# Inter IKEA Group Raise a Concern procedure



## Raise a **Concern** at **Inter IKEA** Group

The Inter IKEA Group approach to business and people success is based on honesty, respect, fairness and integrity. We have documented our way of doing business in our code of conduct and supporting policies. These documents, together with applicable laws and regulations, provide guidance to our co-workers on the principles and ethical values to uphold. They support us in our everyday working life to make the right decisions: no matter where we are, who we are working with and under which circumstances. Despite these you may experience or observe behaviour that concerns you, or that might appear to breach our code, applicable laws, or regulations. If that is the case, we would like to ask you to raise your concern to us.

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#### 1. Why raise your concern to Inter IKEA Group?

Raising concerns is key to sustaining a safe and secure work environment, our reputation and license to operate. We hope you see it as your responsibility to raise your concern and feel safe to do so. Remaining silent could make the situation worse and creates an environment of a lack of trust. When you raise your concern, we can help and take action. In this way, we can improve together.



#### 2. Who can raise a concern?

Anyone who experiences or observes misconduct in a work-related context, involving Inter IKEA Group managers or co-workers. Raise a Concern within Inter IKEA Group is available to e.g., co-workers, suppliers, partners, former co-workers, future co-workers, consultants, etc.

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## **3. What options** are there to raise a concern?

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We offer different options to raise a concern and trust that you choose to report in the way that feels most comfortable to you. We encourage an open and honest dialogue in the workplace and therefore, where possible and suited, we hope that you can address your concern directly with the person involved, or with support of a manager, a colleague from People & Culture or similar. We also realise that there might be concerns for which a more neutral way of reporting is better or feels more well-situated. That's why we have our Raise a Concern platform, and in our larger companies in the EU and Switzerland we also have local ethics representatives to reach out to. In the Raise a Concern platform you can report in local languages via webform or phoneline, anonymously if desired. No matter which of the options you choose, we will listen and follow-up appropriately. In case you think the offered channels by Inter IKEA Group cannot effectively address your concern, you may have the option to report externally to a competent authority in your country. Countries within the European Economic Area must provide for such a competent authority having a website with relevant information for reporting.



4. What concerns should be raised?

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We are open to any concern that you may have but aim specifically at breaches of our code of conduct, laws, and regulations. It is impossible to give an exhaustive list but, broadly speaking, you are encouraged to report:

- situations breaching human rights, including harassment, child labour etc.
- situations which endanger the health or safety of individuals or cause damage to the environment.
- financial and accounting concerns and asset misappropriation.
- corruption or other criminal offences, including bribery, conflicts of interest, illegal gratuities etc.
- breaches of competition and state aid rules.
- situations which result in a risk to the privacy of individuals.
- actions which harm consumer rights.
- actions which are intended to hide any of the above.



# 5. Can reporting harm me or others?

We will protect persons raising concerns in good faith from any disadvantages. We will not tolerate any form of retaliation (e.g., suspension, dismissal, denial of promotion or education, negative reviews or change of work location), even if after an investigation we determine that there has not been any misconduct.

To avail yourself of this protection, it is important that you only raise a concern if you have reasonable grounds to believe that the information on the breach reported is true. Raising a concern knowing that it is false may lead to disciplinary actions. The person raising a concern, the person who is subject of a concern, and others involved in the handling of cases are treated objectively, fairly and equally. If it has been decided that further review like an investigation is necessary, the person(s) involved will be appropriately informed, with at the same time protecting the identity of reporters and others. We will allow those who are subjects of any concern to be heard and give their facts of the situation. Consequential actions will solely be taken based on facts.



## 6. How do I raise a concern via the raise a concern platform?

Our Raise a Concern platform can be reached by phone or web, is available in local languages at all times via: <u>https://interikea.gan-compliance.com</u>. If you report via the Raise a Concern platform, you will receive a user ID and password to connect back into the platform again. Any questions, updates or communication will be shared with you through the platform and you can leave answers or ask further questions. You can revisit the platform at any stage for acknowledgement and further exchange.





## 7. Can l report anonymously?

Yes, you may raise your concern anonymously unless applicable laws in your country do not allow anonymous reporting. No matter if you report anonymous or not, enough detail must be provided to proceed with, and properly conduct an investigation. In case you leave your name, we will make all efforts to ensure that your identity remains protected.

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## 8. What information do I need to provide?

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We encourage you to provide as much relevant information as possible. Detailed information enables us to assess and investigate concerns thoroughly and to act where necessary, including:

- a detailed description of the situation that has caused your concern, as well as the history of the alleged breach or misconduct and examples of events.
- names of people potentially involved, dates, places, and other relevant information.
- any supporting facts and documents related to your concern.

Even if you do not have all the facts, we encourage you to raise your concern as soon as possible and to share the facts that you do have.



#### 9. What happens after I raised a concern?

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Concerns reported to central are handled at group level and concerns reported to local are handled at local level. Concerns reported at local level may reveal a structural problem or a problem that affects two or more entities of the group. To effectively address such concerns involvement of ethics representatives at group level may be required and we may need to send your report to these representatives for further handling. Should this be the case, we will inform you in advance and give you the opportunity to object. If you object, we will not send your report to group. This may affect our ability to handle your concern appropriately.

Co-workers handling concerns within Inter IKEA Group are provided with extensive training in how to handle concerns; how to conduct fair and impartial inquiries and investigations, and their responsibilities with respect to data privacy and confidentiality. These individuals must demonstrate and safeguard that they are independent and neutral from the reported concern. External advisors such as lawyers, forensic experts, auditors, or accountants may be engaged to assist an investigation, under strict confidentiality and appropriate agreements.



## 10. How will I be informed about the progress of my report?

You will receive a confirmation within 7 calendar days after receipt of your concern. Inter IKEA Group will further inform you about the decision on the treatment of the report, and on the closure of the case. You will receive feedback on the outcome and/or status of the case within 3 months after receipt of your concern, but often we communicate throughout the process with you for information and updating purposes.



#### 11. How do we secure confidentiality of your report?

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The Raise a Concern platform is hosted by an external company and only a limited number of representatives within Inter IKEA Group have restricted access to those parts relevant to them. The secure and dedicated platform consists of a web-form and phoneline and a case management system. Technical and organisational security measures protect personal data from being manipulated (unintentionally or intentionally), lost, destroyed, or accessed by unauthorised persons.

All reported concerns and their related information are treated and labelled as strictly confidential information as per Inter IKEA Group instructions on information handling, including the identities of the reporter(s) and anyone mentioned in the report. We share information only with a small group of people on a strictly 'needto-know' basis. We only disclose information to people handling your concern and to those that are responsible for deciding about possible measures to take. We provide information to third parties if required by law. Every effort will be made not to reveal the identity of persons raising a concern or referred to in a concern.



## 12. How does Inter IKEA Group comply with data protection laws?

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In handling your data, we at Inter IKEA Group will comply with all applicable privacy laws, including the General Data Protection Regulation (GDPR) and we have taken appropriate measures to keep your data safe and secure. All entities within Inter IKEA Group have similar policies regarding the processing of your personal data. If you report locally, the entity you report to is responsible for processing your data. If you report centrally Inter IKEA Services B.V. is responsible for the processing of your personal data.

We have a legitimate interest to process your personal data to address misconduct and comply with applicable laws. We assess on a case-by-case basis whether, and if so, how we process the personal data provided by you. We will treat your data as strictly confidential and it will only be accessed on a strict need-to-know basis. The data will only be used for receiving, investigating, and handling the concern raised in your report. We will not keep more data than necessary to investigate your concern and we will keep the data no longer than necessary.



## 12. How does Inter IKEA Group comply with data protection laws?

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You have the right to know what personal information we process about you and why. If you believe we store wrong information about you, you may ask us to correct this. If you believe there's no longer any need for us to keep your data, you may ask us to delete the data. You may also ask us to restrict the processing of your data in certain situations, for example if you've asked us to fix incorrect information, you may ask us to stop processing until the information is correct. These rights apply to both the reporting person and all other person(s) involved. Inter IKEA Group will handle your request in accordance with the law and inform you about the outcome of your request. If access to the data is granted to the person involved, we will take the necessary steps to ensure that your identity is not disclosed, and your personal information is removed from the documents before it is shared.

If you would like to exercise your rights as mentioned above or have any questions about how we protect your privacy you can reach out to the data privacy team within Inter IKEA Group which can be reached via: **isdp.dsar@inter.ikea.com**. If you aren't satisfied with the way we treat your personal information, you have the right to lodge a complaint about us with the national supervisory authority.



#### More questions?

Do you have more questions about the Inter IKEA Group code of conduct or Raise a Concern procedure? Please scan the QR code or contact us via: **ethics@inter.ikea.com**.

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