

# Whistleblower Policy

## 1 INTRODUCTION

Boliden is committed to the highest standards of ethical and legal business conduct. Ethical business behaviour is the responsibility of every person in the company and is reflected not only in our relationships with each other but also with our customers, suppliers, shareholders, and other stakeholders. A healthy speak-up culture of openness, integrity and accountability is essential in order to prevent, detect and react to suspected misconduct or non-compliance.

We encourage and expect all employees to report incidents of non-compliance and suspected misconduct using the appropriate reporting channels. This Whistleblower Policy (the “**Policy**”) and the accompanying Whistleblower Instruction (the “**Instruction**”) describe how to raise concerns regarding actual or suspected serious wrongdoings.

The Whistleblower function provides all employees the right to anonymously report serious wrongdoings without being targeted with any subsequent sanction, disadvantage or other retaliation. In order to ensure this, Boliden’s Whistleblower is hosted by an independent external service provider.

## 2 SCOPE AND RESPONSIBILITY

This Policy and the Instructions apply to all employees, including temporary personnel, contractors and consultants, members of the board of directors and all business partners of Boliden AB and its subsidiaries. Anyone with knowledge of a suspected or actual serious wrongdoing is expected to report such conduct or irregularity either through Boliden’s normal reporting channels or through Boliden’s whistleblower system.

## 3 WHAT AND WHO CAN BE REPORTED?

The whistleblower option may only be used to report *serious wrongdoing*. All other concerns shall be raised through Boliden’s normal reporting channels,

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<b>Asa Jackson</b>	<b>Whistleblower Policy</b>	<b>5/3/2019</b>
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<b>Board of Directors</b>	<b>POLY-21308-v. 1.0</b>	<b>Boliden Group / / / /</b>

such as your manager, your HR-responsible or the heads of the Corporate Responsibility or Legal Departments. Certain jurisdictions may also impose restrictions as to *whom* you may report on. For example, in Sweden, only persons in leading positions and key personnel may be subject to whistleblower reporting.

## 4 HOW DO I FILE A REPORT?

In Boliden's Whistleblower Instruction you can find out more about i.a.:

- When to use Whistleblower reporting and when concerns shall be addressed through other channels;
- What constitutes serious wrongdoing;
- Who persons in leading positions are; and
- How to file a report.

## 5 WHAT HAPPENS AFTER A REPORT?

Reported concerns will be treated and investigated in accordance with the Instruction.

## 6 DATA PROTECTION, PRIVACY AND ZERO TOLERANCE TO RETALIATION

Any processing of personal data will be made in compliance with applicable data protection legislation.

All information received in connection with a report will be treated strictly confidential. The privacy of the subject of the report will be protected unless, and in such case only to the extent, required for performing the investigation. The identity of the sender of the report will not be disclosed unless the sender has approved of such disclosure in advance. Boliden applies a zero tolerance to retaliation against anyone who report wrongdoings in good faith in accordance with this Policy and the Instruction.

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## 7 IMPLEMENTATION

It is the responsibility of each manager within the Boliden group to ensure that this Policy and the Instruction are known and complied with within his/her respective area of responsibility. All employees are obligated to familiarise themselves with this Policy and the Instruction and to follow the contents therein at all times.

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