



Whistleblower Policy for Waterise

1. WHY NOTIFY

We believe that an open and respectful working environment is crucial for our development and success. We acknowledge the right to report concerns without fear of retaliation or other negative consequences. When we are made aware of concerns at an early stage, we are better placed to take action and improve the situation.

Waterise's Whistleblower Policy provides guidance on how, what and when to report, as well as information about how reports are handled. It also includes an overview of rights and obligations of the parties involved, including principles for the processing of notifications.

2. WHO CAN NOTIFY

All Waterise employees, interns, consultants and workers (including hired personnel) have a right to report their concerns. External stakeholders are also welcome to raise concerns.

3. WHAT CAN BE NOTIFIED

If you discover or have reason to suspect breaches of laws or regulations, or criminal offenses, that may endanger anyone's life or health, you have a duty to notify. Further, anyone may notify Waterise about any censurable condition in the company. Censurable conditions are breaches of laws, regulations, the company's Code of Conduct or related policies and ethical guidelines, including but not limited to the Anti-Corruption Policy, or ethical norms acknowledged by society as a whole. Censurable conditions include (but are not limited to):

- Danger to life or health;
- Danger to climate or the environment;
- Corruption, fraud or other financial misconduct;
- Abuse of authority;
- Unsafe or unhealthy working environment;
- Harassment, bullying or discrimination;
- Breach of personal data security.

If you are in doubt as to whether a situation, practice or similar is a censurable condition, do not hesitate to contact your line manager or the Waterise Whistleblower Committee¹ to discuss.

4. TRUE FACTS REPORTED IN GOOD FAITH

At the time of submission of a report of concern, you should have reasonable grounds to believe that the reported information about the infringement is true. The report should be made in a good faith.

5. WHAT IS NOT A WHISTLEBLOWING MATTER

Waterise's whistleblower procedure should not be used to report or otherwise handle any other types of concerns, including job applications, commercial queries or disputes, ordinary HR matters (e.g., your employment conditions, salary, performance reviews, annual leave, etc.), personal grievance or general questions. Such issues should be submitted to the relevant function at Waterise and should be discussed with your manager or Waterise's Chief Financial Officer.

6. HOW TO NOTIFY

You can always discuss a concern with your manager or other designated functions in the company, such as the Executive Management, Waterise's General Counsel, or the Board of Directors.

You may also report a concern as described in this procedure through Waterise's Whistleblower Channel,² which may also be accessed by

¹ The Waterise Whistleblowing Committee consists of the Chief Financial Officer and General Counsel.

² <https://whistleblowersoftware.com/secure/9a4bd01c-21bc-44ba-a9e6-728ccb9de939>.

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A concern may be reported in writing, electronically, or orally via phone or personal meeting. If you wish to report in person, a meeting shall be scheduled no later than in seven days from the date of submission of the request.

The Whistleblower Channel is a supplement to internal reporting of concerns. The Whistleblower Channel facilitates for anonymous reporting. However, we encourage you not to notify anonymously, as it will often be more difficult to follow up the matter. It will e.g. be challenging to ensure a transparent and adversarial process. A written report should adequately describe the detected or suspected behavior or circumstances, as well as the persons involved. If possible, it may include proof or documents that support the facts of the case.

7. WATERISE'S HANDLING OF NOTIFICATIONS

When we receive a notification, it will be promptly and thoroughly assessed. You will receive confirmation that the notification has been received. The recipient is either the company body (referred to in section 4) that the concern is reported to, or the external provider handling the Whistleblower Channel.³

If the Whistleblower Channel is the recipient, external legal counsel will provide initial advice to Waterise's Whistleblower Committee. If the recipient is a company body, the Whistleblower Committee will conduct an initial assessment of the case. In either case you will receive feedback on further case handling.

If the report relates to HR matters (e.g., work environment, harassment), further case handling will be delegated to HR.

You will be informed about the result of the process within the limits of applicable privacy regulations. You are entitled to receive feedback within three months. Exceeding this deadline could only be justified if the investigations/measures for the appropriate follow-up actions are still ongoing.

³ The external provider handling the Whistleblower Channel is the law firm Advokatfirmaet Wiersholm AS ("**Wiersholm**"). Wiersholm acts as data controller for the personal data they process related to the Whistleblower Channel. For information on how Wiersholm processes personal data, please see their privacy policy here: [Our Privacy Policy – Advokatfirmaet Wiersholm](#).

8. WHO WILL BE INFORMED

The Whistleblower Committee will share information about the reported case with the person or functions who is given the responsibility to review and handle the case, as described in section 5.

A case will never be reviewed or investigated by anyone involved in the case, and it will always be reviewed or investigated by employees in higher positions than the parties referred to in the report. Cases involving the Executive Management or the Board of Directors will undergo external review.

If you have raised a concern about a specific person, he/she will be informed about the content of the case as soon as possible, unless and to the extent this can be expected to seriously hinder the further review or follow-up of the case. If required, Waterise may report the matter to relevant public authorities.

9. HOW YOU ARE PROTECTED

All concerns will be handled confidentially. If you decide not to make an anonymous notification, your identity will only be disclosed to those who need to know in order to properly process the notification. If the notification concerns a person (for example a colleague or other employees), you can request your identity not to be disclosed to that person. If it is not possible to preserve confidentiality, you will be notified before a disclosure is made. In any case, Waterise will not tolerate any retaliation if anyone reports a concern in good faith.

If you experience punishment or unfair treatment after having reported a concern, please inform your line manager or use the Whistleblower Channel.

We will treat all information and data received, gathered, retained, or registered in connection with the report in accordance with relevant data protection laws and other relevant legislation.