Whistleblower Policy

Ependion AB, company registration no. 556025-1851 (the "company"), aims to have the highest standards of transparency and honesty.

This policy is applicable to all businesses and operations within Ependion AB wherever they are located globally.

The purpose of this whistleblowing policy is to make it easier for our employees and parties dealing with the company to report suspected irregularities in the company's work. We want to inform you as a whistleblower about how we support you so that you can safely create and submit a whistleblowing report ("Whistleblowing Report") and know who to contact.

This policy also aims to promote a strong “speak-up” culture, where concerns can be raised without fear and are handled in a fair, transparent and timely manner.

The policy further describes how we ensure that we support you responsibly and in accordance with the law, including but not limited to, the EU Directive (2019/1937) on the protection of persons reporting breaches of European Union law ("EU Whistleblower Directive"). Finally, the policy also describes what rights you have and how you can exercise them.

Who can be a whistleblower?

As a whistleblower, you can be an employee or a person with self-employed status, a shareholder or a person belonging to the company's administrative, management, or supervisory body, as well as a volunteer. You as a whistleblower can also be any person who works under the supervision and management of contractors, subcontractors, and suppliers to us.

Please note that you can still be a whistleblower even if your employment or working relationship with us has ended or if it has not yet begun.

Who is responsible for the whistleblowing report?

The overall responsibility for the whistleblowing system lies with the Board of Directors. The operational handling of whistleblowing reports is coordinated by the HR function, ensuring that cases are handled impartially and that conflicts of interest are avoided. All reports are handled confidentially and assessed on a case-by-case basis. Individuals involved in handling reports are required to act independently and in accordance with applicable laws and internal procedures.

The company is responsible if you make a whistleblowing report under this policy. As such, we have a responsibility to protect you, which includes not disclosing your identity to anyone other than the authorized persons who receive your whistleblowing report (unless you expressly consent, or we are required to disclose your identity by law) and ensuring that your report does not lead to consequences.

However, please note that you also have a responsibility in this whistleblowing policy. We expect you to only report information and personal data that is relevant to the handling of your whistleblowing report. We also ask that you do not report personal work-related complaints, such as conflicts between you and other employees or a decision relating to your employment or engagement. Personal work-related complaints should be raised with a member of your local HR team and/or your manager, your direct manager’s manager, or a relevant responsible person.

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What can be reported in a whistleblowing report?

You are welcome to submit a whistleblowing report if you received the information while you are in a work-based relationship with us. You should have reasonable grounds to believe that there is a wrongful or actual breach of applicable rules or regulations in relation to the company and/or actions non-compliant with our Code of conduct.

The Whistleblowing Act specifically states the importance of reporting in the following areas:

- Public procurement
- Financial services, products and markets and prevention of money laundering and terrorist financing
- Product safety and compliance
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data

In addition to the areas listed above, reports may also concern serious breaches of our Code of Conduct or internal policies, including but not limited to:

- bribery and corruption
- fraud or financial irregularities
- human rights violations or labour rights issues
- environmental violations or serious environmental risks
- serious health and safety risks
- breaches of data protection or information security

We strongly encourage you to file a whistleblowing report in these areas.

Please note**:** It is important that, considering the circumstances and the information available to you at the time of submitting a whistleblowing report, you believe that the content of the report is true.

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Where can you file a whistleblowing report?

We enable you to submit a whistleblowing report in writing or orally, or both. Oral reporting is possible by telephone or at your request, through a meeting with a designated impartial person. Contact details can be found by following the link below.

Written reporting is possible via our external whistleblowing system. The system/process is managed by our external partner Interaktiv Säkerhet and is available 24 hours a day. You can send a whistleblowing report via the system by following this link:
https://ependion.whistlelink.com/

You will receive acknowledgment of the receipt of the whistleblowing report within seven days of receipt. For your information: Our partner has an impartial person or department competent to follow up on the whistleblowing report. They will maintain communication with you and, if necessary, ask for additional information from you. No later than three months from the confirmation report received, you will receive feedback on your report through the system.

When a whistleblowing report is submitted, we would also like to inform you that you can choose to report anonymously. This does not affect your rights and protection under the EU Directive or other Country-specific laws concerning whistleblower reporting. However, complete anonymity may make it more difficult for us to investigate the problem or take the measures we would like to take.

Finally, we would also like to clarify that if internal reporting is not appropriate, it is possible to submit a whistleblowing report externally to competent authorities and, where relevant, to EU institutions, bodies, offices, or agencies.

While the whistleblowing system is operated by an external partner, Ependion remains responsible for the assessment, investigation and decision-making related to reported cases.

Personal data

The goal is to always protect the personal data we process to the best of our ability. This means that we are always committed to protecting your privacy and to complying with applicable personal data legislation, including but not limited to the General Data Protection Regulation (GDPR).

When you submit a whistleblowing report, we will process the personal data in it to fulfill our legal obligations under, among other things, the EU Directive. Please see more information about how our partner will process personal data contained in a whistleblowing report in the Privacy Policy here: **https://www.whistlelink.com/privacy-notice/**

What are your rights?

We are committed to implementing and enforcing necessary and reasonable steps to prohibit any form of retaliation against you for filing a whistleblowing report, including threats and attempts at retaliation.

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Ependion will not tolerate any form of retaliation against individuals who report concerns in good faith. Retaliation includes, but is not limited to, dismissal, demotion, harassment, discrimination, or any form of unfair treatment. Any person engaging in retaliation may be subject to disciplinary action.

External reporting - How do I register a report externally to the competent authority?

In addition to the information contained in this whistleblowing policy, competent authorities provide comprehensive and independent information and advice on procedures and measures available, as well as on protection against retaliation and your rights. You can also submit a notification to the competent authority responsible for the area to which your notification relates. Many countries have regulatory authorities that can advise and provide reporting facilities covering Finance, Environmental, Health and Safety, or other employment-related issues.

Monitoring and reporting

Ependion will regularly monitor and review the effectiveness of the whistleblowing system. Aggregated and anonymized information on whistleblowing reports may be reported to senior management and the Board of Directors to support oversight and continuous improvement.

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