

Whistleblower policy

Scope

This policy is intended to encourage Board members, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical, or inappropriate events (behaviors or practices) without retribution. The policy only applies to serious irregularities committed by employees in key and leading positions within MTG AB or its subsidiaries (collectively referred to as the “Company”).

This policy is not designed to question financial or business decisions taken by the Company and does not apply to any matters which should be addressed under harassment, grievance, complaint, disciplinary or other procedures other than as a measure of last resort where all other options have been exhausted and if the matter is of a profoundly serious nature. The policy is a complement to other internal reporting channels within the Company and is optional to use.

The whistleblower can report suspected or actual events internally to MTG AB by sending an email to whistleblower@mtg.com.

Policy

The whistleblower should promptly report the suspected or actual event to their supervisor.

If the whistleblower is uncomfortable or otherwise reluctant to report to their supervisor, then the whistleblower can report the event to the next highest or another level of management.

Only an impartial group of MTG officers, consisting of the general counsel, the chief financial officer, and director of governance, risk and compliance, receives the reports and will maintain communication with the whistleblower. No other company officers have access to the mailbox. Upon request by the whistleblower, it shall be possible to report the events verbally in a physical or remote meeting, set up within a reasonable timeframe. The Company shall keep minutes from such meetings. The whistleblower can report the events to competent external authorities.

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible. The Company will have sole discretion in deciding whether to consider anonymous whistleblower reports. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from reliable independent sources

A whistleblower who reports internally to the impartial group of MTG officers shall receive an acknowledgment of receipt of the report within seven days of the report, provided that the whistleblower has not declined confirmation or that there is reason to believe that an acknowledgment would reveal the identity of the whistleblower.

The impartial group of MTG officers, consisting of the general counsel, the chief financial officer and the director of governance, risk, and compliance, may, where necessary, ask the whistleblower for further information. The whistleblower shall receive an initial written response within seven days of their report, regarding the investigation, disposition or resolution of the issue. The impartial group of MTG officers shall do a diligent follow up of the report and provide final feedback to the whistleblower within three months from the acknowledgment of receipt or, if no acknowledgement was sent to the reporting person, three months from the expiry of the seven-day period after the report was made.

The whistleblower shall receive no retaliation or retribution for a report that was submitted internally.

Anyone who retaliates against the whistleblower who reported an event internally may be subject to disciplinary action, including but not limited to termination of employee status.

Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

Supervisors, managers, or Board members who receive the reports must promptly act to investigate and resolve the issue.

If the investigation of a report, that was investigated by internal personnel, is not to the whistleblower's satisfaction and if the Company has not taken appropriate action against the event described in the report, then they have the right to report the event to the appropriate legal or investigative agency. The whistleblower must also have a justified claim regarding the irregularities described in the report. The whistleblower also has the right to report the events to competent external authorities.

The Company will treat all whistleblower reports as confidential and sensitive. The identity of the whistleblower is protected by confidentiality, meaning that no information provided by the whistleblower may under any circumstances be disclosed. Only those who need the information to investigate the case may be granted access to the relevant parts of the whistleblower report.

The Company will keep a record of the work done in response to the whistleblower report. Where minutes are kept from meetings with the whistleblower, the Company shall, subject to the consent of the whistleblower, make sure that complete and accurate records of the meeting are kept in a durable and retrievable form.

Written reports and documentation of verbal reporting shall be deleted when the information in the reports or documentation is no longer necessary, but no later than two months after a follow-up case has been completed.

Data protection considerations

MTG AB's processing of personal data in the whistleblower system is based on MTG AB's legitimate interest of identifying and duly dealing with serious wrongdoings, as further described in this policy. The processing of personal data in the whistleblower system may also be necessary for the establishment, exercise or defense of legal claims, for reporting a suspected offence to law enforcement authorities, or for fulfilling a legal obligation.

Processing and storage of personal data records will primarily be at MTG AB's office in Sweden. However, MTG AB may disclose personal data to law enforcement authorities, independent auditors or external advisors for the purposes required to duly handle any reported wrongdoings, such as conducting investigations or seeking legal advice. MTG AB's handling of the personal data shall be restricted solely to those persons who handle reports and investigate suspected improprieties. When information (the "Data") has been collected, the person or persons concerned (the "Data Subject") shall also receive specific information thereon. If it is not possible to provide such information immediately, for instance because it could jeopardize the subsequent investigation, MTG AB will not share the Data with the Data Subject until such risk no longer remains. However, the Data Subject shall be informed as soon as possible and, in any event, not later than the time the Data is used, about measures being taken concerning him or her. The Data that is processed in connection with the whistleblowing system shall be deleted as soon as they are no longer necessary, but no later than two months after the processing of the Data in the specific case has been completed.

The Data processed in connection with the whistleblowing system may include information on who has submitted the report, the person suspected of wrongdoing and possible witnesses. The Data may include information on name, position and contact information (e.g., e-mail and phone number) to the individual who submitted the report, the person suspected of wrongdoing and possible witnesses or other persons affected by the event. The report may also include details on the irregularity that the person suspected has committed.

Information must also be provided to anyone who makes a request for information as to whether there is Data registered about him/her. Such request shall be sent to MTG AB's HR Manager. Information, or the reason for not disclosing all requested information, shall as a main rule be provided without undue delay and within one month after the date on which the request was made. However, the information must not disclose the identity of the person who submitted the report. The one-month period may be extended by two further months where necessary. MTG AB will provide information of any such extension within one month of receipt of the request, together with the reasons for the delay. The information shall be provided free of charge to the Data Subject once per year.

If MTG AB does not act in relation to a request of a Data Subject as set out above, MTG AB will provide information without delay and, at the latest, within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Further, MTG AB only processes Data that is correct and relevant for the investigation. A Data Subject has the right to request inaccurate or incomplete Data concerning him or her to be rectified/completed or erased, have processing of data restricted or object to the processing of data. Any such request shall be sent to MTG AB's HR Manager. MTG AB may lawfully choose not to adhere to such a request from a Data Subject if MTG AB has an overriding legitimate ground for the processing, or for the establishment, exercise or defence of a legal claim or if MTG AB has another lawful ground to continue the relevant processing. A Data Subject has a right to, instead of (or in addition to) contacting MTG AB, lodge a complaint with a supervisory authority as to how MTG AB is processing personal data in relation to whistleblowing. The Swedish supervisory authority is the Data Protection Authority (Sw. Datainspektionen), www.datainspektionen.se.

With regards to Data provided by MTG AB to law enforcement authorities or other third parties that may process Data in capacity of controller (for example external legal advisors), such authorities or other third parties will determine the purposes and means for their processing of the Data and MTG AB is neither able to control, nor responsible for, such third parties processing of the Data. No Data will be transferred by MTG AB to a third country.

All Data collected in the whistleblowing system is processed to administrate and investigate the allegations submitted through the system to handle irregularities in accordance with what is set out in this policy. MTG AB has taken appropriate technical and organizational measures to protect the processed Data.

Data controller and data processed

Modern Times Group MTG AB, company reg. no. 556309-9158, PO Box 2094, 111 30 Stockholm, is the data controller for the processing of the Data. The personal data that may be stored is such that is obtained through the whistleblower system and that may be legally processed for the purposes set out herein.

Duration of processing of data

MTG AB will erase any personal data without undue delay when the personal data is no longer necessary in relation to the purpose, i.e., when a reported person (i) is no longer a suspect for any wrongdoing, or (ii) when appropriate measures have been taken against such person, and always provided the personal data must not any longer be stored under applicable legislation. If MTG AB has disclosed personal data to law enforcement authorities or other third parties processing the personal data in capacity of controller, such third parties may process the personal data also after MTG AB's erasure.