

Whistleblower Policy

Introduction and purpose

The ChemoMetec Whistleblower Alert has been established with the aim to support ChemoMetec's commitment to ensure responsible and ethical business behavior.

At ChemoMetec we strive to foster an open culture where everyone is free to raise concerns, and by establishing the ChemoMetec Whistleblower Alert, ChemoMetec aims at increasing the likelihood of early detection of possible serious illegal or unethical misconduct and thus become better equipped to minimize the damages of such misconduct and to implement the right preventive measures.

This policy is global, and the Whistleblower Alert is available to employees, management and board members in the ChemoMetec group as well as customers, suppliers, business partners and other stakeholders.

Below you will find information on the Whistleblower Policy and how it is implemented in ChemoMetec.

What to report?

ChemoMetec encourages you to report knowledge or suspicions of serious illegal or unethical misconduct or serious violations of ChemoMetec's internal guidelines and policies to ChemoMetec through the regular communication channels or, subject to the restrictions set forth below, by using the Whistleblower Alert.

The Whistleblower Alert is thus a supplement to the usual communication between employees and ChemoMetec's management and/or between ChemoMetec and its external stakeholders. If it is not possible to use these communication channels or if you do not feel comfortable in doing so or if you fear there is a risk of retaliation, you may use the Whistleblower Alert.

Only information that indicates that one or more ChemoMetec employees, management or board members, either actively or by omission and by virtue of their position in or assignments for ChemoMetec, carry out illegal or unethical activities or commit clear and serious violations of ChemoMetec's internal guidelines or policies will be processed.

Examples of areas where illegal or unethical misconduct or serious violations of ChemoMetec's internal guidelines and policies or can be reported include, but are not limited to:

- Financial crime, including bribery and corruption, embezzlement, money laundering, tax evasion and counterfeiting
- Anti-trust/competition law
- Insider trading and market abuse
- Major non-compliance with quality standards
- Harassment, violence and discrimination
- Major health, safety and environmental issues
- Human rights violations

- International trade sanctions
- Data Privacy and IT Security
- Conflicts of interest

In some countries, there are specific restrictions on what and how you can report. You will receive the relevant instructions on the reporting page, once you have identified your geographic location.

The Whistleblower Alert is not intended for employee concerns and issues related to human resources (HR), e.g., dissatisfaction with salary or other employment terms and collaboration challenges. For such matters, please contact your local management or the local HR department.

ChemoMetec does not tolerate misuse of the Whistleblower Alert, and you should only use the Whistleblower Alert for reporting in good faith of incidents of serious illegal or unethical misconduct or serious violations of ChemoMetec's internal guidelines and policies within the restrictions set forth in this Whistleblower Policy.

How to report?

Cases can be reported by filing a written report electronically, using a form. Links to the Whistleblower Alert and the form can be found at ChemoMetec's website, www.chemometec.com.

The Whistleblower Alert is hosted by EQS Group A/S (the Data Processor), an independent third party guaranteeing the system's security and anonymity.

Reporting is possible in multiple languages which can be chosen from the available language options.

Reports to the Whistleblower Alert can be filed anonymously, except where prohibited by local law.

However, in order to provide ChemoMetec with the best opportunity to investigate any report submitted under the Whistleblower Policy, ChemoMetec recommends that you disclose your identity to ChemoMetec. Unless compelled otherwise by law or regulation, ChemoMetec will keep your identity in full confidence and not disclose your identity internally or externally unless you provide your prior consent.

However, it is up to you whether you decide to disclose your identity or remain anonymous when submitting information through the Whistleblower Alert, and any information received by virtue of the Whistleblower Policy will be processed whether anonymous or not.

When reporting an issue, you are strongly encouraged to provide as much detail as possible, as it will enable the Whistleblower Committee (see under "Who is responsible for the Whistleblower Alert?") to conduct a thorough and accurate investigation.

You are entitled to receive feed-back on the outcome of investigations of your report. You will receive an acknowledgement of the report within 7 days. Further, you will within reasonable time, however no later than 3 months from the report, receive feedback.

How am I protected?

ChemoMetec (the Data Controller) will ensure that all processing of personal data under the Whistleblower Policy is compliant with EU legislation on data protection and applicable local legislation

(GDPR). If reports involve employees of affiliates outside EU, the ChemoMetec entity, where the relevant employees are employed, is data controller and ChemoMetec, Denmark, is data processor.

ChemoMetec will limit the number of people involved in the processing of the information to the largest extent possible, and the personal data under this policy will only be disclosed to the extent mentioned under this Whistleblower Policy.

Anyone having filed a report will be directed to a secure post box, which allows for subsequent communication with the said responsible persons securely and without disclosing identity.

When setting up the post box you will be provided with a case number and asked to choose a password. With the case number and password you can log on to the post box to read and submit messages.

ChemoMetec guarantees that the submission of information in good faith through the Whistleblower Alert will not have any adverse employment consequences or be used to your disadvantage.

If, however, you have submitted a report in bad faith for the purpose of harassing or causing other harm to your colleagues, management or members of the Board of Directors without reason, it may have consequences for you as an employee.

How are persons concerned by a report protected?

All serious reports will be subject to thorough and confidential evaluation and investigation, and any person who is subject to a formal investigation will be properly informed in due time in accordance with the person's legal rights, taking into consideration the sensitive and confidential nature of the report and any possible risk of jeopardizing ongoing investigations.

Depending on the circumstances, a disciplinary action against the reported employee or members of the management or the Board of Directors may result in termination of the employment or the office.

It will not have any consequences for the said employee, member of the management or the Board of Directors if the allegations are not supported by evidence or by findings during the investigation.

All groundless reports will be dismissed and disregarded, and reports that cannot be substantiated will be deleted and disregarded.

Cases of misuse of the Whistleblower Alert and any reports filed in bad faith will be sanctioned appropriately, as mentioned above.

Who is responsible for the Whistleblower Alert?

The ChemoMetec Whistleblower Alert is anchored in the Board of Directors.

ChemoMetec's external counsel, Kønig Advokater, acts as a secretary to the Board of Directors being responsible for receiving and initially reviewing incoming reports.

Through the initial review the gatekeeper will ensure that the information submitted is not unfounded and that the information is not outside the scope of the Whistleblower Policy. Upon having made such review and assessment any information which is eligible for processing under the Whistleblower Policy will be made available to the ChemoMetec's CEO and the Chairman of the Board of Directors (the Whistleblower Committee).

Information submitted through the Whistleblower Alert will also be received and read by two independent members of ChemoMetec's Board of Directors.

All processing of reports is confidential to the maximum extent possible under applicable law and consistent with a thorough and complete investigation.

The report and information processed as part of the investigation may be transferred onwards to relevant internal managers, an external attorney or auditor in connection with the investigation or if the report results in a court case, a police report or if required by law.

ChemoMetec's HR department will be involved in all reports involving specific employees and their conditions of employment.

In the event that the information submitted involves acts or omissions of ChemoMetec's CEO, the information will be made available to the Chairman and the Vice Chairman of the Board of Directors who will then act as the Whistleblower Committee.

In the event that the information involves acts or omissions of the Chairman of ChemoMetec's Board of Directors, the information will be made available to ChemoMetec's CEO and Vice Chairman of the Board of Directors who will then act as the Whistleblower Committee.

Approved by the Board of Director on 11 January 2023