

## **INTEGRITY POLICY FOR SHAREHOLDERS**

### **GENERAL**

In this Integrity Policy (“**Integrity Policy**”), we provide more detailed information on how Beijer Alma AB, Corp. Reg. No. 556229-7480, Box 1747, SE-751 47 Sweden (“**Beijer Alma**” or “**the Company**”), processes personal data relating to you in your capacity as a shareholder or shareholder representative or the holder or holder representative of other financial instruments that could be converted to or provide entitlement to the acquisition of shares (“**shareholder**”). The Company has another integrity policy that covers other personal data processing within the Company, which can be found on our website <https://beijeralma.se/>

### **PERSONAL DATA CONTROLLER**

Beijer Alma is the personal data controller for the processing of your personal data and is responsible for ensuring that processing is conducted in accordance with applicable legislation. The central securities depository is the personal data controller for the processing of personal data in the record register.

The person responsible for personal data issues at Beijer Alma is Jan Blomén, whose tasks include monitoring that Beijer Alma’s processing of personal data is conducted in accordance with applicable legislation. Jan Blomén can be contacted at jan.blomen@beijeralma.se or +46 18 15 71 60.

### **PERSONAL DATA THAT WE PROCESS**

Your personal data can be submitted to us directly by you or by the company you represent. Your personal data that is contained in the record register may also be provided to us by the central securities depository, Euroclear Sweden AB (publ). Personal data that we process comprise:

- Contact information comprising name, address, telephone number and e-mail address
- Personal identity number
- Corporate Registration Number (if it can be connected to you as a person)
- Holdings of shares or other financial instruments
- Any information regarding guardianship, pledges and pledgees as well as other notes in the record register

Other data provided by you or the organization you represent or that is included in the information we receive from the central securities depository may also be processed.

### **OUR PROCESSING OF YOUR PERSONAL DATA**

The purposes for which we process your personal data and the lawful basis we have for each case of processing are presented in the table below.

<b>Purpose</b>	<b>Lawful basis</b>
To meet Beijer Alma's obligations toward you as a shareholder in accordance with the Company's Articles of Association.	<p><i>Fulfillment of contract</i></p> <p>Processing is necessary to fulfill Beijer Alma's contractual obligations to you in accordance with the Company's Articles of Association.</p> <p><i>Legitimate interests</i></p> <p>Processing is necessary for Beijer Alma's legitimate interest in fulfilling Beijer Alma's contractual obligations to its shareholders (pertains only to representatives of shareholders).</p>
To meet Beijer Alma's obligations to you and other shareholders in accordance with the Swedish Companies Act (for example, notification of the Annual General Meeting, administration of the Annual General Meeting or in connection with other company events).	<p><i>Legal obligations</i></p> <p>Processing is necessary to fulfill Beijer Alma's legal obligations in accordance with the Swedish Companies Act.</p> <p><i>Legitimate interests</i></p> <p>Processing is necessary for Beijer Alma's legitimate interest in fulfilling Beijer Alma's contractual obligations to its shareholders (pertains only to representatives of shareholders).</p>
Distribution of shareholder-related information	<p><i>Legal obligations</i></p> <p>Processing is necessary to fulfill Beijer Alma's legal obligations in accordance with the Market Abuse Regulation.</p> <p><i>Legitimate interests</i></p> <p>Processing is necessary to enable Beijer Alma to quickly and correctly provide shareholders and other stakeholders with regulatory or other information relevant to the Company.</p>

**HOW LONG WE RETAIN YOUR PERSONAL DATA**

Your personal data are retained as long as there is a legal requirement to do so or for the time required to fulfill the purpose of the processing.

**WHO WE SHARE YOU PERSONAL DATA WITH**

The minutes and list of voting rights from general meetings of shareholders may be distributed to the shareholders present at the general meeting in question, the Swedish Companies Registration Office, auditors, and others to whom Beijer Alma has a legal obligation to submit minutes or to whom the Company otherwise deems it appropriate to submit the minutes.

Information about, for example, major shareholders may be submitted to public authorities, advisors and the general public in conjunction with the preparation of prospectuses, information memorandums and financial reports. A list of Beijer Alma's ten largest shareholders is published on Beijer Alma's website.

Personal data is also shared with other trusted parties, such as suppliers, professional advisors and auditors.

## **TRANSFERS OF PERSONAL DATA TO THIRD COUNTRIES**

Beijer Alma will not transfer your personal data to any country outside the EU/EEA.

## **YOUR RIGHTS**

Provided that Beijer Alma is the personal data controller for your personal data, you are entitled, at any time, to receive a register extract free of charge containing information about what personal data relating to you is registered, the purposes of the processing of this personal data and information regarding where this personal data was obtained or to whom it is to be provided. You are also entitled to receive, in the register extract, information regarding the envisaged period for which the personal data will be stored, or the criteria used to determine that period. Requests to receive such information must be made in writing and sent to Beijer Alma at the address provided below under the section "Contact."

You are entitled to data portability, meaning the right to obtain and transfer your personal data under certain conditions in a structured, generally applied and machine-readable format to another personal data controller.

At your request or on its own initiative, Beijer Alma will erase, correct, anonymize, supplement or erase data that is discovered to be incorrect, incomplete or misleading. In certain instances, Beijer Alma is obligated to process your personal data although you have requested that it be removed.

Under certain circumstances, you may request the restriction of continued processing of your personal data (for example, if you question whether your personal data is correct or if the processing is lawful) as well as having the right to object to processing under conditions prescribed by applicable personal data legislation. You can, at any time, inform Beijer Alma that you no longer wish to receive marketing materials or newsletters/press releases from the Company, and Beijer Alma will then immediately cease to process your personal data for this purpose.

If you want to exercise any of the above rights or if you have any questions regarding personal data held by Beijer Alma, or questions about this Integrity Policy, do not hesitate to contact Beijer Alma (for contact information, see the section "Contact" below).

Please contact Beijer Alma if you are not satisfied with the Company's processing of your personal data and Beijer Alma will do its best to address your complaints. Your integrity is extremely important to Beijer Alma and Beijer Alma always endeavors to protect your personal data in a relevant and secure manner. If Beijer Alma, in your opinion, nonetheless fails in this ambition, please note that you are also entitled to submit a complaint to the Swedish Data Protection Authority.

## **IF PERSONAL DATA HAS NOT BEEN PROVIDED TO BEIJER ALMA**

If you do not provide your personal data to Beijer Alma, Beijer Alma will not be able to meet its legal or contractual obligations to you as a shareholder and you will not be able to exercise your rights as a shareholder, such as your right to participate and vote at general meetings of shareholders.

## **CONTACT**

Do not hesitate to contact Beijer Alma if you have any questions regarding this Integrity Policy, the processing of your personal data or if you wish to request a register extract.

Beijer Alma's contact information:

Corporate Registration Number: 556229-7480

Address: Box 1747, SE-751 47 Uppsala

Telephone number: +46 18 15 71 60

E-mail address: [info@beijeralma.se](mailto:info@beijeralma.se)

Contact information for the person responsible for personal data issues at the Company:

Name: Jan Blomén

E-mail: [jan.blomen@beijeralma.se](mailto:jan.blomen@beijeralma.se)

Telephone number: +46 18 15 71 60