

# Concentric Code of Conduct 'The Code'

<b>Version:</b>	0.1
<b>Adopted:</b>	By The Board of Directors of Concentric AB on 18 <sup>th</sup> April 2024
<b>Applicable within:</b>	Concentric AB (publ) (hereinafter “ <b>Concentric</b> ”)

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## 1. INTRODUCTION

Concentric has established a reputation for corporate trustworthiness, based on consistently conducting business with integrity and in compliance with the laws and regulations governing its activities. Our success in business depends on everyone abiding by the Code of Conduct ('The Code') by 'doing the right things', to maintain the trust of customers, shareholders, employees governments and the general public. We recognize human and social rights, take responsibility for our impact on the environment and adhere to the high standards that are expected of us.

Part of our commitment is to also only work with others who share our opinion and values in this regard.

Deviations from this policy may be approved only by Concentric's Board of Directors.

## 2. WHO IS THIS CODE OF CONDUCT FOR?

The short answer is everyone at Concentric.

The little bit longer answer is every employee or 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).

Everyone subject to The Code has a personal responsibility to understand and comply with it, together with any other policies, standards, processes, and procedures applicable when acting for or on behalf of Concentric.

## 3. HOW DO I USE THE CODE?

At Concentric, we are all about following the rules laid out in our Code which consists of:

### Part 1 – An Inclusive Workplace

- Safety
- Anti-Harassment and Sexual Harassment
- Discrimination, Intersectionality and Inclusivity
- Social Human Rights
- Confidential Information

### Part 2 – Fair Competition

- Business Ethics
- Anti-corruption
- Insider Trading
- Conflicts of Interest

- Environmental Responsibility
- Involvement in Politics
- Concentric's Reputation

### **Part 3 – Whistleblowing and Reporting**

- Reporting a breach or suspected breach
- Non-retaliation

The Code is a playbook for how we do business and how we should treat and respect each other. Our goal is to foster a positive environment allowing every individual to flourish.

Under The Code, everyone at Concentric:

- Complies with the laws and regulations of each country in which it operates;
- Demonstrates and promotes its commitment to responsible business practice in policies, decisions and activities;
- Contributes towards improving economic, environmental and social conditions through an open dialogue with the relevant interest groups in those local societies in which it operates, and
- Integrates the principles of The Code into critical business processes.

## **4. OUR CORE VALUES**

Rooted in the company's history, our core values form the basis of our company's unique culture. They shape our work ethic and our behaviour both individually and as a team.

Our Core Values work alongside The Code, to guide our people on what's important for Concentric.

Our Core Values are:

**Customer focused** which includes

- Sustainable products
- Change
- Customer satisfaction

**Achievement through our people** which includes

- Integrity
- Resilience
- Teamwork
- Openness

**Business excellence in all we do** which includes

- Performance
- Change
- Process

**'Doing the right thing' is how we do business at Concentric.**

## Part 1 – An Inclusive Workplace

### 1.1 Safety

***Safety is at the heart of everything we do. All employees share the responsibility for making our workplace safer for everyone.***

Concentric believes that a healthy and safe work environment creates job satisfaction and added value for both the business and our employees. Our objective is to provide a workplace where all employees:

- feel pride, commitment, participation, solidarity and well-being; and
- are given equal opportunities; and
- show respect for each other's opinions and differences; and
- together create a healthy and sound work environment; and
- perform work under safe and stimulating conditions.

**We strive to ensure a safe work environment.** We systematically:

- review working conditions; and
- assess risks of ill health and accidents; and
- take measures as and when needed to prevent and eliminate work environment risks and promote a healthy and sound work environment; and
- evaluate the results.

**We are all responsible for contributing to a healthy and safe work environment.**

**Here's how you can help!**

- We believe employees are best suited to detect risks and shortcomings in their own work environment. It is important that all employees are attentive to and report such matters.
- We want all employees to clearly understand their work tasks and stay informed of and abide by safe working methods. Employees must use assigned safety equipment.
- We request that all employees immediately inform their Manager of any risks identified or shortcomings in the work environment so they can be assessed and dealt with.

### 1.2 Anti-harassment and Sexual harassment

***We emphasize the importance of fostering a workplace culture that not only prohibits harassment but actively promotes respect, inclusivity, and equal treatment.***

#### **Respect and Zero Tolerance**

Concentric maintains an absolute zero tolerance of harassment and fosters an inclusive work environment on the basis of respect. We champion principles of equity, diversity and inclusivity (EDI) and to ensure everybody feel safe and that we can all work together towards our common goals. Concentric has zero tolerance for any form of harassment or sexual harassment at work, whether occurring at or outside the workplace, including conduct on social media.

#### **Speaking up**

Employees should feel safe at work and have the courage to speak up against any form of unwelcomed or offensive conduct and know that they will be protected.

***Employees can speak up to HR, their Manager/ supervisor, or another Manager they trust. Complaints can also be raised anonymously.***

#### **What is Harassment?**

Harassment is unwelcome or offensive behaviour, comments, or actions that target an individual or group based on protected characteristics.

**Harassment includes** any conduct, statement, or gesture, both physical and verbal, which denigrates, ridicules, devalues, insults, or offends a person's dignity and which is associated with at least one of the protected characteristics.

**Sexual harassment includes** any conduct of a sexual nature which offends a person's dignity, such as groping and other unwelcomed physical touching, sexual insinuations, compliments, invites, glances, gestures, nicknames, comments about physical appearance, clothing or private life, and pornographic images.

**Protected characteristics include** things like gender, transgender identity or expression, ethnicity, religion or other religious belief, disability, sexual orientation, age.

**For harassment to occur, it does not have to be intentional**

Harassment does not require intent on the part of the harasser. It is the person subjected to the conduct who decides if the conduct is unwelcome or offensive and constitutes harassment.

**We uphold our policy in the following ways**

Whenever Concentric receives a report about harassment or sexual harassment we act swiftly and immediately launch an investigation into the reported incident.

Based on the outcome of the investigation, we take necessary action to prevent and combat continued and future harassment and sexual harassment. The action that may need to be taken depends on the circumstances in each individual case.

**Prohibition against retaliation**

Concentric does not tolerate any form of retaliation against any person who rejects, denounces, or reports unwelcomed or offensive conduct, nor does Concentric tolerate any retaliation against any person having co-operated in connection with an investigation into alleged harassment or sexual harassment.

**The role of Managers in Anti-harassment and Sexual harassment**

**Managers should.....**

- Consider the wishes of the person subjected to the alleged harassment or sexual harassment.
- Inform the person of their rights that Concentric will not retaliate, and will not tolerate that any other person retaliates, against them.
- Explain that all information uncovered will be handled with due regard, consideration, and respect for all involved parties.
- Explain that Concentric has a zero tolerance approach.
- Handle sensitive matters with discretion.
- Plan meetings well in advance.
- Consider whether an alleged harasser should be performing work off-site or suspended.
- Gather and analyze evidence objectively.
- Keep the parties informed.
- If it is concluded that the matter constitutes harassment or sexual harassment, they may issue a reprimand or terminate the harasser's employment.
- Follow up to ensure that harassment has ceased.

**Managers should not.....**

- Share personal or private information that does not need to be shared or is unrelated.
- Let their views of the complainant and respondent influence the process.
- Take sides.
- Discredit someone's story or experiences before following the process.
- Deny responsibility or 'shrug off' complaints that may be more serious.
- Allow personal relationships or feelings influence their judgement.
- Gossip, or speak to anyone not directly involved in the investigation.
- Seek to delay the process due to other work priorities.
- Follow a different process, other than what is explained clearly in the company's policy.

- Expect that once the investigation is finished, the matter is closed. Further action such as training, and monitoring may be required.

### 1.3 Discrimination and Intersectionality

***Discrimination involves a person being treated unfairly or unreasonably. It becomes unlawful when discrimination is a result of specific characteristics.***

#### **What is Discrimination?**

Discrimination is defined as the unfair or unequal treatment of individuals or groups based on their protected characteristics, such as race, ethnicity, gender, sexual orientation, disability, religion, or other attributes. Discrimination goes against the principles of EDI by perpetuating systemic disadvantages and hindering the creation of an inclusive workplace that celebrates the richness of varied perspectives and backgrounds.

#### **Cultivating our workplace culture**

At Concentric we are dedicated to cultivating a workplace culture that places a high value on diversity, equity, and inclusion. We believe a diverse workforce brings a wealth of perspectives, ideas, and talents, driving innovation and success. We aim to establish an environment where every employee feels valued.

#### **What is Intersectionality?**

We acknowledge and embrace the fundamental principles of intersectionality. Intersectionality recognizes the interconnectedness of various aspects of individuals' identities such as race, gender, sexuality, disability, class, and more.

***Intersectionality is the concept that oppression is linked. When we become aware of it, we can do something about it, by considering and addressing the challenges faced by certain individuals or groups.***

#### **A culture where everyone feels valued**

Understanding intersectionality is vital to fostering initiatives that consider the diverse and multifaceted identities of our employees. By recognising these intersections, we aim to address the unique challenges faced by our employees when navigating the workplace.

This approach promotes a more nuanced and inclusive understanding of diversity, and we strive to create an environment where each person feels authentically seen, heard, and valued.

#### **An inclusive workplace – How we do it**

- **Promote Inclusion.** Encourage open dialogue and value diverse perspectives. Actively contribute to an inclusive work environment.
- **Active Listening.** Listen to the perspectives and experience of others. Be open-minded and have frequent and open dialogue with colleagues. Recognise underrepresented voices and value their insights.
- **Support Equal Opportunities.** Advocate for fair promotion processes based on merit. Mentor and support colleagues from underrepresented groups. Participate in training and engage in training programs willingly.
- **Embrace Cross functional initiatives.** Participate when you have the opportunity
- **Use Inclusive Language.** Employ language that respects diverse identities and experiences. Be receptive to feedback and adjust communication accordingly.
- **Consider Intersectionality.** Trust the experiences and listen to feedback from minority or disadvantaged groups. Consider if your privilege and be mindful of its impact in professional settings.
- **Avoid Discrimination.** Refrain from making discriminatory remarks or contributing to a hostile work environment. Steer clear of stereotypes or biases.

- **Acknowledge Diverse Perspectives.** Avoid dismissing or ignoring input from colleagues of underrepresented groups. Actively seek out and consider diverse perspectives in decision-making.
- **Consider Intersectionality.** Do not discredit experiences from others with different backgrounds. Do not think everyone has the same experience as you.

#### 1.4 Social Human Rights

Concentric is committed to respecting human rights in our operations to avoid causing or contributing to adverse human rights impacts, as well as addressing adverse human rights impacts should they occur in our business operations.

Our commitment is in accordance with the UN Guiding Principles on Business and Human Rights. We adhere to the principles set forth in the International Bill of Human Rights, the International Labour Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

***Importantly, if there is a conflict between local law and The Code or our Social Human Rights Policy, the stricter of them shall prevail.***

**We respect all human rights and workers' rights. This includes**

- Fair employment conditions
- Denouncement of child labor and forced labor
- Freedom of association and the right to organize
- Equal opportunity and ethical recruiting
- Women's rights
- Rights of minorities, indigenous peoples and communities
- Use of Private or Public Security Forces

**We always prioritise health and safety**

- We offer a safe work environment at all our workplaces and take measures to prevent accidents and occupational injuries by minimising the risks in the work environment to the greatest possible extent.
- Concentric is committed to providing a healthy and safe work environment. Therefore, health and safety for our employees are top priorities and a prerequisite for our business. We have zero tolerance for all forms of harassment and bullying.

**We engage with stakeholders and contribute actively to society**

- The views of our stakeholders are important to us, and we listen to and engage in dialogue with them. We are committed to contributing to improving economic, environmental and social conditions through open dialogue with relevant interest groups in the societies where Concentric operates.

#### 1.5 Confidential Information

Each of us at Concentric are entrusted with information that must be handled in a sensitive and confidential matter. This entails company specific information about Concentric, as well as information that has been entrusted to us by our customers and other business partners.

Some examples of what can constitute confidential information includes but is not limited to:

- Business plans
- Employment information
- Pricing and non-public financial information
- Contracts

***It is the responsibility of anyone who is entrusted with confidential information to make sure that the information is kept confidential and ensure it is handled in a secure manner.***

All employees shall observe the confidentiality undertaking in accordance with their employment agreements both during and after the termination of their respective employments.

#### **Media enquiries**

All employees are required to keep company information confidential and should not discuss anything with the media unless expressly authorised to do so. For example, if a reporter approaches you about a new product launch, you should not give any information and should direct them to the company's authorised representative.

#### **Cybersecurity**

Concentric understands that increasingly, all companies are at risk of cyber-attacks. To protect the company's confidential information, employees should only use authorised software, not download suspicious or unknown files, report and delete suspicious emails, not share passwords, not store vast amounts of confidential or personal information on devices, be careful in public areas when connecting to public wi-fi and ensure anti-virus software is up to date. This list is not exhaustive, and employees should complete and always report anything that does not seem right to the IT department.

## **Part 2 – Fair Competition**

### **2.1 Business Ethics**

All employees at Concentric commit to ethical decision-making. We always act with integrity in our business operations, as well as in relation to each other within Concentric and outside of our company. Failure to comply with applicable policies, laws and regulations covering Business Ethics can have serious consequences for Concentric and its employees, such as fines, immeasurable reputation damages and criminal as well as civil sanctions.

All employees must exercise good judgment and never put themselves or others in a position which may violate our Business Ethics Policy, The Code or applicable laws. Managers have some added responsibilities when it comes to business ethics, too. These are detailed below.

#### **Our commitment to business ethics**

- We always comply with laws, regulations and other applicable rules
- We have zero-tolerance against all forms of corruption and bribery
- We stay clear of conflict of interests
- We compete fairly and always follow competition and antitrust law
- We always market our products accurately and fair
- We safeguard confidential information and respect the integrity of personal data
- We do not accept money laundering or other illegal financial systems
- We strictly adhere to regulations regarding export control and international sanctions
- We maintain accurate books and records
- We shall comply with the tax laws and regulations of each country in which it operates. Where tax laws do not give clear guidance, prudence and transparency shall be the guiding principles

In addition to personally complying with the Business Ethics Policy and The Code, **Managers have the following added responsibilities:**

- Take all reasonable steps to ensure that employees and other persons working on behalf of Concentric (whether it be service providers, consultants or other third parties) and which are under the Manager's supervision are aware of our business ethics policy and The Code.
- Foster an environment which encourages ethical behaviour and compliance at all times.
- Make sure to promptly answer any questions relating to business ethics in a timely manner and report any misconduct.
- Facilitate a speak-up culture by never allowing any form of retaliation for persons reporting misconducts or standing up for the principles in this Policy.

***Everyone in a position of leadership should be aware that their behaviour sets the standard, and must be especially careful to always act with the highest level of integrity and ethics.***

#### **Do's**

- Ensure that any discussions with competitors, actual or potential, have a legitimate business purpose and do not share any information regarding sensitive topics.
- Make sure that there is a set agenda and that minutes are kept by an independent person if you participate at a trade association meeting.
- Leave the room or exit a meeting if a competitor discloses sensitive information or suggests any action in breach of competition law. If this occurs you should immediately report the situation to your Manager.
- Ensure that all contract provisions that may impose competition restraints on our distributors are checked against applicable competition law.

#### **Don'ts**

- Don't agree on levels of pricing or the allocation of customers.
- Don't discuss or share any information relating to prices, terms of sale, profit margins, general commercial strategy or other commercially sensitive information.
- Don't discuss or share any information concerning future plans, including but not limited to new business areas and customer segments or otherwise relating to future commercial strategies.
- Don't take any risks when it comes to business ethics – if you are unsure, ask.

## **2.2 Anti Bribery and Corruption**

Concentric acknowledges the detrimental effects corruption in all its form has on societies and organisations. Corruption distorts fair and equal competition and destroys trust.

**Corruption** Concentric adheres to the international anti-corruption organization Transparency International's definition and defines corruption as "the abuse of entrusted power for private gain".

**Anti-corruption laws** refer to laws aimed to prevent corruption by criminalising bribery and undue influence that is directed towards a party who has been entrusted to act on behalf of others. Several countries' Anti-bribery laws can apply to Concentric.

**Benefit** means something that has a value for the recipient, and may include cash, gift cards, goods, services, discounts, travel, loans of money or objects, tickets, sponsorship, commission, employment or assignments, priority in a queue or a prestigious award.

**Bribe** is an improper benefit offered, requested, given or accepted. Typically, a benefit is considered improper when it influences or risks influencing behaviour.

**Facilitation payment** is a bribe in the form of a small or nominal payment made to a government official, typically to speed up and/or secure the performance of a non-discretionary "routine governmental action". Concentric does not tolerate the use of Facilitation payments.

**Gifts** refer to benefits of economic value. Examples of gifts include consumer goods, such as a bottle of wine, branded items, discounts or cash.

**Government official** means any officer, employee or other individual acting in an official capacity for a governmental authority or agency, municipality or instrumentality thereof (including any state- or municipality owned or controlled enterprise). Also, officers or employees of a public, international organisation are considered Government officials, as are representatives of political parties. Immediate family members to just mentioned categories are also considered Government officials.

**Hospitality** includes meals, beverages, and travel and accommodation expenses. Typical examples are business meals, customer trips, site tours, cultural, sporting events and holidays.

**Third-party intermediary** refers to any individual or entity engaged (formally or informally) by Concentric to act for or on behalf of Concentric, regardless of the name or title of the individual or entity, such as agents, advisors, consultants, distributors, subcontractors, sales representatives etc.

### **Gifts and Hospitality**

We ensure that job-related benefits, such as gifts and hospitality, are reasonable, and we **never offer or accept them if they could inappropriately influence a business decision or compromise independence and judgment**. Gifts and hospitality should not be utilized to imply obligations or incentives for business transactions.

***It is the responsibility of everyone at Concentric to uphold principles against bribery and corruption including speaking up if you witness something in breach of the policy, The Code, or local laws and regulations.***

### **What if I receive a gift that does not adhere to Concentric's policy?**

You should not accept gifts and hospitality which do not comply with the company's policy and The Code. If you are offered a gift that isn't allowed, but refusing it would harm yourself or our business, you could accept it on behalf of Concentric and must immediately report it to your Manager so it can be handled in a sensitive and appropriate way.

## **2.3 Insider Trading**

Concentric employees and representatives who have access to **non-public information that may affect the company's share price** are not permitted to buy or sell Concentric shares or any other financial instruments.

In addition, such individuals may not induce anyone else by giving advice or in some other manner to undertake such trading, in line with our Insider Policy.

The register of persons holding an insider position in the Company is reviewed on a regular basis and maintained by the Compliance Officer.

The insider list includes information about all persons having access to insider information, the type of insider information and the date when the lists were updated.

It may constitute a criminal offence under Swedish law to disclose insider information, or to trade in the financial instruments of the Company or encourage others to trade whilst in possession of such information.

## **2.4 Conflicts of Interest**

Employees have an obligation to be transparent in business relationships. Personal interests can compromise judgement if not disclosed and managed correctly.

- A conflict of interest can take many forms, which include but are not limited to:
- Hiring or supervising a family member, relative or close friend.

- Using Concentric's assets for private benefit, whether it be in the form of e.g., using work time for personal matters or using Concentric's property (including equipment, materials, information, telephone etc.) for personal gain.
- Engaging in short sales of Concentric stocks, or trading in the company's stocks for personal benefit or the benefit of a family member, relative or friend, while using non-public information relating to the stock value.
- Close personal relationship influencing a business decision, such as purchasing or contract negotiations.
- Accepting gifts and hospitality in violation of Concentric's Policies.
- Taking on an external commitment, such as a board position in another company or organisation, may also give rise to a conflict with Concentric's interests. All such external commitments shall thus be notified to your Vice President or Senior Vice President and approved in writing.

### **Everyone is responsible**

As soon as you become aware of an actual, potential or perceived conflict of interest you must disclose the situation to your Manager.

### **If you're not sure**

It is better to disclose something that could be a conflict of interest, instead of assuming it isn't and finding out later.

### **We'll manage the situation with appropriate controls**

Many conflicts of interest can be managed, for example by involving another person in decision making, by going to tender for contracts if a friend or family member is involved, or by ensuring reporting relationships consider any personal relationships so that bias and favouritism do not occur.

## **2.5 Environmental Responsibility**

Everyone at Concentric has a personal responsibility to contribute to sustainable development and help minimise environmental impact. Employees are encouraged to actively identify opportunities to make their work or work environment more environmentally friendly.

### **A life cycle perspective**

We recognise the importance of embracing a life cycle perspective. We strive to minimise environmental impacts at every stage of the life cycle, including materials used, manufacturing processes, energy consumption and waste management. In addition to integrating environmental consideration into our product design, development processes and services, we encourage our customers and suppliers to do the same.

### **How we do it**

- Water and waste management and hazardous material. We manage water resources responsibly and implement water-efficient practices, monitor water usage, and work towards reduced water consumption.
- Using minimal energy throughout our operations. We seek ways to implement energy-efficient technologies and promote energy-conscious behaviour among employees.
- Reducing our greenhouse gas (GHG) emissions. We implement energy-efficient technologies and renewable energy sources and integrate sustainable practices into our operations. We implement decarbonisation initiatives across our operations.
- Responsibility for air and soil quality. We implement measures to control and reduce emissions of pollutants such as reducing volatile organic compounds (VOCs), and hazardous air pollutants (HAPs) and measures to protect the soil.
- Protect biodiversity and responsible land use. We implement measures to protect and conserve biodiversity in all areas where we operate. We commit to sustainable land use, including the prevention of deforestation.

- Noise emissions and for light pollution. We acknowledge that noise levels and light pollution from our operations may impact surrounding communities. We implement measures to minimise noise and light pollution where we can.
- Responsible sourcing
  - Collaboration with and choice of suppliers. We work with suppliers who share our values, commitment to environmental stewardship and who adhere to high ethical standards.
  - Conflict minerals. We recognise the social and environmental risks associated with the extraction and trade of conflict minerals and avoid the use of conflict minerals that directly or indirectly finance or benefit armed groups associated with human rights abuses or environmental damage.

## 2.6 Involvement in Politics

Public authority and public procurement are sensitive areas where corruption risks are high, and Anti-bribery laws have stringent regulations on benefits in these contexts. Everyone at Concentric must always observe neutrality with regard to political parties and candidates for public office. Neither the names nor the assets of any Group companies shall be used to promote the interests of political parties or candidates for public office.

### **Recipients in the Public Sector and Publicly Financed Activities**

The public sector and publicly financed activities carry the public's trust, leading to stricter Anti-bribery laws for this group of recipients. Even suspicions of inappropriate gifts and hospitality to these recipients can result in severe reputational damage. If you are unsure, you should check any gifts, hospitality or other requests with your Manager or human resources.

### **Approvals for Charitable Contributions, Sponsorships, and Political Donations**

Charitable contributions, sponsorships, and political donations pose corruption risks, potentially concealing bribes or creating conflicts of interest. Concentric maintains political neutrality and prohibits any political donations, contributions, or sponsorships.

All contributions, whether commercial or non-commercial, aim to be compliant and ethical, without the intent of creating conflicts of interest or bribery.

Concentric supports contributions to local communities and allows reasonable donations to charities and sponsorships.

## 2.7 Concentric's reputation

All employees at Concentric act as brand ambassadors for the company and together we are responsible for safeguarding company interests. Our reputation is one of our most valuable assets and each of us must cultivate and protect Concentric's reputation both among colleagues and stakeholders by living our values and following our policies.

There are many aspects to Concentric's reputation including the quality of our products, statements made in the media and colleague's behaviour with customers, business partners and community members. It is our responsibility to ensure our reputation is as strong as it can be.

**It's up to us to maintain our reputation, which has been built over many years. How do we do it?**

### **Practicing Good Cybersecurity:**

Employees should always be vigilant when using technology to ensure Concentric's information and the information of our business partners is protected. We all have a role in protecting Concentric's cybersecurity.

### **Avoiding Fraud, Bribery and Corruption:**

While the strength of Concentric's products builds our reputation, so does transparency and trust. For this reason, Concentric must remain unequivocally against fraud, bribery and corruption.

**Social Media Responsibility:**

We harness the potential of social media to establish connections, ensuring that any personal opinions we convey are identified as our own. We do not post anything disrespectful, harassing, discriminatory, or revealing confidential information about Concentric or our partners. Guidelines for Responsible Social Media Use include

- Exercise good judgement when sharing thoughts online and do so in a respectful manner.
- When referencing Concentric, clarify that opinions expressed on your social media platforms are personal and not representative of the organisation.
- Refrain from giving the impression of representing the company unless explicitly authorised to do so.
- Safeguard the confidentiality of Concentric's information, as well as that of our customers and business partners.

**Product Quality, Reliability and Safety:**

Quality, reliability, and safety serve as the cornerstone of our product development. Upholding the trust of our customers and business partners is paramount, and we are committed to delivering solutions that are not only reliable and safe but also of the highest quality. Some guidelines include

- Adhere to all established product safety procedures.
- Avoid circumventing quality controls or opting for shortcuts that may compromise quality or safety.
- Promptly report any concerns related to product quality or safety.
- Facilitate the sharing of customer feedback on products with the product quality review board.
- Ensure that all feedback regarding product safety incidents is communicated to the relevant product safety board within the respective business unit.

**Being cautious with Media and Other Inquiries:**

We supply the media and the public with precise and accurate information about our business. Only authorized employees may speak with the media. Our reputation is strengthened through truthful, transparent, and aligned messaging.

## Part 3 – Whistleblowing and Reporting

**Everyone has the right to speak up!**

If you believe that something is wrong and goes against, or seems to go against, The Code, we encourage you to voice your concerns.

In this section, we explain how you can do it, so you can choose the best way that is the most comfortable for you. We know that sometimes these things can be difficult, but we must work together to achieve our goals in accordance with The Code.

***Always report if you're not sure or suspect something.*****Reporting a breach or suspected breach**

To express a concern, we recommend that you first have a conversation with your Manager. If, however, you find it difficult to approach your Manager, you have alternative options.

**You can**

- Speak with your Manager's superior or another Senior Manager
- Seek advice from the relevant functional group, such as Human Resources or the Finance Department, or consult with an employee representative of your choice
- Use the anonymous reporting/whistleblower channel <https://concentricab.integrity.complylog.com/>

### **Can I remain anonymous?**

Yes.

You have the option to anonymously report your concerns through Concentric's anonymous whistleblower channel however, we strongly recommend that you consider identifying yourself when submitting a report. Doing so enables Concentric to engage in a confidential dialogue with you and conduct a more thorough investigation. If you choose to reveal your identity, Concentric will make every effort to strictly maintain the confidentiality of your information within the company.

### **How we handle your report**

If you file a report, Concentric will launch an investigation into the matter and will take appropriate actions. **This investigation will be conducted promptly, confidentially, and with a commitment to fairness, impartiality, and objectivity.** The individuals conducting the investigation will remain unbiased and independent.

Concentric maintains a zero-tolerance policy for any reprisals against you, irrespective of the investigation's outcome, provided that you reported your concern in good faith.

### **Non-retaliation**

Concentric applies a strict prohibition against all forms of retaliation for reports which are made in good faith.

### **False and malicious reports**

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.

### **Finally.....**

***Concentric's reputation is based on everyone, everywhere, at all times abiding The Code.***

**If something is not included in The Code, you can use the following questions to guide you:**

- Is it legal?
- Is it consistent with Concentric's Code of Conduct?
- Do I feel comfortable with my decision/behaviour?
- Would I still feel comfortable having my decision/behaviour disclosed to the public?

If you are ever unsure about what to do, just chat with your Manager, a more Senior Manager, or a human resources representative for advice. Our core values, and acting in accordance with The Code, is in the best interests of everyone at Concentric.

### **Questions?**

Questions regarding The Code or its interpretation may be directed to your Manager or Human Resources.