

Swedish Whistleblowing Line Directive

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Document name: Swedish Whistleblowing Line Directive

Document number: ID-000945

Owner: Zia Gheewalla

Revision: 1

Approved by: Zia Gheewalla

Document type: Directive

Sensitivity: Public

Effective date: 2023-03-31



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1. Directive for the use of Polarium AB's local Swedish Whistleblowing Line

1.1. Introduction

Polarium strives to achieve transparency and a high level of business ethics. You are an important part of that. Our local Whistleblowing Line for Polarium Energy Solutions AB ("Polarium AB" or "company") offers a possibility for you to alert the company about suspected misconduct within Polarium AB. The local Whistleblowing Line is set up in accordance with the Swedish Whistleblowing Act (Sw: *Lag (2021:890) om skydd för personer som rapporterar om missförhållanden*). It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage.

If the misconduct you want to report is within scope of the Swedish Whistleblowing Line (see Section 1.2.) you should use this alternative. This is important because you are then guaranteed protection against retaliation under the Swedish Whistleblowing Act.

You can also choose to use Polarium's Global Whistleblowing Line. You can read more about how to use the Global Whistleblowing Line in our Global Whistleblowing Line Directive. You are protected against retaliation in accordance with Polarium's Speak Up Policy when using the Global Whistleblowing Line.

For all other matters, you should reach out to your line manager (People Leader), People & Culture representative or any other manager you trust. If any of these persons receive a report that falls within the scope of the Swedish Whistleblowing Line, they are required to inform you that the report should be submitted through the Swedish Whistleblowing Line.

For certain instances of suspected misconduct, you can also use designated governmental authorities' whistleblowing lines to report the misconduct. You can read more about this under Section 1.7.

1.2. When can I use the Swedish Whistleblowing Line?

1.2.1. What can I report?

Reports submitted through the Swedish Whistleblowing Line may only concern information about (suspected) misconduct in a work related context which is in the public interest that it becomes

known. You may also report (suspected) misconduct in a work related context that is comprised of acts or omittance to act in violation of EU law.

Examples of what you may submit reports about include:

- Serious violations of law
- Fradulent behavior (such as violations of accounting principles or internal controls and embezzelment)
- Bribery and corruption
- Violation of money laundering provisions and financing of terrorism
- Anti-competitive behavior and violations of anti-trust and procurement laws
- Serious threats against environment, health and safety
- Serious violations of consumer rights
- Serious violations of privacy and data protection legislation, including information security
- Other serious misconduct, such as discrimination and harrasment
- Violations of human rights, modern slavery and the use of child labor
- Serious violations of The Polarium Way (Polarium's Code of Conduct)
- Other acts of neglect relevant to Polarium's interests or individual health and saftey

A person who blows the whistle does not need to have firm evidence for expressing a suspicion, but all reports must be made in good faith, and you need to have reasonable belief that the information you have is true.

Examples of what you *should not* submit a report about:

Complaints and dissatisfaction in the workplace, alcohol- or drug problems, minor theft at work, less serious work environmental issues and similar incidents should not be reported through the Swedish Whistleblowing Line. Further, circumstances that are only attributable to your own personal work situation (such as promotion and salary) should not be reported through the Swedish Whistleblowing Line.

For such matters, you should talk to your line manager (People Leader), People & Culture representative, or some other manager you trust. Please note that if you erroneously submit a report that should not be submitted, there is no penalty or action taken against you for misinterpreting this paragraph.

1.2.2. Who may submit a report?

The Swedish Whistleblowing Line is for individuals actively working in Polarium AB in the capacity of an employee, volunteer, intern, individual that performs work under Polarium AB's supervision and guidance (such as staffing companies), self-employed or consultant, individual in Polarium AB's governance, management, or supervisory bodies, and shareholders actively working in Polarium AB.

1.3. How do I submit a report?

There are two ways in which you can submit a report. All messages received will be handled confidentially. For those wishing to remain anonymous, you may use the online reporting line.

<u>Alternative 1</u>	<u>Alternative 2</u>
<p><i>Submit your report anonymously to the Whistleblowing Team using our online reporting line.</i></p> <p>The Swedish Whistleblowing Line is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB deletes all meta data, including IP addresses. The person sending the message also remains anonymous in the subsequent dialogue with the Whistleblowing Team.</p> <p>Please note that if you use the Swedish Whistleblowing Line, you must save your unique password/pin and log in after you have made your report so that you can be updated or provide answers to follow-up questions which are necessary to help resolve the issue. If you forget your log in credentials, you will have to submit a new report.</p>	<p><i>Contact our Head of Ethics & Compliance or our General Counsel (the "Whistleblowing Team") directly to submit your report orally or in writing. You can also book a physical meeting.</i></p> <p>If you book a physical meeting, this will be held within reasonable time and always (unless you are unavailable) within one week from when you contacted the Whistleblowing Team.</p> <p>If you choose to submit your report orally, the report will be documented through a recording, if you consent, which can also be printed. Otherwise, the report will be documented through meeting minutes. You will be given the opportunity to read, correct and sign the printed recording or meeting minutes.</p>
<p>Link to the online reporting line: https://polarium.com/whistleblower</p>	<p>Contact details to the Whistleblowing Team:</p> <p>Zia Gheewalla: +46 76 134 12 34 zia.gheewalla@polarium.com</p> <p>Veronica Ezeyza-Alvear: +46 70 366 24 46 veronica.ezeyza-alvear@polarium.com</p>

1.4. What do I include in a report?

There are no requirements on what you must include. But your report will be easier to investigate if you include:

- Date, time and place of the event
- A description of what has happened and your role in the events
- Names of the individuals involved and their position within Polarium

- Names of witnesses, if there are any
- Documents, invoices, or emails (where possible and available)
- Other useful information relevant to understand the events and to investigate your report

Do not include sensitive personal data about anybody mentioned in your report if it is not relevant for describing your concern. Sensitive personal data includes, for example, personal data revealing racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership or personal data concerning health or sex life.

1.5. The investigation process

1.5.1. The Whistleblowing Team

Access to messages received through our Swedish Whistleblowing Line is restricted to appointed individuals with the authority to handle whistleblowing cases. The Whistleblowing Team is comprised of Polarium's Head of Ethics & Compliance and General Counsel. Their actions are logged, and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality. If information that risks revealing your identity will be shared outside the Whistleblowing Team, you will be informed, unless such information would hinder or obstruct the purpose of the investigation.

If a person raises a concern directly to the Whistleblowing Team, the message is treated according to these guidelines.

If your report concerns any of the individuals in the Whistleblowing Team, you may contact a member of the Board of Directors directly.

1.5.2. Receiving a report

Upon receiving a report, the Whistleblowing Team decides whether to accept or decline the report. If the report is accepted, appropriate measures for investigation will be taken.

The Whistleblowing Team may decline to accept a report if:

- the alleged conduct is not reportable conduct under this Swedish Whistleblowing Line Directive, see Section 1.2.,
- the report has not been made in good faith or is malicious, or
- the issue identified in the report has already been solved.

If a report includes issues not covered by the scope of the Swedish Whistleblowing Line Directive, the Whistleblowing Team will guide the whistleblower to contact the right person within the Polarium group.

You will receive confirmation of receipt **within 7 days** after submitting your report, unless you have declined to receive confirmation or there is reason to assume that a confirmation would reveal your identity. The Whistleblowing Team will send appropriate feedback **within 3 months** upon the date of receiving the report. If you have not received confirmation of receipt within 7 days, you will be provided with appropriate feedback within 7 days.

1.5.3. Principles for investigating a whistleblower report

All reports are treated seriously and in accordance with these principles.

- No one from the Whistleblowing Team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The Whistleblowing Team can, when needed, submit follow-up questions via the Swedish Whistleblowing Line.
- A report will not be investigated by anyone who may be involved with or connected to the alleged misconduct.
- The Whistleblowing Team decides if and how a whistleblowing report should be escalated.
- Whistleblowing reports are handled confidentially by the parties involved.

1.6. Information about certain rights of the individual submitting a report

1.6.1. Anonymity and confidentiality

You have the right to submit your report anonymously. If you do so, the Whistleblowing Team will not try to find out your identity. We do, however, encourage you to report openly since anonymous reports are often more difficult to investigate.

If you choose to be open with your identity, your identity will be treated confidentially by the Whistleblowing Team. If the Whistleblowing Team needs to share information with some other function or external part to conduct the investigation, and there is a risk that your identity will be revealed, you will be informed about this (unless providing this information would defeat the purpose of the investigation or make it more difficult).

1.6.2. Protection against retaliation

If you report in accordance with this Directive, you are protected against retaliation under the Swedish Whistleblowing Act. This also means it is strictly forbidden for anyone within the Polarium group to try to stop you from submitting the report. Under the Swedish Whistleblowing Act, it is also prohibited to retaliate against someone aiding the whistleblower to submit the report (such as a union or safety representative), someone with a relationship to the whistleblower (such as a colleague or close relative), or a legal person connected to the whistleblower.

If you think that you are subject to retaliation because of a report you submitted, you should report this via the Whistleblowing Line.

1.6.3. Freedom from liability (Sw: *ansvarsfrihet*)

Even if you violate a non-disclosure agreement by submitting a report, you will not be held accountable if the report is submitted in good faith under this Directive and you have probable cause to assume that the information in your report is necessary to reveal misconduct. Similarly, you are free from liability if you violate a provision on gathering of information under the same circumstances. These rights do not include the disclosure of documents. There are some restrictions to the freedom from liability in the Swedish Whistleblowing Act.

1.6.4. Freedom to communicate and acquire information (Sw: *meddelarfrihet och anskaffarfrihet*)

You have a constitutional right to communicate information to a journalist, writer, news agency, etc. with the purpose of making the information public (Sw: *meddelarfrihet*). You also have the right to acquire information for the purpose described above (Sw: *anskaffarfrihet*).

1.7. The possibility to report through governmental authorities' whistleblowing lines

You also have the possibility to report concerns described in Section 1.2.1. to one of the external whistleblowing lines provided by certain appointed Swedish governmental authorities. These governmental authorities are responsible for receiving and investigating reports about misconduct within their designated areas of responsibility.

A list of the relevant governmental authorities, their area of responsibility, and webpage are set out in [Annex 1](#) to this Directive. It is possible to submit your report in writing, orally and at a physical meeting when using the external whistleblowing lines.

1.8. Processing of personal data in the Swedish Whistleblowing Line

1.8.1. Purpose and legal basis for processing of personal data

Polarium takes your integrity and the protection of your personal data seriously. Reports made through the Swedish Whistleblowing Line will inevitably include personal data about you (if you do not report anonymously), the individual you report about, potential witnesses or other individuals you choose to include. Personal data may include names, roles or functions, contact information, alleged misconduct, and geographical location at a certain point in time. Throughout the investigation other types of personal data may also be collected, such as phone records, computer files and other forms of correspondence.

Depending on the character of the report, some personal data may be considered sensitive personal data, i.e., personal data revealing racial or ethnical origin, political opinions, religious or philosophical beliefs, trade union membership or personal data concerning health or sex life. Due to the nature of whistleblowing reports, some personal data may also relate to (suspected) criminal offences.

The processing of this personal data is necessary for the purpose of discovering, investigating, and remediating serious misconduct within Polarium AB. Further, personal data could be processed to be used as evidence in criminal proceedings or to fulfill other legal obligations.

The legal basis for the processing of personal data is that the processing is necessary to fulfill Polarium's legal obligations under the Swedish Whistleblowing Act (including personal data relating to criminal convictions and offences).

If we process sensitive personal data, the legal basis is that the processing is necessary for reasons of substantial public interest. Sensitive personal data could also be processed to fulfil our legal obligations in the field of employment and social security and social protection law.

Sometimes we may need to use information in a whistleblowing report to take remediation actions. Personal data is then processed based on our legitimate interest to ensure that our business is carried out in accordance with applicable law, principles of business ethics and internal policies and procedures. Sensitive personal data and personal data about criminal convictions and offences is processed because it is necessary to make, establish, or defend a legal claim.

1.8.2. Retention periods and sharing of personal data

Your personal data will not be processed longer than necessary. Personal data included in a whistleblowing report and investigation documentation is deleted when the investigation is complete, except for when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower reports that are archived, are anonymized before archiving. Personal data that is not necessary for the investigation will be deleted or anonymized immediately when received or collected.

If personal data is processed to make, establish, or defend a legal claim, the personal data will be stored until the legal claim has been closed and during the subsequent period of limitation.

If it becomes necessary to conduct the investigation, your personal data may be shared with companies within the Polarium group, external legal counsel, forensic firms, or governmental actors such as the police. If the sharing of your personal data involves a third country transfer, Polarium will ensure that the transfer is subject to adequate safeguards such as the use of the EU Commission's standard contractual clauses. If any of these third parties acts as sub-processors to Polarium, a data processing agreement will govern the transfer of personal data.

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) is the personal data processor responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages. As such, neither WhistleB nor its sub-processors have access to readable content.

All personal data is stored within the EU/EEA.

1.8.3. The right to information and data subject's rights

Individuals whose personal data is included in a whistleblowing report or is collected throughout the investigation, will be provided with information if possible. However, if the provision of such information may compromise the investigation, information will be provided as soon as possible after the investigation has reached a stage where such risk no longer exists. At the latest, information will be provided when the personal data is used to take measures in relation to such individuals.

You are entitled to know what personal data we are processing about you, and you can request a copy of such data. However, note that to the extent disclosure of your personal data may compromise an investigation, we may not be able to meet your request. You are entitled to have incorrect personal data about you corrected, and in some cases, you may request that we delete your personal data. You are also entitled to object to certain processing of your personal data, and request that the processing of your personal data should be restricted.

If you have any complaints about the processing of your personal data, you may lodge a complaint with the Swedish Authority for Privacy Protection (Sw: *Integritetsskyddsmyndigheten*), www.imy.se.

1.8.4. Controller of personal data

Polarium Energy Solutions AB, 556986-5461, Solnavägen 3H (6tr), 113 63 Stockholm, is the controller of your personal data.

If you have any questions regarding the processing of your personal data, you may contact privacy@polarium.com

2. Definitions and terms

N/A

3. References and associated documents

IMP-00081 Speak Up Policy

ID-000944 Global Whistleblowing Line Directive

4. Revision history

Revision	Date	Change	Author(s)
1	2023-03-31	First version	Lisa Ejelöv

Annex 1 – External whistleblowing lines

In this Annex 1 we have listed the governmental authorities that provides external whistleblowing lines, their area of responsibility and webpage.

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
Swedish Work Environment Authority (Arbetsmiljöverket)	Product safety and product conformity which are covered by the authority's supervisory responsibility. <i>The Swedish Work Environment Authority is also responsible for misconduct that is not covered by any other competent authority's area of responsibility.</i>	https://www.av.se/
The Swedish National Board of Housing, Building and Planning (Boverket)	Product safety and product conformity which are covered by the authority's supervisory responsibility.	https://www.boverket.se/
Safe and interference-free electricity (Elsäkerhetsverket)	Product safety and product conformity which are covered by the authority's supervisory responsibility.	https://www.elsakerhetsverket.se/
Swedish Economic Crime Authority (Ekobrottsmyndigheten)	EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards the fight against fraud.	https://www.ekobrottsmyndigheten.se/
The Swedish Estate Agents Inspectorate (Fastighetsmäklarinspektionen)	Financial services, products and markets and prevention of money laundering and financing of terrorism and which are covered by the authority's supervisory responsibility.	https://fmi.se/
Financial Supervisory Authority (Finansinspektionen)	Financial services, products and markets and prevention of money laundering and financing of terrorism and which are covered by the authority's supervisory responsibility.	https://www.finansinspektionen.se/

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
	<p>Consumer protection which is covered by the authority's supervisory responsibility.</p> <p>Protection of privacy and personal data as well as security in network and information systems which are covered by the authority's supervisory responsibility.</p>	
Public Health Agency of Sweden (Folkhälsomyndigheten)	<p>Product safety and product conformity which are covered by the authority's supervisory responsibility.</p> <p>Public health and which are covered by the authority's supervisory responsibility.</p>	https://www.folkhalsomyndigheten.se/
Swedish Agency for Marine and Water Management (Havs- och vattenmyndigheten)	Environmental protection and which are covered by the authority's supervisory responsibility	https://www.havochvatten.se/
The Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten)	Protection of privacy and personal data as well as security in network and information systems which are covered by the authority's supervisory responsibility.	https://www.imy.se/
National Inspectorate of Strategic Products (Inspektionen för strategiska produkter)	Product safety and product conformity which are covered by the authority's supervisory responsibility.	https://isp.se/
Health and Social Care Inspectorate (Inspektionen för vård och omsorg)	<p>Public health and which are covered by the authority's supervisory responsibility.</p> <p>Protection of privacy and personal data as well as security in network and information systems which are covered by the authority's supervisory responsibility.</p>	https://www.ivo.se/

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
Swedish Chemicals Agency (Kemikalieinspektionen)	<p>Product safety and product conformity which are covered by the authority's supervisory responsibility.</p> <p>Environmental protection and which are covered by the authority's supervisory responsibility</p>	https://www.kemi.se/
Swedish Consumer Agency (Konsumentverket)	<p>Product safety and product conformity which are covered by the authority's supervisory responsibility.</p> <p>Public health and which are covered by the authority's supervisory responsibility.</p> <p>Consumer protection which is covered by the authority's supervisory responsibility.</p>	https://www.konsumentverket.se/
Swedish Competition Authority (Konkurrensverket)	<p>Public procurement and which are covered by the authority's supervisory responsibility.</p> <p>The internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards the area of competition.</p>	https://www.konkurrensverket.se/
Swedish Food Agency (Livsmedelsverket)	<p>Product safety and product conformity which are covered by the authority's supervisory responsibility.</p> <p>Environmental protection and which are covered by the authority's supervisory responsibility.</p> <p>Radiation protection and nuclear safety and which are covered by the authority's supervisory responsibility.</p> <p>Food and feed safety, animal health and well-being and which are covered by the authority's supervisory responsibility.</p> <p>Protection of privacy and personal data as well as security in network and information systems which are covered</p>	https://www.livsmedelsverket.se/

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
	by the authority's supervisory responsibility.	
Swedish Medical Product Agency (Läkemedelsverket)	Product safety and product conformity which are covered by the authority's supervisory responsibility. Public health and which are covered by the authority's supervisory responsibility.	https://www.lakemedelsverket.se/sv
The County Administrative Boards (Länsstyrelserna)	Product safety and product conformity which are covered by the authority's supervisory responsibility for supervisory guidance. Environmental protection and which are covered by the authority's supervisory responsibility for supervisory guidance.	https://www.lansstyrelsen.se/
The County Administrative Boards of Stockholm, Västra Götaland and Skåne counties also have the following areas of responsibility	Financial services, products and markets and prevention of money laundering and financing of terrorism and which are covered by the authority's supervisory responsibility.	
Swedish Civil Contingencies Agency (Myndigheten för samhällsskydd och beredskap)	Product safety and product conformity which are covered by the authority's supervisory responsibility.	https://www.msb.se/
Swedish Environmental Protection Agency (Naturvårdsverket)	Product safety and product conformity which are covered by the authority's supervisory responsibility. Environmental protection and which are covered by the authority's supervisory responsibility.	https://www.naturvardsverket.se/
Swedish Post and Telecom Authority (Post- och telestyrelsen)	Product safety and product conformity which are covered by the authority's supervisory responsibility. Protection of privacy and personal data as well as security in network and	https://www.pts.se/

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
	information systems which are covered by the authority's supervisory responsibility.	
Government Offices of Sweden (Regeringskansliet)	EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, regarding the area of state aid. The internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, regarding the area of state aid.	https://www.regeringen.se/
Swedish Inspectorate of Auditors (Revisorsinspektionen)	Financial services, products and markets and prevention of money laundering and financing of terrorism and which are covered by the authority's supervisory responsibility.	https://www.revisorsinspektionen.se/
Swedish Tax Agency (Skatteverket)	The EU's financial interests according to Article 2.1 b of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards the area of taxation. The internal market according to Article 2.1 c of Directive (EU) 2019/1937 of the European Parliament and of the Council, as regards the area of corporate taxation	https://www.skatteverket.se/
Swedish Forest Agency (Skogsstyrelsen)	Environmental protection and which are covered by the authority's supervisory responsibility.	https://www.skogsstyrelsen.se/
Swedish Gambling Authority (Spelinspektionen)	Financial services, products and markets and prevention of money laundering and financing of terrorism and which are covered by the authority's supervisory responsibility.	https://www.spelinspektionen.se/
Swedish Energy Agency (Energimyndigheten)	Product safety and product conformity which are covered by the authority's supervisory responsibility. Protection of privacy and personal data as well as security in network and	https://www.energimyndigheten.se/

Governmental authority	Responsible for misconduct/irregularities within the area of:	Webpage
	information systems which are covered by the authority's supervisory responsibility.	
Swedish Board of Agriculture (Jordbruksverket)	Environmental protection and which are covered by the authority's supervisory responsibility. Food and feed safety, animal health and well-being and which are covered by the authority's supervisory responsibility.	https://jordbruksverket.se/
Sweden's national accreditation body, Swedac (Styrelsen för ackreditering och teknisk kontroll)	Product safety and product conformity which are covered by the authority's supervisory responsibility.	https://www.swedac.se/
Swedish Radiation Safety Authority (Strålsäkerhetsmyndigheten)	The field of radiation protection and nuclear safety and which are covered by the authority's supervisory responsibility.	https://www.stralsakerhetsmyndigheten.se/
Swedish Transport Agency (Transportstyrelsen)	Product safety and product conformity which are covered by the authority's supervisory responsibility. Transport safety and which are covered by the authority's supervisory responsibility. Protection of privacy and personal data as well as security in network and information systems which are covered by the authority's supervisory responsibility.	https://www.transportstyrelsen.se/