Whistleblowerpolicy

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Purpose of the Policy

This policy has been developed to clarify and regulate the whistleblowing function for Inducore, including group business areas and subsidiaries. It aims to create clarity regarding what should be reported, ensure a correct and secure case-handling process, and maintain a high ethical standard. The policy also aims to prevent retaliation against the reporting person or persons connected to them.

Scope

This policy applies to all groups and companies within Inducore. This means that all employees, regardless of position or role, are covered. Suppliers, business partners, customers, and other stakeholders are also covered and may use the whistleblowing channel. The approach, case handling procedures, and protections defined in this policy also apply to these stakeholders.

Protection of Whistleblowers

All reports will be handled with strict confidentiality. Inducore does not tolerate any form of unfair treatment, discrimination, retaliation, or other negative consequences directed at a reporting person who has reported concerns in good faith. Any such behavior will be addressed immediately through disciplinary action against the individuals responsible.

Whistleblower Reporting Channel

All whistleblower reports should primarily be submitted through the digital whistleblowing system GlobaLeaks. The channel enables anonymous reporting, secure communication, and case follow-up. A link to the reporting form is available on Inducore's website and the websites of all subsidiaries and is accessible 24/7.

If the reporting person prefers to report by telephone or email, reports may be submitted to whistleblower@inducore.se or to Inducore HR at +46 765 125 918. All reports are nevertheless registered in the system.

Case Process

1. Reporting: Reports are submitted through the GlobalLeaks digital whistleblowing function. Reporting may be anonymous. Supporting material such as images, documents, videos, and recordings may be attached. Each report receives a unique case ID.

2. Receipt and Initial Assessment: Confirmation is provided immediately upon receipt. A central compliance function performs an initial assessment within three working days.

3. Feedback 1: The reporting person is informed within seven working days whether the matter falls within the scope of this policy. Matters outside the policy are classified as non-qualified reports and closed.

4. Investigation: Relevant cases are investigated by an independent internal or external party, depending on the nature and scope of the matter.

5. Decision and Actions: Based on the investigation, appropriate actions may be taken, including disciplinary measures, legal proceedings, or corrective actions.

6. Feedback 2: Upon completion of the investigation, the reporting person is informed of the outcome and actions taken, insofar as confidentiality allows.

7. Case Closure: The case is closed and archived in the system, and the reporting person is notified through the portal.

False or Malicious Allegations

Knowingly false or malicious allegations constitute a breach of the employment agreement and will be regarded as a serious violation. Such actions may result in disciplinary measures, including termination of employment.

Non-Qualified Reports

Reports submitted through the whistleblowing channel that do not fall within the scope of this policy are classified as non-qualified reports. They will not be processed as whistleblowing cases and will be closed in the case management system. The reporting person will receive feedback and may be referred to alternative reporting channels.

What Qualifies as a Whistleblowing Matter

Misconduct within the organization that is of public interest, such as financial crime, environmental crime, or conduct creating an imminent threat to life or health.

Violations within areas such as public procurement, financial services, anti-terrorist financing, product safety, environmental protection, transport safety, public health, cybersecurity, competition law, privacy and data protection, corporate taxation, anti-money laundering, product compliance, and actions affecting the financial interests of the EU may also qualify.

What Does Not Qualify as a Whistleblowing Matter

General dissatisfaction with business operations, leadership, salary issues, or ordinary personnel matters do not normally qualify. Occupational health and safety issues are generally excluded unless they are of a very serious nature. Such matters should instead be reported to a manager, HR, a manager's superior, another senior representative, a safety representative, or a trade union representative.

Responsibilities

- Compliance Function: Receives and assesses reports and ensures investigations are conducted correctly and feedback is provided.
- Group Management: Participates in investigations when required and engages legal or other specialist expertise where necessary.
- Company Management: The CEO of each company is responsible for ensuring that the policy is known, available, and implemented.
- Employees: Responsible for understanding and complying with this policy and raising questions if any part is unclear.

Follow-up and Review

The policy is reviewed annually by the Group Sustainability Council, including annual testing and simulation exercises. Revisions may also be made outside the annual review cycle if significant operational or legislative changes occur. Updates are communicated throughout the group and all subsidiaries.

Document Owner: Sustainability Council
Decision Maker: Group CEO
Next Review Date: 30 August 2027
Responsible for Follow-up: Sustainability Council