

## **Probi's Whistleblower Policy**

Approved by the Management

This is a summary version of Probi's internal policy. This document only presents the main objectives of the policy.

Probi AB is committed to ethical business practices and expects all employees, directors, and partners to report any suspected misconduct. The company provides a whistleblower channel for serious concerns, offering legal protection for good faith reports.

## **Key Points:**

- **Scope**: The whistleblower channel is available to employees, directors, contractors, suppliers, and customers.
- **Reportable Misconduct**: Includes illegal activities, financial fraud, bribery, health and safety threats, data breaches, discrimination, human rights violations, and other serious misconduct.
- **Exclusions**: Minor issues such as personal grievances or petty theft are not handled through this channel.
- Reporting:
  - Submit reports via Probi's confidential whistleblower platform or contact designated personnel (e.g., CFO, VP HR & Sustainability).
  - Anonymity is allowed but providing contact details is encouraged for follow-up.
  - External reporting to relevant authorities is also an option.
- Investigation Process:
  - Reports are assessed by designated personnel within seven days.
  - Investigations may involve internal or external experts.
  - Disciplinary actions, including termination, may follow if misconduct is found.
  - $\circ$  ~ Feedback will be provided within three months of report receipt.

## • Protection Against Retaliation:

- Retaliation for reporting misconduct is strictly prohibited and will result in disciplinary action.
- Reporters will not be held liable for breaching confidentiality if they act in good faith.

## • Data Privacy:

- Personal data related to the report will be processed confidentially and only shared with authorized parties.
- Data is stored for a maximum of two years, and individuals have rights to access or delete their data.

This policy ensures accountability, protects whistleblowers, and promotes a culture of integrity at Probi.