
Whistleblowing at Saab

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1 Whistleblowing at Saab

1.1 Whistleblowing is to be loyal to company values

Saab encourages all employees to report any conduct that may be a violation of laws or the Code of Conduct. This whistleblower policy is intended to encourage and enable employees to raise serious concerns internally, and also serves to provide useful information to anyone who is considering making a whistleblowing report. Reports can be made either through Saab's standard reporting channels or through the Saab Whistleblowing Hotline as further described in this whistleblower policy.

1.2 No retaliation

No one shall ever be discriminated or punished for reporting in good faith any suspected or observed violations of the law or of the company's Code of Conduct. An employee who retaliates against someone who has reported a violation in good faith is acting against the core values of Saab, and will be subject to investigation and appropriate disciplinary measures.

1.3 Confidentiality and remaining anonymous

Regardless of which reporting channel is used, all reports will be treated in confidence. Confidentiality will be maintained to the fullest extent possible during the investigation and conclusion of your report. If it is decided that a matter needs to be further investigated by law enforcement the report may be shared with such authorities.

Although reports can be made anonymously (where legally permitted) through the Saab Whistleblowing Hotline, Saab prefers that you identify yourself so that the company can obtain all facts and properly investigate allegations. Reporters should be aware that anonymous reports carry less weight and require further substantiation to call for an investigation.

1.4 How to report

Reports should normally be made to your manager. Where you feel that it is not appropriate, or where your concerns have not been adequately addressed, you may report to a superior manager, your human resources representative, a compliance officer, or the general counsel.

In addition to the standard reporting channels described above you may use the Saab Whistleblowing Hotline. Please be aware that some reports cannot be processed through the Saab Whistleblowing Hotline due to national data privacy legislation. In any such event, you will be informed on how to proceed.

1.5 What to report

Please be aware that the information you provide or the allegations you make could have serious consequences for other employees. You are therefore urged to provide only information that is accurate to the best of your knowledge. You will not be subject to retaliation for any report of a suspected violation of laws or any alleged breach of the Code of Conduct that is made in good faith, even if it later turns out to be factually incorrect. Reports that cannot be substantiated will not justify further investigation or review.

1.6 Investigation of reports

Anyone who receives a whistleblowing report has a duty to ensure that a proper investigation is initiated in accordance with Saab's internal procedures.

Reports registered in the Saab Whistleblowing Hotline are collected and processed by an independent service provider, EthicsPoint, who forwards the reports to the Whistleblowing Investigation Team.

The Saab Whistleblowing Hotline makes it possible for the Whistleblowing Investigation Team to communicate with a reporter who wishes to remain anonymous, and also allows reporters to follow up on reports by using a specific report number and a PIN-code.

The Whistleblowing Investigation Team consists of a limited number of people who are entrusted to investigate whistleblowing reports throughout the entire Saab Group. The Whistleblowing Investigation Team is monitored by and reports directly to the Ethics and Compliance Board, which is the highest executive authority for all matters relating to business ethics and anti-corruption issues within the Saab Group.

Information concerning reports will only be shared with individuals outside the Whistleblowing Investigation Team, and the Ethics and Compliance Board, on a strict need-to-know basis and subject to confidentiality undertakings.

For more information on how investigations are conducted, please see INF-0399 App 1.

Reference
INF-0399 Whistleblowing Investigation Protocol
App 1

For more information on how to contact Ethics and Compliance, please see Saabs internal web.

1.7 Protection of personal data

Reports made through the Saab Whistleblowing Hotline are likely to include personal data. Saab is protecting personal data in accordance with applicable laws and the relevant contractual confidentiality obligations towards its employees. Saab AB, and or the Saab company employing a person named in a report, is the “Data Controller” for personal data relating to a person named in a report.

The below information is presented for the benefit of anyone who has made a report or who is the subject of a report that is made through the Saab Whistleblowing Hotline.

1.7.1 What types of personal data are processed?

The Saab Whistleblowing Hotline captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by Saab; (ii) the name and other personal data of the persons that you identify in your report if you provide such information; and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Sensitive personal data, such as information relating to an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation may not be submitted unless essential for the reported issue, and will be erased unless legal to process and deemed absolutely necessary for the investigation.

1.7.2 Why is personal data processed?

Personal data registered in the Saab Whistleblowing Hotline is collected and used solely for the purposes of investigating serious violations of certain laws or Saab’s Code of Conduct.

1.7.3 What is the legal basis for processing personal data

Saab’s processing of your personal data is based on the legitimate interests pursued by Saab. This means that Saab is of the view that its interest in processing your personal data for the purposes listed above prevails the privacy violation that you are exposed to as a result of the processing. This conclusion from our balance of interest test is made especially due to the fact that (i) it is crucial for Saab to enable employees to raise serious concerns internally; (ii) the processing of personal data is limited to the extent possible; and (iii) the processing complies with guidelines on whistleblowing issued by the relevant data protection supervisory authority where the report is conducted (if applicable).

1.7.4 Who get access to the personal data processed?

The personal data stored in the Saab Whistleblowing Hotline is strictly limited to the use of:

- the whistleblowing investigation team (INF-0399 App 1)
- the ethics and compliance board
- the group general counsel
- other investigators may be granted temporary and limited access to support ongoing investigations.

The person who is subject of a report will be informed of the report (but not the identity of the reporter) in order for that person to be able to meet the allegations. If it is not possible to inform the individual immediately, for example if such information could jeopardize the Saab Group's investigation, information will be provided at a point of time where it would no longer constitute a risk to the investigation.

The independent service provider EthicsPoint is acting as a "Data Processor" to the Saab Group and may only process personal data on the Saab Group's instructions. The Saab Group has entered into a written agreement with EthicsPoint for the protection of personal data processed within the Saab Whistleblowing Hotline.

The agreement details the technical and operational requirements that EthicsPoint must adhere to. EthicsPoint is using the subcontractors listed below, which are located within the European Union and the United States of America. Any transfer of personal data is being made in accordance with written agreements that contain provisions for correct and adequate protection of personal data.

EthicsPoint subcontractors:

- Teleperformance Portugal SA (Portugal)
- Transatlantic Translations Limited (United Kingdom)
- Wordbee S.A. (Luxemburg)
- Language Services Associates, Inc. (United States of America)
- United Language Group (United States of America)
- Navex Global (United States of America)
- Transperfect (United States of America).

Personal data may also be transferred to law enforcement authorities if it is decided that a matter needs to be further investigated by such authorities.

1.7.5 For how long is the personal data kept?

Personal data which is not relevant for the investigation is deleted when the report is processed. If it is decided that no investigation will be initiated, the personal data will be deleted immediately after such decision has been made.

All personal data is deleted, or anonymised, within two months after an investigation is concluded.

1.7.6 What are your rights?

If your personal data are incorrect or needs to be updated you may at any time request that we correct or update the personal data by contacting the Saab Group Data Protection Officer (“DPO”) at [email address]. You may also contact the DPO if you no longer would like us to process your personal data, if you would prefer Saab to restrict our processing in any manner, or if you want us to erase your personal data. In addition, you may receive a copy of the personal data relating to you and information regarding our processing of such personal data by applying to the DPO. In such case, Saab will provide your personal data to you in a commonly used data format.

If you have any queries regarding the processing of your personal data or wish to exercise any of the rights stated above, please write to the DPO at [email address].

You may find further information in relation to the DPO on Saab’s internal web.

You have the right to lodge a complaint regarding how Saab processes your personal data to the relevant data protection authority or similar body within your jurisdiction.

1.7.7 How can you contact the controller and exercise your rights?

For employees or assignees to Saab AB

Saab AB, org. no. SE 556036-0793, 581 88 Linköping, telephone number + 46 13-18 00 00, is the Data Controller of your personal data.

For employees or assignees to other Saab companies

The company (“Company”) where you are employed or that has signed your assignment contract, is the Data Controller of the your personal data. You can find contact information to the Data Controller on Saab’s internal web or in your assignment contract. This means that Saab AB and the Company is responsible for processing your personal data correctly and in accordance with applicable privacy laws.

The Saab Group’s DPO can be contacted at the above stated email address.



2 Appendices

INF-0399 Whistleblowing Investigation Protocol
App 1