

AB Sagax

Guidelines for Sagax whistle-blower service

Adopted by the Board of AB Sagax on 8 May 2025

1. Introduction

A high standard of business ethics is fundamental to Sagax's credibility. The company has a responsibility to its shareholders, employees, customers, and other stakeholders to act in full compliance with applicable laws and regulations across all of its markets. Sagax strives to maintain transparency, and its operations should always be open to scrutiny.

Sagax maintains zero tolerance towards corruption, discrimination, harassment, criminal activities, and environmental violations. To mitigate risk and uphold trust in the company's operations, it is critical that suspected misconduct is identified early and appropriate action is taken.

These guidelines outline how Sagax employees and contractors can report any suspected misconduct, including money laundering or the financing of terrorism.

Sagax encourages whistleblowers to submit reports under their own name. All reports and any subsequent discussions will be handled with the utmost confidentiality. If the whistleblower prefers to remain anonymous, an anonymous whistleblowing function is available, administered by an independent external party that guarantees both anonymity and secure handling of submitted reports.

2. Suspicion of Misconduct / Legal Violations

All employees and contractors are expected to report any suspected violations of Sagax's Code of Conduct for Suppliers, other company policies, or any suspected instances of fraud, money laundering, or the financing of terrorism. Other matters such as complaints, disputes, minor offenses, and similar issues should likewise not be reported through the whistleblowing channel but should instead be addressed primarily to the immediate manager or in accordance with the procedures outlined in Sagax's policies and guidelines.

Issues relating to dissatisfaction with workplace conditions should be addressed through normal channels, primarily by contacting the immediate supervisor.

3. Whistleblowing Function

There are several channels available for reporting suspected misconduct. Regardless of the method chosen, all reports will be handled confidentially.

Sagax recommends that an employee or an external party who suspects an imminent fraud first contacts their immediate supervisor.

If the suspicion concerns the employee's immediate supervisor, the report should be directed to Sagax senior management.

Alternatively, employees or external parties may report their concerns via the external online whistleblowing service, which is operated by an independent party. Reports can be submitted either under the employee's name or anonymously.

4. Investigation Process

All reports of suspected misconduct will be taken seriously and handled in accordance with these guidelines.

Sagax senior management is responsible for the whistleblowing service and, in consultation with representatives from the external whistleblowing service, will assess incoming reports and determine the appropriate course of action for investigation.

Reports concerning suspected money laundering or the financing of terrorism are submitted directly to the CEO, unless the allegations concern the CEO, in which case the report will be handled in accordance with the general whistleblowing process.

Key principles of the investigation process:

- All whistleblower reports will be treated confidentially by all parties involved in the investigation.
- Reports will not be investigated by individuals who are the subject of the report or who may have a conflict of interest.
- No individual involved in the investigation is permitted to attempt to identify the whistleblower.
- The investigation is managed by Sagax senior management and may, where necessary and under strict confidentiality, involve other individuals whose expertise is required to properly conduct the investigation.
- Only those directly involved in conducting the investigation will have access to the reports and related information. The dissemination of information will be strictly limited to what is necessary for the investigation.
- Investigators may communicate with the whistleblower through the anonymous whistleblowing platform. Such communication will be anonymized.

Protection for Whistleblowers

A whistleblower who raises a genuine concern in accordance with these guidelines will not face any risk of retaliation, dismissal, or other adverse consequences as a result of their report, even if the concern ultimately proves to be unfounded, provided the report was made in good faith.

The whistleblower's identity will be kept confidential throughout the investigation process. However, in cases involving criminal prosecution, the whistleblower's identity (if known) may need to be disclosed as part of legal proceedings.

Protection of and Information for Persons Subject to Investigation

The rights of individuals subject to investigation under these guidelines are governed by applicable data protection regulations. Such individuals have the right to access information about themselves and request corrections to any inaccurate, incomplete, or outdated information.

These rights may, however, be subject to temporary restrictions where necessary to prevent the destruction of evidence or to avoid hindering the investigation process.

Reporting of Investigation Results

Upon completion of the investigation, the results will be reported to the CEO. If the CEO is the subject of the investigation, the report will be submitted to the Board of Directors, which will determine the appropriate corrective actions.

Erasure of Personal Data

All personal data related to submitted reports will be deleted once the case has been closed, typically within two months after the conclusion of the investigation. All documentation from the investigation will be anonymized by removing any information that could directly or indirectly identify either the whistleblower or the individual subject to investigation.

Misuse of the Whistleblowing System

Whistleblowers are not required to possess definitive proof of wrongdoing before raising concerns or suspicions. However, allegations must not be made with malicious intent or with knowledge of their falsity. Any misuse of the whistleblowing system — including knowingly submitting false or misleading information — constitutes a serious breach of company policy and may result in disciplinary measures, up to and including termination of employment.

5. Responsibility for the Guidelines

Sagax senior management holds ultimate responsibility for the company's whistleblowing guidelines, including compliance, oversight, and the annual review and update of these guidelines.

The company will ensure that all employees are made aware of the content of these guidelines through appropriate information and training.
