



**Suzuki  
Garphyttan**

# **Whistle blowing policy**



# Whistle blowing policy for Suzuki Garphyttan Group

## What is whistleblowing?

Employees are usually the first to know when something is seriously wrong. A culture of turning a blind eye to such problems means that the alarm will not ring and the people in charge will not get the chance to act before real damage is done. Whistleblowing can therefore be described as attracting management's attention to information about potentially illegal and/or dishonest practices, i.e., wrongdoing.

## What is wrongdoing?

Wrongdoing involves any unlawful or illegal behaviour and can include:

- An unlawful act, whether civil or criminal
- Breach of the Suzuki Garphyttan's Code of Conduct, Social Policy and/or ethics
- Breach of or failure to implement or comply with any Suzuki Garphyttan policy
- Knowingly breaching local laws or regulations of any country
- Unprofessional conduct or conduct that does not comply with established standards of practice
- Questionable accounting or auditing practices
- Dangerous practices likely to cause physical harm or damage to a person or to property
- Failure to rectify, or take reasonable steps to report, a matter likely to give rise to a significant and avoidable cost or loss to Suzuki Garphyttan
- Abuse of power or authority for an unauthorized or ulterior reason
- Unfair discrimination in the course of employment or facility of services
- Conflict of interest
- This list is not conclusive but is intended to give an indication of the kind of conduct, which might be considered as wrongdoing.

## Who is a whistleblower?

A whistle-blower as defined by this policy is an employee of Suzuki Garphyttan who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistle-blower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are in charge of these responsibilities.

## Who is protected?

Any employee who makes a disclosure or raises a concern under this Policy will be protected, if the employee:

- Discloses the information in good faith
- Believes it to be substantially true
- Does not act maliciously nor makes false allegations
- Does not seek any personal or financial gain

The whistle-blower protection is provided in two important areas - confidentiality and against retaliation. As far as possible, the confidentiality of the whistle-blower will be kept. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights to defence. Suzuki Garphyttan will not retaliate against a whistle-blower. This includes, but is not limited to, protection from retaliation in form of an adverse employment action such as termination, compensation decreases or poor work assignments and threats of physical harm.

Any whistle-blower who believes he/she is being retaliated against must contact their Local Human Resources office. If the whistle-blower believes that their Human Resources contact is not working in their best interest, the whistle-blower should contact the CFO of Suzuki Garphyttan AB. Ultimately, any whistle-blower can raise concerns to the CEO of Suzuki Garphyttan AB.

The right for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

## Confidentiality

Suzuki Garphyttan will respect the confidentiality of any whistleblowing complaint received where the whistleblower requests confidentiality. However, it must be respected that it may be difficult to follow-up and verify anonymous complaints and to verify complaints if the whistleblower is not prepared to give his or her name. If anonymity is requested, however, the investigating official will make every effort to respect that request.

## Reporting

Reports are made thru the **SpeakUp system**. Please read our **SpeakUp guidelines** to learn more about the system and how to leave a report.

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to submit a report thru the SpeakUp system. A determination will be made if the issue needs to be escalated based on the seriousness and sensitivity of the issues involved and the person suspected of wrongdoing.

Suzuki Garphyttan will not tolerate any attempt on the part of anyone to apply any sanction or disadvantage or to discriminate against any person who has reported a serious and genuine concern that they may have concerning an apparent wrongdoing.

## False & Malicious Allegations

Suzuki Garphyttan is proud of its reputation and is striving to continue to meet the highest standards of honesty. It will therefore ensure that sufficient resources are put into investigating any complaint. However, it is important for anyone contemplating making allegations to ensure that they are sincere and sustainable. The employee must exercise sound judgment to avoid baseless allegations. No allegations should be made maliciously or with the knowledge that they are false. Making deliberately false or

malicious allegations is seen as a serious disciplinary offense, and may result in disciplinary action, including termination for cause.