

Whistleblowing investigation instruction

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1 **Scope**

The purpose of this instruction is to establish rules and procedures for the management of Whistleblowing Reports and related investigations. These rules and procedures should in relevant parts be applied also in internal investigations of business ethical conduct resulting from other sources.

This instruction does not apply to Saab, Inc. and Saab Australia Pty Ltd.

2 Definitions

Definitions

Compliance Concern	An actual or suspected violation of Saab's Code of Conduct or applicable law. A complaint that relates exclusively to the personal working conditions of the reporter would normally not qualify for protection and investigation hereunder but should instead be reported and managed in accordance with applicable HR procedures. The only exception being where the reported conduct is of such severity as to affect Saab's operations in general.
Whistleblower	A person who reports in good faith a Compliance Concern which he or she acquired information about in the context of his or her work-related activities, including directors, officers, employees, trainees, volunteers, job applicants, shareholders, consultants, suppliers (or their employees).
Whistleblowing Channel	• Telephone or web filing to Saab's Group Whistleblowing Hotline • Email, telephone or walk-in to a member of Saab's Group Whistleblowing Investigation Team
Group Whistleblowing Investigation Team	Means the functions or roles specifically assigned and authorized to manage and investigate Whistleblowing Reports. The Group Whistleblowing Investigation Team may be expanded to include additional members in a specific case if required for investigative reasons.
Whistleblowing Report	Means the disclosure of a Compliance Concern by a Whistleblower

3 Investigation rules and procedures

Investigation rules and procedures

Initial logging All Whistleblowing Reports shall be logged in Saab's Group Whistleblowing Hotline.

Confirmation of receipt and initial review Receipt of the Whistleblowing Report shall be confirmed to the Whistleblower promptly and no later than within seven days from such receipt. The confirmation shall be logged in the case file.

The Whistleblowing Report shall be reviewed to determine the nature of the Compliance Concern and who shall be responsible for investigating it. The Whistleblower shall be given the possibility to make or clarify a Whistleblowing Report in a personal meeting, if so requested.

If the reported conduct does not qualify as a Whistleblowing Report, the Whistleblower shall be informed thereof and, where possible, advised of any alternative course of action.

Investigation principles The investigation shall be conducted in accordance with applicable laws and without undue delay while seeking to limit any disruption to ongoing business activities.

The investigation shall be conducted objectively and impartially. There shall be a presumption of innocence until the investigation is completed. All persons involved in an investigation shall be treated with respect and fairness.

The scope of the investigation shall take into account the seriousness of the Compliance Concern and the nature and quality of the information supporting the Whistleblowing Report.

Forensic searches of IT-systems or tools shall be approved by the Head of Ethics and Compliance, after consultation with the Head of Labour Law and Industrial Relations, and be performed through the assistance of the Group Security Operations.

Investigation rules and procedures

Confidentiality	Information regarding the Whistleblowing Report and any related investigation shall be treated confidentially to the fullest extent possible. Information shall be shared on a strict need to know basis only and subject to confidentiality undertaking. The Whistleblower shall be informed before any information that could reveal the identity of the Whistleblower is disclosed outside the Group Whistleblowing Investigation Team, unless it would prevent or jeopardize the purpose of the investigation or follow-up of the Whistleblowing Report.
Data protection	Personal data collected or obtained as part of a Whistleblowing Report or a related investigation shall be processed exclusively for the purpose of investigating the Whistleblowing Report or deciding on or implementing corrective actions. Personal data which are manifestly not relevant to the purpose shall not be collected or be deleted or anonymized without undue delay.
Documentation of meetings and interviews	All meetings and interviews held during the investigation shall be recorded or documented in minutes of meeting. Recording may not take place without the Whistleblower's or interviewee's prior approval. Where minutes of meetings are prepared, the Whistleblower or interviewee shall be given the opportunity to check and confirm their correctness.
Record keeping	All investigation material shall be stored in a case file on the Group Whistleblowing Investigation Team's SharePoint Site or in a similar secure location.
Investigation report	The investigation shall be documented in a report which shall broadly outline: • The details of the Whistleblowing Report • The investigative steps taken • The investigative findings (incl. whether or not the investigation is substantiated) • The recommended remedial actions, if any
Remedial actions (non-disciplinary)	Recommended remedial actions will be directed to the relevant internal organisation and reported to the Ethics and Compliance Board.

Investigation rules and procedures

Disciplinary actions	Potential disciplinary actions will be managed in accordance with ordinary Human Resources procedures.
Feedback to the Whistleblower	The Whistleblower shall be kept informed, as reasonable, on the progress and expected time frames of the investigation and actions taken as a result of the Whistleblowing Report. The information can be provided orally or in writing. The time limit for providing feedback shall not exceed three months from receipt of the Whistleblowing Report. The provisioning of feedback shall be logged in the case file. The right to feedback does not include particular details of investigation activities or disciplinary actions.
Reporting of statistics	Ethics and Compliance shall each quarter report whistleblowing statistics to the Ethics and Compliance Board and to the Audit Committee.
Closing and logging of corrective actions	Before the whistleblowing case is closed, a member of the Group Whistleblowing Investigation Team shall ensure that any corrective actions are logged in Saab's Group Whistleblowing Hotline.
Deletion of data	Whistleblowing Reports and investigation material shall be deleted or anonymized within two years from closure of the matter. Statistical non-personal data such as date of the report, issue type, outcome and disciplinary action shall be kept to enable data analytics and program development.

Investigation rules and procedures

Non-retaliation

A Whistleblower who makes a Whistleblowing Report in good faith shall be protected from any form of retaliation. This includes:

- Dismissal, demotion or relocation
- Harassment, intimidation or bullying
- Negative performance assessment
- Early termination of contract
- Any other unfavourable treatment

Any suspected retaliation against a Whistleblower shall be investigated.