

WHISTLEBLOWING POLICY.

To achieve even more sustainable business operations, Semcon gives its employees the opportunity of making safe and anonymous reports of potential irregularities and/or maladministration in relation to Semcon's Code of Conduct and Semcon's Quality and Sustainability Policy.

Semcon's whistleblowing policy explains how to report irregularities and/or maladministration in Semcon's activities that conflict with the company's Code of Conduct and Quality and Sustainability Policy where there is no option for reporting through the regular line organisation.

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A whistleblower is a person who exposes any kind of information or activity that is deemed illegal, dishonest, or incorrect within an organisation. The information of alleged wrongdoing can be classified in many ways: violation of company policy, law, regulation, or threat to public interest/national security, as well as fraud, and corruption.

THE FOLLOWING PROCEDURE APPLIES TO CASES OF WHISTLEBLOWING

If an employee has reasonable cause to suspect irregularities and/or maladministration in Semcon's business activities, and if it is not possible to report the situation to the line organisation, or if a report is ignored, or you want or need to stay anonymous, Semcon's whistleblowing procedure can be used.

Whistleblowing can be done using a template on

Semcon's intranet, Social.

The aim of Semcon's whistleblowing procedure is to keep the respondent completely anonymous. The respondent receives a unique link to the issue that can be used to monitor how the issue is being handled.

This is how it works:

1. The user enters a page on Semcon's intranet Social and fills in:
 - a. Title
 - b. Description of the issue
2. When finished, press the submit button. Information is saved anonymously.
3. The user is emailed a link to the issue if they want to follow the case in the future.
4. Semcon's Sustainability Manager receives an email that a new issue has been added.
5. Semcon's Sustainability Manager will respond to the issue. If the user clicks on the link that was sent to them, they will be able to see the response.

Note: It is only the whistleblower (using the special link) who can see the information. No other employees have access.

IRREGULARITIES THAT CAN BE REPORTED USING SEMCON'S WHISTLEBLOWING PROCEDURE ARE:

- Infringement of Semcon's Code of Conduct and Quality and Sustainability Policy.
- Hazards to human health and life.
- Violation of applicable laws.
- Attempts to conceal any of the above.

PROCEDURES ON HOW SUBMITTED ISSUES ARE HANDLED:

1. The Sustainability Manager carries out an initial investigation to determine whether the issue deserves further action and informs the CEO about the case.
2. If the Sustainability Manager's and the CEO's findings indicate that an irregularity [which should be brought to the board of directors' attention] has occurred, a report will be drafted and [unless inappropriate] communicated to Group Management for comment.
3. The report with [unless inappropriate] comments by Group Management will be communicated to Semcon's board of directors.

The whistleblower can follow the response regarding the issue via the link they received when they reported the issue.

PRINCIPLES FOR WHISTLEBLOWING:

- Individuals reporting irregularities and/or maladministration will have their identity protected throughout the entire process, always remaining anonymous.
- All issues will be treated fairly and correctly.

