

DOCUMENT TITLE:

Global Whistleblower Policy

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## Table of contents

<b>1</b>	<b>Purpose</b> .....	<b>2</b>
<b>2</b>	<b>Scope</b> .....	<b>3</b>
<b>3</b>	<b>Principles and Whistleblower Protection</b> .....	<b>4</b>
<b>4</b>	<b>Roles and Responsibility</b> .....	<b>5</b>
<b>5</b>	<b>Procedure</b> .....	<b>6</b>
<b>6</b>	<b>Confidentiality and Anonymity</b> .....	<b>8</b>
<b>7</b>	<b>Unfounded or False Allegations</b> .....	<b>9</b>
<b>8</b>	<b>Personal Data</b> .....	<b>9</b>

DOCUMENT TITLE:

Global Whistleblower Policy

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## 1 Purpose<sup>1</sup>

This whistleblower policy (the “**Policy**”) sets out how PolyPeptide Group AG, together with its consolidated subsidiaries, with the exception of PolyPeptide Laboratories (Sweden) AB,<sup>2</sup> (“**PolyPeptide**”) will support you so that you can safely express your concerns, know who to contact, understand how to make a report and know the protections available to you.

### Introduction

At PolyPeptide, we strive to remain focused on the needs of our customers and our business, while adhering to fundamental principles of ethics and compliance. The foundation of our commitment is our Code of Conduct, which is mandatory for all employees across PolyPeptide.

Our managers have leadership responsibilities for setting a good example, encouraging an environment of open and honest communication without fear of retaliation, and taking prompt action when ethical or compliance issues are brought to their attention.

PolyPeptide’s whistleblower program is an important element in detecting corrupt, illegal or other unethical conduct. PolyPeptide strongly encourages you to **speak up** if you observe, have knowledge of or suspect any matters of concern.

### **PolyPeptide will take all reports made under this Policy seriously.**

PolyPeptide’s Board of Directors, with the support of the Audit and Risk Committee, urges whistleblowers who have observed or have knowledge of actual or reasonably suspected corrupt, illegal or other unethical conduct to use the whistleblower program. Whistleblowers are encouraged to report such concerns and suspicions via the designated, autonomous and independent whistleblower hotline as soon as possible, knowing that they can do so without fear of intimidation, harassment, retaliation, reprisals, discrimination or adverse employment consequences because of such report.

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<sup>1</sup> This Policy is without prejudice to applicable local legislation and/or local procedures, in particular for countries that have not yet transposed or will not transpose the EU Whistleblower Directive as of that date of this Policy. PolyPeptide may consequently have to change the Policy to ensure compliance with local laws.

<sup>2</sup> PolyPeptide Laboratories (Sweden) AB (“PolyPeptide Sweden”) has, in accordance with requirements under the Swedish whistleblower act (*Lagen om skydd för personer som rapporterar om missförhållanden*), established a separate whistleblower program that covers reporting of breaches of applicable laws, other matters and breaches of internal policies and procedures regarding PolyPeptide Sweden. For further information, please refer to the [PolyPeptide Sweden Whistleblower Policy](#).

DOCUMENT TITLE:

## Global Whistleblower Policy

---

This Policy sets out the way in which whistleblowers may raise any concerns that they have through the whistleblower program and how those concerns will be dealt with. If a whistleblower is uncertain as to whether something is within the scope of this Policy, the whistleblower should seek advice from his/her manager or local HR department or his/her contact person within PolyPeptide.

### **Who is a whistleblower?**

A whistleblower is someone who reports actual concerns or reasonable suspicions about corrupt, illegal or other unethical conduct, which have occurred or are very likely to occur, and about attempts to conceal such corrupt, illegal or other unethical behaviors.

A whistleblower can be a current or former employee of PolyPeptide, including (but not limited to) individuals performing functions in relation to PolyPeptide, such as agency workers and contractors, suppliers, business partners and other external parties with a connection to PolyPeptide.

## **2 Scope**

The whistleblower program covers reporting of breaches of applicable laws, breaches of internal policies and procedures within PolyPeptide, and other matters, including (but not limited to) the following:

- Criminal offences, including fraud, embezzlement, misuse of assets, forgery of documents, accounting manipulation, bribery, corruption and money laundering
- Competition law breaches
- Violations of applicable laws, legislations or regulations
- Breaches of occupational health and safety legislations
- Infringements of environmental regulations and pollution of the environment
- Breaches of internal guidelines at PolyPeptide
- Workplace conflicts, such as bullying, harassment, discrimination, physical violence, threats and sexual abuse.<sup>3</sup>

The above are examples only. If you are in doubt as to whether or not your report falls within the scope of the whistleblower program, you are, nevertheless, encouraged to

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<sup>3</sup> This section is without prejudice to applicable local legislations and/or local procedures/policies across each of PolyPeptide's subsidiaries. Specifically, reference is made to the Sexual Harassment Prevention Policy applicable to PolyPeptide Laboratories Priv. Ltd. Complaints regarding sexual harassment in the workplace in India received through the whistleblower program must and will be referred to and handled by the Internal Complaints Committee in accordance with Indian law. In addition, reference is made to the Belgian legislation on (sexual) harassment, violence and discrimination at the workplace and the applicable specific legal procedures, as well as applicable local policies, for such claims and/or violations.

DOCUMENT TITLE:

## Global Whistleblower Policy

---

use PolyPeptide's whistleblower program. The report will be assessed, and you will receive feedback on whether your report is covered by the whistleblower program.

Other matters, including HR matters, complaints about other employee's behavior or incompetence, dissatisfaction with salary conditions, including minor breaches of PolyPeptide's internal guidelines on sick leave, alcohol intake etc. are not covered by the scope of the whistleblower program. These types of matters must be raised in a dialogue with an intermediate manager or your local HR department.

Do not use the whistleblower program to report events that pose an immediate threat to life or health. If you need urgent help, please contact the public emergency services.

### 3 Principles and Whistleblower Protection

Everyone who works in or works with PolyPeptide should be aware of the importance of preventing and eliminating corrupt, illegal or other unethical conduct, whether at work or in the course of doing business. PolyPeptide's Code of Conduct sets out the values and expectations with which it conducts business. PolyPeptide encourages employees and business partners to be watchful for corrupt, illegal or other unethical conduct and report anything of that nature that they become aware of. All information will be kept confidential to the fullest extent possible.

PolyPeptide does not tolerate harassment and retaliation against whistleblowers. No whistleblower will be victimized for raising a matter through the whistleblower program as long as he/she has raised a legitimate concern in good faith.

A whistleblower who makes such a report via the whistleblower program has the right not to be dismissed, subjected to any other detriment, or victimized because he/she has made a report. If a whistleblower believes that he/she has suffered any such treatment or other retaliatory acts, he/she should immediately inform the General Counsel of PolyPeptide.

No one within PolyPeptide, including management and other employees, may threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

Any instruction to cover up wrongdoing or obstructing whistleblowers from reporting will not be tolerated and is itself subject to disciplinary action.

PolyPeptide does not accept reports via the whistleblower program that are intentionally incorrect or contain misleading information. If an employee knowingly

DOCUMENT TITLE:

## Global Whistleblower Policy

---

makes a false report or makes a report in bad faith, it can result in negative employment law consequences, including termination of employment.

### 4 Roles and Responsibility

#### I. General Counsel and Head of Internal Audit

The General Counsel of PolyPeptide has the overall responsibility for this Policy. The General Counsel is responsible for the whistleblower program and for reviewing the effectiveness of actions taken in response to concerns raised under the whistleblower program.

The General Counsel and Head of Internal Audit<sup>4</sup> are responsible for deciding whether investigations of whistleblower reports shall be conducted, and, in the affirmative, whether the investigation shall be conducted internally and/or with external assistance. The General Counsel and Head of Internal Audit are also responsible for:

- Proper management of the whistleblower program and diligent follow-up on whistleblower reports
- Maintaining a whistleblower procedure for describing the process for handling whistleblower reports, including internal investigations of whistleblower reports
- Ensuring that whistleblower reports are handled in compliance with applicable rules and this Policy
- Maintaining an overview of received whistleblower reports
- Quarterly reporting to PolyPeptide's Audit and Risk Committee as well as its Board of Directors about the number of reports handled, and notifying PolyPeptide's Audit and Risk Committee as well as its Board of Directors in case a whistleblower report concerns matters regarding bribery or corruption.

The General Counsel must ensure that all managers and other individuals who may deal with concerns or investigations under this Policy receive regular and appropriate training.

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<sup>4</sup> If the General Counsel is absent, the responsibility will lie with the Head of Internal Audit. If the Head of Internal Audit is absent, the responsibility will lie with the General Counsel. If (i) neither the General Counsel or Head of Internal Audit are available or (ii) either the General Counsel or Head of Internal Audit have a conflict of interest, the responsibility will lie with the Audit and Risk Committee. If the Audit and Risk Committee are unavailable, or if the report concerns the Audit and Risk Committee, the responsibility will lie with PwC (as administrator of the whistleblower program).

DOCUMENT TITLE:

## Global Whistleblower Policy

---

The General Counsel reviews this Policy from a legal and operational perspective at least every third year.

### II. PwC

Whistleblower reports are received by an external third party, PwC (*PwC Statsautoriseret Revisionspartnerselskab, "PwC"*). PwC is an independent audit, tax and advisory firm that receives reports on behalf of PolyPeptide to ensure an independent and potentially anonymous whistleblower hotline for reports.

PwC will make a preliminary assessment of whether the report falls within the scope of the whistleblower program. PwC will then assess who can handle the whistleblower report in PolyPeptide impartially and competently, ensuring the report is not forwarded to a person whom the whistleblower report directly or indirectly relates to, or where there may be a risk of conflict of interest.

### III. Employees

All employees of PolyPeptide are obliged to collaborate loyally and ethically during investigations of whistleblower reports.

## 5 Procedure

PolyPeptide encourages whistleblowers to speak up and report corrupt, illegal or other unethical conduct by taking the following steps:

#### I. STEP 1 – Reporting

The whistleblower will need to provide the following information through the whistleblower program:

- the nature of concern and why he/she believes it to be true;
- the background and history of the concern; and
- any other relevant information and documentation supporting the allegation or suspicion.

To make a report, go to [PolyPeptide Global Whistleblower Hotline](#).

#### II. STEP 2 – Handling of reports and investigation

PwC initially makes a preliminary assessment of whether the report is covered by the scope of the whistleblower program. PwC then evaluates who should receive the whistleblower report at PolyPeptide in order to ensure that the whistleblower report is handled by an impartial and competent person, and, importantly, that it is not forwarded to the person that the whistleblower report

DOCUMENT TITLE:

## Global Whistleblower Policy

---

directly or indirectly relates to, or where there may be a risk of conflict of interest.

PwC will confirm the receipt of the report directly to the whistleblower within seven days of receiving the report, if possible.

If the report does not fall within the scope of the whistleblower program, it will be forwarded to PolyPeptide with a notice to this effect, along with a notice that there is no basis for processing the report, which must then be deleted.

If the report falls within the scope of the whistleblower program and there is a basis for conducting an investigation, PwC will forward the report to PolyPeptide, who will determine the appropriate steps to take and whether an investigation of the matter will be initiated.

Upon receipt of a report from PwC as outlined above, PolyPeptide may conclude and recommend the following based on an investigation:

- The investigation be closed if the report is unfounded.
- The investigation be closed by giving a reprimand/warning.
- The investigation be closed with an expulsion/dismissal of an employee.
- The investigation be closed with a recommendation to change policy, procedure or guidelines.
- The investigation be handed over to the police for further investigation.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially.

The investigation may include the whistleblower and other individuals involved giving a written statement.

The whistleblower may invite his/her trade union or professional association representative to be present for support during any meetings or interviews in connection with the concerns he/she has raised. The person supporting the whistleblower must respect the confidentiality of the report and any subsequent investigation.

Upon conclusion of any investigation, the whistleblower will be told the outcome of the investigation and what has been done, or proposed to do, about it. If no action is to be taken, the reason for this will be explained. This feedback

DOCUMENT TITLE:

**Global Whistleblower Policy**

---

must be given to the whistleblower within three months of the receipt of the report, insofar as this is possible.

PolyPeptide will aim to keep the whistleblower informed of the progress of the investigation and its likely timeline. However, sometimes the need for confidentiality may prevent PolyPeptide from giving the whistleblower specific details of the investigation or of any disciplinary action taken as a result. The whistleblower shall treat any information about the investigation as confidential.

**III. STEP 3 – Reports outside the scope of the whistleblower program**

Reports and information judged to fall outside the scope of the whistleblower program will be immediately destroyed in accordance with applicable laws and regulations on data protection and consequently not processed according to the procedures applicable for the whistleblower program and within this Policy.

**IV. STEP 4 – Reporting to Authority**

If the whistleblower reasonably believes that the appropriate action has not been taken based on a report made through the whistleblower program, he/she should report the matter to the relevant authority in his/her respective country, including:

- Belgium – [Autorité de protection des données](#)
- Denmark – [Datatilsynet](#)
- France – [Défenseur des droits](#)
- Sweden – [Integritetsskyddsmyndigheten](#)
- United States – [US Food and Drugs Administration](#)

**6 Confidentiality and Anonymity**

All information and the identity of the whistleblower will be safeguarded and kept confidential to the greatest possible extent. The whistleblower has the right to be anonymous.

The whistleblower program is operated by PwC through a secured web-based platform, independent from PolyPeptide and its IT infrastructure. Specifically, PolyPeptide is not able to access the web-based platform or any reports contained therein.

PolyPeptide encourages every whistleblower to disclose his/her identity when reporting. Proper investigation may be more difficult or impossible if PolyPeptide



DOCUMENT TITLE:

## Global Whistleblower Policy

---

cannot obtain further information from the whistleblower. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to PwC through the whistleblower program so that appropriate measures can then be taken to preserve confidentiality.

However, if the whistleblower wants to raise his/her concern anonymously, PolyPeptide, through PwC, will ensure to keep the whistleblower's identity anonymous. If it is necessary for the PolyPeptide representative investigating the concern to know the whistleblower's identity, this will be discussed with the whistleblower through PwC ahead of time, and the identity of the whistleblower will not be shared with the respective PolyPeptide representative without the prior consent from the whistleblower.

## 7 Unfounded or False Allegations

If a whistleblower makes a report in good faith and reasonably believes his/her concern to be true, but the concern is not confirmed by the investigation or proves to be unfounded, PolyPeptide will recognize his/her concern and the whistleblower will have nothing to fear and will not be subject to any negative consequences, including consequences of an employment law nature.

If, however, a whistleblower makes an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

Making a false allegation and recurring reports by the same person regarding a matter that has already been investigated without a change in the circumstances may have disciplinary, civil and/or criminal law consequences.

## 8 Personal Data

Personal data and information submitted through the whistleblower program is processed for the purpose of establishing a whistleblower program at PolyPeptide, which can be used for reporting potential criminal offences and/or irregularities to PolyPeptide. All processing and storage of data resulting from this Policy will be made in accordance with applicable laws and regulations on data protection.

The legal basis for investigating any unethical and/or illegal conduct or activity, irregularities, wrongdoing or dangers at PolyPeptide so that PolyPeptide can prevent and avert impermissible conduct and activities and for the processing of personal data follows from Regulation (EU) 2016/679 ("GDPR"), Article 6 (1) on the processing

DOCUMENT TITLE:

## Global Whistleblower Policy

---

of personal data, Article 9 (2) on the processing of special categories of personal data, and Article 10 on personal data relating to criminal convictions and offences processing of personal data which is necessary for PolyPeptide to pursue a legitimate interest in being able to investigate any criminal offenses or other unlawful conduct in the whistleblower reports.

PolyPeptide collects and processes personal data for the purpose of pursuing the legitimate interests of PolyPeptide to ensure compliance with applicable laws across all of PolyPeptide's operations. This is in accordance with point f in Article 6(1) under the GDPR.

PolyPeptide collects and processes personal data of the whistleblower for the purpose of complying with legal requirements in order to meet a legal obligation imposed by law, by regulation and/or national rules specific for the reported matter. This is in accordance with point c in Article 6(1) under the GDPR.

PolyPeptide collects and processes the following personal data in accordance with the outlined purpose and legal basis:

- Information regarding the reported matter, including potential breach of law, criminal offence or violations of internal policies, procedures and guidelines at PolyPeptide
- Documents, information or evidence supporting the reported matter, and other information relevant to the investigation of the matter
- The whistleblower's name, e-mail and telephone number, including other potential identifiable personal information (to the extent provided)
- Names of any persons mentioned in the whistleblower report, including other potential identifiable personal information, and names of persons within PolyPeptide or outside PolyPeptide who know or may know about the reported matter.

Transfer of personal data to third countries may occur when PolyPeptide transfers data to its subsidiaries in the US or India, or if the report concerns a sexual harassment case concerning employees working for or affiliated to the subsidiary in India. The basis for the transfer to India will be the EU Commission's standard contract for transferring data to a controller outside the EU.

Those PolyPeptide subsidiaries to which the GDPR is not directly applicable will generally apply the same standards towards the protection of individuals' personal data as set out in the GDPR, and those subsidiaries will apply any applicable local laws relating to personal data protection.

DOCUMENT TITLE:

## Global Whistleblower Policy

---

When your personal data is registered you have the following rights:

- The right to be informed about the collection of personal data
- The right to request access to personal data
- The right to request that personal data be corrected or deleted, including request that processing is restricted if you, for example, believe that the information is wrong.

Personal data will be processed in a manner that is compatible with the purposes of this Policy and personal data will not be retained longer than necessary in relation to those purposes. Further, all personal data will be processed in a manner that ensures appropriate security of the data. Personal data will be deleted after the completion of an initial investigation if it turns out that the whistleblower report is unfounded. If an actual investigation is initiated on the basis of the whistleblower report, personal data will be deleted within two months after the investigation has been completed.

Substantiated reports that contain information that may lead to disciplinary, civil or criminal responsibility are kept until the conclusion of the respective proceedings as per the requirements of the applicable law.

The person whose data is being processed, shall be notified of such processing as soon as possible. The notification shall include, *inter alia*, information on the personal data being processed, the duration of the processing and the rights conferred on the person whose data is being processed under applicable laws and regulations. Whistleblowers will be informed of the actions taken or envisaged based on the report and any results within three months of the report, insofar as this is possible.

Reference is made to PolyPeptide's Data Privacy Policy.

The person whose data is being processed also has the right to submit a complaint with the relevant independent authority that supervises compliance with the rules on protection of personal data.

The complete list of European supervisory authorities can be found at [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

The relevant supervisory authority in the United States is: Public Inquiry Unit of the California Department of Justice – the Office of the California Attorney General.

The relevant supervisory authority in India is: Data Protection Authority of India.

29 November 2022