

# Whistleblower POLICY

At Bufab AB (publ) and at all of our subsidiaries (“Bufab” or “we”/“us”), we have the ambition to conduct our business with a high level of business ethics. We expect all employees and representatives of Bufab to act in accordance with applicable laws and our internal policies and procedures. In line with that commitment, Bufab expects and encourages employees and others that we deal with in a work-related context, to report any material issues of concern about any aspect of our business. It is important that any fraud, misconduct, or wrongdoing, by employees or other agents, is reported and properly addressed. The overall purpose of this whistleblowing policy (the “Policy”) is to encourage co-workers and others to report their concerns.

- If you believe or suspect that Bufab, or anyone acting on its behalf, is violating applicable laws, policies, internal procedures, ethical norms or if you observe any other issues of concern, you should report such concerns.
- If the suspected misconduct is in the public interest or consists of any act or omission that violates the aim or purpose of any EU legal act within the scope of the EU Whistleblowing Directive, a report *shall* be made into the Whistleblowing Channel established by Bufab for such purpose. Competent persons will be appointed to manage protected disclosures.
- Examples of what shall be reported into the Whistleblowing Channel include (other than of less serious nature): criminal activities, the offering or acceptance of bribes, breaches of anti-trust laws, threats to environment, health and safety, a failure to comply with any legal obligation, child labour, other unfair labour practices and human rights abuses, a miscarriage of justice, harassment, discrimination, or breaches of legislation protecting privacy, personal data, network security and information systems, and attempts to conceal information on any of the above.
- General complaints and matters such as general expressions of dissatisfactions, poor management (leadership), personal conflicts at the workplace or matters of less serious nature, shall normally not be reported (or handled) via the Whistleblowing Channel. In these cases, turn to your immediate manager or another manager whom you trust or your local HR department for advice on these matters.
- You may submit your report anonymously. If you choose to report anonymously, Bufab will not try to find out who you are, however, please understand that this could limit Bufab’s ability to investigate the relevant wrongdoing. Personal data treated within the Whistleblowing Channel, including your identity, will be treated with strict confidentiality, and will not be disclosed for unauthorized purposes.
- You do not need to have evidence of your suspicion to report, but all reports must be made in good faith, and you must have reasonable grounds to believe that the information about the misconduct is true. It shall be strictly forbidden for Bufab or anyone in our organization to prevent or attempt to prevent you from reporting concerns.
- A reporting person raising legitimate concerns will not be subject to any detriment, either during or after employment. Bufab will also endeavour to ensure that the individual is protected from any intimidation, victimisation, harassment, or discrimination by any other parties. In addition, by reporting issues of concern into the Whistleblowing Channel, reporting persons will, in certain jurisdictions, obtain protection against retaliation under local laws. It will also provide Bufab with the best conditions for investigating your report, to end misconduct and to provide feedback to you!

Read more about your rights as a whistleblower and how the whistleblower process works, in the Bufab Whistleblower Handbook.

## How to submit a report

You can submit a report by logging onto <https://bufab.speakup.report/nl-NL/bufab/home>.

You may also submit a report by phone or by requesting a personal meeting, as further provided in the Whistleblower Handbook.

You may also report to external reporting channels established by public authorities or EU institutions, bodies or agencies. These authorities are tasked with receiving, following up and providing feedback on reports of wrongdoings within a designated area of responsibility. Instructions on how to report into such external reporting channels are normally posted on the website of the relevant authority.

## Data privacy

Personal data may be processed in the Whistleblowing Channel primarily for the purpose of managing and investigating a report and as necessary to enable measures to be taken based on what has emerged further to an investigation, to enable reports to be used as evidence in legal proceedings, or otherwise in compliance with laws or regulations. For further information on data processing, please refer to the Whistleblower Handbook.

Bufab reserves the right to monitor and amend this Policy at its discretion.

Erik Lundén, CEO, Bufab Group

Martijn van Daal, Global Knowledge & Communications Director



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