

Whistleblower Policy

Executive summary

Mycronic AB provides a special reporting channel where employees within the Mycronic Group may report serious wrongdoing within the Group, a so called whistleblowing system. This Policy is intended to cover how to make a report, what may be reported, who may be reported and how confidentiality and anonymity is safeguarded.

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1 Whistleblowing Policy

Mycronic shall be characterized by an open corporate culture where all employees feel comfortable expressing their views freely in case they have experienced suspicious or serious improprieties committed by a person in a leading position or key position within the group. Such actions will hereinafter be referred to as "serious wrongdoing". Serious wrongdoing include both unlawful activities and activities in breach of Mycronic's Code of Conduct.

The first persons to discover serious wrongdoing at the work place are most often the employees themselves. Still, many employees refrain from proceeding with their suspicions or observations due to fear of being considered as disloyal to colleagues or their employer, or of being subject to reprisals. Against this background, Mycronic provides for a special reporting channel that employees are encouraged to use to report serious wrongdoing within the company, a so called whistleblowing system.

1.1 What is whistleblowing?

Whistleblowing is when someone notifies decision makers in the company of:

- evidence of any committed serious wrongdoing;
- a reasonable suspicion of a potential serious wrongdoing; or
- a reasonable suspicion of a potential serious wrongdoing that has not happened yet.

1.2 Other ways of reporting wrongdoing

Please note that the whistleblowing system only constitute a complement to our regular, internal means of communication and is thus voluntary to use. At first hand, we encourage you to contact your nearest manager or, when appropriate, the manager's manager and/or HR. This includes any wrongdoing that does not involve a person in a leading position or key position within Mycronic.

1.3 What may be reported?

The whistleblowing system aims to detect and efficiently handle serious wrongdoing and it is thus important that you have honest intentions with your report and that you report in good faith.

As an employee you may report serious wrongdoing concerning:

- Economic crimes, e.g. the giving or taking of bribes, fraud and forgery

- The company's or the group's vital interests or the life or health of individual persons, for instance major or serious:
 - security deficiencies at the work place
 - violation of environmental regulation and environmental contamination
 - forms of discrimination or harassments
 - other forms of breach of Mycronic's Code of Conduct

1.4 What may not be reported?

Please observe that less serious incidents, for instance salary dissatisfaction or cooperation difficulties with colleagues, are not covered by the whistleblowing system. To spread false rumors or in any other way harass a colleague by making *knowingly false complaints* in bad faith via the whistleblowing system is of course not allowed.

If you are unsure whether you shall report a wrongdoing or not, we recommend that you do. We respond to and handle all reports, as your help is important to us. If your reporting falls outside the scope of the whistleblowing system, your matter will be closed without investigation and all information deleted. If you, as reporting person, have chosen not to be anonymous, you will be notified directly and receive information regarding who to contact instead.

Should the report have been made in bad faith, Mycronic may investigate the report and the data may not be deleted until Mycronic has closed the investigation and carried out necessary actions. In cases of serious bad reporting this may lead to disciplinary actions, up to and including dismissal for cause.

1.5 Who can be reported?

Through the whistleblowing system you may report serious wrongdoing by a person in a leading position or key position within any of the companies within the Mycronic group. By leading position within the group we mean:

- a Board member of the Mycronic Board of Directors
- a member of Mycronic Senior Management Team
- a person who report to a member of Mycronic Senior Management Team
- the MD in any of the subsidiaries of Mycronic group
- a person who report to the local MD in any of the subsidiaries of Mycronic group

1.6 Where to send the report?

You may report serious wrongdoing via Mycronic's secure online whistleblowing system provided by WhistleB Whistleblowing Centre AB ("WhistleB"), <https://report.whistleb.com/mycronic>.

1.7 Confidentiality and anonymity

Unless you report openly and consent to the disclosure of your identity, the law firm that receives the report on behalf of Mycronic, will ensure that your anonymity is maintained. All data provided by you is encrypted and WhistleB does not have access to the encryption keys and thus cannot access the data. If you do not want to use the online system, you may instead send a regular mail to the following address.

Wistrand Advokatbyrå

Att: Whistleblowing Mycronic

PO Box 7543

SE- 103 93 Stockholm

Even if you choose not to be anonymous, your identity will not be disclosed to the reported person. However, you may be called as a witness in case of a subsequent police investigation or court process.

1.8 What shall be included in the report?

We recommend that you include the following information in the report:

- **What is your concern?** (What have you observed)
- **Who is the matter subject?** (Is there anyone else who is/might be involved?)
- **When did this happen?** (Has it happened several times?)
- **Where did this happen?** (Location? At the workplace?)
- **Details of the case.** (Describe what has happened. Can it be assumed to happen again, and in such case, when and where? Is there anyone else who may have knowledge about or access to relevant information?)

It is important that you describe all circumstances and facts regarding the reported matter – also, such circumstances and facts which you believe may be less important. If possible, please enclose documentation or pictures. If you wish to be anonymous, do not provide any information that can reveal your identity.

1.9 Protection of whistleblowers

Mycronic does not tolerate any retribution against whistleblowers for making a report in good faith.

The whistleblowing system is voluntary to use. Those who report in good faith shall remain free from retaliation and not be subject to unfair proceedings brought against them. Anyone who engages in retaliation may face disciplinary action, with penalties up to and including dismissal for cause. Whistleblowers that have become subject of retaliation may report this via the whistleblowing channel.

1.10 Processing of personal data

Mycronic will process any and all personal data included in the report and recorded during the investigation of the report. Detailed information regarding how Mycronic processes personal data within the whistleblowing system may be found in the document *Information regarding processing of personal data within the Mycronic whistleblowing system*.