

TRIFORK GROUP'S WHISTLEBLOWER PROTOCOL

1. Introduction

- 1.1 Trifork Group (Trifork Holding AG together with its direct and indirect subsidiaries ("Trifork")) aspire to operate a consistently transparent and fair business and is committed to detect and prevent fraud, harassment, breach of security and data protection as well as other types of misconduct.
- 1.2 The purpose of Trifork Group's Whistleblower Protocol (the "**Protocol**") is to set out clear guidelines to Trifork's whistleblower arrangement ("**Trifork's Whistleblower Arrangement**") and to ensure that all Trifork employees, Executive Management, Board of Directors as well as other persons doing business with Trifork have a full insight into the Trifork Whistleblower Arrangement.
- 1.3 It is important that a person, who wants to file a report under Trifork's Whistleblower Arrangement, read these terms and conditions carefully to understand what is covered by this Protocol, how a report should be filed as well as their rights and level of protection.

2. Who can use Trifork's whistleblower arrangement?

- 2.1 Trifork's Whistleblower Arrangement can be used by persons, who have obtained knowledge regarding relevant violations through their professional and work-related involvement with Trifork. This includes:
 - Trifork employees
 - Self-employed persons working with Trifork
 - Trifork shareholders and members of Trifork's executive management or board of directors
 - Volunteers
 - Paid or unpaid interns
 - Persons working under supervision and management of contractors, suppliers as well as sub-contractors
 - Persons who have previously had a work-relation with Trifork that has been terminated.
 - Persons who have not yet begun their work-relation with Trifork, but have gained access to information regarding violations during their hiring process or other pre-contractual negotiations with Trifork.
- 2.2 Persons filing a report under Trifork's Whistleblower Arrangement will in this Protocol be referred to as a "**Whistleblower**".
- 2.3 Persons who are not included in the list above in section 2.1 shall use other ordinary reporting channels.

3. What should be reported via Trifork's Whistleblower Arrangement?

- 3.1 Trifork's Whistleblower Arrangement should be used for reporting offences consisting of breaches of certain legislation (section 3.2) and serious offences as well as other severe misconduct (section 3.3). The Whistleblower may report an offence under Trifork's Whistleblower Arrangement, which has already occurred or is likely to happen in the future.
- 3.2 Breach of legislation

3.2.1 Breaches within the following areas of legislation:

- public procurement;
- financial services, products and markets, and prevention of money laundering and terrorist financing;
- product safety and compliance;
- transport safety;
- protection of the environment;
- radiation protection and nuclear safety;
- food and feed safety, animal health and welfare;
- public health;
- consumer protection;
- protection of privacy and personal data, and security of network and information systems;

3.3 Serious offences and other severe misconduct

3.3.1 In addition to breach of certain legislation, there is a wide range of other types of serious offences and severe misconduct that is covered by Trifork's Whistleblower Arrangements. This includes, but is not limited to:

- Bribery
- Forgery
- Hacking
- Fraud
- Intended misrepresentation of citizens or business partners
- Sexual harassment
- Other types of serious harassment due to race, gender, religion, language, etc.

3.4 If the offence does not fall into the categories in section 3.2. or 3.3, the offence should be reported using ordinary reporting channels, such as reporting to a close manager, Business Unit Leader or the Executive Management of Trifork Group.

4. How to file a report?

4.1 A report via Trifork's Whistleblower Arrangement may be reported on the following site: <https://trifork.com/whistleblower/>.

4.2 The report should include a true and sufficiently detailed description of the offence. It is difficult to initiate an investigation, if the report only entails a general input without any clarification of the circumstances.

4.3 Therefore, we encourage any person filing a report via Trifork's Whistleblower Arrangement to provide e.g.:

- A detailed description of the offence
- Name(s) of the person(s) involved in the offence
- Name(s) of person(s) aware of the offence
- A clarification of how long or how many times the offence has occurred

- Information on any documentation which may support the description of the offence
- The Whistleblower's own contact information, such as e.g. name or email

4.4 Please note that the Investigation Team will not be able to contact the Whistleblower after the report has been filed, unless contact information has been provided, see section 5.

5. Anonymity of the Whistleblower

5.1 When a report is filed via Trifork's Whistleblower Arrangement, the identity of the Whistleblower will not be revealed, unless the Whistleblower directly states this information in the report. Because of this, the Whistleblower is encouraged to provide information such as name or contact details in order for the Investigation Team to ask follow-up questions and provide feedback to the Whistleblower.

5.2 If the Whistleblower wants to be fully anonymous, it is recommended that the Whistleblower makes the report while not being connected to a Trifork network and use a private or public available computer.

6. Who will receive the report via Trifork's Whistleblower Arrangement?

6.1 When a report has been filed, the report will be received by an investigation team consisting of:

- External legal counsel, attorney Rahel Merenda from memo.law AG
- The Chair of the Board of Directors; and
- The Chief Legal Officer

(the "Investigation Team")

6.2 A report can also be filed directly to the external legal counsel Rahel Merenda by email: merenda@memo.law, phone: +41 41 552 77 77 or by post to address: St. Andreas 7, CH-6330 Cham.

6.3 All reports will be documented, reviewed and analysed by the Investigation Team.

6.4 If the Whistleblower has provided contact information in the report, the Whistleblower will receive an acknowledgement of the receipt within seven (7) days of the report. Further, the Whistleblower will receive feedback on the report, including information on, e.g., the measures that have been initiated due to the report. The feedback will be provided within three (3) months from the report. If the matter has not been solved within the three (3) months period, the whistleblower will be notified hereof.

6.5 The Investigation Team will ensure independence of the report and will treat the report as confidential.

7. Rights and Protection of the Whistleblower

7.1 A Whistleblower filing a report under the Mandatory Whistleblower Setup has certain rights and protection. These rights include a protection against retaliations or attempt of retaliations, as a consequence of reporting information under the Trifork Whistleblower Arrangement. Such retaliations may include any unfavourable treatment or consequence as a reaction to the report, including, e.g., dismissal, suspension, wage cut or other types of disciplinary actions.

7.2 Information which directly or indirectly discloses the identity of the Whistleblower, will not as a general rule, without an explicit approval from the Whistleblower, be disclosed to others than the Investigation Team.

7.3 However, the Investigation Team may without prior approval reveal the identity of the Whistleblower to relevant authorities, such as, e.g., a Financial Supervisory Authority or the police, to handle a reported offence

or protect the right to an effective defense for the person concerned. Further, the identity of the Whistleblower may also be disclosed to the extent necessary during legal proceedings related to the case.

- 7.4 The identity of the Whistleblower filing an offence will generally not be disclosed to the person concerned. However, Trifork might be obligated to disclose the identity pursuant to applicable law, e.g. EU's General Data Protection Act, which, to some extent, provide the person concerned with a right to access certain information.
- 7.5 Disclosure of the Whistleblower's identity will be notified beforehand to the Whistleblower, unless such notification will jeopardize the case in question.
- 7.6 The rights and protection of the Whistleblower as described in section 7.1 do not apply for reports:
- filed in bad faith,
 - reports made by a person who cannot be considered a Whistleblower in accordance with section 2.1; or
 - the matter does not fall under the scope for Trifork's Whistleblower Arrangement as described in section 3
- 7.6.1 A person filing a report in bad faith and who is fully aware that the reported information is incorrect will not be protected against retaliation and may, if relevant, e.g., be subject to disciplinary actions from Trifork.

8. Protection and rights of the person concerned

- 8.1 The person concerned is defined as the person who is referred to in the report, e.g., the person who has committed an offence.
- 8.2 The person concerned will be informed of the report, after the Investigation Team has performed an initial assessment. The person concerned will be notified of relevant details of the report as well as the identity of the Investigation Team.
- 8.3 The identity of the person concerned will be protected by the Investigation Team in connection with the assessment of the report, and the person concerned also has a right to an effective defence. In order to exercise the right to an effective defence, the person concerned may also, if necessary, have right to be informed of the identity of the Whistleblower.
- 8.4 Additionally, the person concerned may also have certain rights with respect to access to information, deletion or correction of information, in accordance with applicable data protection law, including, e.g., EU's General Data Protection Regulation.

9. Data Security and Storage

- 9.1 The information received under the Whistleblower Policy will be retained by Trifork only for such period of time which is required by regulation and for Trifork's processing of the data in question. In the event that the information is dismissed as being unfounded or outside the scope of this Protocol, the information will be deleted or, in case found relevant for further actions in the subsidiary which the report concerns, sent to the subsidiary in question.

Accepted by the Board of Directors Trifork Holding AG on 12 December 2022.

Replaces May 17 2021 version.