

**SWISSPEARL**

# Swisspearl Group Whistleblower Policy



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## Background and purpose

This whistleblower policy (the "**Whistleblower Policy**") applies to Swisspearl Group AG and all its' subsidiaries, Central Business Register (CVR) no.: CHE-105.967.016, Eternitstrasse 3, 8867 Niederurnen, Switzerland, ("**Swisspearl Group**").

Swisspearl Group is controller in respect of the processing of the personal data that are necessary for handling the whistleblower scheme. Swisspearl Group can be contacted at Swisspearl Group AG, Group General Counsel Morten Sorensen.

The purpose of Swisspearl Group's whistleblower scheme is to enable employees and other parties with work relations to Swisspearl Group, to report their concerns in confidence to an independent party, where there is reasonable suspicion of breaches of international- or national legislation in specific areas and other serious breaches in cases that have been defined as extensions by a separate member state in the national whistleblower schemes in areas or acts not covered by the Directive. The Whistleblower Policy is also intended to inform you about your rights under the nationally applicable law on the protection of whistleblowers (the "**Whistleblower Act**") and Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "**General Data Protection Regulation**").

The Whistleblower Policy is available online on Swisspearl Group's website [www.Swisspearl.com](http://www.Swisspearl.com).

## Policy statement

At Swisspearl, we are committed to the highest ethical standards of business conduct and doing business in a responsible way and with integrity. Swisspearl Group Whistleblower Policy specifies the foundation for our full commitment and provides the scope, principles and procedures for reporting and handling of those reports regarding breaches of the specified law. As defined in this Policy, Swisspearl goes beyond the requirements of the Directive (EU) 2019/1937 of 23 October 2019 by (i) having a whistleblower channel available on our website and thereby extending the reporting right to specified other parties with work relations to Swisspearl Group, (ii) enabling whistleblowing reports also from countries where Swisspearl has legal entities with less than 50 employees and (iii) allowing anonymous reporting, if it is allowed by national legislation.

# Scope

## Matters covered by the whistleblower scheme

The following concerns can be raised under the whistleblower scheme: (i) breaches of EU law that fall within the scope of Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law (the “**Whistleblower Directive**”), (ii) other serious breaches of EU and local law as well as other serious concerns in case those have been defined in those countries where Swisspearl has legal entity as Member State extensions in the national whistleblower schemes in areas or acts not covered by the Directive.

Suspected breaches of the specific EU legal acts that fall within the scope of the Whistleblower Directive do not have to be serious. The Whistleblower Directive applies to breaches of those EU legal acts that are listed exhaustively in Part I in the annex to the Directive, inter alia in the following areas:

- public procurement,
- financial services,
- products and markets,
- prevention of money laundering and terrorist financing,
- product safety and compliance,
- transport safety,
- protection of the environment,
- radiation protection and nuclear safety,
- public health,
- consumer protection,
- protection of privacy and personal data,
- security of network and information systems.

Breaches affecting the financial interests of the EU and breaches relating to the internal market, including breaches of EU competition and state aid rules are also included in the scope.

The Whistleblower Directive is available [here](#).

As noted above, serious breaches of EU and local law and other serious concerns are encouraged to also be reported, including, inter alia:

- criminal acts such as breaches of non-disclosure obligations, abuse of funds, theft, fraudulent misrepresentation, embezzlement, fraud and bribery,
- serious or repeated infringements of the law, including legislation on the use of force and legislation intended to protect public health, provide safety in the transport sector or protect the nature and the environment, etc.,
- sexual harassment in the workplace,
- serious person-related conflicts in the workplace, for instance serious harassment on grounds of race, political affiliation, religious belief, etc.

- serious violations of occupational safety rules, and
- serious breaches of data protection laws.

If you report concerns under the whistleblower scheme that are not covered by the scope of the Whistleblower Act, you will not qualify for protection under the Whistleblower Act as described below in paragraph Matters outside the scope.

### **Matters outside the scope**

Suspected wrongdoings relating to the whistleblower's own employment will, as a general rule, fall outside the scope of the whistleblower scheme, unless they involve a serious breach of the law or other serious allegations of e.g. serious harassment.

Other malpractice such as breaches of internal guidelines of minor importance, including rules on sickness absence, alcohol, dress code, and use of office supplies for private purposes, etc. and information about person-related conflicts in the workplace will generally not be deemed serious breaches. Such matters must be raised through the usual lines of communication, for instance by contacting one's superior, the HR department or a union representative directly.

Where the concern reported under the whistleblower scheme is deemed to be outside the scope of the scheme, no further steps will be taken, and the report will be deleted. It cannot be ruled out, however, that steps have to be taken to follow up on specific concerns that are not subject to further investigations under the whistleblower scheme. This can be done for instance by the whistleblower contacting one's superior, the HR department or a union representative instead.

In case of doubt, you are encouraged to report the issue as it will be determined on a case-by-case basis if the alleged wrongdoing falls within the scope of the whistleblower scheme.

### **Reporting right under the whistleblower scheme**

All Swisspearl Group's employees can report concerns under the whistleblower scheme. Swisspearl Group has decided that also external persons having work relationship with Swisspearl can also report information about suspected wrongdoings which has been disclosed to them in the course of their work-related activities. These persons include, but are not limited to independent contractors, shareholders, directors, officers, voluntary, salaried or non-salaried trainees, employees of contracting parties, suppliers or sub-contractors, former employees or new employees who have not yet started work who report information about alleged wrongdoings which has been disclosed to them in the course of the employment process or during other pre-contractual negotiations.

You may report concerns under the whistleblower scheme even if you have no evidence of the allegations. To enjoy protection under the Whistleblower Act, you must be in good faith when reporting the information. For further details on the protection requirements, see paragraph Protection criteria.

You may report concerns under the scheme regardless of your citizenship.

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### **Persons concerned**

Any person who commits an act or omission which breaches EU law, which constitutes a serious wrongdoing or other serious malpractice, or which defeats the object or the purpose of these rules can be reported. The person concerned is therefore the natural or legal person who is referred to in the whistleblower report to Swisspearl Group as the person to whom the breach is attributed or with whom that person is associated.

## **Reporting procedure**

### **The reporting solution**

Reporting takes place electronically by completing and returning an online reporting form. The technical reporting solution is provided by the systems provider EQS Group A/S (Got Ethics), EQS Group A/S, Bag Elefanterne 3, 1.th 1799 Copenhagen, CVR no.: 33057431. The reporting solution is accessible via Swisspearl Group's website and local websites. Personal data disclosed in the reporting form will be stored on the server of EQS. The server is located within the EEA.

### **Use of wrong reporting channel**

Reporting is possible using the technical reporting solution or by contacting the local contact person, where such person has been nominated in compliance with local legislation or the local authorities. As an example, for countries where local contact person has not been nominated, it is not possible to submit a report by sending an email to the person responsible for the whistleblower scheme, since the report contains confidential information that may not be transmitted without encryption. If such report is received, a new report must be submitted using the online form. This can be done by you or by the person in Swisspearl Group who has received the report. If Swisspearl Group is in contact with you or knows your identity, you will be encouraged to submit the report again using the proper channel.

### **Acknowledgement of receipt**

If you submit a report online, you will receive an automated acknowledgement of receipt.

### **Anonymity principles**

If possible according to local statutory legal requirements, you may report concerns anonymously or stating your contact details to allow Kromann Reumert and/or Swisspearl Group to ask you any additional or clarifying questions. Swisspearl Group encourages you to state your name and contact details in the reporting form. The reason is that, in our experience, anonymous reporting makes further investigations difficult as it will not always be possible to ask additional or clarifying questions from the anonymous whistleblower. However, in countries where national legislation requires that the reporter is identifiable, the reports cannot be anonymous. For these countries, the anonymous reporting is disabled from the reporting form in the platform, based on incident location.

### **Anonymity in countries allowing anonymous reporting**

If an anonymous report is received, Swisspearl Group will not make any attempt to trace back the information to any individual, even if it would be technically possible to e.g. track your computer's IP address or take other steps to reveal your identity.

The IT solution enables Kromann Reumert and/or Swisspearl Group to contact you via the reporting platform even if you have opted to stay anonymous, provided that you access the reporting platform after reporting by using your password. Neither Kromann Reumert nor Swisspearl Group will have access to information about your identity if you have decided to report anonymously.

To be guaranteed full anonymity, do not submit your report by using:

- your work computer or other devices made available by Swisspearl Group,
- the internet connection at your workplace or any similar employer-paid internet connection

If you want to stay anonymous and attach documents, you should also remove any metadata from the attachments. Regardless of the report being anonymous or not, your identity and the content of your report will be treated confidentially, see also paragraph Duty of confidentiality.

If your report gives rise to investigations by a third party, for instance the police, then Swisspearl Group may have a legal obligation to reveal your identity to the extent it is known to Swisspearl Group. If a lawsuit is filed against the person concerned, you may be called as a witness.

### **Rectification and additions**

If you notice that the disclosed information is inaccurate or incomplete, you merely submit a new report referring to the first one and explaining what should be rectified.

## **Handling of reports**

### **Swisspearl Group's internal whistleblower unit**

Swisspearl Group has appointed Head of Group Sustainability and Group General Counsel (the "**Whistleblower Unit**") as the authorized persons to manage Swisspearl Group's internal whistleblower scheme in an impartial manner. The Whistleblower Unit is designed to ensure independence and absence of conflicts of interest, and the Whistleblower Unit members may not receive instructions telling them how to handle and follow up on the reports received. They also have a non-disclosure obligation (see paragraph Duty of confidentiality). In addition, where required by the local whistleblowing legislation Swisspearl has nominated local designated person(s) to locally handle the whistleblowing reports.

## **Receipt of reports**

Reports are received by nominated, competent persons at the external law firm Kromann Reumert, who forward them to the Head of Group Sustainability, unless they involve that individual. If so, the report is forwarded to the Group General Counsel. In case the report concerns any of the possible, locally nominated designated person, the report is forwarded to the Head of Group Sustainability.

Kromann Reumert is a Danish external law firm. Their role is to pre-screen and pre-categorize all the reports and forward them to the correct designated persons in Swisspearl. The further handling of all reports is managed by the designated persons of Swisspearl.

## **Record keeping of reports received**

Swisspearl Group must keep record of your report and of all documents accompanying it.

Swisspearl Group keeps such records subject to its non-disclosure obligation as described in more detail in paragraph Duty of confidentiality. Accordingly, Swisspearl Group keeps records of your report in a manner that guarantees non-disclosure of i.a. your identity.

The purpose of the record keeping is, inter alia:

- to preserve evidence of the reports received to ensure that the disclosures can be used as evidence in enforcement proceedings,
- to safeguard the right of defense of the person concerned in connection with any criminal proceedings or other actions where the disclosures serve as evidence, and
- to enable the linking together of information from multiple reports on the same matter, where such linking makes it possible to address and follow up on the matter and where this would not be possible on the basis of a single report.

Records of your report will be kept in accordance with current data protection legislation. To learn more about the criteria used when determining the storage period, please see paragraph Storage of personal data.

## **Further documentation**

If further documentation is necessary, it is possible for Swisspearl to contact you. Swisspearl will contact you directly via the platform or in person, depending on how the reporting was done and what contact details you have provided. If you have reported via the platform, Swisspearl can contact you via it as well, also where you have opted to stay anonymous. However, if you opted to stay anonymous, you must access the platform after reporting and answer any additional questions that may be asked via the platform.

The documentation may include correspondence, documents, photos, minutes of meetings, telephone recordings, emails, expenditure sheets, browsing history, etc. If Swisspearl obtains further information from you and you opt to stay anonymous, please

follow the guideline in paragraph Anonymity to ensure your personal data is not transferred to Swisspearl in the documentation.

### **Feedback to the whistleblower**

Swisspearl Group will give you feedback on your report as soon as possible and no later than 30 days after the date of acknowledgement of receipt.

Subject to compliance with applicable law, including the rules on non-disclosure, we will inform you of the action envisaged or taken as follow-up to the report and the ground for the choice of that follow-up. Follow-up could include, for instance, filing of a police report, launch of an internal enquiry, or referral to a supervisory authority.

In the event that Swisspearl Group has not, within 30 days of having acknowledged receipt of the report, decided on the follow-up action to be taken, you will be notified of this and of any further feedback you may expect. Swisspearl uses the platform for the communication, unless otherwise has been agreed with the reporting person or if you have reported in oral form. In order for you to receive the notification in the whistle blower Scheme, you need to access your report by using your password.

### **Notification of persons concerned**

The General Data Protection Regulation stipulates that the persons concerned must generally be notified of the report within one month. If there is a genuine risk that such notification will jeopardize the investigations, notification can be postponed as long as the risk exists (please see paragraph The right of persons concerned and reported third parties to receive information).

## **Non-disclosure**

### **Duty of confidentiality**

The members of Swisspearl Group's Whistleblower Unit and the employees at the external law firm Kromann Reumert who assist in managing the whistleblower scheme have a duty of confidentiality in respect of all disclosures made in whistleblower reports. The duty of confidentiality also applies to other members of staff who are authorized to receive or follow up on reports and, in doing so, receive information about your identity or other details that must be treated confidentially.

### **Disclosure of information about your identity**

Information about your identity and other information from which your identity can be deduced, directly or indirectly, may not be disclosed without your explicit consent to anyone beyond the authorized staff members in Swisspearl Group who are competent to receive or follow up on reports. You may withdraw your consent at any time. However, the withdrawal of consent will not affect the lawfulness of disclosures based on consent before its withdrawal.

Your identity may be disclosed to public authorities without your consent, where disclosure is necessary to address breaches falling within the scope of the Whistleblower Act or to safeguard the rights of defense of persons concerned. Where Swisspearl Group contemplates a disclosure from which your identity may be directly or indirectly deduced, Swisspearl Group must notify you before the disclosure, unless such notification will jeopardize the related investigations or judicial proceedings.

Other information in reports from which your identity as whistleblower cannot be deduced may be disclosed to persons who are not members of Swisspearl Group's Whistleblower Unit and to the external law firm Kromann Reumert only for the purpose of following up on a report or addressing breaches that fall within the scope of the Whistleblower Act. The recipient will be subject to the same duty of confidentiality in respect of such information as employees in Swisspearl Group's Whistleblower Unit and in Kromann Reumert.

## Protection of whistleblowers

### Protection criteria

The Whistleblower Act offers protection to whistleblowers against retaliation, etc.

As whistleblower, you will be afforded protection under the Whistleblower Act only if you had reasonable grounds to believe, based on the information available to you at the time of reporting, that the matters reported were true, and if the matters are covered by the whistleblower scheme as described above. If you report inaccurate information on breaches by honest mistake, you will also be entitled to protection.

You will not enjoy protection under the Whistleblower Act if you deliberately report inaccurate information or information about breaches that are manifestly unfounded, including unsubstantiated rumors and hearsay. The consequences of malicious reporting are described in more details in paragraph Consequences for whistleblowers.

You cannot waive your rights under the Whistleblower Act.

### Protection granted

#### Exemption from liability for breach of confidentiality and acquisition of information

If you meet the criteria for protection, you will not be deemed to have breached any statutory non-disclosure obligation and will not incur liability in that respect, provided that you had reasonable ground to believe that the report was necessary to disclose a breach falling within the scope of the Whistleblower Act. Nor will you incur liability for getting access to the reported disclosures, provided that such access did not constitute a self-standing criminal offence.

#### Protection against retaliation

If you meet the criteria for protection, you will enjoy statutory protection against retaliation, including threats of retaliation and attempts of retaliation as a result of the reporting, and no one can hinder or attempt to hinder you from reporting your concerns.

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Retaliation means any direct or indirect act or omission which occurs in a work-related context, which is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person.

#### Request for dismissal of a case

You have a right to rely on a report to seek dismissal of a case, provided that you had reasonable grounds to believe that the reporting was necessary for revealing a breach that falls within the scope of the Whistleblower Act.

## Possible outcomes

### Consequences for whistleblowers

Reports submitted in good faith will not have any adverse consequences for you.

If, however, you deliberately report inaccurate information, for instance for the purpose of harassing or causing other harm to your colleagues or to members of the board of directors, it may have consequences for you as an employee.

Anyone submitting a report in bad faith will risk disciplinary, civil (including contractual), criminal or administrative penalties as well as employment law sanctions.

### Consequences for the persons concerned

Depending on the circumstances, a whistleblower report may have the following consequences for the persons concerned:

- imposition of disciplinary measures on the employee concerned, which may lead to a warning or termination of the employment,
- commencement of proceedings against the director concerned, which may lead to termination of the directorship,
- filing of a police report against the persons concerned and subsequent criminal proceedings, or
- contractual consequences for business partners, including termination of contract

A whistleblower report will generally not have any consequences for the persons concerned if the allegations are not supported by evidence or by the outcome of the investigations.

## Processing of personal data

The collection of personal data provided in connection with a whistleblower report and the processing of personal data for the purpose of following up on a report are generally governed by the data protection legislation, including the General Data Protection Regulation on the protection of natural persons with regard to the processing of personal data and the free movement of such data.

Processing of personal data may take place if necessary to handle reports received under Swisspearl Group's whistleblower scheme.

Under the General Data Protection Regulation, data subjects, including whistleblowers, persons concerned, and any third parties referred to in the report, have a right to receive certain information. As a result of this right, the following should be added to the above paragraphs.

### **Categories of personal data**

In connection with the handling of reports received, Swisspearl Group will be processing the personal data provided in the report. The personal data that are most frequently processed in connection with whistleblower reports include identity and contact details and personal data included in the description of the matter/incident that has triggered the report, including - as the case may be - sensitive personal data and details on any criminal offences and other private affairs.

The investigation of the reported allegations may also involve collection and processing of personal data in addition to the data provided in the report.

### **Purposes of and legal basis for the processing of personal data**

Swisspearl Group may process the personal data of whistleblowers, persons concerned and other persons referred to in the report, where it is necessary to handle reports received under a whistleblower scheme that has been established under the Whistleblower Act.

Processing of personal data may also take place where necessary in order to follow up on reports, for instance for the purpose of interviewing members of staff, the executive board or the board of directors, imposing disciplinary sanctions, or notifying competent authorities or the police.

The whistleblower scheme is not intended to collect sensitive personal data, including e.g. health data. However, it may prove relevant and necessary when investigating the reported allegations (if, for instance, a whistleblower expresses concerns about safety at work, it may be necessary to process information about potential occupational injuries or accidents in the workplace or if a whistleblower reports about sexual harassment, it may be necessary to process information about those consequences).

The legal basis for the processing of personal data in relation to a report is section 22 in the Whistleblower Act.

### **Categories of recipients of personal data**

Swisspearl Group may have to disclose personal data from a whistleblower report to others, including to the following categories of recipients:

- Authorized members of relevant units/departments in Swisspearl Group's organization.
- The external law firm Kromann Reumert and any other data processors and EQS Group A/S and any other sub-processors who manage the whistleblower scheme on behalf of, and according to instructions given by, Swisspearl Group and who provide legal, technical or administrative assistance for that purpose.
- Third-party advisers who provide e.g. legal assistance for the purpose of handling a specific report.
- Public authorities such as the police, where the data are disclosed to address reported breaches.

### **The right of persons concerned and reported third parties to receive information**

Swisspearl Group must inform the person concerned and any third party referred to in the report about the processing of their personal data in connection with the handling of a report. As a general rule, they must receive this information within a reasonable time, but at the latest within one month after the personal data have been obtained. However, provision of this information may be postponed or omitted, for instance for the purpose of investigating a matter or safeguarding the interests of Swisspearl Group, including the company's business concept, business practice, knowhow, etc., where such interests override the data subjects' interests. Deviation from this obligation to provide information will be allowed if and to the extent provided in Article 14(5) of the General Data Protection Regulation or the relevant provisions of the nationally applicable data protection laws.

### **Transfer to third countries**

Personal data that are collected and stored in the technical whistleblower solution will not be transferred to any third country, i.e. non-EU/EEA countries.

If the processing of your personal data for the purpose of following up on a report involves a transfer of your data to a third country, for instance because a hosting provider is based in a non-EU/EEA country, then Swisspearl Group will ensure that such transfer is lawful at all times and that the requirements in the General Data Protection Regulation for an adequate level of protection are satisfied. Also, you will receive further information about the transfer.

### **Storage of personal data**

Whistleblower reports will be stored only as long as is necessary and proportionate for the purpose of complying with the Whistleblower Act. Accordingly, reports will be kept only as long as is necessary to ensure documentation for any claims raised under the Whistleblower Act, including in particular the need of whistleblowers and persons concerned to preserve evidence and Swisspearl Group's obligation to follow up on reports received, including by linking such reports to previous reports.

The necessary storage period for whistleblower reports will be assessed on a regular basis. For this purpose, it will be taken into account if individuals entitled to protection under the Whistleblower Act are likely to need proof of the relevant report. Continued storage may also be justified where there is ground to believe that the report will be

confirmed by subsequent reports on the same matter, for instance because Swisspearl Group has already received multiple reports on that matter. Further, continued storage may be necessary to comply with a legal obligation prescribed by other legislation.

If a disciplinary sanction is imposed on an employee who has been named in a whistleblower report, or if there are other objective and compelling reasons for retaining information, the information may be kept in the employee's staff file. In that case, the information must be deleted no later than 5 years after termination of the employment, unless there are objective and compelling reasons for retaining the information for a longer period, for instance because of a pending lawsuit.

### **Your rights**

As a data subject - whether you are whistleblower, person concerned or third party mentioned in the report - you have the following specific rights, unless otherwise exceptionally provided by the data protection legislation:

#### Right of access

You have a right to request access to those of your personal data that are being processed and to receive a copy of the data along with information about:

- The purposes of the processing.
- The categories of personal data.
- The recipients or categories of recipients, including recipients located in third countries and, in that connection, the appropriate safeguards relating to the transfer.
- The storage period or the criteria for determining it.
- Your right to rectification, erasure, restriction and objection to the processing of your personal data.
- Your right to file a complaint with the nationally competent data protection authority.
- The source of your personal data if not collected from you.

#### Right to rectification

You have a right to have your incorrect personal data rectified without undue delay and a right to have incomplete personal data completed.

#### Right to erasure ("right to be forgotten")

You have a right to have your personal data erased without undue delay in certain circumstances, e.g. if the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.

#### Right to restriction of processing

You have a right to have the processing of your personal data restricted, e.g. if the accuracy of the personal data is contested.

#### Right to data portability

You have a right to receive those of your personal data which you have provided to us in a structured, commonly used and machine-readable format and a right to have such data transmitted to another data controller on certain conditions.

#### Right to object

You have a right to object to the processing of your personal data for the purpose of investigating a whistleblower report. If your objection is justified, processing must cease.

#### Right to complain to the Data Protection Agency

If you disagree with the way in which Swisspearl Group processes your personal data, you may file a complaint with the national Data Protection Agency. However, we hope that you will contact us first, using the below contact details, so that we may reach agreement.

You may exercise your rights by contacting Swisspearl Group General Counsel Morten Sorensen, legal (at) swisspearl.com.

## Violation of the EU Anti-Money Laundering Provisions

In the event of a suspected violation of the EU Anti-Money Laundering Provisions, the external law firm Kromann Reumert may have to notify the relevant authority and to disclose data for that purpose. Such notification will take place in accordance with the EU Anti-Money Laundering Provisions. In cases like that, the external law firm Kromann Reumert will act as an independent data controller and will not be required to follow Swisspearl Group's instructions.

## External whistleblowing

### **External whistleblower schemes in brief**

An external whistleblower scheme is a whistleblower scheme operated by a public authority under a statutory provision, which requires the authority to establish such scheme.

The Whistleblower Act provides for the establishment of an external national whistleblower schemes that allow all of the persons enjoying statutory protection (and not only employees) to report the wrongdoings that can also be reported under Swisspearl Group's whistleblower scheme, including breaches of EU law, other serious breaches of the law, or other serious concerns.

### **Choice of reporting channel**

You are free to choose whether to report your concerns under Swisspearl Group's internal whistleblower scheme or under any relevant external whistleblower scheme e.g. to the Ministry of Justice or under both. However, we advise you to use Swisspearl Group's

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internal whistleblower scheme if the breach can be effectively addressed internally and if you consider the risk of retaliation to be non-existent.

## Policy information

This Whistleblower Policy must be reviewed by the Swisspearl Whistleblower Unit at least once a year followed by approval of Swisspearl Group Executive Management and the Swisspearl Board of Directors. It may be amended at any time with the approval of Swisspearl Board of Directors. In the event of any discrepancies between the English version of this Whistleblower Policy and a translated version, the English version shall prevail.

## Questions and comments in relation to the whistleblower scheme

If you have any questions or comments about this Whistleblower Policy or in relation to the whistleblower scheme, please contact Swisspearl Group Legal Counsel, [legal \(at\) swisspearl.com](mailto:legal@swisspearl.com).

# Change log

| Version | Date      | Comment  | Changed by                       |
|---------|-----------|--|----------------------------------|
| 2.0     | 11.9.2024 | Amendments to v1.0 to comply with the Whistleblowing Act in Czech Republic | Morten Sorensen and Pasi Koskela |
|         |           |  |                                  |
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