

Speak Up Policy

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1. Background and purpose

At Humble Group ('the Group'), we aim to be a conscientious company.

However, we recognize that occasionally things may not always be up to our standard or things may need to be improved. The sooner we are aware, the sooner we can intervene or take corrective measures.

The purpose of the **Speak Up Platform and Policy** is to prevent both financial and reputational damage to the company and a loss of image.

This policy aims to outline when and how Humble Group employees, stakeholders or external partners can speak up and submit a Speak Up (whistleblowing) report. It also details how any Speak Up reports will be handled in accordance with the [EU Whistleblowing Directive](#).

This policy also intends to ensure, from a technical and organizational perspective, that reports of violations of laws or violations of the **Humble Way (our Code of Ethics)** or other Humble Group policies are received in accordance with the requirements of the data privacy and data security. And that reports are processed, stored, and archived with the necessary confidentiality.

2. Audience

The policy applies to all employees within the Group.

3. Policy statement

3.1. When to Speak Up

The Humble Group Speak Up platform is intended to enable employees and other persons to submit anonymous reports and to record such reports in a comprehensible process that ensures the best possible protection of the legitimate interests of those involved.

The Speak Up platform is only intended to report on suspected or actual violations of laws, policies, or our **Code of Ethics**. It is not available for general complaints or for product and warranty inquiries.

Suspected or actual violations include:

- Concerns over human rights & basic freedoms (i.e. harassment, sexual harassment, discrimination, forced or child labor, verbal or physical violence).
- Concerns over the health & safety of a person/team.
- Concerns over the safety & quality of products.
- Concerns over financial misconduct (i.e. fraud on financial statements).
- Concerns over bribery and/or corruption.
- Concerns over the use of confidential information (i.e. data privacy, trade secrets, intellectual property).

- Concerns over environmental impact.
- Concerns over conduct by the Humble Group Board of Directors.
- Concerns over conduct by a colleague or manager.
- Concerns over retaliation relating to a previous Speak Up report.

Only those reports should be submitted where the whistle-blower believes in good faith that the information provided by him/her is correct. The person is not in good faith if he/she knows that a reported fact is untrue. In case of doubt, corresponding facts are not to be presented as a fact, but as an assumption, evaluation or as a statement of other persons. It is noted that a whistle-blower may be liable to prosecution if, against his or her better knowledge, he or she alleges untrue facts about other persons.

3.2. Processing Time

Under the EU Whistleblowing Directive, the Group is obliged to acknowledge receipt of their report within seven days.

Furthermore, the Group is obliged to provide feedback to the reporting person and/or resolve the case within a reasonable timeframe not exceeding three months, or six months in duly justified cases.

3.3. No Act of Retaliation

All reports, including references to the whistle-blower, will be processed confidentially and in accordance with applicable laws. Employees and others who report will not be harassed, retaliated against, or suffer adverse employment consequences, such as discharge, demotion, suspension, discrimination with respect to the terms and conditions of employment.

Employees and associated persons who retaliate against an individual who has reported an incident in good faith will be subject to disciplinary action, up to and including termination.

3.4. Confidentiality & Data Protection

All reports, regardless of their truthfulness, are likely to damage the reputation of the persons concerned, those who speak up and/or third parties as well as the company fully.

We therefore treat them with confidentiality, over and above the obligations arising from the data protection laws.

Any IT solutions for the intake and processing of reports must be approved by Humble Group's Chief Analytics Officer before they are used. The minimum requirements for the scope of the General Data Protection Regulation are derived from Art. 32 of the GDPR and are further described in the Humble Group **Information Security & Data Protection Policy**.

3.5. Legal Restrictions

The laws in some countries prescribe certain restrictions for reports, e.g., what may be reported, whether personal data about an individual may be stored, or whether reports can be made anonymously. The corresponding requirements are integrated into the digital **Speak Up Platform**.

3.6. Deletion Of Data

The deletion of data in the digital Speak Up platform must be carried out exclusively in accordance with the respective time specifications of the deletion concept or after deletion approval by two separate users (four eyes principle).

4. Roles and responsibilities

The CEO of Humble Group AB (publ) is the owner of this policy.

The CEO and Board of Directors of Humble Group AB (publ) are ultimately responsible for compliance with this policy and Humble Group's ethical code.

The CEO of each subsidiary is responsible for implementing the Group Policy Portfolio together with any locally developed policies. This includes ensuring their teams are aware of and consistently trained on the existence of **Humble Group's Speak Up Platform and Policy**.

This policy does not imply any requirement for anyone to report. However, if there are legal, contractual, or other obligations to provide reports, these are not affected by the above paragraph.

5. Exceptions

There are no exceptions to this policy.

6. Monitoring of compliance

- Any employee and other person in a business relationship (stakeholder) with Humble Group is entitled to submit reports directly on the **Speak Up Platform**. It is irrelevant whether they are current employees of Humble Group or an external party. To ensure open access to the Speak Up Platform, it has been made public on <https://humblegroup.se/>
- Employees or stakeholders may also raise concerns of suspected or actual violations via their direct line manager, local case manager or HR responsible or Humble Group AB (publ)'s CEO or CFO. These designated individuals can then create a Speak Up report on the case reporter's behalf, with their explicit permission. However, Humble Group always encourages Speak Up reports to come directly from the source, to reduce any opportunity for misinterpretation.
- Reports are received by either Humble Group AB (publ) or by trained employees within selected entities within the Group. The monitoring of cases – including frequency of reports, types of cases and support on case resolution – is done Humble Group AB (publ)'s management team and by the Board of Directors.

- To the extent permitted by law and to the extent consistent with conducting an adequate investigation, the company will protect the confidentiality and anonymity of the person making the report.