

WHISTLE BLOWER POLICY

Introduction of the Policy

SWIN Technologies AB, its subsidiaries and affiliate companies ("TrusTrace" or the "Company") is committed to the highest standards of openness, probity, and accountability. TrusTrace believes in the conduct of affair in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity, and ethical behaviour.

India: Section 177(9) of the Companies Act, 2013 (India) and Regulation 22 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that every listed company establish a Whistle blower mechanism. However, TrusTrace though not a listed company, adopts as a best practice, the spirit of this Section.

Sweden: According to Law 2021:890 the regulations in cap. 5 applies for operators in the private section with 50 to 249 employees.

Associates are often the first to recognize any concern within the Company. However, they may ignore such concerns or dismiss them as mere suspicions or disloyalty to their colleagues, managers or to the Company itself. Also, they may not be aware of the appropriate procedure or the internal authority to whom the concern must be raised.

The Whistle Blower Policy has been introduced by the Company to enable employees and other individuals associated with the Company to not overlook any concern but instead raise it at an early stage and in the right manner, without fear of retaliation, victimization, subsequent discrimination, or disadvantage at workplace.

As is well known, TrusTrace has zero tolerance to any malpractice, impropriety, abuse, or wrongdoing and encourages Associates to come forward and voice their concerns. TrusTrace assures that such concerns would be enquired into by designated persons independently and fairly.

Definitions

The definitions of some of the key terms used in this Policy are given below. Capitalized terms not defined herein shall have the meaning assigned to them under the Code of Business Conduct and Ethics.

“Company” means SWIN Technologies AB, its subsidiaries and affiliate companies – TrusTrace.

“Concerns” means any known or suspected matter that is held by any Person in relation to the activities of the Company including but not limited to:

- Anything that would be the subject- matter of a Protected Disclosure including a breach of any rule or regulatory requirement.
- A failure to comply with the Company’s policies, standards, procedures or Codes of Conduct including the Companies’ [Code of Business Conduct and Ethics](#)
- Behaviour that has or likely to have an adverse effect on the Companies’ reputation or financial well- being and Deliberate concealment relating to any of the above.

“Investigators” mean those persons authorized, appointed, consulted, or approached by the Ethics Officer for the purpose of investigation under this Policy.

“Persons” includes a natural person, body of persons, corporate or unincorporated Persons including Staff.

“Protected Disclosure” means a disclosure of information which, in the reasonable belief of the Person making the disclosure, is made in the public interest and tends to show that one or more of the following has been, is likely to be, committed:

- a. Criminal offence
- b. Failure to comply with any legal obligations.
- c. Miscarriage of justice.
- d. The putting of the health and safety of an individual in danger; or damage to the environment.
- e. Deliberate concealment relating to any of the above (a) to (d).

“Associates” includes all staff and other Persons working for TrusTrace, including contractors, consultants, and interns.

“Subject” means a Person against or in relation to whom a Concern has been raised.

“Whistle Blower” means a Person making a disclosure under this Policy.

“Ethics officer” is the individual appointed by Board to investigate the matters raised by the Whistle blower.

“Audit Committee” means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act India, 2013.

Applicability of the policy and its effective date

This Policy applies to all Associates of the Company including those who are on probation and notice period. It also applies to employees of vendors and service providers, contract employees, clients, retainers, consultants, trainees and interns. To clarify, any of these Persons who raise concerns under this Policy are referred to as “Whistle Blower” in this Policy.

Assurance under the policy

If a Whistle Blower raises a concern under this Policy, he/she will not be under any risk in the form of retribution or retaliation including the risk of his/her job. If one acts in good faith, it does not matter if the concern was raised by mistake.

The Company will not tolerate any harassment or victimization (including informal pressures) against any Whistle Blower who raises a genuine concern and will take appropriate action to protect the Whistle Blower when he/she raises a concern in good faith.

If the Whistle Blower raising a concern request that his/her identity should not be disclosed, the Company will not disclose it without his/her consent. However, please note that to conduct effective investigation Whistle Blower's identity may be required in certain cases and in its absence, Company may be unable to resolve the Whistle Blower's concern. In such situations Whistle Blower shall be informed that his/her identity is required to be revealed and only upon the Whistle Blower's consent his/her identity shall be revealed and investigation will be initiated.

However, under any circumstance if a Whistle Blower believes that he/she has been retaliated against for disclosing any concern, he/she may file a written complaint/email to the Audit Committee Chairman to seek remedy.

Procedure for disclosure, investigation, and disciplinary action**Following constitutes malpractice, impropriety, abuse, or wrongdoing.**

Concern can be in respect of a variety of issues, and some are listed below. This list is solely intended to illustrate the types of issues that may be raised under this Policy and not to be construed as exhaustive:

- Any unlawful act, whether criminal (e.g., theft) or a breach of the civil law (e.g., slander or libel).
- Breach of any Policy of Code of Conduct adopted by the Company from time to time. Breach of Company's Code of conduct to regulate, monitor and report trading by designated Persons and their immediate relatives, including any incident involving leak or suspected leak of unpublished price sensitive information.
- Health and safety risk observed, including risk to the public as well as other Persons (e.g., faulty electrical equipment).
- Abuse including physical, sexual, psychological, or financial abuse, exploitation, or neglect.
- Damage to the environment (e.g., pollution).
- Fraud and corruption (e.g. to solicit or receive or offer or promise any gift/reward as a bribe).
- Any instance of failure to comply with legal or statutory obligation either for and on behalf of the Company or in any personal capacity in the course of discharging duties of the Company.
- Any instance of any sort of financial malpractice or wrongful accounting practice.

- Conflict of interest.
- Abuse of power (e.g., bullying or workplace harassment).
- Any other unethical or improper conduct or a conduct that is in violation of any policy/procedures/ standards of the Company.

Procedure

Protected Disclosure should be reported in writing to ensure a clear understanding of the issues raised and should either be typed or written in legible handwriting and also can be in the regional language of the place of the employment of the Whistle Blower.

All the Protected Disclosure to be addressed to The Ethics Officer or Chairman of the Audit Committee under a covering letter to any one of the below addresses.

Sweden	India
SWIN Technologies AB (TrusTrace), IOFFICE Business centre Olof Palmes Gata 11 111 37 Stockholm, Sweden	SWIN Technologies Pvt Ltd (TrusTrace), Site No. 9, Teachers Colony, Chinniyampalayam, Coimbatore-641062

If an Associate receives a Protected Disclosure, he/ she should forward the same to the Ethics Officer or Chairman of the Audit Committee under a covering letter. The Ethics officer or Chairman of the Audit Committee shall detach the covering letter and forward only the Protected Disclosure to the investigator for the investigation in case if the investigation is not conducted by the Ethics Officer or Chairman of the Audit Committee.

Protected Disclosure should be factual and not speculative or in a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the Concern.

Investigation

- All the Protected Disclosures reported under this Policy will be thoroughly investigated by the Ethics Officer/ Chairman of the Audit Committee or such other Investigators. If any member of the Audit Committee has a conflict of interest in any given case, then he/she should recuse himself/herself and the other members of the Audit Committee should deal with the matter on hand.
- The decision to conduct an investigation taken by the Ethics Officer/ Chairman of the Audit Committee is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may or may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.

- The identity of the Subject(s) and the Whistle Blower will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- Subjects shall have a duty to co-operate with the Ethics Officer/ Chairman of the Audit Committee and any other Investigators (applicable basis on nature of investigation) during the investigation process to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.
- Subjects have the right to consult with Persons of their choice, other than the Ethics Officer/ Investigators and / or members of the Audit Committee and / or the Whistle Blower.
- Subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coached, threatened or intimidated by the Subjects.
- Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered maintainable unless there is good evidence in support of the allegation.
- For all women Subjects, investigation will happen in the presence of other women Staff nominated by the Ethics Officer/ Chairman of the Audit Committee.

The investigation will be completed normally within 45 days of the receipt of the Protected Disclosure. However, there may be deviation if there is delay in collecting evidence or for such other legitimate reason.

Anonymous Complaints

The Ethics Officer/ Chairman of the Audit Committee will take into consideration all anonymous complaints for appropriate investigation based on the following factors:

- The seriousness of the concern raised.
- The credibility of the concern.
- The likelihood of confirming that the allegation is raised through reliable sources.
- The ability to investigate into anonymous complaints.

However, the Company encourages Whistle Blowers raising a concern to provide his/her name to facilitate addressing the Concern more effectively and expeditiously.

Untrue Allegations

If a Whistle blower makes an allegation in good faith, which is not confirmed by subsequent investigation, no adverse action will be taken against that Whistle Blower. In making a Protected Disclosure, the Whistle Blower should exercise due care to verify the accuracy of the information provided in the complaint.

Disciplinary action may be taken against a Whistle blower who makes mala fide or frivolous allegations.

Confidentiality

The Whistle blower raising a Concern or the Persons to whom the Concern is made, or any Person involved in the investigation including witnesses shall maintain confidentiality and shall not disclose / discuss the Concern or the internal proceedings with any third party. The obligation of confidentiality does not however restrain an individual from disclosing the information as part of legal proceedings initiated by the individual or in response to any statutory or judicial process in accordance with the law.

Decision

If an investigation leads the Ethics Officer/ Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Ethics Officer/ Chairman of the Audit Committee shall recommend to the management of TrusTrace to take such disciplinary or corrective action as the Ethics Officer/ Chairman of the Audit Committee may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject because of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

Reporting

The Ethic Officer shall submit a report to the Chairman of the Audit Committee on a regular basis about all the Protected Disclosures referred to him/her since the last report together with the results of investigations, if any

Retention of documents

All Concerns in writing or documented and the results of investigation will be retained by the Company for a minimum period of 3 years.

Policy related authorities.

Dispensations to this Policy requires approval from Chairman of the Audit Committee.

Policy effectiveness review

This Policy shall be reviewed on an annually. TrusTrace reserves its right to unilaterally amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever and any such amendments/ modifications to this Policy will be communicated to the Associates.

Policy Changes / Reviews

This policy will be reviewed based on the following criteria:

- Annual Basis
- Major organization & structural changes
- Sr. Management & business feedback

Members of the Whistle blower

Sweden	India
Chairman of the Audit Committee	Chairman of the Audit Committee
Ethics Officer:	Ethics Officer: