	Title: Speak Up Policy	Document no: 3.4.6.1
		Revision: 2
		Valid date: 2017-12-15
	Author: Emma Wahlborg	Replaces: Version 1
	Approved by: GEM	Approved date: 2017-12-15

Speak Up policy

Background and purpose

Sandvik Group's Code of Conduct and the core values Customer Focus, Innovation, Fair Play and Passion to Win form the foundation for conducting our business with honesty, integrity and high ethical standards.

The purpose of this policy is to explain how employees and other stakeholders can raise concerns (Speak-up) about suspected breaches of Sandvik's Code, policies and the law without fear of retaliation. It also describes what employees and other stakeholders can expect from the Company if they Speak Up.

Scope

This policy, together with the corresponding procedures and work instructions, explain Sandvik employees' and other stakeholders' responsibilities and rights related to raising concerns about suspected breaches of Sandvik's Code, and the matter in which Sandvik will respond to such concerns, for purposes of making protected disclosures as provided by applicable legislation.

Audience


This policy applies globally to all Sandvik companies and their stakeholders, such as customers and suppliers, who use the Speak Up system to file a report.

Policy Statement

In order to take necessary action in case of a breach of the Code or law within Sandvik, all employees, customers, suppliers and other stakeholders are encouraged to report any concerns they may have or ask questions related to Sandvik's business conduct.

Sandvik employees are strongly encouraged, in the first instance, to report any incidents directly to their manager. If employees cannot, or do not feel comfortable, reporting to their manager Sandvik encourages them to use the Speak Up System.

The Speak Up System is available 24 hours a day, 7 days per week regardless of where anyone who wants to raise a concern is located. If local laws permit, a reporter may remain anonymous, however, anonymity may inhibit an investigation and, therefore Sandvik encourages all reporters to identify themselves to help facilitate a potential investigation.

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Depending on the country a reporter wants to raise a concern in, the list of issues one may report on through the system will differ depending on local legislation.

Please note that the Speak Up System shall not be used to:

- Report threats to life or property. If emergency assistance is required, the local or Country emergency phone number shall be used
- Report grievances related to e.g. salaries, benefits and services. These issues should be brought up with the manager or local HR
- Settle personal disputes
- Make accusations which the reporter knows are false. Doing so may lead to disciplinary measures

Employees and other stakeholders who submit reports into the Speak Up System are protected and will not be prejudiced or suffer occupational disadvantage for raising concerns in good faith about suspected misconduct. No form of threat or retaliation will be tolerated and will be treated as a disciplinary matter.

Anyone who is the subject of a report will receive notification as soon as practicably possible, taking into account the integrity of the reporter as well as the person subject to a report and the integrity of the Investigations process.

Data privacy


Employees' and other stakeholders' privacy and integrity are of utmost importance to Sandvik at all times, regardless of whether someone is submitting a report or is the subject of a report. The Speak Up process complies with applicable data privacy regulations in all countries where Sandvik operates.

When reporting a concern into the system the reporter will be instructed to agree to the contents of the Data Privacy Notice and Consent form prior to submitting a report.

Please refer to the Speak Up portal for further information on data privacy and how personal information is being processed within the Speak Up System.

Exceptions

N/A

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Roles and responsibilities:

Group Legal

Group Legal formulates and issues the Speak Up policy, and is responsible for;

- Overseeing that the Speak Up Policy is available throughout the organization through group wide communication channels
- Overseeing the implementation of this policy and adherence to the Speak Up process
- Developing group procedures which specify minimum requirements how to achieve policy objectives
- Ensuring that Speak Up training is made available
- Developing implementation guidance for the policy and its objectives
- Providing support to case owners and others involved in the Speak Up process
- Providing reports and statistics of reported cases and queries in a transparent manner to Business Areas or other relevant organization/function

Each Case Owner (and Remediation Manager)

- Ensuring legal compliance with this policy and supporting procedures, the Investigations process and local legislation
- Conduct an investigation in accordance with the Investigations and Remediation procedure
- Initiate and carry out remediation in coordination with appropriate functions and line management

Each Business Area

- Communicating and implementing the Speak Up Policy throughout the BA organization/Group Function
- Ensuring that necessary resources are dedicated to supporting the Investigations process and responding to questions through Speak Up
- Taking remedial measures and exercising consequential management when a breach of the Code of Conduct or this policy has been confirmed
- Ensuring that all employees working within the Speak Up system complete the required training
- Ensuring appropriate communication with relevant functions during and on completion of an investigation
- Ensuring legal compliance with this policy and its procedures in relation to local legislation

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Each Sandvik employee

- Sandvik employees are responsible for complying with this policy and supporting procedures when reporting breaches of the Code of Conduct through Speak Up

Measurement of success

Through oversight of all cases, Group Legal confirms that each reported case is handled, logged and closed in the Case Management System and on a regular basis reported back to the relevant Business Area or Group Function.

The regular and transparent reporting of cases is facilitated by a framework for performance management including relevant KPI's.

The analysis of reported case data and statistics is used to define continuous improvement activities to further improve the Speak Up process.

References to further information

- The Speak Up Portal
- The Investigation and Remediation Procedure
- The Investigation and Remediation Work Instructions

Links

N/A