



Whistleblower policy

About this policy

This policy describes the internal reporting channel and procedures that are applicable within Modern Times Group MTG AB (referred to as “MTG”) when reporting information on suspected or actual occurrence(s) of irregularities noticed in a work-related context in the business of MTG.

This policy covers any individual working at any level or grade within MTG, including board members, directors, senior managers, employees, volunteers, interns, agency workers, consultants, and others engaged in the business of MTG in a work-related context.

This policy is intended to encourage the abovementioned individuals to use MTG’s internal channel and procedures when reporting on suspected or actual occurrence(s) of irregularities noticed in a work-related context in the business of MTG.

What does it mean to report information on irregularities?

To report on suspected or actual occurrence(s) of irregularities noticed in a work-related context in the business of MTG is what is commonly known as whistleblowing. When whistleblowing through MTG’s internal channel and procedures, the whistleblower is protected from any retaliation.

Irregularities that a whistleblower can report on include, but are not limited to, acts of bribery and corruption, fraud and other economic crimes, irregularities concerning false accounting or facilitation of tax evasion, circumstances that entail safety risks that may hazard the health and safety of employees, customers or the environment, and other illegal, unethical or inappropriate behaviors and practices that are of a public interest or are in breach of MTG’s Code of Conduct or are in breach of applicable European Union law.

The internal channel and procedures for whistleblowing are not designed to be used to question financial or business decisions taken by MTG and are not to be used in matters which should be addressed under grievance, complaint, disciplinary, or other reporting procedures other than as a measure of last resort when all other options have been exhausted and the matter is of a profoundly serious nature. Any crimes against an individual person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.

Due to restrictions imposed on MTG in Sweden under applicable data protection regulations, MTG’s internal channel and procedures may not be used to report information on suspected or actual criminal offences committed by any individual, unless the information concerns irregularities committed by employees in key and leading positions within MTG or its subsidiaries.

How to report through the internal channel

Any individual covered by this policy who in a work-related context notices suspected or actual occurrence(s) of irregularities in the business of MTG, or in one of MTG’s subsidiaries and the irregularities can be deemed to also concern MTG as a parent company, can report information on it through the internal channel that is applicable for MTG. The internal channel for MTG can be found in the MTG portal at <https://www.mtg.com/responsibility/#policies-and-guidelines>. The internal channels applicable for MTG’s subsidiaries can be found via the same link.

Any individual covered by this policy who attempts to report information on suspected or actual occurrence(s) of irregularities directly to a supervisor or to another level of management or through the incorrect internal channel will be instructed to instead report through the correct internal channel.

Reports through MTG's internal channel can be made in writing or verbally. Upon request, a report can also be made verbally in a physical or remote meeting, which is to be set up within a reasonable timeframe upon such request.

Reports that are made verbally will be documented and MTG will keep minutes of the report or, upon prior consent from the whistleblower, a recording of the report. Reports that are made verbally through the internal channel may also be documented by a transcript of the report. The whistleblower will be offered the opportunity to check, rectify and agree to the minutes or transcript by signing them.

Written reports and minutes, recordings or transcripts of verbal reports will be stored by MTG for no longer than what is necessary and will be deleted not later than two years after the follow up on the report has concluded.

Internal procedures for receipt of and follow up on reports

Reports through MTG's internal channel will only be received by and be available for an impartial group of specially appointed persons within MTG, which will maintain the communication with the whistleblower through the internal channel.

A whistleblower who reports through the internal channel shall receive an acknowledgement of receipt of the report within seven days after the report was made, unless the whistleblower has declined such confirmation or there is reason to believe that acknowledgment of receipt would reveal the identity of the whistleblower.

The impartial group will diligently follow up on reports and may, after an initial assessment, ask the whistleblower for further information where necessary. After an initial investigation, the impartial group will determine if, and in what form, any further investigations may be appropriate. Where deemed appropriate, further investigations may involve assistance of the general counsel, the chief financial officer, the director of governance, risk and compliance or other functions within MTG or involvement by an independent auditor or other external party or an independent inquiry. Where urgent measures are required, such measures will be taken prior to further investigation.

The impartial group will provide the whistleblower with final feedback on the investigation and the measures taken during the follow up and the reasons therefore within three months from the acknowledgement of the receipt or, if no acknowledgement was sent to the whistleblower for reasons not relating to the whistleblower, three months from the expiry of the seven-day period after the report was made.

Acknowledgement of receipt, requests for further information, final feedback and other communications between the impartial group and the whistleblower will be carried out through the internal channel.

Confidentiality

Reports through the internal channel can be made anonymously. This policy, however, encourages the whistleblower to state their name when reporting through the internal channel since the follow up on the report and any investigations will normally be facilitated by such details and since reports made anonymously are typically less credible.

All reports will be treated as confidential and sensitive. Personal data included in reports will only be available for the impartial group and will be processed by them only to the extent it is necessary to follow up on the report. The identity of the whistleblower is protected by confidentiality, meaning that the identity of the whistleblower or other individuals involved in the matter may not be disclosed to

any unauthorized party. Where it is necessary for the follow up on the report and the subsequent investigations, information that may reveal the identity of the whistleblower and other individuals involved in the matter may be shared only with those who strictly need the information for such follow up and investigation. The impartial group will inform the whistleblower prior to sharing any information that may reveal the identity of the whistleblower, unless informing the whistleblower would jeopardize the follow up on the report and the subsequent investigations.

For more information on the processing of personal data in respect of the internal reporting channel (e.g., purpose of processing, legal basis, erasure, etc.) please see: <https://www.mtg.com/responsibility/#policies-and-guidelines>.

Protection against retaliation and malicious use

Retaliation in any form is prohibited against a whistleblower who has used the internal channel to genuinely report information on suspected or actual occurrence(s) of irregularities noticed in a work-related context in the business of MTG. Retaliation against such whistleblower will not be tolerated and anyone who retaliates against the whistleblower will be subject to measures and may be at risk of termination of services or employment.

MTG is committed to conducting its business with honesty and integrity and expects all individuals engaged in the business in a work-related context to maintain high standards. MTG will ensure that sufficient resources and competences are utilized for the follow up on and investigation of reports made through the internal channel. However, all individuals using the internal channel are responsible to ensure that reported irregularities are based on genuine and true suspicions or facts. Any individual who intentionally reports false information or with malicious intent intentionally falsely accuses another through the internal channel may be subject to measures and may be at risk of termination of services or employment.

External channels and procedures

This policy intends to encourage use of MTG's internal channel and procedures when reporting information on suspected or actual occurrence(s) of irregularities noticed in a work-related context in the business of MTG. A whistleblower may, however, also choose to report information on such matters without risking retaliation if reports are made through external channels established by competent local authorities or through external channels established by competent institutions, bodies, offices, or agencies of the European Union (referred to as a "Union Body").

When reporting through an external channel established by a competent local authority or a competent Union Body, the relevant authority or Union Body will have procedures for the external channel and for the receipt of and follow up on reports.

For information on competent local authorities with external channels in Sweden and their relevant areas of responsibility, please refer to the at each time applicable schedule to the Regulation on Protection for Persons Reporting on Irregularities (Sw. Förordning (2021:949) om skydd för personer som rapporterar om missförhållanden). The Regulation and schedule can be accessed via this [link](#) or via the Swedish Government's webpage, www.riksdagen.se.

Constitutional rights

Everyone has the principal freedom to obtain and communicate information to the press or the media anonymously or under protection of confidentiality without risking retaliation from the government or from the authorities. These fundamental freedoms are set out in the Freedom of the Press Act (Sw.

Tryckfrihetsförordningen) and in the Fundamental Law of Freedom of Expression (Sw. Yttrandefrihetsgrundlagen).

Policy history and change information

Version	Revision Date	Change information
1	2019-04-01	Final draft of policy
1.5	2021-01-26	Revisions based on Swedish whistleblowing law
2.0	2021-02-09	Updated policy based on new EU and Swedish regulation and updated whistleblowing process