



Whistleblowing Policy

Version: 0.1

Adopted: By The Board of Directors of Concentric AB on 7th December 2023

Applicable within: Concentric AB (publ) (hereinafter “Concentric”)

1 CONCENTRIC’S COMMITMENT

Concentric recognizes the important role whistleblowers have in an organization for the detection of irregularities and misconduct. Fostering and maintaining a speak-up and transparent culture is a vital part of our corporate values and our business ethics.

This Policy establishes the framework for whistleblowing at Concentric. It aims to ensure that all reports are treated seriously, handled in a confidential manner and investigated appropriately.

2 WHO IS THIS POLICY FOR?

This Policy applies to everyone at Concentric and is applicable in all our business operations. Accordingly, the Policy applies to every employee and representative of Concentric, including its subsidiaries, members of the Board of Directors as well as anyone working on behalf of Concentric (such as consultants and subcontractors). Reports from external stakeholders will also be handled in accordance with this Policy.

3 WHAT IS WHISTLEBLOWING?

Whistleblowing is attracting management’s attention to information about potentially illegal and/or underhand practices, i.e., misconduct that is in the public interest.

Misconduct refers to both an act and omission occurred (or most likely to occur). It can be an intentional or negligent act or accidental.

Public interest means that the misconduct must concern the public and that the public must have a legitimate interest in receiving information about the misconduct and to remedy it.

Examples include but are not limited to:

- (i) behavior that is contrary to law and/or regulations (e.g., breaches of money laundering legislation, data protection legislation, health and safety legislation, environmental legislation, accounting legislation, competition legislation, product safety legislation and/or anti-corruption legislation);
- (ii) mismanagement of public funds;
- (iii) acts or omissions that endanger life and health; and
- (iv) deviations from Concentric’s externally communicated rules or policies that give Concentric a competitive advantage (such as a Concentric’s Business Ethics Policy).

Examples of what typically does not constitute misconduct in the public interest:

- (i) information on deficiencies in the workplace or working environment;
- (ii) information on experienced, witnessed or suspected discrimination, harassment or sexual harassment;



- (iii) information of experienced, witnessed or suspected bullying or victimization;
- (iv) circumstances relating to your employment relationship; and
- (v) general dissatisfaction.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure.

4 NON-RETALIATION

We apply a strict prohibition against all forms of retaliation for reports made in good faith. Retaliation refers to termination of employment, dismissal, other unfavorable treatment, or adverse consequences due to speaking up in accordance with this Policy. The prohibition applies also to any measures to hinder or attempt to hinder a person from speaking up according to this Policy.

5 WHISTLEBLOWING SYSTEM

Concentric has established a whistleblowing channel through which whistleblowers may submit reports at <https://concentricab.integrity.complylog.com/>

It is possible to report in local language or in English. Also, it is possible to make a report anonymously. Whistleblowers may also report externally via various authorities.

6 WHAT HAPPENS WITH A WHISTLEBLOWING COMPLAINT?

6.1 Acknowledgement of receipt of report

Whistleblowers will receive an acknowledgement of receipt of their report within seven (7) days, provided that the whistleblower has not opted out from further communication.

6.2 Investigation and follow-up

Concentric will take measures to investigate and follow-up the issue, and may engage external expertise. Any investigation carried out will be conducted impartially, objectively and with due regard for the rights of all individuals.

6.3 Feedback

Within three (3) months of the acknowledgement of receipt of the report, whistleblowers will receive feedback, provided that they have not opted out from further communication.

6.4 Confidentiality and data processing

Reporting is treated confidentially. Information shall be kept confidential to the extent permitted by law, and efforts will be made to ensure anonymity, if requested. Information will only be disclosed on a need-to-know basis and in accordance with applicable legislation.

7 FALSE AND MALICIOUS REPORTS

It is important for anyone contemplating making allegations to ensure that they are sincere and sustainable. No allegations should be made maliciously or with the knowledge that they are false. We regard the making of any deliberately false or malicious allegations by any employee of the company as a disciplinary offense, which may result in action up to and including summary termination.



8 QUESTIONS?

All individuals are responsible for a workplace that is transparent and complies with business ethics. Questions may be directed to:

- Site Level: your manager or local Human Resources representative
- Group Level: the CEO, CFO or Vice President of Human Resources
- Board Level: Chairman of the Concentric Audit Committee



Appendix 1 - specific to Sweden only

For Sweden, due to limitations to process certain personal data in the whistleblowing system reports relating to breaches of law involving criminal offences can only be reported through the whistleblowing system if it relates to persons in key positions or senior management within Concentric and if the person in question has been involved in serious irregularities relating to:

- (i) accounting;
- (ii) internal accounting controls;
- (iii) auditing;
- (iv) anti-bribery offences;
- (v) banking and financial crime; or
- (vi) vital interests of Concentric's organization or the life and health of individuals.

Information that does not constitute misconduct in the public interest, or, for Sweden, that does not relate to breaches of law involving criminal offences as listed above, should not be reported through the whistleblowing system.