

Whistleblowing Policy

Mainly Silver Design is providing its employees with a reporting channel,

<https://mainlysilver.visslan-report.se/>,

which should be used to report improprieties within the company, for example, harassments, corruption/bribery, or any wrongdoings in our company.

Mainly Silver Design is committed to the highest possible standards of openness, integrity and accountability. We take every effort to avoid any improprieties that may result in serious consequences for the company or its employees. However, despite all these efforts malpractice in any part of the business may occur.

In case of malpractice or misconduct, all employees are able to use the Whistleblowing Channels.

Purpose

The purpose of the Whistleblowing Policy and Channels is to encourage employees to disclose any malpractice or misconduct of which they become aware.

With the Whistleblowing Policy, Mainly Silver Design undertakes to act in accordance with legislation on disclosure of malpractice in the workplace as well as in accordance with personal data protection.

Authority for Whistleblowing Policy

Overall authority for this policy sits with the CEO

Managers are responsible for ensuring that all employees are aware of this policy and are able to raise concerns (in accordance with the channels/procedures below) without fear of reprisals.

All employees are responsible for the success of this policy and should ensure that they take steps to disclose any malpractice (under this policy) of which they become aware.

Scope

This policy applies to all employees within Mainly Silver Design. The policy refers to malpractice concerning:

1. Auditing matters
2. Fight against bribery
3. Banking- and financial crime
4. Other improprieties concerning the company's or the group's vital interests or the life or health of individual persons, as for instance environmental crimes, deficiencies as regards the security at the place of work and serious forms of discrimination or harassments.

Channels to Report Wrongdoing

We have implemented low-threshold possibilities for reporting any wrongdoing related to Mainly Silver Design. The whistleblowing channel is designed, set up and operated in a way that ensures the confidentiality and anonymity of the whistleblower.

Reports are received by our CEO, who work under the supervision of, and with the support from our President.

Reporting can be done either anonymously, confidentially or openly by submitting a report through our highly secure whistleblowing channel, provided by Visslan. This can be found here:

<https://mainlysilver.visslan-report.se/>

Confidentiality

In the case the company is aware of the Whistleblower's identity, Mainly Silver Design will not disclose the identity of the person who makes a report to any internal or external part. The identity of the person is, if known, only known by our CEO and disclosed to the state authorities only when investigation so requires.

Mainly Silver Design is also liable at the request of the data subject to rectify personal data that is incorrect, incomplete or misleading.

Any employee has the right to request an excerpt of the register to check which information if any is registered about him or her. The information will however not be disclosed if it could jeopardize the investigation but should be released as soon as action is taken against the person concerned.



Visslan Whistleblowing Software



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MAINLY SILVER DESIGN CO., LTD.

Corrective Action and Compliance

As part of handling and investigating disclosures, any needed changes to routines and procedures to prevent malpractice in the future are recommended to our CEO, he is responsible for reviewing and implementing these recommendations.

False Disclosures

Mainly Silver Design will treat all disclosures of malpractice seriously. However, appropriate disciplinary action will be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate.