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Whistleblowing Guidelines

This whistleblowing guidelines template is based on the GDPR and the EU Whistleblower Protection Directive (2019/1937). Please note that the information below may vary between countries according to local legislation.

1. Introduction – what is whistleblowing, and why is it important?

Rapala VMC strives to achieve transparency and a high level of business ethics. Our whistleblowing service offers a possibility to alert us about suspicions of misconduct in a confidential way. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage. Whistleblowing channel ensures the confidentiality of the identity of the whistleblower and any third party mentioned in the report.

2. When to blow the whistle?

The whistleblowing service can be used to alert us about serious risks of wrongdoing affecting individuals, our company, the society or the environment.

Reported issues can include criminal offences, irregularities and violations or other actions or misconduct in breach of EU or national law within a work-related context, in e.g., following areas:

- Public procurement
- Financial services, products and markets, and prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data, and security of network and information systems
- Implementation of EU expenditures, collection of EU income and funds for EU or national contributions; EU or national regulations on State aid; EU or national competition regulations; and corporate tax regulations or arrangements to obtain tax benefits.
- Possible extended material scope as based on national legislation.

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Employees are asked to contact their supervisor or manager for issues relating to dissatisfaction in the workplace or related matters, as these issues cannot be investigated in the scope of the whistleblowing.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

3. How to blow the whistle?

There are different ways to raise a concern:

Alternative 1: Anonymous or confidential messaging through the whistleblower reporting channel to the whistleblowing team: https://report.whistleb.com/en/rapalavmc

Alternative 2: Contact Executive Vice President, General Counsel Olli Aho, Group Legal Counsel Tuomo Leino or Director, Group Financial Control, Joni Virtanen (firstname.lastname@rapalavmc.com)

Alternative 3: Reporting to external channel maintained by competent authority; the Office of the Chancellor of Justice of Finland.

All messages received will be handled confidentially. The whistleblowing channel is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB deletes all meta data, including IP addresses. The person sending the message does not need to state his/her identity in the subsequent dialogue with responsible receivers of the report.

4. The investigation process

The whistleblowing team

Access to messages received through our whistleblowing channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process, upon consent from the whistleblower in case identity of the reporting person is disclosed. These people can access relevant data and are also bound to confidentiality.

The whistleblowing team consists of/or reports may be disclosed to the following persons: Executive Vice President, General Counsel Olli Aho, Group Legal Counsel Tuomo Leino and Director, Group Financial Control Joni Virtanen.

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Receiving a message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken, please see Investigation below.

The whistleblower will receive an acknowledgment of receipt of the report within 7 days.
The whistleblowing team may not investigate the reported misconduct if:

- the alleged conduct is not reportable conduct under these Whistleblowing guidelines
- the message has not been made in good faith or is malicious
- there is insufficient information to allow for further investigation
- the subject of the message has already been solved

If a message includes issues not covered by the scope of these Whistleblowing guidelines, the whistleblowing team should provide the reporting person with appropriate instructions.

The whistleblowing team will send appropriate feedback within 3 months upon the date of receiving the report.

Sensitive personal information should not be included in the message if it is not necessary for describing the concern.

Investigation

All messages are treated seriously and in accordance with these Whistleblowing guidelines.

- No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- A message will not be investigated by anyone who may be involved with or connected to the wrongdoing.
- Whistleblowing messages are handled confidentially by the parties involved.
- Corporate or external expertise may be included in the investigation upon consent from whistleblower.

Whistleblower protection

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower will be kept informed of the outcomes of the investigation into the allegations.

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In cases of alleged criminal offences, the whistleblower who has announced his/her identity in the report, will be informed that his/her identity may need to be disclosed during judicial proceedings. Whistleblowing team shall not disclose personal data outside the company in any other purposes than what is strictly necessary to investigate reported cases.

5. Processing of personal data

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate behaviour eligible under our code of conduct or internal rules. This processing is based on statutory obligations and the legitimate interest of the controller to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case. Data is stored within the EU. For any further questions or complaints please address your request to privacy@rapala.fi.

Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower messages that are archived will be anonymised under GDPR; they will not include personal data through which persons can be directly or indirectly identified.

Personal data controller:

Rapala VMC Corporation, Mäkelänkatu 87, 00610 Helsinki, Finland, is responsible for the personal data processed within the whistleblowing service.

Personal data processor:

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages. As such, neither WhistleB nor its sub-processors have access to readable content.