

Whistleblowing Policy of Alteams

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 refers 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 refers 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 refers to

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

Wrongdoing refers to

- Breach of the company's policies, practices, procedures or other rules of conduct.
- Misuse or abuse of Alteams' funds or assets and serious financial irregularities or nonconformities within Alteams.

Data Security and breaches refers to

- The company's or customers' confidential or protected data are delivered, copied, transmitted, viewed or stolen to the 3rd party without company's or customer's approval.

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 Ethics Committee.

The Alteams Ethics Committee is responsible for this policy and overseeing its conduct. Alteams ethical committee has the authority to determine the legitimacy of the disclosure; direct further action and determine who should conduct the investigation.

Reports or disclosure under this Policy can be sent to Alteams Ethics Committee by:

- e-mail (ethics@alteams.com)
- post (to the postal addresses of the Alteams departments, addressed to a member of the Committee)
- telephone
- Using the form on the Alteams website (<https://www.alteams.com/whistleblowing/>)

Reports can be sent anonymously or by name.

The members of Alteams Ethics Committee are:

- CFO of Alteams
- EVP Sourcing and Management Systems
- General Manager of Laihia, Alteams Finland
- General Manager of Loppi, Alteams Finland
- General Manager of Alteams Poland
- General Manager of Alteams Suzhou.

Whistleblowing procedure

To start with, Alteams Ethics Committee will collect all evidence of wrongdoing. The Committee 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 Committee 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:

- Nature of wrongdoings
- The date of incidence
- Time and place of its occurrence
- The identity of the alleged wrongdoer
- Particulars of witnesses if any
- 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.

Preliminary action

The Alteams Ethics Committee will make decisions regarding the following:

- Investigation or rejection of disclosure

- Selecting the members (who must be unbiased in relation to reported case) of the Committee who shall take responsibility for the investigation as follows:
 - a. Carrying out the investigation internally or with the help of an external party.
 - b. Suspending the alleged wrongdoer or any other implicated persons from work, to facilitate any fact finding or to avoid any employee's exposure to a threat or harm.
 - c. Referral to the police or any other appropriate enforcement authority.

All decisions made and reasons for actions will be recorded in the minutes of meetings.

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 or party until it is required.

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

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.

Customer's data breaches will be informed to the customer and investigated together with the customer on their request.

Reporting the outcome

The members who carried out the investigation will present the results when the investigation is completed.

If the Alteams Ethics Committee 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:

- Will have the final decision on whether to pursue any legal actions against the alleged wrongdoer or any other implicated persons.
- Will also inform the result to the whistleblower (if the disclosure is not made anonymously)

Actions regarding this Policy will be reported to the Alteams' BoD once a 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. If the whistleblower suffers retaliation or is being victimized in any way, disciplinary action will be used, including the possibility of dismissal.

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.

Information data security incidents involving customer information will not be disclosed or published to any third parties without authorization from customer.