



Whistleblower policy

Studsvik

Whistleblower policy

Any wrongdoing by the Group or any of its employees, consultants, contractors or suppliers shall be reported. The Group will deal with it promptly and thoroughly investigate and correct it. We will further examine means to ensure that such wrongdoing is prevented in the future. We encourage our customers to alert us of any wrongdoings.

Purpose

The purpose of this policy is to encourage our employees to report matters without the risk of victimization or discrimination. This policy enables all employees to raise serious concerns they may have about matters occurring within or pertaining to Studsvik, rather than overlooking a problem or seeking a resolution of the problem outside Studsvik.

Scope

This policy applies to all employees and business partners working for the Studsvik Group ("The Group").

Definitions

Whistleblowing alerts management's attention to information about potentially illegal and/or unethical practices, also known as wrongdoing.

Wrongdoing involves any unlawful or illegal behavior and can include:

- An unlawful act, which may be civil or criminal.
- Failure to comply with Group policies.
- Breaching applicable laws or regulations.
- Unprofessional conduct.
- Questionable accounting, fraud or auditing practices.
- Practices likely to cause physical harm or damage to a person, property or environment.
- Failure to rectify or take reasonable measures to report a matter likely to cause a significant and avoidable cost or loss to the Group.
- Abuse of power or authority for any unauthorized purpose.
- Discrimination such as differentiation based on age, race, gender, religion, sexual orientation, marital or maternity status, political opinion or ethnic background during the employment or provision of services.
- Conflicts of interest.

This is not an exclusive list but rather examples of the kind of conduct which might be considered as wrongdoing.

Protection

Any employee who makes a disclosure or raises a concern under this policy will be protected if the employee:

- Discloses the information in good faith.
- Believes the information is true.
- Does not act maliciously nor makes false allegations.
- Does not seek any personal or financial gain.

Process

Anyone with a complaint or concern is encouraged to contact his or her supervisor, manager, or the person in charge of the department that provides the relevant service.

However, based on the seriousness and sensitivity of the issues involved and the person suspected of wrongdoing and/or if the complaint is related to your supervisor, manager or any other person in direct line of command for you, you may make a report via a reporting tool (IntegrityLog) on the Studsvik Intranet and our external website, which connects you directly with an independent counselor that will handle your case. Your anonymity is consequently guaranteed.

Depending on what level in the organization the report relates to, the matter will be raised on different levels. This is assessed and managed by external person.

Report level	Handled by
Department	Managing Director
Managing director	CEO
Executive Management	Chair of the Board
Board member	Chair of the Board
Chair of Studsvik AB	Chair of the Audit Committee

Response

The Group will act upon any concerns raised. Please note that the Group can assess a concern only after having conducted an initial inquiry and, most likely, after duly investigating the matter in question.

Where appropriate, the matters raised may:

- Be investigated by management, the Board of Directors, internal audit or through the disciplinary process.
- Be referred to the police or other law enforcement authorities.
- Be referred to the independent auditor.
- Become subject of an independent inquiry.

In order to protect the individuals involved and those suspected of the alleged wrongdoing, an initial inquiry will be made to decide whether an investigation is appropriate or not and, if so, what form it should take. If urgent action is required, this will be taken before any investigation is conducted.

You can follow the status of the case through the whistleblowing reporting tool. Log in to the tool regularly as the investigator may need to ask additional questions in order to act as quickly as possible.

Within ten working days you will receive a response that will:

- Acknowledge that the concern has been received.
- Indicate how the matter will be handled.
- Give an estimate of how long it will take to provide a final response.
- Tell you whether an initial inquiry will be made.
- Tell you whether further investigations will take place and, if not, why not.

The amount of contact between you and the person handling the issue will depend on the nature of the matter raised and the clarity of the information provided.

Studsvik will take steps to minimize any difficulties you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, the Group will arrange for you to receive legal advice about the procedure.

The Group acknowledges that a person who raises concerns will need assurance that they have been addressed. Subject to legal constraints, the Group will provide information about the outcomes of any investigation as indicated above.

Time scale

Concerns will be investigated as quickly as is reasonably possible. It may be necessary to refer a matter to an external advisor, which may result in an extension and delay of the investigation. The seriousness and complexity of a complaint may also impact upon the time it takes to investigate the matter. The Group will try to indicate at the outset the anticipated time scale for investigating the complaint.

Prevention of recriminations, victimization or harassment

The Group will not tolerate any attempt on the part of anyone to apply sanctions or to discriminate any person who has reported a serious and genuine concern that they have regarding an apparent wrongdoing. Any such victimization will be dealt with swiftly and with strict disciplinary consequences.

Confidentiality and anonymity

To ensure your anonymity, the IntegrityLog reporting tool is provided by an external and independent company. The reporting channel is encrypted, and password protected. You never have to reveal your identity if you do not want to.

No IP addresses are registered, and the system does not use cookies. If you use a computer that is connected to the Group, it may appear from the Internet log that you have visited the page where the report is made. If you do not want this to be visible, use a computer that is not connected to the Group's network.

All data communication and storage of personal data is encrypted, to avoid it being distorted or coming to the knowledge of unauthorized persons.



