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**PROBI**

**WHISTLEBLOWING POLICY\***

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*\*This is a summary version of Probi's internal policy.*

*The original policy document consists of 5 pages. This document only presents the main objectives of the policy.*

## **INTRODUCTION**

Probi AB (“**Probi**” or “**we**”) shall conduct our business in a responsible and sustainable manner. We expect our employees, including directors of the board, to act in accordance with applicable law, principles on business ethics, and internal policies and procedures with high integrity. If you suspect that a Probi employee is acting in violation of applicable law or our internal policies and procedures, you are requested to report such (suspected) misconduct to your closest manager or the CFO.

When you do not feel comfortable using our regular reporting channels you may, voluntarily, submit a report via our whistleblowing system. The purpose of our whistleblowing system is to serve as an alternative to regular reporting channels. The whistleblowing system may only be used in accordance with this whistleblowing policy (the “**Policy**”).

## **WHO CAN SUBMIT A REPORT?**

Our whistleblowing system is available to all our employees. In addition, it is also available to the following categories of persons within Probi:

- (a) Self-employed persons;
- (b) shareholders and persons belonging to the administrative, management or supervisory body, including non-executive members;
- (c) volunteers and paid or unpaid trainees.

A person, who in good faith and with reasonable grounds to suspect a certain misconduct, submits a report via our whistleblowing system will not be subject to any retaliation, regardless of the conclusion of the subsequent investigation.

## **WHO CAN A REPORT BE ABOUT?**

A report in the whistleblowing system may only concern misconduct by an individual who is in a leading position or who is considered key personnel. Such individuals include board members, Probi's top management and department heads. If your suspicion concerns any other employee you should use our regular reporting channels, i.e. you should report to your closest manager or the CFO. If you do not feel comfortable discussing the matter with your closest manager or the CFO, you may report to any other manager or director of the board instead.

## WHAT CAN A REPORT BE ABOUT?

Reports submitted in the whistleblowing system may only concern matters of a serious nature, such as:

- (a) Illegal activities of a serious nature
- (b) Financial fraud (such as incorrect accounting, violations of internal control procedures, misappropriation of assets or fraud)
- (c) Bribery and corruption (for example, taking or giving bribes)
- (d) Violations of competition law legislation (e.g. exchange of price sensitive information, illegal cooperation between competitors)
- (e) Serious threats to the environment, health and safety
- (f) Activities that are otherwise seen as seriously inappropriate behaviour, for example, discriminatory work routines, harassment and other serious unethical conduct, the use of child labour and human rights violations
- (g) Other serious misconduct which concerns Probi's vital interests, individuals' life and health, or misconduct for which there is a public interest in its uncovering.

Matters such as alcohol or drug problems, petty theft at work, less serious work environment problems or offenses committed by persons that do not hold senior or key positions within Probi cannot be reported in the whistleblowing system.

The information in a report should always be submitted in good faith and, to the extent possible, fact based. Personal data (*i.e.* any information relating to an identified or identifiable individual) should (only) be included in the report to the extent it is necessary.