

Speak Up Policy

1. Background and purpose

Sandvik Group's Code of Conduct and our 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 of Conduct, policies and the law without fear of retaliation. It also sets out the Speak Up process and what employees and other stakeholders can expect from the Company if they speak up. The possibility to speak up is an important building block in Sandvik's culture to help build trust and improve the working environment for all employees and partners.

2. Definitions

Speak Up is Sandvik's confidential reporting process that consists of internal reporting channels and an externally provided whistleblowing system. The process covers the full lifecycle of a report, from the intake and investigation stage to remediation and closure.

3. Scope

This policy sets out the requirements related to Sandvik employees' and other stakeholders' responsibilities and rights related to raising concerns about suspected breaches of Sandvik's Code of Conduct, policies or the law, and the manner in which Sandvik will respond to such concerns in order to make protected disclosures according to applicable legislation.

4. Audience

This policy applies globally to all Sandvik employees and legal entities, including contractors, subcontractors, suppliers, customers and other stakeholders, who use the Speak Up process to file a report.

5. Policy statement

The possibility to speak up is an important building block in Sandvik's culture to help build trust and improve the working environment for all employees and partners. It also fulfills the purpose of mitigating and reducing risk for the Company.

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

All concerns of serious misconduct shall be reported through internal channels into Speak Up. Managers are required to report serious misconduct if notified of such concerns into Speak Up. For EU member states, where local legislation allow, reporters can choose to report through a local channel. Should employees consider that their report was not adequately responded to, or if the reporter has reason to believe that it is in the public interest, they have an option to report to a



competent national supervisory authority.

Speak Up is available on Sandvik Intranet under “My Resources & Tools” “Mandatory Tools” and on the Sandvik web site.

Reports can be made via:

- Speak Up online, accessible via URL link and QR code.
- Speak Up Hotline contact with an independent call center by telephone 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. All reports submitted to Speak Up are handled with strict confidentiality and with limited access rights to secure the confidentiality of the reporter.

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 due to 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 shall 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.

All matters reported into Speak Up will be assessed.

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

5.1. No retaliation policy

Employees and other stakeholders who submit reports into the Speak Up system are protected and will not be mistreated or suffer any occupational disadvantage for raising concerns in good faith about suspected misconduct. The no retaliation policy also applies to the reporters' co-workers, family and supporting organs such as union representatives. No forms of threat or retaliation will be tolerated.

Anyone providing information in accordance with the Speak Up policy is protected and any form of threat or retaliation should be reported and either escalated in the line-organization or through the filing of a separate Speak Up alert. Subsequent to the finalization of any investigation, further contact with reporters will be maintained to receive feedback on any concerns in relation to possible retaliation.

5.2. Data privacy

Employees' and other stakeholders' privacy and integrity are of the 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, including local whistleblowing laws, in all countries where Sandvik operates. When reporting a concern into the system the reporter will be instructed to acknowledge the contents of the data privacy notice prior to submitting a report.



All data in the Speak Up System is handled in accordance with the GDPR (General Data Protection Regulation 2016/679) to ensure that personally identifiable information is kept secure and confidential and that such information is only retained for as long as necessary. Please refer to the Speak Up portal for further information on data privacy and how personal information is processed within the Speak Up system.

6. Exceptions

N/A

7. Roles and responsibilities

7.1. Group Legal

Group Legal owns the Speak Up process, including the Speak Up policy, and through the Ethics Office supported by the Business Integrity function, Group Legal is responsible for:

- Overseeing that the Speak Up policy is communicated throughout the organization.
- Overseeing the implementation of this policy and adherence to the Speak Up process.
- Developing Group procedures which specify minimum requirements on how to achieve policy objectives.
- Ensuring that Sandvik has an efficient Speak Up platform, including IT-system, web portal and information on intranet.
- 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 organizations/functions.

7.2. Business area

- Communicating and implementing the Speak Up Policy throughout their organization and ensure awareness of the Speak Up process and resultant investigation and remediation procedure.
- Ensuring that necessary resources are dedicated to the investigations process and responding to questions through Speak Up.
- Taking remedial measures and exercising consequential management when a breach has been confirmed.
- Ensuring that all investigators working within the Speak Up system are trained on case management in the system as well as general investigations training.
- Ensuring appropriate communication with relevant stakeholders during and on completion of an investigation.
- Acknowledgement of receipt to the reporter within 4 days of receipt of the report and, provide feedback on the investigation if exceeding 90 days.
- Ensuring that all cases are filled into the Speak Up system.
- Ensuring legal compliance with this policy and its procedures.

7.3. Investigators and Remediation Manager

- Ensure legal compliance with this policy and supporting procedures.
- Conduct investigations in accordance with the Investigations and Remediation procedure.
- Initiate and carry out remediation and log actions taken in the system.



7.4. All Sandvik employees

- Sandvik employees are responsible for complying with this policy when reporting breaches through Speak Up.
- Sandvik employees have a responsibility to report suspected breaches of Sandvik's Code of Conduct, policies or the law.

8. Monitoring of compliance

The following control measures are implemented to ensure compliance with this policy.

- By overseeing all cases, The Ethics Office 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.
- Performance management is measured in targets and followed up in a KPI scorecard.
- Employee engagement surveys (Your Voice or similar) are used to monitor awareness and trust of Speak Up process.
- The analysis of reported case data and statistics is used to define continuous improvement activities to further improve the Speak Up process.
- Performance management progress and trends are reported to the Audit Committee.
- The control CG.06 in RACM controls the implementation of the policy requirements at the sites.

9. References to associated policies and procedures

Steering and guidance documents related to the Speak Up Policy:

- The Investigation and Remediation Procedure.
- The Investigation and Remediation Guidance Notes and Templates.
- Speak Up - GDPR Procedure.

For more information visit the [Speak Up Portal](#)