



Wistleblower Policy

The Swedish Tourist Association (STF) is committed to fostering an open and transparent workplace where misconduct is not tolerated.

Purpose of the Whistleblower System

The whistleblower system aims to:

- Enable individuals to report justified suspicions or knowledge of illegalities, irregularities, or serious concerns related to STF without fear of retaliation.
- Protect individuals who report concerns in good faith.
- Enhance the detection and resolution of illegalities and irregularities at an early stage.

The whistleblower system serves as an alternative and complement to standard internal communication channels. Reporting is voluntary, and individuals are encouraged to consider contacting the management team, HR department, direct supervisor, safety representative, or union representative if appropriate. However, whistleblower protections under the Whistleblower Act (2021:890) only apply when reporting complies with legal requirements and is made through the designated channel.

This policy, including an action plan, provides guidance on when and how to report serious misconduct in accordance with the Whistleblower Act. All disclosures will be handled fairly, impartially, and confidentially.

Reporting Process

Whistleblower cases are handled by HR, the Chairman of the Board, and the GS/CEO. If a case concerns any of these functions, the remaining two functions will handle the case.

Eligible Reporters

The following individuals may use STF's whistleblower system:

- Employees
- Job applicants
- Elected representatives and volunteers
- Interns
- Contractors and consultants under STF's direction
- Members of STF's management, administration, or supervisory bodies

What Can Be Reported?

Whistleblowing pertains to reporting misconduct in a work-related context that is in the public interest, as defined in Chapter 1, Section 2 of the Whistleblower Act. Examples include suspected fraud, corruption or economic crimes, violations of occupational health and safety laws, environmental crimes and serious cases of harassment or systematic mistreatment.

Attempts to conceal misconduct also qualify for reporting. However, the following are typically excluded: Complaints solely about personal work or employment conditions, issues such as poor leadership and dissatisfaction or inefficient systems. These issues should be addressed with a direct supervisor or HR.

Misuse of the whistleblower system, such as submitting knowingly false allegations, voids the protections under this policy.

Action Plan

Reporting Channel:

STF uses a web-based whistleblower channel, accessible via the intranet or STF's external website. The system meets all legal requirements and ensures anonymity unless personal information is voluntarily disclosed. Reporters may attach documents, images, or videos to their report. Reporters receive a case ID upon submission. The case ID can be used to track the case via the whistleblower channel.

The reporter is encouraged to describe the incident in a detailed way in order for the case to be handled as accurately as possible.

Timeline:

- Confirmation of receipt: Within 7 days (immediate confirmation is provided by the whistleblower channel).
- Initial decision: Within 2 weeks (decision to proceed or dismiss the case).
- Feedback to reporter: Within 3 months of confirmation. (actions taken)

Investigation and Actions:

As far as possible, all evidence traceable to the reporter will remain confidential. An initial investigation determines if further action is warranted. Necessary meetings with the reporter may be arranged to clarify or expand on the report. The designated case handler will decide on the next appropriate steps, which may include additional meetings or requests for further evidence.

Data Retention:

Closed cases are stored for two years before automatic deletion, in compliance with GDPR.