

Complaints and Reporting of Misconduct

Purpose and Scope

The purpose of this procedure is to ensure that complaints, concerns and suspected misconduct can be reported, handled and followed up in a structured, fair and confidential manner. This procedure applies to all stakeholders affected by the company's operations, including employees, temporary workers, subcontractors, suppliers, customers and other external parties.

What Can Be Reported?

Complaints, concerns or suspected misconduct may relate to, for example:

- Occupational health and safety
- Discrimination, harassment or victimisation
- Human rights issues
- Environmental matters
- Unethical business practices
- Corruption, bribery or other irregularities
- Violations of the company's Code of Conduct, policies or applicable legislation

Reporting of Complaints

The company's external whistleblowing service, visselblasning@nordbro.com, serves as the company's grievance mechanism and may be contacted directly by both internal and external stakeholders. The service is operated by an independent third-party provider and enables confidential and anonymous reporting of complaints, concerns and suspected misconduct.

Complaints may also be reported to:

- Immediate manager
- Administrative Manager
- Company Management
- The IA reporting system for work environment-related matters

Responsibilities and Handling

The Administrative Manager is responsible for the company's internal handling of complaints and reports of misconduct. This responsibility includes registration, coordination of investigations, follow-up activities and ensuring that corrective actions are implemented and monitored.

OTTOSSON	Kapitel	Dokumentnamn	Dokument nr	Dokumenttyp	Version	Fastslagen datum	Uppdaterad datum	Sökväg:
	5	5.1.4 b Klagomål och rapportering av missförhållanden	5.1.4 b	Stöddokument/rutin	2026-1	2026-02-04		BKMA/Kapitel 5/Förbättringar av verksamheten

Cases received through the external whistleblowing service are handled in accordance with the service provider's process and, where appropriate, forwarded to the Administrative Manager for further handling.

The external whistleblowing service is managed by an independent third party that acts impartially, independently and without instructions from the company when receiving reports.

Handling of Cases

1. The complaint or report is received.
2. Receipt is normally acknowledged within five working days when contact details are available.
3. The matter is assessed and investigated by the responsible person.
4. The complainant or their representative is given the opportunity to provide information and comments during the investigation and, where appropriate, prior to decisions regarding corrective actions.
5. Corrective and/or preventive actions are determined.
6. Actions are implemented and followed up.
7. The outcome is communicated to the complainant where possible and appropriate.
8. The case is documented and formally closed.

The objective is to handle cases promptly and normally conclude them within 30 days. More complex cases may require a longer processing period.

Confidentiality and Protection Against Retaliation

Complaints and reports of misconduct shall be treated confidentially.

No person who, in good faith, reports a complaint, non-conformity or suspected misconduct shall be subject to retaliation, adverse consequences, discrimination, harassment or any other form of unfair treatment as a result of making a report.

The company does not tolerate any form of retaliation against individuals who report concerns or participate in the investigation of suspected misconduct.

Communication and Accessibility

Information regarding the possibility to report complaints and misconduct is made available to employees through onboarding, internal communication channels, the company intranet and governing documents.

External stakeholders may contact the company through the company website, available contact channels or the external whistleblowing service.

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CR Ottosson Bygg AB operates in Sweden. Information regarding the company's grievance mechanism and reporting channels is available in both Swedish and English.

Information regarding reporting channels and contact details is kept up to date and made available to relevant stakeholders through the company's internal and external communication channels.

Appeals

If the complainant believes that a case has not been handled appropriately, a review may be requested by Company Management or the matter may be reported through the external whistleblowing service for reassessment.

Follow-up

The Administrative Manager is responsible for reviewing this procedure and its effectiveness at least annually and whenever required.

A summary of complaints received and actions taken shall be reviewed as part of the company's continual improvement process and during Management Review.

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