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Whistleblower Policy

Bentley Endovascular Group AB (publ)

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1. INTRODUCTION

Bentley Endovascular Group AB (publ) (hereinafter “Company”; Bentley Endovascular Group AB (publ) as well as its subsidiaries hereinafter “Bentley”, the “Group” or “we”) is an international medical technology company with headquarters in Sweden and global subsidiaries.

Whistleblower Policy is a critical tool for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.

2. PURPOSE

- 2.1 The board of directors (the “**Board**”) of Bentley Endovascular Group AB (publ) has adopted this Whistleblower Policy (the “**Policy**”). Business ethics are part of contributing to a sustainable society. Bentley has a code of conduct based on our core values and the ten principles in the UN Global Compact. It describes what acting Bentley’s stakeholders can expect from Bentley’s employees and Board of directors. The Code of Conduct also counteracts the risks of corruption, bribery and other violations.

The purpose of this Policy is to provide for a culture of zero tolerance towards fraud, corruption, bribery and any malpractice or wrongdoing. This Policy defines an internal mechanism for reporting and investigating wrongdoing in the workplace.

3. SCOPE

The Policy applies to all permanent and temporary employees of the Company (including any of its intermediaries, subsidiaries or associated companies). It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, directors, agency workers, casual workers, contractors, consultants, and suppliers. All employees and associated persons are expected to adhere to the principles set out in this Policy.

4. PRINCIPLE

- 4.1 Whistleblowing can anonymously be done via the website.
- 4.2 When reporting, it is important that the whistleblower reports in good faith and has reasonable and appropriate grounds to believe that the information about Whistleblowing Matter that was reported was true.
- 4.3 Receipt of the whistleblowing will be acknowledged within seven days and handled within due course. Feedback will be provided within three months as of receipt of the report by the whistleblower.
- 4.4 Reported Whistleblowing Matters are also recorded and retained in accordance with applicable law.

5. WISTLEBLOWER POLICY

- 5.1 Bentley has implemented a whistleblower function which is accessed via the company's website. There it is possible to report irregularities, suspicions of corruption or other offenses via the Case Manager. The Case Manager will with discretion follow up all reported leads. In Sweden and in other countries, there is a law that protects whistleblowers who report.
- 5.2 Bentley wants to encourage and protect whistleblowers who report concerns and events by clarifying the procedure of the reporting and also by creating a company culture which fully tolerates and encourages whistleblowers raising concerns without having to fear any negative consequences. In fact, Bentley also seeks to prevent any non-compliances and therefore also relies upon the reporting by whistleblowers.
- 5.3 The whistleblowing platform can also be used to contact and organise a personal meeting if the reporting person prefers to submit the report in person. It is understood that personal reports will also be processed confidentially.

6. REPORTING IRREGULARITIES OR PROBLEMS

- 6.1 Whistleblowing is when a stakeholder reports irregularities or problems that are or at some point in the future may cause serious harm to the company and / or its stakeholders' interests.
- 6.2 The irregularities or concerns ("**Whistleblowing Matters**") that can be reported via Bentley's whistleblowing platform refer to concerns about suspected or actual unethical conduct, criminal conduct or other breach of law, for example:
- Violation of the Code of Conduct and/or Policies, e.g.:
 - Insider dealing
 - Money Laundering
 - Breach of confidentiality obligations, in particular in relation to trade secrets
 - Breach of accounting standards
 - Serious misconduct in a work-related context
 - Danger to human life and health or to the environment
 - Violations of laws and regulations
 - Attempt to cover any of the above
- 6.3 Reports on harassment or bullying or other personal grievances that are not subject to criminal law or official fines are not part of the whistleblower protection. Such matters are covered by separate grievance procedures within the Group.
- 6.4 As stated before, the whistleblowing platform is accessible via the Company's website.

7. DATA PROTECTION

The data protection rules applicable to our Whistleblower system are available in OurBentley app

8. ASSOCIATED DOCUMENTS

- Code of Conduct Policy
- Insider Policy
- Anti-Corruption and Money Laundering Prevention Policy

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