

INSTRUCTIONS FOR WHISTLEBLOWING

We strive to run JCE in a long-term and sustainable manner. We are therefore dedicated to ensuring that irregularities that might seriously damage the company or our employees should be drawn attention to and investigated as early as possible. We have set up a whistleblowing solution to make it easier for those who wish to provide information about irregularities that are in breach of applicable legislation. All reports are received anonymously and handled by an external agent.

Please note that only persons directly connected to JCE's operations are covered by the protections in whistleblowing legislation (the Protections for Persons Reporting Irregularities Act (SFS 2021:890)).

REPORTING VIA INTERNAL WHISTLEBLOWING CHANNELS

Reporting can take place in writing via the website **wb.2secure.se** or verbally by phone at +46 (0)77 177 99 77. You can choose to remain anonymous in both of these reporting channels. If you would like to report via an in-person meeting, this can be requested by registering a report on the website **wb.2secure.se**. The in-person meeting will be held by agreement either with a representative from JCE or with JCE's provider of whistleblowing services, 2Secure.

When registering a new report on **wb.2secure.se**, you must state the company-specific code **jcg526** to identify that the report is being made for JCE. On the website, you will be asked to answer a number of questions about the matter to which the report relates. You can remain anonymous and are assigned a unique case number and password, which must be saved so that you can actively log in to the website, monitor the report and communicate with the case officer at 2Secure.

Once a report has been registered, it is processed by experienced case officers at 2Secure, who will contact JCE's primary contact person based on a predetermined contact list with several names. If the primary contact person is the subject of the report, another person on the contact list will be informed. It is always JCE who ultimately assesses the report and decides what measures are to be taken.

REPORTING VIA EXTERNAL WHISTLEBLOWING CHANNELS

In addition to reporting to JCE's internal whistleblower channel, you can report externally to a competent authority within a specific area of responsibility or to one of the EU institutions, bodies and agencies. The following authorities have been appointed as competent authorities and established external reporting channels: Swedish Work Environment Authority, National Board of Housing, Building and Planning, National Electrical Safety Board, Swedish Economic Crime Authority, Swedish Estate Agents Inspectorate, Swedish Financial Supervisory Authority, Public Health Agency of Sweden, Swedish Agency for Marine and Water Management, Swedish Authority for Privacy Protection, Inspectorate of Strategic Products, Health and Social Care Inspectorate, Swedish Chemicals Agency, Swedish Consumer Agency, Swedish Competition Authority, Swedish Food Agency, Medical Products Agency, The county administrative boards, Swedish Civil Contingencies Agency, Swedish Environmental Protection Agency, Swedish Post and Telecom Authority, Government Offices, Swedish Inspectorate of Auditors, Swedish Tax Agency, Swedish Forest Agency, Swedish Gambling Authority, Swedish Energy Agency, Swedish Board of Agriculture, Swedish Board for Accreditation and Conformity Assessment, Swedish Radiation Safety Authority and Swedish Transport Agency.

ABOUT STATUTORY INFORMANT PROTECTION

In addition to the ability to report suspected irregularities in accordance with whistleblowing legislation, there is also a right to freedom of disclosure and acquisition in accordance with the Swedish Freedom of the Press Act and the Swedish Fundamental Law on Freedom of Expression. This means that it is possible for an employee (with certain exceptions) in both private and public sectors to submit with impunity otherwise confidential information for publication to mass media covered by the Swedish Freedom of the Press Act and the Swedish Fundamental Law on Freedom of Expression.

There is also extended protection for employees in public sector organizations or other operations where informant protection applies in accordance with the Swedish Informant Protection in Certain Sectors of Economic Activity Act (SFS 2017:151) or the Swedish Public Access to Information and Secrecy Act (SFS 2009:400). This extended protection relates to a prohibition against investigation and a prohibition against retaliation.

The prohibition against investigation means that a government agency or other public body may not, as a general rule, investigate who has submitted a notification for publication.

The prohibition against retaliation means that the general public may not take measures that have negative consequences for an individual because he or she has exercised his or her freedom of expression and disclosure.