

Mercuri International



Whistleblower Policy

March 2018

Whistleblower policy

Background

Mercuri has established policies and guidelines for how Mercuri shall act as a responsible company, supplier and employer, and comply with applicable legislation. By encouraging an open and responsible company culture, Mercuri believes that circumstances involving misconduct and serious incidents can be prevented. Accordingly, Mercuri expects employees to report infringements of laws and regulations.

Aim

The aim of this policy is to provide Mercuri employees with a framework to report misconduct and serious incidents relating to the company without fear of reprisal. Company employees shall feel confident that notifications made under the Whistleblower Policy are taken seriously, and are handled professionally and confidentially.

Guidelines

Employees are encouraged to report misconduct and serious incidents believed to infringe laws or Mercuri's published policies and guidelines to their most immediate supervisor. If a report relates to the supervisor, or the supervisor is unable to, or has failed to deal with the issue satisfactorily, the employee should refer the matter to a more senior manager, or within the company's whistleblower function.

The company believes that the following points are examples of misconduct and serious incidents that should be reported:

- a criminal act has been committed, is being committed, or risks being committed;
- a person has failed to comply with applicable laws, is not complying with applicable laws, or risks not complying with applicable laws;
- an employee's health and safety has been severely threatened, is threatened or risk being severely threatened;
- an employee has violated the company's policies or guidelines, is violating or risks violating the company's policies or guidelines;
- working conditions have deteriorated, are deteriorating or risk deteriorating;
- manipulation of accounting or financial data;
- financial offences such as the offering or acceptance of bribes, fraud or counterfeiting;
- serious forms of discrimination and harassment; and
- the deliberate withholding of information regarding any of the above.

This policy does not apply to cases of salary dissatisfaction, inadequate or unfair leadership, inefficient systems or lack of feedback regarding work performance. Employees who wish to raise issues in any of these areas should, in the first instance, refer to their most immediate supervisor.

Provided that suspected misconduct, negligence, or failings in the workplace are reported in good faith, and that valid reasons exist to consider the matter is relevant, and that an employee making a notification has followed reporting routines, the matter will be handled as follows:

- In so far as is possible, the employee's identity will not be disclosed, if this is not necessary in the pursuance of the investigation or if legally required to do so.
- The employee will not be exposed to harassment or subject to disciplinary measures by the company as a result of having reported misconduct.
- In so far as is possible, evidence that can be linked to the employee will be kept confidential.

Abuse of this policy, for example the reporting of false or baseless accusations, will result in the employee no longer being covered by the aforementioned protection.

The employee shall report his or her suspicions regarding misconduct to their immediate supervisor. Situations may arise when an employee is unable to speak with his or her immediate supervisor, and in such circumstances the employee shall refer to the CEO in the first instance.

Notifications shall be made in writing with reference to the Whistleblower Policy. The recipient of the notification shall confirm receipt of it and pursue the matter. If an employee is dissatisfied with how a notification is handled, or feel that it is not possible to raise a specific notification with one of the aforementioned individuals, the employee shall refer the matter to:

Björn Kristiansson
KANTER Advokatbyrå
Engelbrektsgatan 3
Box 1435
111 84 Stockholm
SWEDEN
Phone: +46 76 770 37 47
Email: kristiansson@kntr.se

The company is required to immediately investigate and handle all notifications fairly and confidentially in so far as is possible. An investigation's length and scope will depend on the nature of the issue. A preliminary investigation is conducted to determine whether there are sufficient grounds to continue the investigation. The person responsible for the investigation may arrange a meeting with the employee who has raised the issue. The responsible person decides whether additional measures shall be taken and, if so, what measures are appropriate. This may mean the employee is required to attend additional meetings with management, or that the employee is required to submit further evidence, if this is deemed necessary. The employee will, in so far as is possible, be informed about what measures the company decides to take, and must treat such information as strictly confidential.

The company understands that a notification made under this policy may contain extremely sensitive and confidential information that will mean that the employee will want to remain anonymous. However, the company does not necessarily require whistleblowers to act anonymously. Measures to maintain secrecy regarding notifications, and the anonymity of those who bring such notifications shall be taken in so far as is possible.

When a notification is judged to be correct according to the guidelines provided above, the company may act in one or more of the following ways:

- The matter is referred to the board.
- The matter is referred to an appropriate external authority.
- The matter is reported to the police.

If, having followed each step of the Whistleblower Policy, an employee remains dissatisfied with the outcome, the employee may, under the strictest secrecy, refer the matter to an external authority. If an employee elects to take this step, he or she is required to inform the company's CEO at least seven days prior to the authority being contacted.

Responsibility

Company managers are responsible for ensuring employees of the company are familiar with the Whistleblower Policy, but it is the responsibility of individual employees to observe it. This policy shall only be considered as a guide and does not form any part of employees' employment contracts.

Latest update: 26 March 2018.