

## **WHITLEBLOWING GUIDELINE**

### **INTRODUCTION**

Due to our continued focus on compliance, including the work against corruption and fraud, MSTS has decided to implement a Whistleblower programme.

The purpose of **Whistleblowing** is to limit unethical behaviour in the MSTS and maintain an organization in which important information is neither suppressed nor remains undisclosed.

It is the responsibility of all employees, officers and directors to ensure that MSTS is a safe and ethical workplace as well as a trusted business partner.

### **WHAT CAN BE REPORTED**

As an employee, officer and director in the MSTS Group, you should file a report if you have knowledge of or suspect critical conditions or activities that may be in conflict with MSTS's policies, legal requirements or conditions that may harm MSTS in terms of our financial position, reputation or otherwise.

#### **Reporting in Whistleblowing may take place concerning:**

- Economic crime (including fraud, bribery, forgery);
- Violation of environmental rules and regulations;
- Violation of work safety;
- Violation of matters in relation to employees (such as sexual harassment and violence; and/or
- Violation of anti-trust rules and regulations.
- Violation of anti-bribery, anti-corruption policies

The possibility to report the issues stated above may vary subject to where you are located in. Please check your whistle-blower policy to see which issues can be reported in your country. When entering the **Whistleblowing** site you will only be allowed to report on the issues stated therein.

For guidance MSTS has a Code of Conduct and policies within the areas:

- Business Ethics;
- Labour standards;
- Occupational health and safety;
- Environmental;
- Community.

The current version of these policies is available on MSTS's share point.

If you have doubt on how to interpret the policies, ask your manager or the relevant department. If they cannot help you or if you want to remain anonymous, you can send email : [codeofconduct@relyonnutec.com](mailto:codeofconduct@relyonnutec.com) for clarification.

### **What should not be reported via Whistleblowing?**

You shall not report offences like:

- Cooperative difficulties;
- Incompetence;
- Absence;
- Violation of guidelines for e.g. smoking/drinking, using e-mail/internet.

In these cases, the normal communication channels must be used instead, such as relevant line manager or local HR.

### **WHO CAN FILE A REPORT**

All MSTS employees, officers and directors can file a report through email : [codeofconduct@relyonnutec.com](mailto:codeofconduct@relyonnutec.com)

### **Confidentiality and anonymity**

MSTS recommends that employees, officers or directors who file reports identify themselves as this will ease further investigations. All reports are handled under conditions of strict confidentiality.

Reports can be made anonymously, and protecting the identity of the reporter is very important to MSTS regardless of whether through anonymity or by means of confidentiality.

### **HOW TO REPORT**

Employees, officers and directors can file a report either online or by phone. Reports can be submitted 24 hours, 365 days a year.

Online:

In order to file a report to : [codeofconduct@relyonnutec.com](mailto:codeofconduct@relyonnutec.com)

In order to file a report by phone you can call your local phone number as stated at [www.msts-my.org](http://www.msts-my.org) and ask to speak with MD.

### WHO WILL RECEIVE THE REPORTS?

In order to comply with the confidentiality issue of implementing Whistleblowing and ensure qualified treatment of the incoming cases, all reports will be received by the General Counsel.

The General Counsel is the head of Group Legal in RelyOn Nutec Group and is obligated to evaluate the reports and make sure that actions are taken based on an investigation.

The General Counsel is assisted by a permanent limited selected group of persons consisting of Managing Director, Head of HR, Head of Finance, Group CEO, Group CFO or Senior management, who will only have the necessary and limited access to the specific report.

### HOW WILL THE REPORTS BE PROCESSED?

It is very important that **Whistleblowing** is not used for false accusations against innocent persons. All reports must be filed in good faith.

If a report is filed in bad faith, it may lead to consequences for the reporting employee, officer or director concerning the employment.

When a report is received the General Counsel will temporarily investigate the matter.

- If the report is obviously unfounded, it will be rejected and deleted from the system. A notice will be sent to the reporting employee, officer or director.
- If the temporary investigation ends up with the conclusion that the report is not to be assessed as obviously unfounded, the matter is subject to further investigation.

### WHISTLEBLOWER POLICY

These guidelines are subject to changes due to local regulation and/or practice. The guidelines are a supplement to the whistleblower policy available. Please familiarize yourself with the whistleblower policy currently in at [www.msts-my.org](http://www.msts-my.org)