

CellMark Whistleblowing and Grievance Platform – FAQ

1. Who can report concerns or violations?

We encourage anyone working for CellMark (regardless of the nature of their activities or relationship to CellMark) to raise their concern or discuss any suspected violation of applicable laws or our integrity principles ([Code of Conduct](#), policies, and directives) .

Similarly, external stakeholders (business partners, customers, and other third parties involved with CellMark) are encouraged to discuss any concern or suspected violation of applicable laws or our [Code of Conduct for Business Partners](#) .

2. How to report concerns or violations?

As a first instance, if you work for CellMark, you should discuss your concerns or potential violations with your manager or, if the concern relates to your manager, with another manager within your Division. If you are an external stakeholder, you are encouraged to discuss any concerns with your CellMark contact (or another person within CellMark if your concern relates to your CellMark contact).

However, alternatively, you should use the Whistleblowing and Grievance Platform operated by TRUSTY (an independent third party) if:

- you are not comfortable reporting in this manner, or
- you believe that the concern or potential violation is serious¹ or relates to several managers within CellMark.

Through this dedicated whistleblowing and grievance channel, you can file a confidential report via either the telephone or the Internet.

You may also report your concerns directly to the [VP of ESG & Compliance](#) via:

- email: compliance@cellmark.com, or
- telephone: +46 70-673 66 14, or
- postmail: CELLMARK AB
Attn: VP ESG & Compliance,
Lilla Bommen 3C,
411 04 Göteborg, SWEDEN

3. What concerns or violations can be reported?

You may raise concerns about or report any observed or suspected misconduct or incidents that:

¹ “**Serious misconduct**” covers misconduct that can potentially have a severe financial or reputational impact on CellMark. Note that certain areas are always deemed to potentially have a severe financial or reputational impact: anti-bribery and anti-corruption, anti-trust, sanctions and export control, discrimination and harassment, health and safety, human rights, and data protection.

- constitute a breach of applicable legislation or CellMark's Code of Conduct, policies, or directives,
- can result in harming the public interest, for instance by damaging the environment, public health and consumer safety and public finances,
- are attempts to conceal such violations
- or could in any way damage CellMark's reputation,
- as well as can be considered as retaliation against a person who has raised a concern or is believed or suspected to have made or be planning to raise a concern.

You should not report:

- complaints regarding purely commercial disagreements or disputes – for such issues, please visit <https://www.cellmark.com/divisions/> for contact details
- employee dissatisfaction (unless the matter constitutes harassment, discrimination, or bullying),
- rumours – you need to have reasonable cause to believe that misconduct has occurred or may occur.

If you are unsure whether what you have observed or heard is considered a violation, but it just does not feel right, we encourage you to file a report that can be properly understood. **We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.**

4. Can I report anonymously?

You may choose to remain anonymous whenever legally permitted, but we strongly encourage you to provide an email address and/or a phone number to allow effective follow-up and the most efficient investigation.

If you choose to provide your contact details in your report, your identity will be kept strictly confidential and may only be shared according to specific applicable legislation or with relevant individuals supporting the investigation on a strict need-to-know basis and subject to strict confidentiality. You may read more in the [Privacy Statement](#).

If you wish to remain anonymous, you need to ensure that the information provided does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...". Also, the Whistleblowing and Grievance platform and the confidentiality principles (see section 7) are designed to protect your anonymity, and the parties reported are not notified or granted access to your report.

You can also choose to remain anonymous if you report through the telephone toll-free hotline: you will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the Whistleblowing and Grievance platform.

5. What should I report in practice?

When making a report, please provide as many specific details as possible (such as what has happened, who is involved, where it took place, when it happened, how you became aware of the incident, names of witnesses if any, etc.) and be as descriptive as possible.

If you provide information about a person, please do not include (i) personal data that is not needed for the report, or (ii) sensitive personal information such as mental or physical condition, or religious beliefs.

Avoid making general or vague allegations such as “This person is a poor leader”, or “This person bullies people”. To the extent possible, give specific examples of how the person’s behavior violates applicable laws or CellMark’s integrity principles.

As the Whistleblowing and Grievance platform allows us to communicate with you confidentially, even if you have chosen to remain anonymous, please use the “Follow Up on a Report” option to check for feedback or answer any follow-up questions. To do so, you will need the Report Key provided and the password you created when you first filed the report.

Similarly, you may modify or add information about the incident after filing the report by using the “Follow Up on a Report” option.

6. Non-retaliation

If you raise a concern in good faith (i.e. with an honest and reasonable belief that misconduct, a violation of law or policy, or any other non-compliance may have occurred), CellMark will not tolerate any retaliation against you, regardless of the outcome of the investigation.

7. Confidentiality and security of the reports

Concerns raised or potential violations reported through the Whistleblowing and Grievance platform are entered directly on the secure server of TRUSTY (our independent third-party service provider) to prevent any possible breach of security. All whistleblowing reports are treated by CellMark with the utmost confidentiality, to the fullest extent possible, regardless of which whistleblowing channel is used.

Thus, without restricting any right under applicable law, information linked to a whistleblowing report (including your identity, if applicable) will be kept strictly confidential and only be shared on a strictly need-to-know basis and subject to strict confidentiality with relevant individuals or organizations supporting the assessment of the report and, if applicable, the investigation.

These confidentiality measures apply to any modification of initial reports, or all correspondence through the Whistleblowing and Grievance platform (i.e., including your answers to any follow-up questions), and reports made through the telephone toll-free hotline.

8. Expectations of reporters

If you raise a concern or report a violation, you are expected to:

- report in good faith (i.e. you should have a reasonable ground to believe that the information, or suspicion, reported was true at the time of the report); and
- only discuss or share information related to the concern or the violation reported with the investigation team, no one else.

9. Assessment of the reports and investigation

All whistleblowing reports are taken seriously and will be assessed and, when relevant, investigated according to the principles of fairness and confidentiality towards all involved parties.

In practice, all reports made through the Whistleblowing and Grievance platform are handled as follows:

- The report is initially shared with one of CellMark's non-executive Board members, who acknowledges receipt of the whistleblowing report.
- This whistleblowing report is shared (on a strictly need-to-know basis and confidentially) with the relevant individuals or organizations supporting the assessment of the report.
- The likelihood that the misconduct or incident reported may have happened is assessed, based on the information provided and additional initial inquiry.
- It is determined whether an internal investigation is required to gather evidence to establish the facts and substantiate the matters reported.
- If relevant, appropriate investigation measures are performed.
- The reporter is updated on the actions undertaken.

Anyone involved in the assessment of a whistleblowing report or the conduct of an internal investigation must perform their duties independently and impartially, in observance of the principles of fairness and confidentiality towards all parties involved.