

# Whistleblower policy

*Our shared responsibility*



# Whistleblower Policy

**This Whistleblower Policy is written based on the EU-Whistleblower directive ([Europaparlamentets och rådets direktiv \(EU\) 2019/1936 av den 23 oktober 2019 om skydd för personer som rapporterar om överträdelser av unionsrätten](#)).**

The Directive includes many areas of law, such as financial services and product safety. The reporting also applies to tax offences, money laundering and violation of data protection rules and competition rules.

The group's subsidiaries should keep the highest possible standard for openness, honesty and accountability. We expect that our employees and business partners who are concerned over the group's performance, report this to us.

Employees are usually the first to discover irregularities in the company. The employee may choose not to report this out of fear of appearing disloyal to colleagues or against the company. They may even fear harassment. It could be easier to ignore the case under these conditions, instead of reporting it.

The intention with this policy is to encourage the staff to report cases without the risk of being subject to discrimination. The policy allows the staff to bring up serious suspicions of wrongdoing in, or related to, the company, instead of looking away or trying to find a solution to the problem externally.

The policy applies to all the employees and business partners, our subsidiaries and all stakeholders that are affected by our operations. The policy clearly states that if any impropriety committed by the company or any of their employees, consultants, contractors or suppliers is reported, the company will deal with it immediately and thoroughly investigate and correct it. We will also investigate how irregularities can be prevented in the future. We encourage all our customers to report any suspicions of possible irregularities.

## Introduction / purpose

The intent of that policy is to encourage our staff to report cases without the risk of becoming a victim of discrimination. The whistleblower policy appeals to our employees to report serious suspicions of wrongdoing within the company or related events. Our policy shall be guiding in the event of suspicion of irregularities in the company, our employees, consultants, contractors or suppliers. We also encourage our customers to report irregularities. It is the company's responsibility to immediately report any irregularities or suspicions of irregularities to employees who make a report, and in doing so thoroughly investigate and take corrective action. It is also the responsibility of the company to investigate how irregularities can be prevented in the future.

## Definitions

### Whistleblowing

Whistleblowing means that someone in the organization or outside will notify us that it occurs, will occur or has occurred some form of serious misconduct in the business that could cause damage to the company.

### Irregularities

Irregularities include any wrongful and illegal behavior, for example:

- An unlawful act, civil or criminal
- Not following a stated company policy
- Knowingly violating any local laws, regulations and rules of order
- Exhibiting unprofessional behavior
- To report questionable accounting or accounts for fraudulent purposes

- Conducting activities that may cause damage to persons or property.
  - To demonstrate failure to correct, or take reasonable steps to report, a case likely to cause substantial and unavoidable cost or loss to the Company
  - Abusing one's power or position
  - Expressing unfair discrimination based on age, race, gender, religion, sexual orientation, marital status, parental status, political opinion or ethnic background for employment or use of services.
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- Using their position for personal interests that involve a conflict of interest with the company.

This is not a prescribed list of irregularities but only examples of different types of behavior that may be considered irregularities.

### **Protection as an employee**

An employee who reports wrongdoing or suspected wrongdoing will be protected by this policy as an employee under the following conditions,

- Reveals the information in good faith.
- Thinks that the information is truthful and sincere.
- That the person is not acting with malicious intent or making false accusations
- That the person does not search for personal or financial gain

### **Process**

#### **Contact person**

When reporting irregularities or suspected irregularities, the supervisor, manager or the person in the department responsible for the task in question should be contacted in the first instance. The supervisor or manager should then decide whether a matter should be forwarded to management, depending on how serious or sensitive it is for the person making the report and for the designated person.

Sounding the alarm does not require any special form. An alarm can also be sent to a safety representative within the scope of his duties or by an employee turning to their trade unions. In a first stage, the nearest responsible manager should be contacted. If a reported event does not receive a hearing or adequate feedback, the report can be forwarded to the local CEO or, in the next instance, to the CEO and then to the chairman of the board for the group. When reporting a serious suspicion of impropriety, the following levels may be applied:

CEO of the company where you work

CEO of the Group: Magnus Biesse | 073 370 36 66 | [magnus.biesse@inducore.se](mailto:magnus.biesse@inducore.se)

The chairman of the Group: Per Vannesjö, +46 70-572 28 14, [per.vannesjo@amymone.se](mailto:per.vannesjo@amymone.se)

You can reach all the people above through phone, email or sending a letter to the head office  
INDUCORE AB, Kopparbergsvägen 10, 722 13 Västerås

### **Response**

It is the company's responsibility to act as soon as an alarm about suspected serious misconduct has been received. After that, an analysis must be immediately prepared regarding the data that a person has raised the alarm about in order to determine the extent to which the report relates. Depending on the seriousness of the report, the following investigation options can be applied:

- Be investigated by the management, the board, internal audit or as a disciplinary case
- Be forwarded to the police or other legal authorities
- Be forwarded to independent auditors
- Become an object for an independent investigation

In order to protect those involved and suspects from alleged wrongdoing, an initial investigation will be conducted to determine whether a more thorough investigation is required, and if so, what level of investigation is required. If an urgent intervention is required, measures will be taken before a more fundamental investigation is carried out.



It is always the responsibility of the recipient of a report to contact the person who submitted the report within seven (7) working days at the latest. A feedback must take place in accordance with the following order.

1. Confirm that the notification has been received
2. Communicate how the case will be handled
3. Provide an estimate for how long it will take to reach a final solution
4. Announce whether an initial investigation will be carried out
5. Announce whether further investigations will take place, and if not, explain the reason for such a decision.
6. Feedback to the person who reported with information about action

The number of contacts between you and the managers concerning the case, will depend on the case's nature and how clear the information in your message has been.

The Company will take steps to avoid any difficulties you may face as a result of your case. The company confirms that anyone who raises concerns will be informed of how the matter has been dealt with. Subject to legal impediments, the company will provide information on the outcome of the aforementioned investigation.

### **Time estimate**

Concerns will be investigated as soon as possible, however with reservation for that it could be necessary to send the case further, which could extend the investigation process. A serious and complex case could also prolong the time needed for the investigation. The company will already early try to give an indication how much time it will take to investigate the case.

### **Prevent blaim, negative special treatment and harassments**

The company will not tolerate in any way that anyone tries to subject a person who reported irregularities or suspected irregularities to negative special treatment or discrimination. Such discrimination will be dealt with immediately with severe disciplinary consequences against people who in any way express blame or negative discrimination.

### **Confidentiality and anonymity**

The company must always respect that the report is handled confidentially if a person who reported irregularities or suspected irregularities (whistleblower) requests this. However, anonymous reports can be difficult to follow up and confirm in cases where the person who submitted a report does not want to state their name at a later stage.

### **False and malicious accusations**

It is the company's objective to continuously maintain the highest standard for honesty and integrity. It is always the responsibility of the company to ensure that sufficient resources are available to investigate the cases that are received.

At the same time, it is important to emphasize that knowingly false or malicious allegations by an employee are considered a serious offense that may result in disciplinary action. It is therefore of great importance to ascertain before making a report that the information provided is truthful and sincere.