

VESPER GROUP GRIEVANCE PROCEDURE

Vesper Group believes that good communication at all levels throughout the organization promotes better work practice. Vesper Group seeks to conduct itself honestly and with integrity at all times. However, we acknowledge that all organizations face the risk of their activities going wrong from time to time, or of unknowingly harboring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. On this basis, staff and volunteers are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals and Vesper Group will protect them from victimization and dismissal.

Vesper Group undertakes to take steps to protect to its workers from detrimental treatment or dismissal if they raise concerns in good faith.

Whistleblowing

If you believe that the actions of anyone (or a group of people) working for Vesper Group do or could constitute malpractice you should preferably raise the matter with your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice in some way, the matter should be raised directly with a member of Vesper Management, by emailing compliance@vespergroup.se. You may also your concern verbally and should include full details and, if possible, supporting evidence. You should also specify whether you wish your identity to be kept confidential. If you do not wish to contact Vesper Management with you concern, you can file a report anonymously through Lantero online whistleblowing-service

<https://lantero.report/vesper>

The service can also be accessed via your smartphone with a **QR-reader**. If there is suspicion of criminal offence, all information will be handed over to competent authorities. If the case is a breach of internal policies or procedures, an internal investigation will be launched.

How does Lantero whistleblowing-service work?

Disclosers complete a form at an external independent website set up specifically for Vesper, but completely isolated from our network. A specially appointed group of trustees receives information, investigates cases, and files recommendations to the management for action or further case handling. Investigators sometimes require additional information. All email addresses provided by disclosers are anonymized, which means investigators can contact them by email without either personal details or email address being visible to the investigators or anyone else.

After investigations are completed employees receive email summaries of how their cases were assessed.

Note:

- Do not enter the reporting site from a corporate network.



AUTHORITY: COMPLIANCE MANAGER
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- If you use the QR code below at your workplace, make sure to turn off Wi-Fi.
- Do not use a company email address for feedback.

