

ENERSENSE'S WHISTLEBLOWING GUIDELINES

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Making a zero-emission society a reality.

1 Introduction

1.1 Background and purpose

Enersense International Plc and its group companies (together “**Enersense**”) are committed to observing the highest requirements of legislation and ethical principles in all of their operations.

Our whistleblowing service offers a possibility to alert Enersense about suspicions of misconduct in confidence. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage.

Whistleblowing can be done by any person openly or anonymously.

1.2 Scope of application

These guidelines are applied to Enersense International Plc and its group companies, employees and management in all countries in which Enersense operates.

2 When to blow the whistle?

The whistleblowing service can be used to alert us about serious risks affecting individuals, our company/organisation, the society or the environment.

The processing may only refer to data about serious improprieties concerning among other things:

- Prevention of money laundering and terrorism
- Environmental protection
- Data protection and privacy
- Competition legislation and corporate tax issues
- Securities market breaches

Employees are asked to contact their supervisor or manager for issues relating to dissatisfaction in the workplace or related matters, as these issues cannot be investigated in the scope of the whistleblowing.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

3 How to blow the whistle?

There are different ways to raise a concern:

- Alternative 1: Contact a supervisor or manager within our organisation.
- Alternative 2: Contact Enersense’s legal department at ethics@enersense.com or by mail to the address Enersense International Plc, SVP Legal, Konepajaranta 2, 28100 Pori, Finland.
- Alternative 3: Anonymous or confidential messaging through the whistleblower communication channel to the whistleblowing team: <https://report.whistleb.com/enersense>

We encourage anybody who shares their suspicions to be open with their identity. All messages received will be handled confidentially. For those wishing to remain anonymous, we offer a channel for anonymous reporting. The whistleblowing channel enabling anonymous messaging is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB deletes all meta data, including IP addresses. The person sending the message also remains anonymous in the subsequent dialogue with responsible receivers of report.

4 The investigation process

4.1 The whistleblowing team

Access to messages received through our whistleblowing channel is restricted to appointed individuals being members to the Enersense's whistleblowing team (ethical board; SVP Legal, SVP Human Resources an CFO) with the authority to handle whistleblowing cases. Their actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process on a confidential basis.

If a person raises a concern directly to a supervisor, manager or by contacting the whistleblowing team in person the message is treated according to these guidelines.

4.2 Receiving a message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken.

The whistleblowing team may decline to accept a message if:

- the alleged conduct is not reportable conduct under these Whistleblowing guidelines or protected under applicable laws
- the message has not been made in good faith
- there is insufficient information to allow for further investigation
- the subject of the message has already been solved

If a message includes issues not covered by the scope of these Whistleblowing guidelines or applicable laws, the whistleblowing team should take appropriate actions to get the issue solved.

The whistleblowing team will send appropriate feedback within 3 upon the date of receiving the report.

Do not include sensitive personal information about anybody mentioned in your message if it is not necessary for describing your concern.

4.3 Investigation

All messages are treated seriously and in accordance with these Whistleblowing guidelines.

No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower. The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.

A message will not be investigated by anyone who may be involved with or connected to the misgiving.

The whistleblowing team decides if and how a whistleblowing message should be escalated.

Whistleblowing messages are handled confidentially by the parties involved.

4.4 Whistleblower protection in the case of non-anonymous whistleblowing

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during police investigations or judicial proceedings.

5 Entry into force and updates

These guidelines have been approved and will enter into force on 7.12.2021. The SVP Legal is responsible for updating, interpretation and supervision of these guidelines, and any decisions on amending these guidelines are made by the SVP Legal. These guidelines may only be deviated from by the approval of the the SVP Legal, unless otherwise specified herein.