

Instructions for the Rottneros Group whistle-blower service

As decided by Rottneros' CEO on 24 August 2023



1. Internal and external communication

Rottneros' whistle-blower service

We want to do the right thing

Rottneros strives to maintain an open business climate and a high standard of business ethics. We care about safety and respect for all people involved in our activities. You have an important role to play in our success.

Our whistle-blower service

The whistle-blower service gives everyone, internally and externally, the opportunity to report a suspicion of serious misconduct. Our whistle-blower service is an early warning system to reduce risk. It is important to safeguard good corporate governance and maintain confidence in us among all stakeholders and among the public.

We encourage you to first contact your manager or another manager, or your contact person if you are an external party. If you feel that you cannot be open with your information, we offer the opportunity to report your concern anonymously.

When can I use the whistle-blower service?

The whistle-blower service can be used to provide information about a concern regarding something that is not in line with our values and ethical principles or with the laws and regulations that apply to our business, and that could seriously affect the life or health of a person or our organisation.

You do not need to have proof of your suspicions, but all communication must be made in good faith.

How your message is handled

To ensure your anonymity, the service is managed by an external party, WhistleB, Whistleblowing Centre, <https://report.whistleb.com/rottneros>

The communication channel is encrypted and password protected. All messages are treated confidentially and anonymously.





2. Handling of cases

Whistle-blowing cases are forwarded to two individuals, who are appointed by the CEO. They are the CFO and the HR Director (“Case Managers”).

Cases must be addressed without delay and reported to the CEO. In cases concerning the CEO, the Chairman of the Board shall be informed.

The Case Managers will decide whether it is appropriate for them to investigate the case, or if someone else needs to join the group.

If a case concerns one of the appointed individuals, she/he shall promptly notify the CEO, who shall appoint a replacement to handle the case.

Feedback to the individual who reported the matter is provided via WhistleB, Whistleblowing Centre.

The number of incoming cases is reported to the Audit Committee on a quarterly basis. If the need arises and the privacy of all parties can be ensured, reporting can be more detailed.

