

Memorandum



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How to report regulatory violations

Finansinspektionen's Procedures for Receiving Notifications of Regulatory Violations Ordinance (2016:1318) and Protection for Persons Reporting Improprieties Ordinance (2021:949) within FI's area of supervision in consumer protection, financial services, products and markets, the prevention of money laundering and terrorism financing, and the protection of a private life and personal data as well as the safety of network and informational systems state that FI must follow specific procedures when receiving notifications of suspected violations of the regulations in FI's area of responsibility.

How to submit a notification

FI receives notifications from individuals who in a work-related context would like to provide FI with information about improprieties for which it is in the interest of the public that this information becomes known pursuant to the Protection for Persons Reporting about Improprieties Act (2021:890). A notification must refer to a concrete suspicion that a firm or an individual has acted in violation of a regulation that is part of FI's supervision responsibility. This channel is not for complaints, questions, etc.

It is easiest to submit a notification via email or letter, but it is also possible to call FI to book an in-person meeting. You should provide a short description of the course of events and the impropriety you observed in the notification. Attach any documents that support your description. The more clearly you can describe the problem, the easier it is for FI to make an assessment of whether a violation has occurred.

If you would like to report a suspected regulatory violation, use one of the

following channels:

- Email: visselblasare@fi.se if the notification refers to a firm under FI's supervision or visselblasare.mar@fi.se if the notification refers to suspected market abuse.
- Letter: Finansinspektionen, Box 7821, 103 97 Stockholm, Sweden.
- Telephone: +46 (0)8 408 986 70 or, if the notification refers to suspected market abuse, +46 (0)8 408 986 90. FI does not record telephone conversations.

If you would like to arrange an in-person meeting, you must first contact us via email, letter or telephone.

FI will respond that it has received your information. If the information you provided is not complete or needs clarification, FI will contact you in the same manner that you contacted FI – if FI makes the assessment that this can be done without inappropriately revealing your identity. At your request, FI can issue a certification that a notification has been submitted and, if possible, that it has led to an investigation or a sanction. FI's supervisory measures are subject to secrecy pursuant to the Public Access to Information and Secrecy Act (2009:400), which could entail that FI may not provide any information about FI's supervisory measures.

Anonymity and confidentiality

If you prefer, you may submit a notification anonymously, for example by creating an anonymous email account where you do not use your name in the email address. FI will not require you to identify yourself. If you would like to send an email to FI, you can encrypt/decrypt your emails using PGP, an encryption program. More information about encryption and FI's encryption key can be found under Contact us at FI's website, www.fi.se.

Chapter 30, section 4b of the Public Access to Information and Secrecy Act states that secrecy applies to FI's activities for all information that could reveal your identity as the notifier. A separate secrecy provision regarding violations of the EU's Market Abuse Regulation is set out in Chapter 30, section 6b of the same act.

Secrecy that protects the notifier's identity in accordance with these provisions is absolute. This means that information may not be released even if it is clear

that the notifier will not be negatively impacted by the release of the information. However, it is possible that your notification may serve as a basis for an investigation within FI, another authority, or a court of law. Within the framework of such a matter, it is possible that your notification, or parts of it, may be released to a party that through its position as party to the matter is entitled to insight into the handling.

Protection in the form of a release from liability, a ban on preventive measures and retaliatory action, and compensation

According to the Protection for Persons Reporting Improproprieties Act, a person submitting a notification may not be held responsible for disregarding a confidentiality obligation on the condition that the person at the time of submitting the notification had reasonable cause to assume that the submission was necessary to reveal the reported impropriety and that it was true.

Notifications should primarily be submitted via FI's specific whistleblower channels identified above.

The release from liability does not include a right to release documents, and neither does it apply if the person submitting the notification commits a crime to obtain the information.

A person who commits a crime through the submission of a notification or the gathering of information is not protected from retaliatory actions.

An undertaking may not attempt to prevent submission of a notification or due to submission of a notification take retaliatory action against a person submitting a notification.

An undertaking that violates any of the bans on preventive measures or retaliatory action must pay compensation for any losses and for the discriminatory action.

For more information about the Protection for Persons Reporting Improproprieties Act, contact FI via the above-mentioned channels, an employee organisation or legal counsel.

Reporting violations of the Market Abuse Regulation

Chapter 2 of the Supplemental Provisions for the EU Market Abuse Regulation Act (2016:1306) (the Supplemental Act) states that a person submitting a notification about a violation of the Market Abuse Regulation, without being subject to a reporting obligation pursuant to Chapter 2, section 10 of the Supplemental Act, may not be held responsible for having disregarded a confidentiality obligation if the person had cause to assume that a violation had occurred. This does not apply, however, if the person commits a crime.

In other words, you may not be subject to harm or other legal consequences if you submit a notification of a violation to FI in accordance with Chapter 2, section 11 of the Supplemental Act.