

Whistleblowing at Saab

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 whistleblowing 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 whistleblowing 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.

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, or an ethics and compliance officer.

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, Navex Global, who forwards the reports to the Whistleblowing Investigation Team.

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 Officers, please see Ethics and Compliance Portal on SaabNet.

1.7 Data privacy

Any personal information you provide when making a report will be handled according to applicable laws and Saab's Privacy Notice for Whistleblowing.

Reference

INF-1357 Privacy Notice for Whistleblowing

2 Appendices

INF-0399 Whistleblowing Investigation Protocol
App 1