



WHISTLEBLOWING POLICY

Version 1.0

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Reviewed and approved for publication by Whistleblowing Committee

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CONTENTS

1.	Introduction	3
2.	Who is Covered by this Policy	3
3.	Purpose of this Policy	3
4.	Reportable Incidents	4
5.	How to Raise a Concern	4
6.	Confidentiality	5
7.	Support for Whistleblowers	5
8.	Prohibition of Retaliation	5
9.	Investigation Process	5
10.	False Claims	6
11.	Monitoring and Review	6
	FREQUENTLY ASKED QUESTIONS (FAQ)	7
	Whistleblower Report Form.....	8

ECOLEX WHISTLEBLOWING POLICY

Effective Date:
1.10.2024

1. INTRODUCTION

Ecolex (the "Company") is committed to upholding the highest standards of integrity, accountability, and ethical conduct in all aspects of our business operations.

To reinforce this commitment, we have established this Whistleblowing Policy (the "Policy") as a secure and confidential mechanism for employees, consultants, and external stakeholders to raise concerns about actual or suspected misconduct, unethical behaviour, or other violations.

This Policy is designed to provide a safe environment for reporting and is not intended to cover concerns about general employment terms, conditions, or grievances.

2. WHO IS COVERED BY THIS POLICY

This Policy applies to:

- All permanent and temporary employees of Ecolex.
- Consultants, contractors, and any other individuals or entities providing services to the Company.
- External stakeholders, including suppliers, partners, customers, and any other parties with a business relationship with the Ecolex.

3. PURPOSE OF THIS POLICY

The objectives of this Whistleblowing Policy are to:

- Encourage a culture of transparency, accountability, and ethical conduct within the Ecolex.
- Provide a trusted channel for reporting actual or suspected misconduct or unethical behaviour.
- Protect whistleblowers from retaliation or victimization when reporting in good faith.
- Ensure thorough and independent investigation of the reported concerns and appropriate actions to be taken.

4. REPORTABLE INCIDENTS

You should report any concerns regarding suspected misconduct or unethical behaviour, including but not limited to:

- Fraud, corruption, theft, or any other criminal activities.
- Violations of the Ecolex's code of conduct or internal policies.
- Financial irregularities, accounting malpractices, or mismanagement.
- Serious breaches of health and safety regulations.
- Any form of harassment, discrimination, or unethical behaviour.

5. HOW TO RAISE A CONCERN

You may raise your concerns using the following procedures:

Reporting Channels:

You can report your concerns either verbally or in writing. Written reports are preferred, as they provide clearer information for the investigation process. To facilitate this, you may use the **form** provided at the end of this document ("Appendix 1"), which will guide you systematically in reporting the issue

Whistleblowing Committee:

Concerns should be addressed to the Whistleblowing Committee at whistleblowing@ecolexgroup.com. The Committee is responsible for receiving and evaluating all complaints. It consists of three members, all selected from the APEX team.

Information to Provide:

Ensure your complaint is factual, not speculative, and contains specific details, including the nature of the concern, the parties involved, relevant dates, and any supporting evidence.

Anonymity:

If you wish to remain anonymous, please indicate this in your report. Ecolex will fully respect your anonymity possible.

6. CONFIDENTIALITY

Ecolex is committed to maintaining the confidentiality of all information disclosed under this Policy, including the identity of the whistleblower. Exceptions may arise if:

- Disclosure is required by law.
- The information is already in the public domain.
- Disclosure is necessary to obtain professional advice.
- Disclosure is made to law enforcement agencies for criminal investigations.

In any case where your identity must be revealed, we will endeavour to inform you in advance.

7. SUPPORT FOR WHISTLEBLOWERS

Ecolex encourages openness and will support employees or other stakeholders who raise genuine concerns, even if they turn out to be mistaken. We are committed to creating a work environment where everyone feels safe and supported when reporting issues.

8. PROHIBITION OF RETALIATION

Ecolex strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Any employee found engaging in retaliation will face disciplinary action, up to and including termination of employment. Whistleblowers who believe they have been subjected to retaliation should report this immediately.

9. INVESTIGATION PROCESS

Upon receiving a report, the Whistleblowing Committee will:

- Review and assess the validity of the concern.
- Conduct a fair and thorough investigation into the matter.
- Submit findings to the relevant body or department for further action.

Investigations will be carried out discreetly and promptly, and feedback will be provided to the whistleblower on the outcome to the extent possible without breaching confidentiality.

10. FALSE CLAIMS

Deliberately making false, malicious, or frivolous claims is a serious violation of this Policy. Individuals who knowingly submit untrue or misleading information may be subject to disciplinary action.

11. MONITORING AND REVIEW

This Whistleblowing Policy has been reviewed and approved by the following individuals, ensuring its alignment with the best practices and Ecolex's commitment to transparency and ethical conduct:

- Jouni Asikainen, Chief Executive Officer
- Ken Wong, Corporate Finance & Business Controller
- Danny Tan, Human Resources Senior Manager

This policy is officially approved for release and implementation across the Ecolex. It will be reviewed periodically to ensure its continued relevance and effectiveness in promoting a culture of accountability and integrity within the organization.

FREQUENTLY ASKED QUESTIONS (FAQ)

Who does the Ecolex Whistleblowing Policy apply to?

Answer: The Ecolex Whistleblowing Policy applies to all permanent and temporary employees, consultants, contractors, and any other individuals or entities providing services to the Company. It also covers external stakeholders, including suppliers, partners, customers, and other parties with a business relationship with the Company.

What kind of incidents should be reported under this Policy?

Answer: Reportable incidents under the Ecolex Whistleblowing Policy include fraud, corruption, theft, or any other criminal activities; violations of the Company's code of conduct or internal policies; financial irregularities, accounting malpractices, or mismanagement; serious breaches of health and safety regulations; any form of harassment, discrimination, or unethical behaviour; and concealment of any such activities.

How can an individual raise a concern?

Answer: Individuals can raise their concerns either verbally or in writing, although written reports are preferred for clarity. Concerns should be directed to the Whistleblowing Committee at whistleblowing@ecolexgroup.com. The report should be factual, detailed, and include specific information such as the nature of the concern, the parties involved, relevant dates, and any supporting evidence.

Can a whistleblower remain anonymous when raising a concern?

Answer: Yes, a whistleblower can choose to remain anonymous when submitting a report. Ecolex fully respects the anonymity of whistleblowers possible, although providing identifying information may sometimes facilitate a more effective investigation.

How does Ecolex ensure confidentiality in handling whistleblower reports?

Answer: Ecolex is committed to maintaining the confidentiality of all information disclosed under the Whistleblowing Policy, including the identity of the whistleblower. Disclosure of information may only occur if required by law, if the information is already in the public domain, if professional advice is needed, or if disclosure is made to law enforcement agencies for criminal investigations.

What protections are in place for whistleblowers at Ecolex?

Answer: Ecolex strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Employees found engaging in retaliation will face disciplinary action, up to and including termination of employment. Whistleblowers who believe they have been retaliated against should report this immediately.

What happens if a whistleblower makes a false claim?

Answer: Deliberately making false, malicious, or frivolous claims is a serious violation of the **Ecolex Whistleblowing Policy**. Individuals who knowingly submit untrue or misleading information may be subject to disciplinary action.

How does the investigation process work for reported concerns?

Answer: Once a report is received, the Whistleblowing Committee will review and assess its validity, conduct a fair and thorough investigation, and submit findings to the relevant body or department for further action. The whistleblower will be informed of the investigation's outcome to the extent possible without breaching confidentiality.

How often is the Whistleblowing Policy reviewed?

Answer: The Whistleblowing Policy is reviewed periodically to ensure its continued relevance and effectiveness in promoting a culture of accountability and integrity within the organization. The review process is overseen by senior management, including the CEO, the Corporate Finance & Business Controller, and the Human Resources Senior Manager.



WHISTLEBLOWER REPORT FORM

(Appendix 1)

If you suspect or have actual knowledge of any serious malpractice, wrongdoing or impropriety that may adversely impact Ecolex, please provide the following information:

SECTION 1 WHISTLEBLOWER INFORMATION	
Name	
Designation	
Department	
Contact number	
Email address	
SECTION 2 SUBJECT(S) INFORMATION	
Name(s)	
Designation(s)	
Department	
Contact number	
Email address	
SECTION 3 WITNESS(S) INFORMATION	
Name(s)	
Designation(s)	
Department	
Contact number	
Email address	

SECTION 3 DETAILS OF THE COMPLAINT(S):	
1.	What misconduct/improper activity occurred (e.g. fraud, theft, conflict of interest, violation of law and briefly describe the misconduct/improper activity)?
2.	Who committed the misconduct/improper activity?
3.	When did it happen and when did you notice it?
4.	How did the subject(s) of this complaint carry out the activity?
5.	Name(s) of organization/individual staff involved in the activity?
6.	Where did the incident occur (provide specific location, where possible)?
7.	Is it ongoing? How frequently has it occurred?
8.	How did you become aware of the alleged improper activity?
9.	Please list and/or attach any documents/evidence you are aware of which supports your allegation:
10.	Please provide any additional details of the incident that would be useful to investigators:
Date:	Signature:

Notes:

1. Please submit this completed form via email to whistleblowing@ecolexgroup.com
2. Please note that you may be called upon to assist in the investigation, if required.
3. As set out in the Policy, Ecolex treats all the above disclosures in the strictest confidence. The identity of the reporter will be kept confidential so long as it does not hinder or frustrate any investigation.