

Whistleblowing Policy & Procedures

1. Background

This policy is intended to guide those who have reason to report cases of misconduct that it would be in the public interest to reveal so that they can feel confident about reporting without hindrance or risk of reprisal.

Cambrex Karlskoga strives to maintain a culture in which all employees dare and wish to express their opinions and internal dialogue is used to address any problems that arise in our operations. We encourage our employees to raise any issues they experience within the organisation even if these do not relate to misconduct of a nature that requires reporting in accordance with this policy. Such issues should initially be raised with your immediate manager, their manager or HR.

If you are unsure whether the matter you are reporting is covered under this policy, we recommend seeking advice from a trade union representative or similar before submitting your report.

2. Who the policy applies to and what can be reported

2.1 Who can submit a whistleblowing report?

Generally speaking, whistleblowers should have a work-related relationship to Cambrex Karlskoga. This refers to e.g. current and former employees, prospective employees (applicants), as well as consultants and suppliers. You will be covered by whistleblower protection before, during and after leaving the company.

2.2 What can be reported?

The whistleblowing system exists so that individuals can report serious work-related misconduct or irregularities at Cambrex in relation to e.g.:

- Violation of laws
- Financial crime
- Bribery or corruption
- Conflicts of interest
- Environmental crime
- Serious impact on the life and health of individuals
- Sexual harassment and systematic discrimination

2.3 What should not be reported?

Matters relating to general dissatisfaction with the company's operations or management, pay or other ordinary HR matters should be raised with your immediate manager, their manager, the safety officer/trade union representative or HR. The same applies to matters relating to the working environment that are not of a serious nature.

3. Protection of whistleblowers

The Swedish Whistleblower Act (Act 2021:890) guarantees protection for anyone who reports misconduct in good faith. Such protection also covers colleagues, trade union representatives or safety officers that provide assistance, as well as your company or employer (if you are a consultant or similar).

In the event of matters that lead to a police report or other legal action, Cambrex may be required to disclose the personal data of the whistleblower. In such cases, the whistleblower will always be informed before any data is disclosed. Anonymity cannot be guaranteed in the event of a violation of law.

Please note that the protection against the duty of confidentiality does not give you any right to disclose information or documents.

3.1 No false information or unsubstantiated rumours

A prerequisite for being protected against labour law action is that the whistleblower is acting in good faith at the time of reporting, i.e. that the whistleblower has reasonable grounds to believe that the information relating to the misconduct is true. An employee who reports or discloses false information will therefore not be protected under the Swedish Whistleblower Act. The same applies to any information reported on the basis of unsubstantiated rumours or hearsay.

Nevertheless, the employee is not required to submit actual evidence of misconduct, but there must be sufficient detail to be able to reasonably believe that the information is correct.

4. Whistleblowing procedures

4.1 Submitting a report

When you submit your report via our whistleblowing channel, WhistleSecure, you can choose whether or not to remain anonymous.

In order for us to proceed and investigate the matter, we need you to describe the matter in detail. If possible, whistleblowing reports should include the following information as a minimum:

- What the report relates to
- Who the report relates to
- When and where the incident took place
- Whether it was a one-off occurrence or whether the issue is ongoing or recurring

You can submit your report in writing, verbally or, if you prefer, face-to-face.

If you choose to submit your report anonymously, you must make sure not to include your name or other details in the report that could lead to you being identified.

In order to start a report, simply copy the link to WhistleSecure; whistlesecure.com/cambrexkarlskogaab and paste it into your web browser. The system allows for completely anonymous two-way communication between the whistleblower and the person receiving the report.

4.2 Consideration of whistleblowing reports

All incoming reports are considered by Cambrex Karlskoga's Whistleblowing Committee, which consists of the Director of HR and the appointed safety officers. If there is a need to involve other key personnel from the company in the investigation, this will be done with discretion and in accordance with this policy.

You will automatically receive a confirmation from the system when you have submitted a report. If you do not receive a confirmation, you will need to re-submit your report. The Whistleblowing Committee will then consider whether the matter can be dealt with via the whistleblowing system. If the matter cannot be dealt with via the whistleblowing system, you will be encouraged to raise the issue via Cambrex's other reporting channels instead.

Reports will be dealt with respectfully, cautiously, confidentially and with consideration of the privacy of all involved parties. Reports will also be dealt with promptly and any decisions relating to measures will be made as soon as possible, albeit never at the expense of quality or the legal rights of the individual(s) in question.

Once the report has been investigated, you will receive feedback on the measures taken, which will be provided no later than three months after you submitted your report.

The report will be deleted no later than two years after the matter is closed.

5. Reporting to external authorities

Misconduct can also be reported directly to the competent authorities. A list of the designated authorities can be found here:

[List of authorities with responsibilities relating to areas of responsibility pursuant to Ordinance 2021:949 - Swedish Work Environment Authority \(av.se\).](#)

6. Disclosure of information relating to misconduct

In some cases, whistleblowing protection under this policy may also apply if a reporter discloses information about the types of misconduct referred to in this whistleblower policy. Such protection will apply only in the following cases:

- The whistleblower has reported the matter to an authority but the authority has not taken any reasonable measures to remedy the misconduct or the authority has not provided feedback within the stipulated timeframe.
- The whistleblower has good reason to believe that a report submitted to the authorities would result in the whistleblower being reprimanded or that the misconduct would continue.
- The whistleblower has good reason to believe that the misconduct entails a clear or imminent danger to an individual's life, health or safety or extensive risk of environmental damage or if the whistleblower has other similar reasons to disclose the information.