



PALESTINAGRUPPERNA I SVERIGE

WHISTLEBLOWING POLICY

1. Background

At The Palestine Solidarity Association in Sweden (Palestinagrupperna, PGS), we strive to have an open and transparent workplace, where malpractice does not occur. We have a zero tolerance policy for corruption. It is therefore important to us that there is clear information available on how to report confidentially and securely. In the event of suspicion of ongoing or previous malpractice, resources must be available to disclose them. By making it easy to report, we promote the trust of employees, members, beneficiaries and the general public.

1.1 Definitions

GDPR: General Data Protection Regulation, which is a European regulation governing the processing of personal data and the free movement of such data within the European Union.

The Whistleblower Directive: EU Directive 2019/1936 on the protection of persons reporting irregularities in Union law.

Whistleblower Act: National implementation of the Whistleblower Directive in EU Member States.

Visslan: The Whistle Compliance Solutions AB's service Visslan, which enables digital reporting of misconduct: <https://visslan.com/>

Misconduct: Acting or omissions that have emerged in a work-related context that there is a public interest in it occurring.

Reporting: Written or verbal submission of information about misconduct.

Internal reporting: Written or verbal provision of information about misconduct within a company in the private sector.

External reporting: Written or verbal provision of information about misconduct to the relevant authorities.

Publication or to make public: To make information about misconduct available to the public.

Reporting person: A person who reports or publishes information about misconduct acquired in connection with his work-related activities.

Retaliation: Any direct or indirect act or omission which occurs in a work-related context and which is caused by internal or external reporting or by a publication, and which gives rise to or may give rise to unjustified injury to the reporting person.



PALESTINAGRUPPERNA I SVERIGE

Follow-up: Any action taken by the case manager(s) of a report to assess the accuracy of the allegations made in the report and, where appropriate, to deal with the reported infringement, including through measures such as internal investigations, investigations, prosecutions, actions to recover funds and to close the procedure.

Feedback: Providing reporters ("whistleblowers") with information on the actions planned or taken as a follow-up and on the grounds for such follow-up.

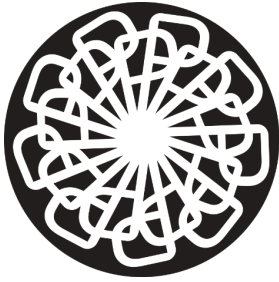
2. Who can report?

You can report and receive protection from the Whistleblower Act if you are an employee, volunteer, trainee, person who is otherwise available for work under our control and management or is part of our administrative, management or supervisory body. People who are employed by our partner organisations in Palestine and Lebanon, or who take part in projects that Palestinagrupperna contributes financially to or transfers Swedish aid to, can report. Contractors, subcontractors and suppliers who have information about any misconduct within the organisation can also report. Reporting misconduct is also possible for those whose work-related relationship with Palestinagrupperna has ended or has not yet commenced.

3. What can be reported?

In case of suspicion of any possible misconduct, law or regulation violation, we urge you to report this to us as a whistleblowing case. It is important that you at the time of reporting had reasonable grounds to believe that the information about the misconduct was true. Assessing whether there were reasonable grounds, circumstances and information that were available to you at the time of reporting should be the basis for whether you may have assumed that the misconduct was true. In addition, it is also important that the incident can be considered a violation that is of public interest, and thus give you protection against retaliation.

Before you file a report, read [5 questions to determine if you are protected by the Whistleblower Act](#).



PALESTINAGRUPPERNA I SVERIGE

3.1 Malpractice of public interest

You can report information about a suspected misconduct of which there is a public interest in it coming to light, and which has happened in a work-related context.

Misconduct of public interest entails violations or irregularities within a workplace that persons in senior positions or key personnel commit concerning;

- accounting, internal accounting control, auditing, bribery and corruption, financial crime, or
- other serious irregularities concerning the vital interests of the company or the life or health of individuals, such as serious environmental crimes, major deficiencies in workplace safety and serious forms of discrimination or harassment.

In the event of other types of complaints that are not of public interest, such as interpersonal disputes or complaints regarding the workplace or the work environment, we encourage you to contact your immediate manager, HR or other suitable person instead. This is to ensure that these matters are handled in the best possible way.

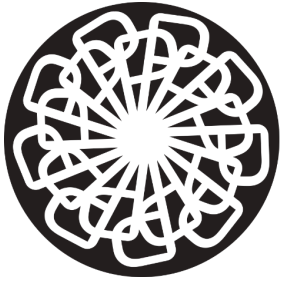
3.2 Misconduct contrary to EU law

In addition, there is misconduct that emerged in a work-related context that is contrary to EU laws or regulations. If you suspect such misconduct, please refer to the scope of the [Whistleblower Directive](#) in Article 2 and Annex Part 1 for applicable laws.

4. How is reporting done?

4.1 Written reporting

For written reporting, we use [Visslan](#) and our whistleblowing channel is available through <https://palestinagrupperna.visslan-report.se>. To file a report, choose the option "report" and then describe the suspected misconduct. Please describe the incident as thoroughly as possible, so that we can ensure that adequate measures can be applied. It is also possible to attach additional evidence, in the form of written documents, pictures or audio files.



PALESTINAGRUPPERNA I SVERIGE

4.1.1 Sensitive personal data

Please do not include sensitive personal information about people mentioned in your report unless it is necessary to accurately describe your case. Sensitive personal data is information about ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, health, a person's sexual life or sexual orientation, genetic data or biometric data used to identify a person.

4.1.2 Anonymity

You can stay anonymous throughout the process without it affecting your legal protection, but you also have the opportunity to reveal your identity under strict confidentiality. Anonymity can in some cases complicate the report's follow-up and measures to be taken, but in such cases we may ask you to reveal your identity to the case manager/s only, again in strict confidentiality.

4.1.3 Follow-up & login

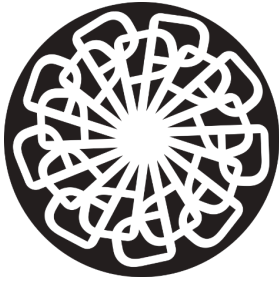
When you have submitted the report you will receive a sixteen-digit code, which you can subsequently use to log in to Visslan through <https://palestinagrupperna.visslan-report.se>. It is very important that you save the code as otherwise you will not be able to access your report again. If you lose the code, you can submit a new report referring to the previous one.

Within **seven days**, you will receive confirmation that a case manager has received your report. A case manager is an independent and autonomous party that receives reports in the reporting channel, whose contact information is attached in 7.1 Contact information. In case of questions or concerns, you and the case manager(s) can communicate through the platform's built-in and anonymous chat function.

You will receive feedback within **three months** on any measures planned or implemented as a consequence of the report.

It is important that you, with your sixteen-digit code, log in regularly to answer any follow-up questions that case manager(s) may have. In some cases, a report can not be proceeded without answers to such follow-up questions.

Our cases are initially handled by Starck & Partner. The case manager may refer the report to our internal contact person(s).



PALESTINAGRUPPERNA I SVERIGE

4.2 Verbal reporting

It is also possible to submit a verbal report by uploading an audio file as an attachment when creating a report at <https://palestinagrupperna.visslan-report.se>. This is done by selecting the option of submitting evidence and uploading an audio file. In the audio file, you can describe the same facts and details as you would have done in a written report.

In addition, a physical meeting with the case manager(s) can be requested via Visslan. This is most easily done by either requesting it in an existing report, or creating a new report asking for a physical meeting.

4.3 External reporting

We urge you to always report malpractice internally first, but in the event of difficulties or it is considered inappropriate, it is possible to conduct external reporting instead (or after internal reporting without results). We then refer you to contact the competent authorities or, where applicable, to EU institutions, bodies or agencies.

5. Rights as a whistleblower

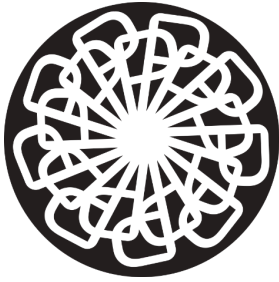
5.1 Right to confidentiality

The identity of reporting persons is treated confidentially and access to cases is prevented for unauthorised personnel. We will not disclose the identity of anyone reporting misconduct without their consent if applicable law does not compel us to, and we will ensure that whistleblowers are not subjected to retaliation of any kind.

5.2 Protection against reprisals or retaliation

Whistleblowers are protected by law against negative consequences from having reported misconduct. The protection also applies in relevant cases to persons in the workplace who assist the whistleblower, such as colleagues or relatives in the workplace, and legal entities that whistleblowers own, work for or are otherwise related to.

This means that all kinds of threats of retaliation and attempts at retaliation are not permitted. Among those unlawful acts of retaliation are firing a whistleblower, forcing them to change



PALESTINAGRUPPERNA I SVERIGE

work tasks, imposing disciplinary measures or threats, acts of discrimination or blacklisting them due to reporting a misconduct.

Even if a whistleblower were to be identified and subjected to reprisals, they would still be covered by protection as long as they had reasonable grounds to believe that the misconduct reported was true and within the scope of the Whistleblower Act. Note, however, that protection is not applicable if it is a crime in itself to acquire or have access to the information reported.

The protection against retaliation also applies in legal proceedings, including defamation, copyright infringement, breach of confidentiality, breach of data protection rules, disclosure of trade secrets or claims for damages based on private law, public law or collective labour law, and the whistleblower shall not be held liable in any way a consequence of reports or disclosures provided that they had reasonable grounds to believe that it was necessary to report or publish such information in order to expose a misconduct.

5.3 Publication of information

The protection also applies to the publication of information, assuming that a whistleblower has first reported internally within the company and externally to a government authority, or directly reported externally, and no appropriate action has been taken within three months (in justified cases six months). Protection is also obtained when a person has had reasonable grounds to believe that there may be an obvious danger to the public interest if the information is not made public, for example in an emergency. The same applies when there is a risk of retaliation in case of external reporting or that it is unlikely that the misconduct will be remedied in an effective manner, for example if there is a risk that evidence may be concealed or destroyed.

5.4 The right to review documentation of meetings with case manager(s)

If you have requested a meeting with a case manager(s), they will, with your consent, ensure that complete and correct documentation of the meeting is preserved in a lasting and accessible form. This can be done, for example, by recording the conversation or by keeping minutes. Afterwards, you will have the opportunity to check, correct and approve the protocol by signing it.



PALESTINAGRUPPERNA I SVERIGE

We recommend that this documentation is kept in Visslan's platform by the whistleblower creating a case where the information can be collected in a secure way, with the option to communicate securely.

6. GDPR and handling of personal data

We always do our utmost to protect personal information and ensure that our handling of these is in accordance with the General Data Protection Regulation (GDPR). In addition, all personal data without relevance to the case will be deleted and the case will only be saved for as long as it is necessary to do so. The longest a case will be processed is two years after its conclusion. For more information about our handling of personal data, see our [Integrity policy](#).

7. Additional contact

If you have further questions regarding how we handle whistleblower cases, you are always welcome to contact case Manager(s).

For technical questions about Visslan's platform, feel free to create a case at <https://palestinagrupperna.visslan-report.se>. Should this not be possible, contact Visslan (contact information below).

7.1 Contact information for Case Manager(s)

External case manager

Company: Starck & Partner

Email: visselblasning@starckpartner.se

Internal contact person

Anna Wester, organisation secretary

Email: anna@palestinagrupperna.se



PALESTINAGRUPPERNA I SVERIGE

7.2 Contact information for Visslan (The Whistle Compliance Solutions AB)

Email: clientsupport@visslan.com

Phone number: +46 10-750 08 10

Visit the [Visslan](https://www.visslan.com) website for more information about Visslan.