



Whistleblowing at Avalon Innovation

Avalon Innovation encourages all employees to report any incident that they believe to be in breach of applicable law, EU law, our Code of Conduct, internal guidelines or policies.

Legal requirements

This policy is based on the Act on Special Protection for Workers against Reprisals for Whistleblowing concerning Serious Irregularities (2021:890), in accordance with EU directives, and is valid from 17 December 2021.

This law provides protection for whistleblowers who report misconduct and violations when it is in the public interest to do so. This includes violations of Avalon Innovation's Code of Conduct and internal policies and guidelines, as well as legislation and violations of EU law.

It should be noted that information supplied by employees and any accusations presented may have serious consequences. That's why it's important that whistleblowers only provide information when it's reasonable to disclose the truth, and when there is a public interest to do so. The sooner a problem can be uncovered, the better. In a best-case scenario, the damage can be limited for all parties, which benefits Avalon Innovation's brand and the workplace.

The whistleblower who reports misconduct is protected, and won't be hindered, disadvantaged, or be subject to retaliation. In the event that the whistleblower violates a duty of confidentiality in connection with the report, they won't be penalised either. However, the information or documents about the violation that the whistleblower reports can't have been obtained illegally.

It is Avalon Innovation's hope that internal employees and external stakeholders have the confidence to contact their line manager or other contact at Avalon Innovation for support regarding the violation in the first instance, before the violation is reported via the whistleblower channel.

Scope

Avalon Innovation's policy and whistleblowing procedure covers all employees at Avalon Innovation. It also includes external parties such as candidates in the recruitment process, those performing work under the auspices of Avalon Innovation and their related parties, subcontractors and the self-employed, contract staff, volunteers, trainees, and those representing administrative, management, or supervisory bodies.

Reporting channel

When a violation or misconduct is spotted, this can be reported internally, externally, or directly to a public authority. The whistleblower is always protected against retaliation.

Avalon Innovation uses the *&frankly* whistleblowing reporting channel. The channel is available for both internal and external reports, and there will be a link to it from both Avalon Innovation's intranet and website. The reporting channel is a GDPR-secured case management system where you can anonymously report a violation and then communicate directly in the system. It's possible to make a report in writing (message) and verbally (record an audio file). The whistleblower can also request to book a meeting with the channel manager if they wish to do so.

It's also possible to submit a report to a [public authority](#). This channel is an option for the whistleblower in case that proper investigation and measures aren't undertaken. However, we hope that the whistleblower first chooses to report the matter to Avalon Innovation directly, so that we have the opportunity to investigate and remedy the matter in accordance with our whistleblowing process. If there is a major risk to life and health, the whistleblower must be able to submit a direct report to the public authorities.

It's also possible for whistleblowers to seek consultation with unions before submitting a report.

Channel manager

Avalon Innovation has two channel managers who are responsible for the reporting channel at *&frankly*, as well as for investigation and follow-up. There are two people so that they can cover for each other during leave and absence. Channel managers at Avalon Innovation are independent and objective in their roles, and they lead the work on assessing the pertinence of the case and whether it's a matter of public interest. They're also responsible for communicating with the whistleblower and during the investigation to involve the parties needed in order to conduct an investigation and come up with any measures. Channel managers are also protected in their roles from being disadvantaged or retaliated against in connection with whistleblowing.

The whistleblowing process

1. The whistleblower submits a report and the case is registered
2. Within seven days, the channel manager confirms that the case has been received
3. Investigation – the case is assessed and measures implemented
4. Feedback to the whistleblower within three months

Anonymity and confidentiality

It's up to the whistleblower how anonymous they want to be when submitting a report. The reporting channel allows for communication without providing any contact information, but there is also an option to add an e-mail address or phone number, and to book a meeting with the channel manager. Although the channel manager protects the whistleblower's privacy, if the channel manager assesses that the privacy and anonymity of the whistleblower need to be broken in order to proceed with the investigation, the whistleblower must be able to come forward. However, it's important that the channel manager and whistleblower discuss this first, and that the whistleblower isn't subjected to reprisals or otherwise disadvantaged. If the whistleblower doesn't want to reveal their identity and the channel manager deems it necessary to be able to investigate the case, the case will be closed.

Erasure

Documentation and information will be kept for as long as is needed and necessary for the investigation and measures to take place. Documentation and information will be erased after two years, provided that it doesn't affect future measures.

This policy was last updated on 18 May 2022.