

V1.0 – September 2023

# Whistleblower Policy

## Purpose of the Policy

The purpose of this whistleblower policy is to ensure transparency and accountability regarding any illegalities and serious matters within our organization. It is also to provide a safe environment for employees and others associated with our organization to voice concerns about objectionable issues without fearing negative consequences.

Our whistleblower program is intended to help identify serious issues and cases of neglect and resolve or prevent them to the greatest extent possible.

Our whistleblower program should be seen as a supplement to direct and daily communication in the workplace regarding issues and unsatisfactory conditions. The whistleblower program is also a supplement to existing options, such as contacting the immediate supervisor, HR/personnel department, or a union representative.

## Who Can Report to the whistleblower program?

You can make reports to our whistleblower program if:

- you are or have been employed by us or have been a paid or unpaid intern.
- you are a member of our management or board.
- you have an affiliation with our organization, such as a supplier, collaborator, or customer.

## What Can You Report About?

The whistleblower program can be used to report serious matters. For example, you can report information about:

- Serious or repeated violations of legislation (both national and EU), related to:
  - Public procurement
  - Money laundering prevention and terrorism financing
  - Product and transportation safety
  - Environmental protection
  - Food safety, animal health, and animal welfare
  - Public health, consumer protection, and protection of privacy

- Serious legal violations (violations of the Criminal Code or special legislation), such as information about criminal activities, including breach of confidentiality, hacking, theft, embezzlement, fraud, and bribery.
- Serious personnel matters (e.g., harassment or disregard of professional standards) Such as neglect of professional standards that could pose risks to personal safety and health, serious or repeated violations of the workplace's internal guidelines, serious errors and significant irregularities related to IT operations, or special cases where minor collaboration difficulties entail significant risks, thus constituting a serious matter. As a general guideline, a violation of the law or other matter is considered serious if it involves information that is in the public interest to disclose. Minor violations and accessory provisions are not covered. Reports regarding the whistleblower's own employment relationship are generally not covered unless they involve sexual harassment or severe harassment. You should be aware that other violations, such as violations of internal guidelines on sick leave or smoking, are not covered by the whistleblower program. As a general guideline, information about other matters should be handled through the immediate supervisor, HR department, or union representative.

## **How Does Reporting Work?**

Reports to the whistleblower program are made electronically through our whistleblower portal, which can be accessed via our website.

Your inquiry will be treated confidentially by our whistleblower unit, consisting of selected employees or partners (Case Managers). All reports are stored and processed through our whistleblower platform.

In line with legal requirements, we will send you a confirmation that your report has been received within 7 days of receipt. You will also receive feedback regarding your report, as detailed above. However, this does not apply if you choose to report anonymously; see more about the possibility of anonymous reporting below. Regardless of whether you choose to report anonymously or not, we may contact you through the whistleblower portal if we need to ask you follow-up questions that allow us to adequately handle your case.

Our Case Managers will conduct an initial assessment to determine whether your report falls within the scope of the Whistleblower Act and whether you meet the criteria for reporting through our whistleblower program. If the report falls outside the scope of the legislation, we will inform you. Depending on the nature of your inquiry, our whistleblower unit will guide you on how to proceed with the rejected report, such as suggesting that you contact your immediate supervisor, HR department, or union representative.

If your report can be processed, the whistleblower unit will conduct a further investigation of the matter, including gathering internal information within our organization. If the inquiry involves a member of senior management, the matter will be handled within the management team without the presence of the implicated member.

Based on the assessment of the case, different responses are possible:

- If it involves a violation of the Criminal Code, the matter may be reported to the police.
- If the case concerns serious errors and/or negligence committed by an employee, it may lead to employment-related consequences for the individual, including disciplinary sanctions such as warnings or dismissal in line with your organization's disciplinary policy.
- If the case involves serious errors and/or negligence committed by a collaborator,

it may lead to contract-related consequences for the collaborating partner, such as contract termination.

## **Feedback**

Our whistleblower unit will, to the extent possible, inform you about the measures taken or planned and why this solution was chosen. You will receive feedback as soon as possible and no later than 90 days after confirmation of receipt of your report. If it is not possible to provide feedback within the deadline, the whistleblower unit will notify you and inform you when feedback can be expected.

## **Anonymity**

You have the option to report to our whistleblower program without disclosing your identity. If you want to remain anonymous, you should choose 100% anonymity (My identity is unknown to all parties in the whistleblowing process) when making your report through our whistleblower portal. If you upload files, please ensure that the files do not contain information that accidentally reveals your identity. If you choose to remain anonymous and lose the key to the whistleblower portal generated during the report, you will not be able to access your case, and we will not be able to grant access to the case again, however, in this event, you may resubmit your case.

## **Your protections as a whistleblower and the affected person**

Whistleblowers are protected by certain rights that apply before, during, and after the whistleblower has made a report or disclosure (the latter being an alternative to reporting through an internal or external whistleblower program).

However, it is a requirement for you to be protected as a whistleblower that you believe the information you are reporting is accurate. In other words, you must report "in good faith". This is to say that you will not be protected as a whistleblower if you intentionally report incorrect information to the whistleblower program.

As a whistleblower, you cannot be held liable for obtaining the information you report unless the way you acquired the information was illegal. This would be the case, for example, if you obtained information through hacking, illegal recording, eavesdropping on others, or similar activities.

If you, as a whistleblower, act in good faith and report information to our whistleblower program, you cannot be held liable for violating a legal duty of confidentiality related to the information you report, if you reasonably believed that the report disclosed matters covered by the scope of Whistleblower Act. If, in connection with reporting to the whistleblower program, you disclose information subject to a special duty of confidentiality, such as under health legislation, classified information, or other information not covered by the Whistleblower Act, you may still be liable for breaching your duty of confidentiality.

Regardless of whether you make a report to an internal or external whistleblower program, you are protected as a whistleblower against reprisals, including threats of reprisals or attempts at reprisals. You must not be hindered or attempted to be hindered from making a report.

The Case Managers associated with our whistleblower unit have a special duty of confidentiality regarding information in the reports. This special duty of confidentiality only applies to information in the report.