# Corporate Governance Report 2009/10

Elekta AB is a Swedish public limited liability company that operates under Swedish law. Elekta is listed on the NASDAQ OMX Nordic Exchange in Stockholm. Corporate Governance of Elekta is based on Swedish legislation, primarily the Swedish Companies Act, the Rule Book for Issuers of the NASDAQ OMX Stockholm and other relevant rules and guidelines. Elekta's internal Code of Conduct, as well as its mission, vision and values, form cornerstones for the internal corporate governance regulations.

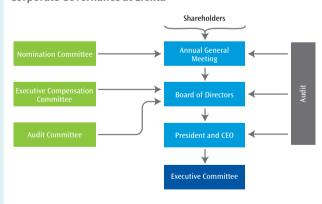
The Swedish Code of Corporate Governance (the Code) is part of the rules of NASDAQ OMX Stockholm to which Elekta has committed to adhere. Elekta has applied the Code since 2005. As of February 1, 2010, a revised Code applies.

Elekta has implemented and follows the Code with the following comment/explanation:

Elekta's Board of Directors has been informed that Elekta's Nomination Committee decided to appoint Laurent Leksell, who is a Board member, as Chairman of the Nomination Committee. This decision by the Nomination Committee was motivated by the fact that Laurent Leksell is a major shareholder and well suited to effectively lead the work of the Committee in order to achieve the best result for the Company's shareholders.

This Corporate Governance report has been reviewed by the Company's auditors in accordance with the Annual Accounts Act (1995:1554).

### **Corporate Governance at Elekta**



### **Annual General Meeting**

The shareholders' right of decision in Elekta's affairs is exercised at general meetings. The Annual General Meeting (AGM) is held in Stockholm, Sweden in September. Notification of the AGM is published according to the rules of the Companies Act, not earlier than six and not later than four weeks in advance. All registered shareholders receive an invitation to the AGM together with a copy of the annual report.

To be able to participate in decisions, shareholders must be present at the AGM personally or via a representative. Shareholders may register to participate by mail, fax, telephone or e-mail. The language for the AGM is Swedish, and all documentation is available in Swedish and English. Matters considered at the AGM include dividend, adoption of the annual report, nomination of members of the Board of Directors as well as auditors, if applicable, remuneration to the Board of Directors and auditors as well as other important issues resulting from laws or the articles of association.

Series A shares entitle the holder to ten votes, while Series B shares carry one vote. Decisions are normally taken by simple majority, with the exception of those instances when Swedish law requires a qualified majority. All relevant documentation for the AGM is made available at the Company's head office and on Elekta's website, www.elekta.com, in Swedish and English.

At the AGM on September 15, 2009, 224 voting entitled shareholders participated, representing 52 percent of the votes in the Company. For more information about the AGM 2009 please visit www.elekta.com.

Information regarding direct or indirect shareholding in Elekta representing at least one-tenth of the total votes of the Company and information about authorizations by the general meeting for the Board of Directors to decide upon repurchases of own shares is set out in the Board of Directors' Report on page 47.

### **Nomination Committee**

The AGM 2009 resolved that the Nomination Committee for the AGM 2010 should be appointed through a procedure whereby the Chairman of the Board, before the end of the second quarter of the fiscal year, contacts three to five representatives for the, as per the last banking day in September, largest holders of voting rights of A and B shares. Those representatives shall together with the Chairman of the Board constitute the Nomination Committee and fulfill its obligations in accordance with the Code. The procedure is described in its entirety in the

### **Board of Directors**



**Akbar Seddigh** born: 1943 CHAIRMAN Member of the Board since 1998 Holdings: 3,300 B-shares Graduate Chemist, **Marketing Specialist** Other board memberships: Chairman of the Board: Innovationsbron AB and Blekinge Tekniska Högskola Member of the Board: LSO (USA)



Hans Barella born: 1943 Member of the Board since 2003 Holdings: -Former President and CEO of Philips Medical Systems Other board memberships: Chairman of the Board: SuperSonic Imagine SA Member of the Board: Senator Group Consultancy and Investment B.V.



Luciano Cattani

born: 1945 Member of the Board since 2008 Holdings: -Senior Advisor on Global Health Care to Private Equity Funds Former Group President International and Former Executive Vice President International Public Affairs. Stryker Corporation MBA



Vera Kallmeyer born: 1959 Member of the Board since 2008 Holdings: -Managing Partner Equity4Health LLC and Consulting Professor Stanford Medical School MD, PhD and MBA Other board memberships: Member of the Board: UC Davis Medical School Board of Visitors and Scientific Advisory Board, Helga-und-Hans Dittner Stiftung



Tommy H Karlsson born: 1946 Member of the Board since 2001 Holdings: 1,650 B-shares International Management Consultant MSc and BA Other board memberships: Chairman of the Board: Amtico International Inc, OfficeTeam Group Ltd. and U-POL Inc Member of the Board: Aldata Solution Oyj



**Laurent Leksell** born: 1952 Member of the Board since 1972 Holdings: 3,562,500 A-shares, 2,543,001 B-shares (incl. via companies) and 73,687 employee options Former President and CEO of Elekta AB. 1972-2005 **Executive Director since 2005** MBA, PhD Economics Other board memberships: Chairman of the Board: Stockholm City Mission Member of the Board: Royal University College of Fine Arts



Carl G. Palmstierna

born: 1953

Member of the Board since 1993 Holdings: 100,000 B-shares **Executive Chairman Valbay** International SA MBA Other board memberships: Chairman of the Board: Momail AB, Qbrick AB, Accumulate AB, Panopticon AB, MyFc AB and WeMind AB. Member of the Board: Alltförföräldrar AB, Bluefish Pharmaceutical AB, Natural Fragrances of Sweden AB, Constellation Group AB, Chinsay AB, Peepoople AB and Oculusai AB



Birgitta Stymne Göransson born: 1957 Member of the Board since 2005 Holdings: 900 B-shares President and CEO Memira Holding AB MSc and MBA Other board memberships: Chairman of the Board: **Fryshuset Foundation** Member of the Board: Arcus AS, Rhenman & Partners AB, Wavin N.V. and Stockholm Chamber of Commerce

minutes of the AGM, which can be found on Elekta's website www.elekta.com. Shareholders that agreed to participate in the Nomination Committee work have each nominated a representative. The names of persons appointed to the Nomination Committee were announced in a press release on November 12, 2009. The Nomination Committee's assignment is valid until a new Nomination Committee has been named.

The Nomination Committee consists of the following persons representing the following shareholders

- Åsa Nisell Swedbank Robur funds
- Tove Bångstad SEB Investment Management
- Anders Oscarsson AMF Försäkring och Fonder
- Laurent Leksell private and via companies
- Akbar Seddigh Chairman of the Board

At the time when the Nomination Committee was established, these shareholders collectively represented over 41 percent of the votes in Elekta.

The Nomination Committee appointed Laurent Leksell as Committee Chairman and has held three recorded meetings. The Committee has performed the duties for the Nomination Committee as set out in the Code and has thus had the assignment to prepare proposals for the composition of the Board of Directors to be presented to the Annual General Meeting for decision and to prepare other issues before the Meeting. Prior to the nomination process, an evaluation was conducted under the Chairman's leadership of the performance of all members of the Board of Directors. In addition, all Board members have also filled out a special evaluation form regarding Board work during the year. The result of this evaluation was then shared with the Nomination Committee and has formed the basis for the Nomination Committee's discussions.

Prior to the 2010 AGM, the Nomination Committee will

submit proposals for the Chairman of the AGM, number of Board members, the Chairman of the Board and Board members. The Nomination Committee will also submit proposals for remuneration to the Chairman and other members of the Board, any Board committees and auditors and procedure for appointment of a new Nomination Committee. The Nomination Committee's proposals are presented in the notice of the AGM, and on Elekta's website. When the notice of the AGM is published, the Nomination Committee also publishes a motivated statement regarding its proposed Board on Elekta's website www.elekta.com.

No remuneration was paid by Elekta to the members of the Nomination Committee.

### **Board of Directors**

Elekta's Board of Directors is elected by the Annual General Meeting. The Board of Directors establishes Elekta's strategy and goals, ensures an effective evaluation of operations and controls the Company's development and financial position. During the 2009/10 fiscal year, the Board of Directors consisted of eight members, who are presented on page 83. Seven of the eight Board members are independent of the Company and its senior management, as well as of major shareholders in the Company, according to the, until the AGM 2010, applicable rules in the Rule Book for Issuers of NASDAQ OMX Stockholm, see the table below.

Information regarding provisions of the articles of association for appointment and dismissal of board members and possible provisions regarding changes to the articles of association is set out in the Board of Directors' Report on page 47.

During the 2009/10 fiscal year the Board held ten recorded meetings.

Attendance and	remuneration	for the Board	of Directors in	Elekta AB 2009/10

SEK 000s	N A M E	INDEPENDENT*	REGULAR REMUNERATION	REMUNERATION COMPENSATION	REMUNERATION AUDIT COMMITTEE	ATTENDANCE
Chairman:	Akbar Seddigh	yes	570	70	_	10/10
Members:	Hans Barella	yes	285	_	120	10/10
	Luciano Cattani	yes	285	35	_	10/10
	Birgitta Stymne Göransso	on yes	285	_	60	10/10
	Vera Kallmeyer	yes	285	_	60	10/10
	Tommy H Karlsson	yes	285	_	60	10/10
	Laurent Leksell	no	**	_	_	10/10
	Carl G. Palmstierna	yes	285	_	_	10/10
Total			2,280	105	300	

<sup>\*</sup> Independent in relation to Company and management as well as to major shareholders.

<sup>\*\*</sup> No remuneration is paid to members of the Board who are employed by the Company.

As part of its work, the Board regularly visits Elekta's larger units around the world. During the year, the Board traveled to Tokyo, Japan, to meet with local Elekta management. This year the Board also had one scientific meeting in Utrecht, Netherlands where the Board met with external expertise and advisors. Other meetings were held at the main office in Stockholm, all with Elekta's General Counsel acting as secretary. Board member attendance has been 100 percent.

Representatives from executive management and other managerial representatives have, during the year, regularly participated in Board meetings to report on issues relating to their respective areas.

### **Working procedures for the Board**

Within the Board of Directors, there is no special distribution of responsibility among Board members. Apart from the responsibilities assigned by the Swedish Companies Act, Elekta's articles of association and the Code, the work of the Board of Directors is regulated by its working instructions, which for example stipulate that the Board should:

- Hold at least seven ordinary meetings.
- Establish finance and currency policies.
- Approve budgets and similar long-term plans including investment budgets.
- Consider matters regarding investments and similar measures in amounts over SEK 4 M if such matters are beyond the scope of approved investment budgets.
- Decide on acquisitions of fixed property, shares or the acquisition of operations in another company.
- Decide on the establishment and capitalization of subsidiaries.
- Establish the terms of employment for the CEO.
- Approve the annual accounts, Board of Directors' report and interim reports.

At the ordinary Board meetings, the following items should also be considered:

- Report on the Group's operations including financial management.
- Report on extraordinary measures or events.
- Development of major projects and business events.
- Report on existing or potential legal disputes.

### Significant decisions during the year

In addition to decisions on plans and strategy, continuous follow-up of business operations and approval of interim and

year-end reports, the Board of Directors during the 2009/10 fiscal year decided on matters including:

- Long term financing and financial policy.
- Plan for succession management.
- Release of a revised Code of Conduct and establishment of activities for an effective implementation.
- Long term IT strategy and risk analysis.
- Establishment of a joint venture together with Swedfund.
- Major R&D, product development programs, product roadmap and future development research projects.

Remuneration to the Board of Directors is determined by the AGM and is paid to those Board members who are not Elekta employees. Elekta has implemented no share, or share price related, incentive program for Board members who do not hold employment with the Company. Remuneration to the respective members is detailed in the table on page 84.

### **Executive Compensation Committee**

Elekta's Executive Compensation Committee (ECC) is appointed by Elekta's Board of Directors and serves as a subcommittee to the Board. The purpose of the Committee is to provide clarity in the decision process for issues related to compensation of executive staff within Elekta as well as other incentive plans throughout the Elekta organization. The objective of the Committee is to achieve maximum shareholder and customer value through ensuring fairness and internal equality of the structure, scope and level of executive compensation in Elekta while maintaining market competitiveness.

The ECC during the year consisted of the Chairman of the Board, Akbar Seddigh, who also was Chairman of the ECC and Board member Luciano Cattani. President and CEO Tomas Puusepp is present at the committee meetings and the Group VP Human Resources serves as secretary.

The ECC provides the Board with recommendations regarding principles for formulating the Group's compensation system and remuneration to senior executives and senior managers. The recommendations cover formulation of the variable salary component, distribution between fixed and variable remuneration as well as the level of salary increases for top management. The ECC also proposes criteria for assessing performance of senior executives and senior managers, which are discussed and decided by the Board. The entire Board decides on remuneration to the President and CEO.

During the 2009/10 fiscal year the ECC held 5 meetings. Minutes are taken at every meeting. Attendance at the committee meetings has been 100 percent.

More important matters dealt with by the ECC during the year included:

- Yearly remuneration audit for the CEO and the Executive Committee.
- Compensation benchmark for the CEO and Executive Committee.
- Proposal to revised guidelines for remuneration to executive management.
- An enterprise-wide system that effectively links individual and business performance to Elekta's various reward systems.
- A revision of the corporate short-term incentive plan structure and policy and an upgrade of long-term incentive scheme.
- A new enterprise-wide process for evaluating and promoting managers and other key talent.
   Note 27, "Salaries, wages, other remuneration and social security costs," describes Elekta's outstanding share and share-related incentive programs in greater detail.

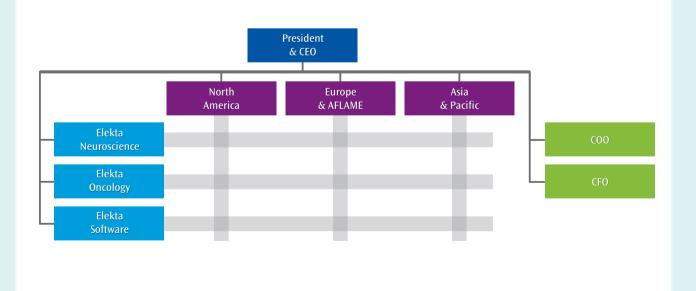
### **Audit Committee**

The Audit Committee works in accordance with guidelines and instructions for the Audit Committee which have been adopted by the Board. The Audit Committee is responsible for ensuring that the entire Board of Directors is kept regularly informed as to the work of the Audit Committee and, where necessary, shall submit matters to the Board for a decision. The main duties of the Audit Committee are to support the Board of Directors in the work of ensuring the quality of the financial reporting, risk management, auditor review and that established financial principles are applied in a correct manner. The Audit Committee regularly meets Elekta's auditors, evaluates the audit work and grants approval as to which additional services Elekta may procure from the external auditors.

The Audit Committee's members have been Hans Barella (Chairman), Birgitta Stymne Göransson, Tommy H Karlsson and Vera Kallmeyer.

During the 2009/10 fiscal year the Audit Committee held five meetings. Minutes are taken at every meeting. Attendance at the committee meetings has been 100 percent.

# Elekta's organization



# **Executive Management**



Tomas Puusepp born: 1955 President and CEO Employed since 1988 Holdings: 179,000 B-shares, 180,000 employee options



Olof Sandén born: 1962 Region Europe & AFLAME Employed 1993-1995 and since 2002 Holdings: 8,640 B-shares, 87,981 employee options



Ian Alexander
born: 1958
Region Asia Pacific
Employed since 2008
Holdings: 40,000 employee options



James P. Hoey born: 1955 Region North America Employed since 2005 (Founded IMPAC 1990) Holdings: 1,500 B-shares, 130,000 employee options



Åsa Hedin born: 1962 Elekta Neuroscience Employed 1994-2000 and since 2007 Holdings: 327 B-shares, 70,000 employee options



Johan Sedihn born: 1965 Elekta Oncology Employed since 1993 Holdings: 40,203 B-shares, 87,981 employee options



Todd Powell born: 1965 Elekta Software Employed since 2005 (Employed IMPAC 1992) Holdings: 1,500 B-shares, 50,905 employee options



Håkan Bergström born: 1956 CFO Employed since 2001 Holdings: 35,013 B-shares, 101,313 employee options

The following changes have been implemented during and after fiscal year 2009/10:

### Joseph K. Jachinowski was Executive Vice President of Region North America until September 2009 when he resigned.

# James P. Hoey was appointed Executive Vice President of Region North America in September 2009. He was also Executive Vice President of Elekta Software until December 2009.

# Todd Powell was appointed as new member of the Executive Committee and Executive Vice President of Elekta Software in May 2010 (he was appointed acting Senior Vice President of Elekta Software in December 2009)

Laurent Leksell was acting Executive Vice President of Region Asia Pacific until May 2010.

lan Alexander was appointed Executive Vice President of Region Asia Pacific in May 2010 and left thereby his position as COO.

The position as COO is presently (Aug. 2010) vacant.

More important matters dealt with by the Audit Committee during the year included:

- Risk Management and prioritization of resources to ensure proper risk management.
- Cash flow review and implementation of effective methods to improve cash flow.
- Review of principles for revenue recognition.
- Auditor review and auditor evaluation.
- Establishment of risk management and internal control processes.

#### **Auditors**

The Annual General Meeting on September 18, 2008 elected Deloitte AB as audit firm, with Jan Berntsson as auditor in charge, for a period of four years, i.e. until the 2012 AGM. Deloitte AB has been the auditor of Elekta AB since the 2002 AGM.

Jan Berntsson, born 1964 and an authorized public accountant, has been senior auditor in Elekta AB since 2008. In addition to Elekta, Jan Berntsson's auditing assignments include Atlas Copco, Tele2 and ICA. He has no auditing assignments in companies related to Elekta's major owners or its President and CEO. The auditors' fees during the fiscal year are reported in note 29.

### **President and CEO**

The President and CEO is appointed by the Board of Directors and shall oversee the operational management of Elekta in accordance with the guidelines and directions stated in law, the articles of association and the internal operating instructions. Operational management includes all measures that are not – considering the scope and nature of the Company's operations – of an unusual nature or of major significance, or are explicitly defined as being the responsibility of the Board of Directors.

Tomas Puusepp has served as President and CEO of Elekta since 1 May, 2005. Born in 1955, he has a total of 28 years of experience in international medical technology. Following studies in engineering and physics and management training at IMD in Lausanne, Switzerland, Tomas Puusepp held various positions at the Research Institute for Atomic Physics, Scanditronix and Ericsson before being employed by Elekta in 1988. Since then, he has held various management positions within the Company, including head of Elekta's neurosurgery operations, President of Elekta's subsidiary in North America and global head of Elekta's sales, marketing and service operations.

Tomas Puusepp is member of the Board of Bactiguard AB, but has no further significant assignments outside Elekta. He has no shareholdings or ownership interests in companies with significant business relations with Elekta.

### **Executive Committee**

Elekta's Executive Committee consists of the President and CEO, the Chief Financial Officer, the Chief Operating Officer, the managers of three product areas and the three regions – a total of nine members. The President and CEO oversees the work of the Executive Committee and makes decisions after consulting with the members. Executive Committee meetings are held one or two days each month. The meetings are often held in conjunction with visits to the Group's various units.

Details regarding remuneration for the President and CEO and Executive Committee are provided in note 27.

### **Financial reporting and information**

Elekta provides the market with continuous information regarding the Company's development and financial position in accordance with the guidelines specified in the Board's communications policy.

Financial information is published regularly in the form of:

- Interim reports.
- Elekta's annual report.
- Press releases on news and events that may significantly
  affect the Company's valuation and future prospects.
   As a general rule, orders with an order value exceeding
   USD 10 M shall be considered for disclosure through
   publication of a press release.
- Presentations and telephone conferences for financial analysts, investors and media.
- Capital markets days arranged by the Company at one of its major units or in conjunction with major scientific conferences where Elekta is exhibiting.
- Elekta's website www.elekta.com where the above information is made available.

According to policy, Elekta has a "silent period" prior to each quarterly report, during which the Company does not present at investor seminars or conduct one-on-one meetings, in person or over telephone. The length of this silent period is to be determined by the CEO. It should not be shorter than 14 days.

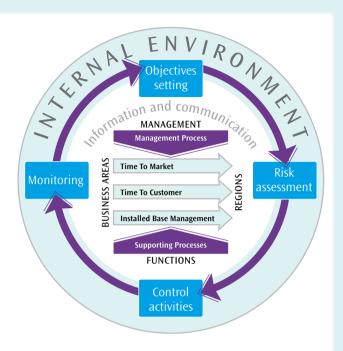
### **Risk Management and Internal Control**

During the year Elekta has developed and started implementation of a more systematic approach in working with risk management and internal control resulting in the Elekta Risk Management and Internal Control process, see figure at right. The new approach is developed from already established methods of identifying and handling of risks and will secure that risk management and internal control is an integral part of the strategy and management processes. The approach for risk management and internal control is to focus on strategic risks, operational risks, legal and regulatory compliance risks and risks related to financial reporting with the aim to provide reasonable assurance that the Elekta long term and short term objectives are achieved. Risk Management and Internal Control over financial reporting aims to provide reasonable assurance with regard to the reliability of the external financial reporting in terms of interim reports, year-end reports and annual reports, and to ensure that the external financial reporting is prepared in accordance with laws, applicable accounting standards and other requirements on listed companies.

### Internal environment

The internal environment is the foundation for internal control. It establishes the culture in which Elekta operates and sets standards for corporate behavior. The internal environment embraces our Mission, Vision and Values as guiding principles and is supplemented by further descriptions in documented policies, procedures, processes and working instructions that are communicated throughout the organization.

The Elekta Code of Conduct serves as an overall policy to ensure all employees understand the corporate responsibility regarding business ethics and behavior in the areas of social, environmental and economic responsibility. Other policies procedures, processes and working instructions describe how Elekta manages and conducts its business operations, e.g. the management process, the main business processes; Time to Market, Time to Customer and Installed Base Management, and supporting processes such as purchasing, customer feedback, IT and human resources. There are also policies, procedures, supporting processes and working instructions regarding the financial reporting in the Financial Guide, including e.g. authorization policy and instruction, accounting policy, reporting instruction and financial policy. In addition there are working instructions established for supporting e.g. the financial IT systems and an information policy.



The Elekta Risk Management and Internal Control process is developed from the principles and definition of Enterprise Risk Management established by COSO, The Committee of Sponsoring Organizations of the Treadway Commission.

As a medical device company, Elekta operates according to several external requirements and standards that supervisory authorities have established. The requirements and standards are implemented and maintained through Business Management Systems, which include policies, procedures, processes and working instructions.

The organizational structure is transparent with defined roles, authorities and responsibilities documented in working instructions and job descriptions on all levels in the Company, from the Board of Directors to all employees. The Board of Directors has established working instructions for the Board of Directors, the Audit Committee, the Executive Compensation Committee, the CEO and instructions regarding financial reporting to the Board of Directors. Evaluation of performance is done on an annual basis in order to ensure relevant competency and any needs for personal development.

The Audit Committee and the Executive Committee of Elekta have during the year strengthened the management of risks and internal control by appointing a Risk Manager to further develop and enhance the risk management and internal control process throughout the organization, with specific focus on the internal controls related to financial reporting.

The organization structure is described on page 86.

### Objectives setting and risk assessment

As part of the Elekta strategy and management processes, the Company long term and short term objectives are established. A risk assessment is performed in connection with the strategy process in order to identify the risks related to the achievement of the objectives including risks related to financial reporting, under the supervision of the Risk manager. The risks are documented in a company risk map. In addition, risks that appear during the year are continuously evaluated and added if applicable to the company risk map. The major risks are described on pages 45-46 and 62-63.

The risk assessment is performed by assessing the risk level, from an impact and probability perspective, and defines the appropriate risk response as base for actions and handling of each risk. All risks are handled by appointed risk owners and risk actionees.

### **Control** activities

The control activities are designed to handle risks that the Audit Committee, the CEO and the Executive Committee consider to be significant for reaching the strategic objectives, and the objectives for business operations, legal and regulatory compliance and for financial reporting.

Policies and Procedures are established and implemented to help ensure that the risk responses are effectively carried out e.g.

- Changes in the business model to avoid risks.
- Accept risk but monitor and analyze any changes.
- Improve business processes and behavior to mitigate risks.
- Share risk between entities.
- Transfer risks to external parties as appropriate.

Control activities regarding financial reporting are designed to ensure that the fundamental requirements on the external financial reporting are fulfilled. They are comprised of detailed or overall controls and could be preventative or detective. Control activities are often integrated in key processes, such as order and revenue recognition and in addition comprise analytical reviews such as performance follow-up. Areas that are covered by control activities are e.g. approvals and authorizations of business transactions, reliability of business IT systems, observance of laws, applicable accounting standards and other requirements on listed companies and areas that include a certain degree of judgment.

### Monitoring

Monitoring of the risk management and internal control process to ensure the effectiveness of the process, is done

by the Board of Directors, the Audit Committee, the CEO, the Executive Committee and other appointed dedicated committees and relevant employees. Monitoring includes e.g. review of monthly business and financial reports, quarterly business reviews, monthly reviews of order recognition by the Order Committee and follow-up of internal quality audit reports of the business operations related to e.g. quality of product, product development and manufacturing by the Quality function, and reports from the external auditors.

Prioritized risks are monitored quarterly by the Audit Committee, while all overall company risks are monitored by the Executive committee as an integrated part of business reviews.

### Information and communication

As part of the Elekta strategy and management processes, the Board of Directors, the CEO and the Executive Committee decide on company long term strategy, operational plans and company policies. These are all communicated to relevant levels within the company as building blocks for company control.

Management at different levels within the organization make daily decisions based on relevant reported operational and financial information and ensure that implementation of made decisions are secured and in line with overall strategies, plans and policies.

Elekta has different channels for communication within the organization, including e.g. the company's intranet, information letters, regular meetings and company magazines. The aim is to ensure visibility of necessary information to relevant employees.

The Risk manager coordinates risk reporting from risk owners to the Executive Committee, the Audit Committee and the Board of Directors.

For suspected violations of the Code of Conduct, an anonymous communication line exists directly to the Corporate Social Responsibility Officer.

The Elekta communications policy regulates communication with external parties including the financial market.

The company has currently no separate internal audit function. The work with risk management and internal control over financial reporting has during the year been performed by the risk manager, other internal functions and external resources. The Board of Directors continuously evaluates the need and scope of an internal audit function related to financial reporting.