

Whistleblowing Investigation Protocol

1 The Whistleblowing Investigation Team

The Whistleblowing Investigation Team (WIT) shall be made up of:

- the Chief Compliance Officer
- the Head of Internal Audit
- the Head of Labour Law and Industrial Relations
- the Head of Compliance & Investigation.

The WIT may appoint other members or involve other functions as appropriate.

2 Review of incoming reports

Upon receipt of a complaint the WIT shall make an initial determination:

- a) whether the complaint qualifies as a whistleblowing
- b) who shall be responsible for investigating the complaint
- c) whether there is a need to inform the Ethics and Compliance Board about the complaint
- d) whether there is a need to inform any other organisation, function or individual.

Where the complaint does not qualify as a whistleblowing, the reporter shall be informed of the decision and where possible advised of any alternative reporting avenue.

3 Conducting an investigation

If an investigation is commissioned it shall be conducted in accordance with the following steps and principles:

- a) the investigation shall be conducted in a fair and objective manner
- b) review of the complaint and all documentation submitted in support of it
- c) the reporter and other persons relevant to the investigation shall be interviewed, all interviews shall be documented, where appropriate the interviewee shall be appointed a contact person at Group HR and/or Group Security
- d) identify and collect other information and documentation relevant to the investigation., information in IT-systems shall be requested through the Security Investigation Team
- e) identify and keep track of any time bar rules that may affect the investigation or its outcome
- f) continuously consider whether there are other measures that may be relevant to the investigation
- g) where an allegation has been made against a named individual, the person concerned shall be informed of the allegation and the evidence supporting it (the identity of the whistleblower shall not be disclosed), the person will be invited to respond to the allegation before any conclusion is reached, the point at which it is appropriate to inform the individual will depend on the nature of the complaint
- h) the investigation shall be kept confidential to the fullest extent possible, to safeguard confidentiality the investigation shall normally be assigned a code name and relevant material shall be marked “Company Confidential” and, where applicable, “Legally Privileged”
- i) the investigation shall be conducted without undue delay.

4 Data Privacy

The WIT shall ensure that:

- a) personal data collected or obtained during the investigation are used solely for the purpose of establishing whether the complaint is substantiated and constitutes a serious violation of Saab's Code of Conduct or any applicable laws
- b) personal data collected or obtained are adequate, relevant and limited to what is necessary for the purpose of the investigation
- c) personal data are accurate and kept up to date and that inaccurate data are erased or rectified.

The processing of personal data shall at all times in all other aspects comply with Saab's Data Protection Policy and Saab's Whistleblowing Policy.

5 Reporting

The Ethics and Compliance Board shall be informed about whistleblowing cases and investigations quarterly or whenever required.

6 Closure of the investigation

At the conclusion of an investigation a report shall be prepared. The report shall broadly outline:

- a) the details of the whistleblowing report
- b) the information and evidence collected during the investigation
- c) the conclusion reached by the investigation and the reasoning behind the conclusion
- d) the recommendation as to any action to be taken and as to who should be the appropriate decision-maker in respect of any such action.

The reporter shall be informed of the closure of the investigation.

When the investigation has been closed any personal data recorded in the whistleblowing system shall be identified and deleted.



7 Other investigations

The WIT may conduct investigations based on information received from other sources than a whistleblowing complaint, if the information indicates a serious violation of Saab's Code of Conduct. Such investigations shall be conducted in accordance with the same principles as set out above.