

Company Ikano Bank AB (publ)	Function People & Communications	Created by Teresia Palm
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P.05.03 Whistleblowing Policy

Document information	
Owner	Chief People & Communications Officer (CPCO)
Adopted by	Board of directors
Adopted when	2024-06-05
Purpose	To provide a framework in which all co-workers and others to which the policy applies can raise concerns protected by the Whistleblowing Directive 2019.
Application	All employees, including non-permanent staff, shall comply with this document as applicable.
Revision	At least annually
Legal reference	The Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law. Local Whistleblowing legislation that transposes the EU Whistleblowing Directive into the laws of each EU country.
Connected steering documents	Standard Operating Procedure - Whistleblowing

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1 Introduction

We encourage co-workers with serious concerns about any violation of the Code of Conduct or any laws to come forward, in good faith and voice their concerns.

This policy makes it clear that Ikano Bank co-workers and other eligible persons included in the scope can raise a concern without fear of reprisals. It is intended to encourage and enable co-workers to raise serious concerns within Ikano Bank, including where those concerns involve a breach of local Whistleblowing legislation.

1.1 Policy Purpose

The key purposes of this policy are to:

- Provide a clear definition of what constitutes a whistleblowing concern.
- Encourage all co-worker groups to feel confident to identify the types of concerns that can be raised under this policy, including those concerns specifically set out in local Whistleblowing legislation.
- Encourage all co-worker groups to feel confident to make a disclosure of those concerns.
- Reassure co-workers that they will be protected when they raise a concern, including legal protections offered when raising a concern about a breach of local Whistleblowing legislation.
- Provide a framework in which co-workers can raise serious concerns in a supportive atmosphere.

1.2 Governance and implementation

The Chief People and Communication Office (CPCO) is the owner of this Policy. This Policy shall be reviewed annually to ensure it is fit for purpose and complies with all relevant regulations. If necessary, the Policy shall be updated in between annual reviews.

This Policy shall be communicated in accordance with the CEO Instruction on Framework and Internal Rules. The CPCO is responsible for the implementation of this Directive.

This Policy enters into force on the approval date stated on the front page and is valid until the Board decides otherwise.

1.3 Who does this Policy apply to?

This policy applies to all Ikano Bank people i.e., co-workers, consultants (both hired and self-employed), shareholders (being active in the business) management, persons working under the supervision and direction of suppliers or contractors, temporary staff, volunteers, and job applicants. It also applies to former co-workers and consultants or otherwise persons in a work-based relationship.

2 Whistleblowing definition

Whistleblowing is defined as the disclosure of information or a perceived wrongdoing in an organization concerning breaches (including both acts and omissions) of Union law or the risk thereof. This definition applies to those actions deemed to be breaches of country-specific Whistleblowing legislation that transposes into local law the requirements of the EU Whistleblowing Directive. The EU Whistleblowing Directive applies to reporting persons who:

- Acquire the information in a (current or past) work related context.
- Report a breach falling within the material scope of the legislation.

- Report a threat or harm to the public interest and
- Have reasonable grounds to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of the legislation.

It is important to note that this policy shall not be used for reporting personal complaints or dissatisfactions (grievances) which are not resulting from a malpractice, misbehaviour or a fraudulent action from an Ikano Bank co-worker or Ikano Bank management team. The difference between a whistleblowing concern and a co-worker grievance is that in the case of whistleblowing, the concern is about a danger or illegality (as described in the local Whistleblowing legislation) that has a public interest to it; a grievance is a dispute about a co-worker's own employment position and has no additional public interest dimension. Please refer to your P&C function for more information on this

3 What concerns can be disclosed under this policy?

Any breach (both actual ones and suspicions) as described in the local Whistleblowing legislation that may cause serious harm to the public interest, or serious concern(s) that co-workers may have about any aspect of the activities of Ikano Bank (or those who work within Ikano Bank) can be reported under this policy.

Examples of a breach that should be reported include, but are not limited to, the following:

- Corruption, bribery, or blackmail.
- Money Laundering and terrorist financing.
- Fraud and financial irregularity.
- Other criminal offences.
- Failure to comply with legal or regulatory obligations.
- Endangering the health and safety of another individual.
- Unauthorized disclosure of confidential information.
- Environmental damage.
- Cultural bullying and harassment
- Evidence of Ikano Bank concealing any of the above
- Any unethical conduct or breach of Ikano policies such as the Ikano Code of Conduct and Ikano Anti-Bribery & Corruption Policy.

4 Confidentiality and anonymity

All concerns raised will be treated confidentially. Ikano Bank will respect and protect the confidentiality of any co-worker's identity and any person cited in the report and will not reveal their identity to any third party insofar as it is possible to do so. Sometimes it may not be possible to do this, for example if something is being investigated by the police.

A co-worker may choose to not reveal their identity when raising their concern and remain anonymous. Ikano Bank will investigate any concerns by an anonymous individual to the extent possible with an anonymous report and we encourage co-workers to be as specific as they can when raising their concern and provide

Ikano Bank with details such as dates, times etc. to ensure Ikano Bank can investigate as thoroughly as possible.

5 Protecting a whistleblower

Co-workers may fear retaliation because of raising a concern. Ikano will not accept any discrimination or retaliation against co-workers for having, in good faith, reported malpractices or suspected malpractices in accordance with this policy. Ikano will take any reasonable steps to ensure that no person under its control engages in victimization in any form.

Provided the concern is raised in good faith, no action will be taken against the co-worker even if the concern turns out to be unfounded. However, reports which are malicious, knowingly untrue or made for personal gain will be viewed as a serious matter and may be subject to disciplinary action.

If a co-worker raises a concern about a breach that is set out in the local Whistleblowing legislation, then the co-worker is also entitled to those legal protections set out in the Whistleblowing legislation and the EU Whistleblowing Directive (please refer to the Standard Operating Procedure for Whistleblowing for more information).

6 Internal reporting procedure

The internal reporting and investigation procedure is outlined in the Standard Operating Procedure for Whistleblowing. The procedure is in accordance with the requirements set out in the Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law and any local Whistleblowing legislation that transposes the EU Whistleblowing Directive.

7 Reporting

Ikano Bank take all whistleblowing concerns extremely seriously. All concerns raised are reviewed to ensure Ikano bank is mitigating any trends, patterns and/or risks relating to whistleblowing and to ensure any outcomes are adhered to. No personal data is shared in this reporting, only details about the concern which has been raised is shared.

8 Processing of personal data

Reports will be stored for no longer than it is necessary and proportionate to comply with the local requirements.

Further information on the processing of personal data in connection with reporting in accordance with this policy is found in Ikano Bank's Co-Worker Privacy Notice.

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Appendix 1 – Record of amendments

#	Date	Name	Details of Amendment	New Version
1	2022-02	-	Revised Policy. New according to the EU Directive 2019	1.0
2	2022-09	-	Appendix 4. UK Compliance Officer detail added	1.1
3	2023-03	-	Annual review – no changes	1.2
4	2024-03	Teresia Palm	Section 8 removed – internal process. Internal whistleblowing procedure taken out to create a separate standard operating procedure. This policy now outlines the definition, protections, and framework for all applicable Ikano bank people. Sections 7 and 8 added into Policy. Updated to the new template.	1.3