

## Whistleblower Policy

Karo wants to have an open business climate, high business ethics and healthy employees. Our employees, customers and suppliers are our most important sources of insight into any misconducts that need to be rectified. We want those who suspect any misconduct, which is contrary to our values, business ethics, code of conduct or current legislation, to have the opportunity to speak without fear of retaliation. You can choose to submit your report anonymously. To protect you, we have a whistleblower policy with an associated reporting function.

### Whistleblowing

Whistleblowing means drawing the management's attention to a potentially illegal and / or unethical activity, also known as misconduct.

### What can be reported?

Through this function, suspicion of serious irregularities can be reported. Serious misconducts include:

- economic crime such as bribery, theft, fraud and forgery, accounting fraud and other breaches of accounting and tax laws
- a conflict of interest between an employee and Karo.
- other serious misconducts affecting our vital interests or the lives and health of individuals, such as serious environmental crimes, major deficiencies in workplace safety and discrimination and harassment.

### Who can report?

The reporting function can be used by all employees globally (regardless of type of employment) in all legal entities. Suppliers, former employees, etc. can also use the function.

### How to report other errands?

Other type of errands such as disputes, errors, complaints, minor crimes, dissatisfaction with salary will not be considered as a whistleblower case and should not be reported through this system. These errands should primarily be reported to supervisor or a member of the management team.

### Reporting

To ensure your anonymity, a reporting tool is provided by an external and independent partner. The reporting channel is encrypted, and password protected. You never have to reveal your identity if you do not want to.

You can choose to report through:

**Reporting tool:** Anonymously through <https://karopharma.whistlelink.com/>

**Phone:** Service Office days CET, 09:00-17:00,+46(0)76 314 31 13 – Head of People & Organization

**Meeting:** Please call or notify through the reporting tool that you want a meeting

- You do not have to have proof of your suspicion, but no accusation can be made with malicious intent or with the knowledge that the accusation is false.
- It is important that you describe all the facts in the case, including the circumstances that you think are less important
- Please think through your statement carefully and attach anything that may be relevant.

**Who will receive the report?**

All reports are received by a committee consisting of Head of Legal, Head of People & Organization and VP of Commercial Pharma Operations, Corporate Communication and Sustainability. An assessment is made to clarify whether the case falls within the *DIRECTIVE (EU) 2019/1937* or not. If a report refers to anyone in the committee, this person will be disconnected from the specific case.

If external expertise is needed, investigations will be carried out by an external company with long experience and related investigations. No information about you as a whistleblower will be disclosed unless you have given your approval. You choose whether you want to be completely anonymous to the investigator or not.

**Response**

Within a week after your report has been submitted, you can log in with your personal login and password to see any follow-up questions / comments. You can follow up your case through the reporting tool. Make sure you have written down the case number and the code that you receive when you file your report. Log in regularly as the investigators may need to ask you supplementary questions and, in some cases, want to act quickly. Within one month you will receive a status update.

**Privacy and anonymity**

We value and respect data privacy and the protection of personal data. The rights of persons who appear in cases within the whistleblower process are protected in accordance with current data protection laws. Personal data included in the case management and investigation documentation will be deleted after the investigation has been completed, except for cases where applicable laws state that personal data must be saved.

**Abuse**

We will investigate all cases that are reported and categorized as a whistleblower case. It is important that every individual who raises the alarm really suspects that there is a serious misconduct. We take false or malicious accusations seriously and may take disciplinary action against anyone who intentionally accuses someone else.

**External reporting**

It is also possible to report misconduct externally to a competent authority who can receive, provide feedback, and follow up on whistleblowing cases and, where applicable, to EU institutions, bodies, or agencies. Further information can be found in the link External reporting in the reporting tool -

<https://karopharma.whistlelink.com/>

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