



Instruction - Akademiska Hus, Reporting feature - flag suspected irregularities

INTRODUCTION

Akademiska Hus has established a mechanism for handling suspected corruption, other criminal activities, or potential irregularities related to its own operations or those of its suppliers. This document outlines and explains how the mechanism can be used, who can use it, and how Akademiska Hus manages reported suspicions and/or incidents.

PURPOSE OF THE MECHANISM

The purpose of enabling the reporting of incidents/irregularities is to:

- Strengthen protection against corruption within Akademiska Hus operations.
- Provide a channel for Akademiska Hus partners and other stakeholders to raise concerns, suspicions, and act as whistleblowers.
- Encourage employees, stakeholders, partners, and their staff, as well as other affected parties, to report suspected irregularities and/or serious incidents connected to Akademiska Hus operations or suppliers.
- Make Akademiska Hus aware of issues or suspicions of corruption within its operations and/or projects it is involved in.
- Facilitate Akademiska Hus in investigating and resolving reported concerns and suspicions.

HOW TO USE THE REPORTING MECHANISM / WHO CAN USE IT?

The Akademiska Hus reporting mechanism for supplier-related issues can be used by:

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- Akademiska Hus partners, suppliers, subcontractors, and their employees.
- Individuals supported by, affected by, or involved in activities carried out by Akademiska Hus.

HOW TO SUBMIT A REPORT

A concern, suspicion, or other issue can be reported by:

- Using the digital reporting form through our website.
- Completing the Word form (that also can be found at akademiskahus.se) and sending it via email to: leverantorsradet@akademiskahus.se, (Or printing it out and sending it by post, or submitting it through the link provided on the Akademiska Hus website).

TYPES OF REPORTS

Akademiska Hus handles all cases submitted through the reporting mechanism. However, cases related to the following areas will be prioritised:

- Contractual and/or legal violations.
- Inappropriate behaviour or conduct by those working on behalf of Akademiska Hus.
- Suspicions of fraud or misuse of funds.
- Suspicions of criminal activity.
- Environmental, health, or safety hazards.
- Sexual exploitation, abuse, or harassment.
- Other forms of abuse of power.

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- Cases outlined in the Akademiska Hus Anti-Corruption Policy or Code of Conduct.
- Other cases unrelated to corruption and/or misconduct will be treated as valuable feedback, but actions cannot be guaranteed.

HOW AKADEMISKA HUS HANDLES REPORTED CASES

Reports submitted to Akademiska Hus are managed through the following process:

1. Case reception: Once submitted, cases are forwarded to the Akademiska Hus Supplier Council, responsible for handling these matters.
2. Case categorisation: Two staff members categorise the case and decide how it should be managed. The Supplier Council collectively decides whether the case should be handled internally or by an external party.
3. Reporting obligations: Akademiska Hus may be required to report suspicions of corruption and/or misconduct to other stakeholders involved in the relevant activities. When the case affects external parties, they will be informed.
4. Action plan development: The Supplier Council determines the necessary actions. Further information may be required from the sender to ensure appropriate measures are taken. Processing times may vary based on the case's complexity and involved parties.
5. Investigation: Depending on the decisions made, an investigation is initiated. This may involve Akademiska Hus employees and/or external consultants.
6. Decision and actions: Akademiska Hus determines the consequences and further actions, sometimes in collaboration with relevant stakeholders. The outcome of the investigation is communicated to the involved parties.

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7. Response to the sender: The individual or group handling the investigation informs the sender of the outcome and decisions made.

RESPONSE TO THE REPORTING PARTY

Akademiska Hus will respond to the sender. If the sender specifies a preferred method of receiving feedback, it will be respected as far as possible. Responses to submitted cases will be provided within 30 days:

- Non-priority cases will include an explanation of why further investigation will not be pursued and how the information will be utilised.
- Akademiska Hus cannot guarantee a timeline for results from investigations. Delays may occur during July due to holidays.
- In the event of system or email errors, delays or loss of information may occur. If no response is received within 30 days, the sender should resubmit the case.

CONFIDENTIALITY AND ANONYMITY

Cases will remain confidential from the public and the individual(s) involved. A small group within Akademiska Hus handles these matters, though the group composition may change based on the specific case.

In some situations, disclosing the sender's identity may be necessary or beneficial for the investigation. In such cases, Akademiska Hus will consult the sender beforehand. Anonymous submissions are accepted, provided there is a means of contact (e.g., an anonymous email address). Cases without contact information will be treated as valuable feedback but may not result in direct actions.

When submitting cases, avoid including personal data about others. If this requirement is not met, Akademiska Hus may reject the submission due to data protection regulations.

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