



# Brickpack AB Grievance Mechanism

The grievance mechanism may be used to lodge any concerns and grievances in respect of Brickpack and Brickpack’s portfolio companies, but not in respect of individuals due to applicable data protection legislation. Also, anonymous reports will be considered

## Brickpack’s Grievance Mechanism

### Introduction

The purpose of this document is to define the procedure for managing stakeholder concerns and complaints (referred to as “grievances”) in a planned, timely, and respectful manner.

This grievance mechanism helps Brickpack fulfill the requirements of:

1. Human Rights Policy.
2. Alignment with international best practices in stakeholder engagement.

A management process to effectively and proactively manage a community’s feedback, grievances or concerns is frequently used to allow communities a chance to have two- way dialogue with a company about its operations. A grievance mechanism can enhance outcomes by giving people satisfaction that their voices are being heard and that their issue was subject to formal consideration within the company

Brickpack’s Grievance Mechanism is not a legal enforcement mechanism and does not confer or preclude any rights of access to justice to claimants.

All grievances, regardless of outcome, are part of Brickpack’s on-going human rights due diligence.

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## How to use the Grievance Mechanism

Individuals and communities that are subject to risks or impacts from Brickpack can lodge a grievance, by e-mailing [grievances@brickpack.se](mailto:grievances@brickpack.se). Grievances are received by Brickpack's ESG Team which is responsible for investigating grievances. The team reports to Brickpack's CEO.

In order for Brickpack to deal with the grievance quickly and fairly, it should contain an accurate, adequate, and relevant description of:

- Individuals or communities impacted and how they are impacted
- The company to which the concern or grievance is related
- Any actions already taken to address the concern or grievance
- Which resolution or remedy is sought

For example, the following format could be used to file a complaint:

First name

Last name

E-mail

Phone

Name of the Brickpack plant, project or activity

Please describe your concern/question/grievance

What happened?

Who was involved?

What are the consequences?

When did it happen?

What actions would you like to see to resolve the issue?

Please state whether you wish your identity and/or the information provided to be kept confidential. Please note that Brickpack cannot assure legal protection against retaliation or reprisal from external parties. However, Brickpack does not tolerate any form of retaliation against a claimant and we will, to the best of our possibilities, take necessary steps to prevent and discipline such actions.

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Anonymous reports will be considered and investigated, to the best of our possibilities.

The Grievance Mechanism may be used to lodge concerns and grievances in respect of Brickpack and Brickpack's portfolio companies, but not in respect of individuals, due to applicable data protection legislation. If the report relates to an individual, Brickpack refers to its whistleblowing service where reports may be filed regarding serious irregularities involving persons in key or executive positions within Brickpack and Brickpack's portfolio companies.

When lodging a grievance under the Grievance Mechanism, the claimant should avoid sharing information involving personal data of anyone else but the claimant. If this requirement is not met, Brickpack may deem the grievance inadmissible as Brickpack may not be allowed to process personal data in relation to the report, due to applicable data protection legislation.

### **Brickpack's Procedures**

Although response times will depend on the nature of the grievance, claimants will be kept informed about expected response times and progress made in addressing the grievance. The initial phases have defined timeframes. If these are not met, the grievance may be escalated to Brickpack's management.

Once a grievance is received, Brickpack aim to send an acknowledgement of receipt of the grievance within five working days.

Brickpack determines whether a grievance is legitimate or not, based on if the grievance is directly or indirectly linked to Brickpack and the significance of the grievance. Brickpack treats all grievances seriously and will not dismiss issues unless clearly unfounded and after a dialogue with the claimant. This admissibility assessment is aimed to be completed within the next 10 working days. Brickpack informs the claimant about the decision made and the basis of the decision.

If a grievance is deemed legitimate, Brickpack will make a preliminary review of the issues raised in the grievance to reach a deeper understanding of the issues and likely impacts. Brickpack will aim to finish the preliminary review within the next 20 working days.

If Brickpack, based on the preliminary review, determines that a deeper investigation must follow Brickpack will set up an indicative timeframe for such investigation and communicate the same to the claimant. The timeframe will largely depend on the complexity of the matter, including factors such as the number of issues and parties involved, whether the issue and/or remedy is contested, and if negotiation or mediation is necessary.

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When the investigation has been finalized, Brickpack will prepare a report on the grievance, including recommendations for corrective actions and potential remediation. Corrective actions may take the form of improvements of existing policies or procedures, as well as training and capacity building.

The report will be presented to Brickpack's Chief Executive Officer, who will decide on the most appropriate course of action. If Brickpack's Chief Executive Officer is deemed to be in a conflict of interest, the report will instead be presented directly to the chairman of the board of directors of Brickpack.

The final outcome will be communicated to the claimant as soon as practicable possible. At this stage the claimant can either accept or reject the outcome, which will formally be logged.

Throughout the process Brickpack will ensure close dialogue with the claimant. Gathering the necessary information for addressing the grievance may include reviewing relevant documentation and records, meetings with external stakeholders, consultations with external expertise, on-site visits and contacts with the claimant and other affected parties, as well as the relevant portfolio company.

### **Processing of personal data of claimants**

The Grievance Mechanism may include processing of personal data of claimants, in order to administer and evaluate grievances.

If you have any questions or concerns regarding the processing of your personal data, you may primarily contact Brickpack at [GDPR@Brickpack.se](mailto:GDPR@Brickpack.se). If you have complaints regarding the processing of your personal data, you may also contact the Swedish Data Protection Authority.

For more information on Brickpack's privacy practices, please see Brickpack's Code of Conduct

This Grievance Mechanism will be evaluated by Brickpack on an on-going basis and updated where appropriate.

Brickpack AB