

Whistleblowing Policy of Alteams

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Address

Alteams Oy
Yritystie 1
PL 91, 40351 Jyväskylä
P.O. Box 91,
FI-40351 Jyväskylä

Phone

+358 201 339 500

Telefax

+358 201 339 501

VAT NO

0180389-2

Business

ID 0180389-2

BANK

Nordea 119330-6667

SWIFT code

NDEAFIHH

IBAN

FI36 11933000 0066 67

Place of registration

Jyväskylä

WHISTLEBLOWING POLICY

Introduction

Illegal and unethical activities raise social, moral and economic concerns, undermining good corporate governance and hindering development. Alteams **Whistleblower Policy (later “Policy”)**. supports the Alteams Code of Conduct (later “CoC”).

This Policy is intended to assist employees, stakeholders, vendors or any parties with a business relationship, who believe they have discovered nonconformity and especially illegal activities.

When to blow the whistle

Whistleblowing is a process to report an ethical concern to company management about possible violations.

A whistleblowing concern should be reported when the following types of suspected illegal activities are observed:

Bribery relates to

- Offering, promising, giving and accepting an undue advantage of any value (financial or non-financial), directly or indirectly, irrespective of location(s), in violation of applicable law and an inducement or reward for a person acting or refraining from acting in relation to the person’s duties.

Conflict of interest relates to

- Situations where business, financial, family, political or personal interests could interfere with the judgement of persons in carrying out their duties for Alteams.

Illegal activity relates to

- Conduct or activity, which breaches any law or regulatory obligation and criminal offence.

Wrongdoing relates to

- Breach of the company's policies, practices, procedures or other rules of conduct, misuse or abuse of Alteams’ funds or assets, serious financial irregularity or nonconformity within Alteams.

Reporting

Any employee or business partner reporting a breach, which the employee or business partner reasonably believes to be true (“in good faith”) will be provided full protection against retaliatory action.

This protection means that Alteams will not dismiss, demote, suspend, threaten, harass or in any manner discriminate against any employee or business partner. Alteams does not tolerate any form of threat, retaliation or other action against an employee who has reported a breach or assisted in making a report in good faith. Any observances of such threat, retaliation or similar action should immediately be reported to the Alteams anti-illegal activity function.

The EVP of Quality and OPEX is responsible for this Policy. Alteams anti-illegal activity function is responsible for the oversight function over this Policy.

Alteams anti-illegal activity function has the authority to determine the legitimacy of the disclosure; direct further action and determine who should conduct the investigation.

- a. Reports or disclosure under this Policy can be made through e-mail (ethics@alteams.com)
- b. Report to line manager or by using local practises (employee feedback boxes) at Alteams manufacturing sites.
- c. Disclosure of information can be made also to Alteams anti-illegal activity function :
 - i. CFO of Alteams
 - ii. EVP of Quality and OPEX
 - iii. General Manager in Finland
 - iv. General Manager in Poland
 - v. General Manager in China.

The whistleblower should be able to provide in the disclosure, whether in writing or by telephone, information regarding the type of wrongdoings, identity of the person(s) suspected as being involved, when it occurred and who was affected.

Whistleblowing procedure

To start with, Alteams will collect all evidence of wrongdoing. The General Manager must have first-hand knowledge or information of the facts, i.e. information obtained from a third party or 'hearsay' will not be accepted. However, the local head must make a report even if they are unsure whether there is sufficient evidence to support the allegations.

Any whistleblower must provide all details of his or her concerns, including:

- 1) Nature of wrongdoings
- 2) The date of incidence
- 3) Time and place of its occurrence
- 4) The identity of the alleged wrongdoer
- 5) Particulars of witnesses, if any
- 6) Particulars or production of documentary evidence, if any and other details regarded as useful to facilitate screening and action to be carried out.

Anonymous cases will be investigated if credible and sufficient information is provided.

Any whistleblower is requested to disclose his or her particulars including, name, current address and contact information.

Any whistleblower can also directly contact the anti-illegal activity function, when he or she has a reasonable belief that there is serious malpractice relating to any of the wrongdoings mentioned, especially when it would not be properly dealt with by reporting to the line management.

Preliminary action

The local General Manager, together with the general recommendations made by anti-illegal activity function, will make decisions regarding the following:

- a. Investigation or rejection of disclosure
- b. Directing an investigation by Internal Audit or through any other external party
- c. Suspending the alleged wrongdoer or any other implicated persons from work, in accordance with the CoC and Procedures to facilitate any fact finding or to avoid any employee's exposure to a threat or harm
- d. Referral to the police or any other appropriate enforcement authority
- e. All decisions made and reasons for actions will be recorded in the minutes of meetings of the local General Manager.

Investigation

The investigation will be carried out in strict confidentiality. This means, any information concerning the subject of the whistleblower's disclosure must not be shared with any other person/party other than local General Manager, until it is required.

The whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation, or any other process carried out in relation to this Policy and/or the CoC, as well as HR Procedures.

The alleged wrongdoer will also be informed of the allegations and given full opportunity to answer the allegations in any upcoming investigation, whenever seen as appropriate by the local General Manager.

Reporting the outcome

When the investigation is complete, local General Manager (or other investigators) will present the result of the investigation.

If the anti-illegal activity function is satisfied with the result of the investigation, it will inform the local management to proceed with any immediate disciplinary action based on company policy procedures.

The local General Manager:

1. Will have the final decision on whether to pursue any legal actions against the alleged wrongdoer or any other implicated persons.

2. Will also inform the result to the whistleblower.

Actions regarding this Policy will be reported to the Alteams' BoD once per year as a part of Alteams risk management.

Confidentiality & Protection

Any whistleblower will be protected from any reprisal within the company as a direct consequence of the disclosure. Should a whistleblower suffer any reprisal actions or is being victimized in any way, and then disciplinary actions, including the possibility of dismissal, will be used.

Any whistleblower's identity will be protected i.e. kept confidential unless otherwise required by law or for any proceedings by or against Alteams.

Employee and industrial relations related issues, along with HR issues are excluded from the operation of this Policy because other established mechanisms already exist to handle such issues.