

Whistleblower Policy

With this whistleblower policy, we explain how employees at Randek AB and Randek Robotics AB can disclose serious misbehaviour without violating their obligations towards the employer.

The purpose of this policy is to provide clear guidance on when and how significant misconduct should be reported in cases where the standard reporting route is not appropriate.

All disclosures of serious misbehaviour must be handled fairly, objectively and confidentially.

This policy is based on the EU Whistleblowing Directive (EU) 2019/1937 and complies with the Swedish Lag (2021:890) (the Swedish Whistleblower Protection Act). The Act provides protection against retaliation for persons who report work-related misconduct and establishes requirements regarding reporting channels, confidentiality, documentation and follow-up. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)

We strive for a positive work culture with open communication regarding business concerns. Even if there is no misconduct that would trigger a whistleblower report under this policy, we encourage employees to first discuss ordinary workplace issues with their immediate supervisor whenever appropriate.

Includes all employees

The policy applies to all employees, regardless of employment status, as well as hired consultants from consulting firms.

The protection under this policy may also apply to job applicants, former employees, interns, temporary agency workers, suppliers, contractors and other persons who obtain information about misconduct in a work-related context. [\[riksdagen.se\]](https://riksdagen.se)

Whistle blowing

In this policy, whistleblowing refers to a person reporting information about work-related misconduct where there is a public interest in the information being disclosed.

Whistleblowing concerns serious misconduct within Randek's operations that may affect the company, employees, customers, business partners, society or the public interest.

In which situations is it possible to sound the alarm?

Employees and other persons covered by this policy can report information about misconduct in the employer's activities.

Examples of reportable misconduct include:

- criminal offences;
- corruption or bribery;
- fraud or financial irregularities;
- discrimination, bullying or harassment;
- serious breaches of health and safety requirements;
- violations of environmental legislation;
- breaches of data protection legislation;
- violations of applicable laws and regulations;
- actions that may seriously harm the public interest. [\[riksdagen.se\]](https://riksdagen.se)

The reporting person does not need to prove that misconduct has occurred. Protection applies where the reporting person had reasonable grounds to believe that the information reported was true at the time of reporting. [\[riksdagen.se\]](https://riksdagen.se)

How should an employee raise the alarm?

No specific paperwork is required to submit a report.

However, to facilitate the reporting process, Randek has decided that reports shall be submitted through the following internal reporting channel:

- Via letter to Randek AB, Vagnsvägen 1, 311 32 Falkenberg, Sweden. Mark the letter with recipient: Linda Liljegen.

A reporting person may request that the report be handled anonymously. Unless the whistleblower requests otherwise, every effort will be made to protect the identity of the reporting person.

The personnel within the organization who have access to received reports are the designated recipient and Human Resources. These individuals are responsible for handling reports confidentially and with appropriate care.

A whistleblower may also request a physical meeting for reporting purposes. Such a meeting shall be arranged within a reasonable time. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)

The reporting person may also choose to report externally through a competent public authority designated under Swedish whistleblower legislation. Employees are free to choose whether to report internally or externally. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)

Examples of competent authorities include:

- Arbetsmiljöverket
- Integritetsskyddsmyndigheten (IMY)
- Konkurrensverket
- Finansinspektionen
- Naturvårdsverket

An updated list of external reporting authorities can be found on the Swedish Government's and the relevant authorities' websites. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)

What happens when an alarm is received?

If the whistleblower has not chosen to remain anonymous and contact information is available, confirmation of receipt shall be provided within seven (7) days after the report has been received. [\[extra.skr.se\]](https://extra.skr.se), [\[riksdagen.se\]](https://riksdagen.se)

Immediately after receiving a report, an initial assessment will be conducted to determine whether further investigation is warranted.

The recipient of the notification and Human Resources will decide how the matter shall be handled moving forward and whether additional investigation measures are required.

To the greatest extent practicable, feedback shall be provided to the whistleblower regarding actions taken or planned as a result of the report.

Such feedback shall be provided within a reasonable period and no later than three (3) months from the acknowledgement of receipt, unless confidentiality, legal requirements or the integrity of an ongoing investigation prevent more detailed information from being disclosed. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)

Protection against retaliation

No person who reports misconduct in accordance with this policy and the applicable legislation shall be subject to retaliation.

Retaliation includes, but is not limited to:

- dismissal;
- suspension;
- demotion;
- withheld promotion;
- salary reduction;
- disciplinary measures;

- intimidation or threats;
- harassment;
- discrimination or other unfair treatment.

Any retaliation against a whistleblower is considered a serious violation of this policy. [\[riksdagen.se\]](https://riksdagen.se)

Documentation and confidentiality

All reports received through Randek's whistleblowing channel shall be documented and handled confidentially.

Access to case information shall be limited to persons authorized to receive, investigate and follow up whistleblower reports.

Personal data and case documentation shall only be retained for as long as necessary to investigate the reported matter and fulfil legal obligations. Information that is not relevant to the investigation shall be deleted without undue delay. [\[riksdagen.se\]](https://riksdagen.se)

Document Information

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Policy owner: HR Manager Pernilla Allhage

This policy has been reviewed and updated to comply with Swedish Law (2021:890) and Directive (EU) 2019/1937. Future legislative changes affecting whistleblower protection, reporting procedures, documentation requirements or reporting deadlines shall trigger a review and, where necessary, an update of this policy. [\[riksdagen.se\]](https://riksdagen.se), [\[extra.skr.se\]](https://extra.skr.se)