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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 7 pages. This document only presents the main objectives of the policy.*

## 1. INTRODUCTION

Probi AB, including all companies in the Probi AB group of companies (“**Probi**” or “**we**”), shall conduct its business in a responsible and sustainable manner. We expect our employees, including directors of the board (“**you**”), to act in accordance with applicable law, principles on business ethics, and internal policies and procedures with high integrity.

If you suspect that Probi, or any of its subsidiaries, or anyone acting on our behalf, is acting in violation of applicable law or our internal policies and procedures, you are required to report such (suspected) misconduct.

If the suspected misconduct is of serious nature and may be reported in our whistle-blower channel (see Section 3), then the whistle-blower channel must be used. This is important to you, because by reporting in the whistle-blower channel, you will by operation of law gain special protection. This is also important to us, since we expect reporting into the whistle-blower channel to provide the best conditions to investigate your report and to follow-up with you.

If the matter cannot be reported in the whistle-blower channel, you should turn to our group CFO or group VP HR & Sustainability, or any other manager or member of the board that you trust.

## 2. WHO CAN SUBMIT A REPORT?

Our whistle-blower channel is available to all employees and directors of the Probi group of companies. Also other individuals who work with us under our control, such as directors, trainees, volunteers, hourly employees (*Sw. timanställda*) and self-employed persons, can submit a report in the whistle-blower channel.

We also make the whistle-blower channel available to customers, suppliers and other business partners.

A person, who in good faith and on reasonable grounds suspects a certain misconduct and submits a report via our whistle-blower channel, shall not be subject to any retaliation, regardless of the outcome of the subsequent investigation. However, deliberate reporting of false or malicious information is a serious disciplinary offence and not tolerated.

### 3. WHAT CAN A REPORT BE ABOUT?

By law<sup>1</sup>, reports in the whistle-blower channel may concern reporting within a work-related context of (i) serious (suspected) misconduct in the *public interest* to uncover; or (ii) (suspected) acts or failure to act in breach of or contrary to Union law, i.e. EU law and implementing acts.

This may include (*examples*):

- (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, promising, taking or giving of bribes
- (d) Violations of anti-trust laws (e.g. exchange of price sensitive information or illegal cooperation between competitors)
- (e) Material violations of Probi policies or conflicts of interest
- (f) Serious threats to the environment, health and safety, including work environment
- (g) Material breaches of privacy regulations, personal data breaches and network and information security
- (h) 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
- (i) 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 poor leadership, 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 and similar, can normally not be reported (and handled) in the whistle-blower channel.

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.

### 4. HOW DO YOU SUBMIT A REPORT?

A report is submitted in the whistle-blower channel by using the confidential whistle-blower channel available on Probi's website: <https://probi.integrity.complylog.com/>

You may also contact designated persons directly.

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<sup>1</sup> The Swedish Whistleblower Act (*Sw. lag om skydd för personer som rapporterar om missförhållanden*)

You have a right to request a physical meeting. Such meeting may be requested in the whistle-blower channel, in which case such a meeting shall take place without undue delay.

You may submit a report in the whistle-blower channel anonymously. However, you are encouraged to provide contact details, which provides the best conditions to investigate your report and to provide feedback to you.

If you wish to report (suspected) misconduct that is not reportable in the whistle-blower channel, you are asked to contact our group CFO or group VP HR & Sustainability, or any other manager or member of the board that you trust. If either of these persons receive a report that they deem to fall within the scope of the whistle-blower channel, it is their duty to inform you that the report should be submitted to the whistle-blower channel, or the manager must report the (suspected) misconduct into the whistle-blower channel himself/herself.