

Eltete's Whistleblowing channel

Eltete Oy and Eltete TPM Oy have a joint reporting channel through which Eltete employees, and third parties can report suspected violations or omissions.

Protection of whistleblower

Whistleblower protection can be granted to whistleblowers who have become aware of or have reasonable suspicion of a crime or misconduct in the course of their work or work. However, no contractual relationship is required from the notifier or the subject of the notification. Whistleblower protection is based on the National Act on Whistleblower Protection ("Whistleblower Act") and the European Union's whistleblower directive.

There are three general requirements for receiving whistleblower protection:

- At the time of the report, the whistleblower must have a legitimate reason to believe that their information about a breach is true.
- The information about a breach must be in the scope of the Whistleblower Act.
- The whistleblower must be reporting a breach they have discovered in the course of their work.

The law protects whistleblowers who report a breach of the rules covered by the law and the report concerns an act or omission that meets:

- constituent elements of a criminal offense,
- may result in at least punitive administrative sanction, or
- may seriously endanger the realisation of public interest.

The reporting concerns breaches of both national and EU legislation in the areas listed below.

- 1. public procurement (excluding defense and security spending);
- 2. financial services, products and markets;
- 3. prevention of money laundering and terrorist financing;
- 4. product safety and compliance;
- traffic safety;
- 6. protection of the environment;
- 7. radiation protection and nuclear safety;
- 8. food and feed safety, animal health and welfare;
- 9. public health (as defined by Article 168 of the Treaty on the Functioning of the European Union);
- 10. consumer protection;
- 11. protection of privacy and personal data;
- 12. security of network and information systems

Reporting other violations or omissions is not within the scope of the Whistleblower Protection Act.

Processing the report

Notification data is treated as confidential information and can only be accessed by authorised processors. No IP address or any other identifying information is stored in the system about the whistleblower. The language of processing of notifications is Finnish.

Reports covered by the Act on the Protection of Whistleblowers can be submitted anonymously. The identity of the whistleblower and the subject of the report is kept secret during the processing of the report. The



obligation of professional secrecy applies to all persons participating in the processing of the report. Other information from which the identity of the whistleblower or the subject of the report can be deduced is also kept secret.

The persons responsible for processing the report shall take the necessary measures to establish the accuracy of the report and, if necessary, to intervene in the breach as soon as possible. The notifier shall be given an acknowledgment of receipt no later than 7 days after the notification and within three months of the submission of the acknowledgment of receipt, information on the action to be taken. If necessary, expert assistance may be used to investigate the matter.

How to report and follow up

You can submit a report and follow its progress through Eltete's Whistleblowing channel.

https://wb.eltete.com/#/

The notification is made anonymously via the link above <u>or, if desired, you can leave contact information. The report must state all the information as accurately as possible, and if there is evidence to support the matter, it can be attached to the report. The reporting channel can be used in Finnish and English. The language selection can be made in the upper right corner of the notification page.</u>

After submitting the notification, you will receive a numeric code that is needed to track the progress of the notification. The notification can be followed on the same page as the person submitting the notification.

Data entered into the reporting channel will be deleted one year after the investigation has been carried out unless its storage is necessary for the exercise of legal rights or obligations.

Other reporting channels

If the whistleblower has reasonable grounds to believe that the necessary measures have not been taken on the basis of the report, or that the breach cannot be addressed effectively, or that there is a risk of retaliation, the whistleblower may also report the matter to the authority's reporting channel.

Here is a link to the <u>Centralised external reporting channel instructions</u> of the Office of the Chancellor of Justice. Reports may be emailed to ilmoittajansuojelu@gov.fi or sent by post to Chancellor of Justice, PO box 20, FI-00023 VALTIONEUVOSTO, Finland.

If you would like to give us feedback on products or services, please do so through the contact form on our website https://eltete.com.