the personal data processing that takes place and the rights you have if you are reported through the Whistleblower Arrangement, as well as your rights if you use the Whistleblower Arrangement to report another person.

Reference is also made to Foreneade's Whistleblower Policy, containing information about who can submit reports and who can be reported.

This policy only concerns the handling and the investigation of reports submitted through the Whistleblower Arrangement. Therefore, this policy must - in relation to employees - be seen in connection with Foreneade's other relevant policies and procedures.

#### 1 DATA CONTROLLER

The legal entity responsible for the processing of your personal information is:

Foreneade Care AB  
 CVR.no.: 556535-5400  
 Murmansgatan 126  
 212 25 Malmö

#### 2 DESCRIPTION OF THE PROCESSING

The following is a description of how Foreneade will process information on the person who is reported about (the "**Reported Person**") as well as the person who is submitting the report (the "**Whistleblower**") in connection with reports to Foreneade's Whistleblower Arrangement as set out in Foreneade's Whistleblower Policy.

Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
<p><b>#1</b>            Handling and investigation of reports under Foreneade's Whistleblower Arrangement regarding:</p> <ul style="list-style-type: none"> <li>The Reported Person</li> </ul>	<p>We can process the following personal data categories about you:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> <li>Name, email telephone number,</li> <li>Other information included in the report.</li> </ul> <p><u>Sensitive information,</u> including information on sexual matters, may be included in the processing.</p> <p><u>Information on criminal offences or possible criminal offences</u> may also be included in the processing.</p>	<p>We process your personal data on the following bases:</p> <ul style="list-style-type: none"> <li>GDPR, Article 6.1.f.f: Necessary for the purposes of the legitimate interests pursued by Foreneade or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Foreneade's legitimate interest is to enable Foreneade to process reports received under Foreneade's Whistleblower Arrangement.</li> <li>GDPR, Article 9.2.f: Processing is necessary for the establishment, exercise or defence of legal claims.</li> <li>Information on criminal offences or possible criminal offences is processed on the basis of section 5.1. in Ordinance (2018:219) with Supplementary Provisions to the EU Data Protection Regulation (necessary for the establishment, exercise or defence of legal claims).</li> </ul>	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> <li>Bech-Bruun Law Firm</li> <li>Foreneade Care AB, Adium Omsorg AB, A&amp;O Ansvar och Omsorg, A&amp;O Tejabo AB, Solhaga Vårdhem AB, och Hela Sveriges Assistans AB</li> <li>IT suppliers</li> <li>External advisors</li> <li>The police</li> <li>Public authorities, e.g., the Swedish Financial Supervisory Authority, the Swedish Data Protection Agency, or relevant tax authorities.</li> </ul>	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> <li>The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation.</li> <li>Reports submitted to the Arrangement are in principle deleted after 45 days, unless Foreneade has legitimate reasons for continued retention.</li> <li>Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Foreneade's HR manager where they will be processed in accordance with Foreneade's relevant policies and procedures.</li> <li>Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded.</li> <li>If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority.</li> <li>Otherwise, the data will be retained in accordance with Foreneade's deletion policy.</li> </ul>
<p><b>Sources</b></p> <p>We can collect information from the following sources:</p> <ul style="list-style-type: none"> <li>Bech-Bruun Law Firm</li> <li>Employees of Foreneade</li> <li>Self-employed persons</li> <li>Shareholders and members of the executive board, board of directors, or similar governing body in the undertaking</li> <li>Volunteers</li> <li>Paid and/or unpaid trainees</li> <li>Persons working under the supervision and management of contracting parties, suppliers, and sub-suppliers]</li> <li>Persons who are reporting information to which they have gained access in a work-related relationship that has ceased since then.</li> <li>Persons in work-related relationships that have not yet commenced, who report information on violations to which they have gained access during the course of the recruitment process or other pre-contractual negotiations.</li> </ul>				

• Any other persons submitting reports through the Arrangement.				
Purpose	Categories of Personal Data	Legal Basis for the Processing	Recipients	Data Retention
<p><b>#2</b> Handling and investigation of reports under Forenedede's Whistleblower Arrangement regarding:</p> <ul style="list-style-type: none"> <li>The Whistleblower</li> </ul> <p>If there is suspicion of the report being deliberately false, this purpose also comprises investigation of the Whistleblower.</p> <p><b>Sources</b></p> <p>We can collect information from the following sources:</p> <ul style="list-style-type: none"> <li>Bech-Bruun Law Firm</li> <li>You</li> </ul>	<p>We can process the following categories of personal data about you, provided that your report is not anonymous:</p> <p><u>Ordinary personal data:</u></p> <ul style="list-style-type: none"> <li>Name, email, telephone number,</li> <li>The contents of your report.</li> </ul> <p>As a rule, no sensitive information about you will be processed as part of the handling of the report - unless you choose to provide such information yourself.</p> <p>However, information on criminal offences or possible criminal offences may be included in the processing if there is a suspicion that the submitted report is deliberately false.</p>	<p>We process your personal data as described above on the following bases:</p> <ul style="list-style-type: none"> <li>GDPR, Article 6.1.f: Necessary for the purposes of the legitimate interests pursued by Forenedede or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Forenedede's legitimate interest is to enable Forenedede to process reports received under Forenedede's Whistleblower Arrangement.</li> <li>GDPR, Article 9.2.f: Processing is necessary for the establishment, exercise or defence of legal claims.</li> <li>Information on criminal offences or possible criminal offences is processed on the basis of section 5.1. in Ordinance (2018:219) with Supplementary Provisions to the EU Data Protection Regulation (necessary for the establishment, exercise or defence of legal claims).</li> </ul>	<p>We can share your personal information with:</p> <ul style="list-style-type: none"> <li>Bech-Bruun Law Firm</li> <li>Forenedede Care AB, Adium Omsorg AB, A&amp;O Ansvar och Omsorg, A&amp;O Temåbo AB, Solhaga Vårdhem AB, och Hela Sveriges Assistans AB</li> <li>IT suppliers</li> <li>External advisors</li> <li>The police</li> <li>Public authorities, e.g., the Swedish Financial Supervisory Authority, the Swedish Data Protection Agency, or relevant tax authorities.</li> </ul>	<p>We will retain personal data for as long as it is necessary for the purposes listed.</p> <ul style="list-style-type: none"> <li>The data are retained for as long as the investigation is in progress. The retention period depends on the outcome of the investigation.</li> <li>Reports submitted to the Arrangement are in principle deleted after 45 days, unless Forenedede has legitimate reasons for continued retention.</li> <li>Reports falling outside the scope of the Arrangement, but not appearing to be unfounded, will be passed on to Forenedede's HR manager where they will be processed in accordance with Forenedede's relevant policies and procedures.</li> <li>Reports turning out to be unfounded will be immediately closed in the Arrangement and deleted within 45 days after having been deemed to be unfounded.</li> <li>If a report is conveyed to the police or another public authority, the data will be retained for at least as long as the investigation is in progress at the police/public authority.</li> <li>Otherwise, the data will be stored in accordance with Forenedede's deletion policy.</li> </ul>

### 3 INFORMATION TO THE REPORTED PERSON AND RECTIFICATION

If you are subject to a report submitted through the Whistleblower Arrangement, you will be notified as soon as possible after an initial investigation has taken place and all relevant evidence is secured. In this connection, you will receive information about:

- The identity of the person(s) who is/are responsible for the investigation of the report
- A description of the contents of the report

As mentioned below in the section about your general rights, you have a right of access to the report that was submitted about you. However, your right to access to the report might be limited in accordance with Swedish law.

You also have the right to request rectification of the information in the report if you believe this to be false, misleading, or incomplete. If your request in this respect cannot be met, the information will be supplemented with your comments.

### 4 CONSEQUENCES OF THE PROCESSING

Reports and investigation of reports to the Whistleblower Arrangement may have significant consequences for the person who is reported, as reports concern violations or suspected violations of the law, as further outlined in the separate guidelines for the Arrangement.

Likewise, a report to the Whistleblower Arrangement may have significant consequences for the person who has submitted the report in case of a deliberately false report. Such cases may have criminal consequences.

### 5 TRANSFERS TO COUNTRIES OUTSIDE THE EU/EEA

Your personal data will not be transferred to countries outside the EU/EEA.

### 6 YOUR GENERAL RIGHTS

You have the following rights:

- You have the right to request access to and rectification or deletion of your personal data.
- You also have the right to object to the processing of your personal data and have the processing of your personal data restricted.
- You may always lodge a complaint with a data protection supervisory authority, e.g. The Swedish Data Protection Agency.

You are furthermore entitled to dispute our processing of your personal data in the following events:

- If our processing of your personal data is based on the GDPR, Article 6.1 (e) (public interest or exercise of official authority) or Article 6.1 (f) (balancing of interests), see above under legal basis for the processing, you are, at any time, entitled to dispute such processing for reasons related to your particular situation.

There may be conditions or limitations on these rights, e.g., you may not be entitled to deletion of your personal data in a specific case – this depends on the specific circumstances of the processing activities.

You can make use of your rights by contacting System & Dataskyddsamordnare, Charlotte Boström [chabos@forenadedecare.se](mailto:chabos@forenadedecare.se)

## **7 IT POLICY**

For employees of **Forenade**, reference is made to **Forenade's** staff manual/IT Policy containing information on **Forenade's** IT and email policy.

## **8 QUESTIONS**

If you have any questions regarding this policy, please feel free to contact Head of People & Culture, Lotti Klefström, [lottik@forenadedecare.com](mailto:lottik@forenadedecare.com).

*Last updated: January 2026*