



WHISTLEBLOWING POLICY

Adopted by the Board of Directors 2023-11-15

1 BACKGROUND AND OBJECTIVE

Alma Property Partners (“Alma”/“We”/“Our”) business is built on integrity, trust, openness and being straight forward. We understand our responsibility to uphold the highest standards towards our stakeholders, including colleagues, investors, business partners and the local communities in which we operate. We strive to develop and maintain the resolve to live up to those high standards and not only meet those required by the laws and regulations that apply to us, but also to our principles, which are rooted in exceeding our stakeholders’ expectations. Whistleblowing is about drawing attention to misconduct of business ethics. Alma has a Whistleblower channel where employees and other interested parties can anonymously alert the organization to wrongdoing within the business. The Whistleblower channel and related information about the channel is available on Alma’s website. The recipient of the whistleblower information is an independent external party that qualifies whistleblower cases and it is not possible to identify the individual that submitted a report and it is therefore not possible to verify whether the individual is employed at Alma or not. All reported cases will be reviewed and qualified. Alma is not covered by the European Whistleblower Protection Directive due to having too few number of employees. We have established our Whistleblowing channel voluntarily to maintain a strong focus on business ethics and good governance.

2 PURPOSE AND SCOPE

The Whistleblowing channel should clarify everyone's responsibility to collectively draw attention to issues and areas where Alma as an organization or our employees do not follow applicable laws or act according to our guidelines and policies. The system is also a reminder of the organization's responsibility to clarify the rules that apply and what is expected of employees. Overall, the whistleblower system helps to strengthen a culture where issues, if any arise, are addressed, managed and discussed.

Our strong hope is that all employees feel that there is enough openness to engage in dialogue about problems openly. But the ability to anonymously submit tips is a way of showing that no one should have to worry about the consequences of pointing out misconduct.

Alma fully prohibits any retaliation against whistleblowers. This means that we have zero tolerance for actions intended to punish or intimidate an individual who has complained about wrongdoing – actual or perceived – as long as the action has been done in good faith. However, deliberate smearing or spreading of rumors will not be tolerated.

The Whistleblowing channel is intended for serious violations and misconduct as well as matters that can be considered of public interest if they were brought to their attention. These are types of cases that will be handled in the whistleblower system's defined handling process. Other matters will be referred to the appropriate party.

3 ABOUT THE WHISTLEBLOWING CHANNEL

In order for the system to be credible and reliable, it is important to have transparency and clarity about how we protect the user's privacy. It is also important to help respondents to provide the best possible information. Some aspects that Alma has paid special attention to are:

- **Independent case management**

The case management is done and followed up through an independent system provider called Lantero (<https://www.lantero.se/en>). For any cases that are deemed to be qualified whistleblower cases, they are further investigated by appointed trust representatives from Alma which are (i) the CFO and CSO who report to Alma's management team or (ii) by an external independent lawyer. The party who investigates the case further is determined by the initial assessment of the case conducted by representatives from the independent system provider.

- **Information to users**

As a whistleblower, you must know how you are technically protected and what you need to think about in order not to provide too much information. This may include user data in attachments, the risk of reporting from the workplace's network, or the risk of revealing your identity through the way you express yourself.

- **Data storage**

Our chosen supplier, Lantero, has data servers located in Sweden. Managed cases are deleted from the system so that information is not saved longer than necessary. Alma will not store any information that could violate data protection.

- **Information management**

No sensitive information should be sent via email and, in fact, a personal login is always required to access and work with case information.

- **Reporting quality**

Clear questionnaires help whistleblowers provide complete information that helps cases to be properly investigated. In addition, there is the possibility to correspond anonymously with the informant.

- **Availability**

Adapting the reporting system to work well with mobile devices is an obvious benefit since more and more communication takes place via mobile devices. An advantage of this is that mobile devices are often outside the workplace's network and therefore during working hours they are a good privacy-friendly alternative to the work computer. The possibility of submitting cases by telephone is also offered.

4 ABOUT CASE MANAGEMENT

Case management is conducted and reviewed by the independent system provider Lantero. For any cases that are deemed to be qualified whistleblower cases, they are further investigated by appointed trust representatives from Alma which are (i) the CFO and CSO who report to Alma's management team or (ii) by an external independent lawyer. Investigation and possible recommendation for further action or review is conducted by Alma's management team.

If Alma's management team is not the proper party or if there are other reasons why the above process cannot ensure an independent management of the case, the matter is investigated by an external independent lawyer who reports to the Chairman of the Board of Alma.

Cases that fall outside the purpose of the whistleblowing channel will be excluded from the whistleblower process.

Individuals identified in a case are informed of the ongoing investigation as soon as practically possible regarding the investigative work. However, the individual submitting the report is not disclosed, even if they would be known to the investigator.

After processing, the case is deleted from the database. If the case needs to be investigated further, the necessary information is stored outside the database. The information related to the investigation is destroyed or anonymized as soon as practically possible.

If a whistleblower chooses to be open about their identity, their identity will only be made available to the group appointed to handle whistleblower cases. The exception is if the case results in a criminal investigation, then you as the informant may be called as a witness.

5 EVALUATIONS AND IMPROVEMENTS

In order for the Whistleblowing system to be effective, regular evaluations are made of how the channel is used, whether the affected individuals are aware of the channel, whether the type of cases are in line with the purpose of the system and whether the procedures for managing any cases are working as intended.

6 RESPONSIBLE FOR THE WHISTLEBLOWING CHANNEL

This policy is adopted by Alma's Board of Directors. For any questions about the Whistleblowing system please contact:
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