



# **Whistleblower Policy**

Document Owner  
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Approval

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CFO  
Board of directors of Bentley Endovascular Group AB  
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# **Whistleblower policy**

## **Bentley Endovascular Group AB (publ)**

## **1. WHISTLEBLOWER POLICY**

- 1.1 Business ethics are part of contributing to a sustainable society. Bentley has a code of conduct based on our core values and the ten principles in the UN Global Compact. It describes what acting Bentley's stakeholders can expect from Bentley's employees and Board of directors. The Code of Conduct also counteracts the risks of corruption, bribery and other violations.
- 1.2 Bentley has implemented a whistle blower function which is accessed via the company's website (please see below: reporting procedure). There it is possible to report irregularities, suspicions of corruption or other offenses via the Case Manager. The Case Manager will with discretion follow up all reported leads. In Sweden and in other countries, there is a law that protects whistle-blowers who report.
- 1.3 Bentley wants to encourage and protect whistleblowers who report concerns and events by clarifying the procedure of the reporting and also by creating a company culture which fully tolerates and encourages whistleblowers raising concerns without having to fear any negative consequences. In fact, Bentley also seeks to prevent any non-compliances and therefore also relies upon the reporting by whistleblowers.

## **2. REPORTING IRREGULARITIES OR PROBLEMS**

- 2.1 Whistleblowing is when a stakeholder reports irregularities or problems that are or at some point in the future may cause serious harm to the company and / or its stakeholders' interests.
- 2.2 This policy applies to stakeholders and hence employees, former employees, candidates, volunteers and also parties with whom Bentley has a business relationship with.
- 2.3 The irregularities or concerns ("Whistleblowing Matters") that can be reported via Bentley's whistleblowing routine refer to concerns about suspected or actual unethical conduct, criminal conduct or other breach of law, for example:
- Violation of the Code of Conduct and/or Policies, e.g.:
    - Insider dealing
    - Money Laundering
    - Breach of Confidentiality Obligations, in particular in relation to trade secrets
    - Breach of accounting standards
    - Serious misconduct in a work-related context
  - Danger to human life and health or to the environment
  - Violations of laws and regulations
  - Attempt to cover any of the above

- 2.4 Reports on harassment or bullying or other personal grievances that are not subject to criminal law or official fines are not part of the whistleblower protection. Such matters are covered by separate grievance procedures within the Group.

### **3. PRINCIPLES**

- 3.1 Whistleblowing can anonymously be done via the website.
- 3.2 When reporting, it is important that the whistleblower reports in good faith and has reasonable and appropriate grounds to believe that the information about Whistleblowing Matter that was reported was true.
- 3.3 Receipt of the whistleblowing will be acknowledged within seven days and handled within due course, providing prompt and appropriate feedback to the whistleblower. Feedback will be provided within three months as of receipt of the report by the whistleblower.
- 3.4 Reported Whistleblowing Matters are also recorded and retained in accordance with applicable law.
- 3.5 In addition, as further set forth on the website mentioned above, a whistleblower may also request a meeting with the Case Manager for reporting the Whistleblowing Matter.

### **4. DATA PROTECTION**

- 4.1 The data protection rules applicable to our Whistleblower system are available under [Privacy Policy](#).

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