

# Whistleblower policy

## Background

Modul strives to maintain an open corporate climate, high business ethics, and the well-being of our employees. Our employees, customers, and suppliers are our most important sources of insight into any shortcomings that must be addressed.

As Modul is a value-driven organization, we want anyone who suspects misconduct that is contrary to Modul's values, business ethics, or applicable laws to have the opportunity to speak up without fear of retaliation. You may choose to provide information anonymously. To protect whistleblowers, Modul has implemented this Whistleblower policy along with an associated reporting function.

## Whistleblowing

Whistleblowing means bringing potential illegal and/or unethical conduct—also referred to as misconduct—to the attention of management.

## What can be reported?

Through this function, suspicions of serious misconduct can be reported. Serious misconduct includes, but is not limited to:

- Economic crimes such as bribery, corruption, theft, fraud, forgery, accounting offenses and other breaches of accounting and tax legislation
- Conflicts of interest between an employee and companies within Modul
- Other serious misconduct concerning Modul's vital interests or individuals' life and health, such as serious environmental crimes, major safety deficiencies in the workplace and severe forms of discrimination and harassment

## Who can report?

The reporting process can be used by all employees (regardless of employment type) at Modul. Suppliers, former employees and others may also use the function.

## How to report other matters

Other matters, such as disputes, errors, complaints, minor offenses, dissatisfaction with salary, and similar do not constitute whistleblowing cases and should not be reported via this system. These matters should primarily be reported to your immediate manager or another member of the management team.

## Reporting

To ensure anonymity, a reporting tool provided by an external and independent party is used. The reporting channel is encrypted and password-protected. You never need to reveal your identity if you do not wish to. You can choose to report in the following ways:

- **Reporting tool:** via the link on Modul's website, through our partner lzyfy.com
- **Physical meeting:** Please call or notify via the reporting tool that you wish to arrange a meeting

Guidelines for reporting:

- You do not need to have proof of your suspicion, but no accusation may be made with malicious intent or knowing it to be false
- It is important to describe all facts of the matter, including details you believe may be less important
- Please elaborate on your statement carefully and attach anything that may be relevant

## Who receives the report?

All reports are received by Modul's CEO.

If needed, investigations may also be carried out by an external party with extensive experience in whistleblowing cases and related investigations. No information about you as the whistleblower will be disclosed unless you have given your consent. You decide whether to remain completely anonymous to the independent investigator or to reveal your identity.

## Follow-up

Within one week of your report being submitted through the reporting tool, you can log in again with your personal login and password to view any follow-up questions/comments from Modul. You can monitor your case in the reporting tool using the case number and code provided when you submit your report.

Please log in regularly, as investigators may need to ask additional questions and, in some cases, act quickly. No later than three months after the report, Modul's management will provide an update on the status of the case.



## **Personal data and anonymity**

Modul takes the protection of personal privacy very seriously. The rights of individuals involved in whistleblower cases are protected under applicable data protection laws. Personal data included in case management and investigation documentation will be deleted after the investigation is concluded, except in cases where applicable law requires personal data to be retained. For more information, please refer to Modul's Privacy Policy.

## **Misuse**

Modul will investigate all reported matters. It is important that each individual who reports genuinely suspects that serious misconduct has occurred. Modul views knowingly false or malicious accusations as a serious matter and may take disciplinary action against anyone who makes such accusations in bad faith.

## **Responsibility**

The CEO of Modul is responsible for this policy. The policy is reviewed annually by Modul's Board of Directors.