

Whistleblowing Policy

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1 Purpose

Biotage employees should feel safe and know that they can report misconduct, irregularities and serious events relating to Biotage without fear of negative consequences. Biotage employees should feel that their notifications made under this whistleblower policy are taken seriously and that they are handled professionally and confidentially.

This policy is intended to be used for serious, wrong actions and as a supplement to regular reporting. This policy applies to all Biotage employees. The policy also includes a statement by Biotage that Biotage will immediately handle and thoroughly investigate the reported notifications of incorrect action by Biotage or its employees, consultants, contractors, or suppliers, as well as take the appropriate actions.

The policy gives all employees an opportunity to act responsibly to preserve Biotage reputation and public confidence in Biotage operations. The policy intends to ensure that suspicions of irregularities and incorrect actions are treated and addressed correctly.

2 Scope

This policy covers misconduct according to the activities listed below and is applicable for all Biotage employees, in all functions and all sites as well as employees working remotely, worldwide.

Title Whistleblowing Policy		Document# / Revision POL-0014/01	
Document type Governing Policy	Reviewed by Petra Duprez, CHRSO		
Authored by Petra Duprez	Approved by Tomas Blomquist, CEO	Date 2023-11-27	Page 1 (5)

Biotage believes in openness and transparency and encourages employees, as far as possible, to report any misconduct and serious events they perceive as violations of laws or the Code of Conduct, to their manager, the managers manager or HR. If this is not possible for some reason, a report can be submitted anonymously via the Whistleblowing Form on the first page of the intranet.

A misconduct, according to below, can be reported by internal stakeholders anonymously using the Whistleblowing form on Biotage Intranet, first page. Misconduct can also be reported from both internal and external stakeholders, non-anonymous, by using the Biotage Hotline, hotline@biotage.com. If the manager is involved in the matter or if the manager cannot or did not handle the question satisfactorily, employees should report to the manager's manager and/or to HR.

The policy does not cover affairs such as bullying, dissatisfaction with pay, bad or unfair leadership, ineffective systems or lack of feedback regarding performance of such things. Employees who wish to raise questions in these areas should primarily contact their immediate manager or HR.

This policy is connected to the Code of Conduct and other governing policies such as the Anti-Corruption and Bribery Policy, the Global Work Environment Policy and the Modern Slavery and Human Trafficking Statement. This policy describes how to act on any misconduct not acted on, related to the aforementioned policies.

3 Policy

The policy covers misconducts, serious events and irregularities that could have a harmful impact on Biotage business activities and, due to the nature of the irregularity, cannot be reported in the usual manner, such as:

- » Illegal activities.
- » Financial fraud, such as improper accounting, violations of internal control procedures, asset confiscation or fraud.
- » Bribery and corruption, such as conflicts of interests, bribes, sponsorship, donations, gifts.
- » Breaches of competition law, such as price fixing, exchange of price sensitive information, collusion on bidding with competitors.
- » Serious threats to the environment, health and safety.
- » Activities other than by law, treaty or agreement are to be regulated as seriously inappropriate actions, such as discriminatory work routines, the use of child labor, human rights violations.
- » Information that any of the above-mentioned situations are deliberately withheld.

Provided suspicions of misconduct, negligence or workplace failures are reported in good faith and not by malice or personal gain, and there are good reasons to assume that the matter is relevant, and the employee has followed the reporting procedures, the case will be handled as follows:

- » As far as possible, the employee's identity will not be disclosed, unless it is necessary for further investigation or if the law requires it.
- » The employee will not be subjected to any harassment or disciplinary action from Biotage because of reporting a misconduct.
- » As far as possible, evidence that can be deducted to the employee will be kept confidential.

Biotage will ensure that incoming reports and suspicions of irregularities are correct and discreetly processed. Biotage will take action to minimize any difficulties that may arise because of a person reporting a suspected irregularity. If it is required that the person attesting to a criminal case or disciplinary action, Biotage will ensure that it receives legal advice regarding this.

Misuse of this policy, for example, reporting false, malicious or unfounded charges means that the employee is not covered by the above-mentioned protection.

Employees shall report their suspicions of misconduct to the immediate manager, the manager's manager, HR, through the Whistleblowing form on the intranet first page or to hotline@biotage.com. Information provided in the form and e-mails sent to hotline@biotage.com are sent to the CEO, CHRSO and the Chairman of the Board.

As an employee, you can submit an oral and/or written notification. It must always be stated that this policy is used and if the employee wishes to keep his/her identity secret they may use the Whistleblowing form on the intranet, not state the name on the written notification or state that they wish to stay anonymous in the e-mail or in the written notification.

If an employee is dissatisfied with how a case has been handled or feels that it is impossible to raise a specific case with any of the above-mentioned people, the employee shall contact one of the members of Biotage Board.

Biotage is required to investigate and handle all notifications fairly, quickly, and confidentially as far as possible. The length and extent of the investigation will depend on the nature of the matter. An initial investigation is conducted to determine if there is reason to continue the investigation or if there is no reason to continue the investigation because the notification is based, for example, on incorrect information.

The person responsible for processing the notification can set up a meeting with the employee. The employee may need to prepare parts of the notification in writing, these items will then be discussed in full during the meeting. The person responsible will decide on further meetings with the management or that the employee is asked to provide further evidence if necessary. The employee will, as far as possible, be informed of what actions Biotage decides to take and must handle such information as strictly confidential.

Biotage understands that a notification made under this policy may contain highly sensitive and confidential information that would allow an employee to be anonymous. However, Biotage always calls it as a whistleblower to not act anonymously if possible. Measures to maintain confidentiality around the notification and the notified person are taken as far as possible. When a notification is received according to the guidelines mentioned above, Biotage may act according to one or more of the following options:

- » The matter is referred to the board.
- » The matter is referred to an appropriate external authority.
- » The case is reported to the police.

If an employee, after following all the steps in the whistleblowing policy, still feels dissatisfied with the result, the employee may, under strict confidentiality, turn to an external authority. If an employee decides to take this action, he/she is required to inform Biotage's CEO at least seven days before contacting the authority.

Responsibility

Biotage managers are responsible for ensuring that all employees are familiar with the whistleblower policy, but it is the responsibility of the employee to follow it. This policy should only be seen as a guide and is not a part of the employee's employment contract.

4 Document information

4.1 References

POL-0013	Code of Conduct
POL-0015	Anti-Bribery and Corruption Policy
POL-0016	Global Work Environment Policy
POL-0017	Modern Slavery and Human Trafficking Statement

4.2 Terms/Abbreviations/Definitions

General Definitions/acronyms are defined in the Global Document "*Biotage Glossary of Terms*"

Document specific terms and abbreviations are listed in the following table:

Term / Abbreviation	Definition
CEO	Chief Executive Officer
CHRSO	Chief Human Resources and Sustainability Officer

4.3 Version history

Version	Changed by	Date	Changes
1.0	Petra Duprez	2020-12-18	First edition
2.0	Petra Duprez	2023-11-24	Second edition