

Medius Group

Whistleblowing policy



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Document Control

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Contact Persons

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1. Introduction and purpose

Medius is committed to conducting its business at the highest ethical levels and does not tolerate wrongdoing. If wrongdoing happens, we want to take appropriate action. Medius seeks to promote and maintain a culture in which reporting wrongdoing is encouraged and appreciated, and employees and others are confident to act and report when they see wrongdoing.

The purpose of this policy is to i) encourage our employees and other whistleblowers to disclose any wrongdoings of which they become aware, ii) describe the protection that is offered, and iii) clarify the procedures that apply, including how reporting channels are structured and how whistleblower cases are managed and investigated.

With this policy, Medius undertakes to act in accordance with the relevant legislation regarding protection of whistleblowers as well as applicable rules on privacy and personal data protection.

This policy is applicable to all companies within the Medius group.

2. Fundamental principles

Whistleblowing and wrongdoing. Whistleblowing is when someone notifies decision makers of Medius of a) evidence of any wrongdoing that has happened already or b) a reasonable suspicion of potential wrongdoing that has not happened yet. "Wrongdoing" broadly consists of i) unlawful activities or direct threats to public interest and ii) activities in breach of the Medius code of conduct. Examples of wrongdoing that should be reported under this policy include criminal acts, accounting and auditing irregularities, corruption, bribery, harassment, discrimination, or safety deficiencies in the workplace. Matters that relate only to a specific individual, for instance a specific employee's own work or employment conditions, should normally not be reported under this policy.

Persons protected by the policy. Any whistleblower who works at or for Medius is covered by the protection of this policy. This includes employees, self-employed, volunteers and trainees, persons who are part of a company's administrative, management or supervisory body, board members and shareholders who are active in the company. Other persons that do not work directly or indirectly for Medius, for example jobseekers, customers, suppliers, facilitators (like individuals and non-profit entities such as trade unions and other associations), public officers, soldiers or persons that were previously in one of the positions mentioned above, may also report on wrongdoing by use the reporting channels set forth in this policy and will benefit from the protection of this policy if reasonable and relevant.

Good and bad faith reporting. Anyone who reports wrongdoing in good faith receives protection by this policy. "Good faith" means a) that the person believes that the information reported points to wrongdoing and b) that the belief was reasonable for someone in their position based on the information available to them. No protection is offered to a



whistleblower who reports in bad faith, which means that the whistleblower has knowingly made a false report. A report will always be considered to be made in good faith and the whistleblower will receive full protection under this policy unless an investigation determines otherwise.

Anonymous and confidential reporting. Medius welcomes reporting of any misconduct or wrongdoing and respects the whistleblower's right to anonymity. We do, however, prefer that a whistleblower discloses their identity, both to facilitate our investigation of the matter and to enable us to follow up and report on any actions taken as a result of the report. The identity of a whistleblower will not be disclosed to anyone other than the persons that are designated by Medius to receive, investigate and act on a whistleblower report. If the whistleblower does not want to receive feedback on the report, that should be clarified upon submittal of the report.

Protection under the policy. Medius does not tolerate any retaliation or unfair actions against any whistleblower who has reported in good faith as described above (unless the whistleblower is guilty of a crime through his or her actions).

A whistleblower may not be held liable for confidentiality breach or for obtaining information if the whistleblower, when reporting, had reasonable grounds to assume that the information about the misconduct was true, and that the reporting of the information was necessary to reveal the reported misconduct. A Whistleblower will however not be discharged from liability for any disclosure of confidential documents to third parties or if the whistleblower is guilty of a crime through his or her actions.

3. Reporting wrongdoing

A whistleblower may report wrongdoing by any of the following means:

- a. Report the wrongdoing to their manager, who will be responsible for escalation of the report to the Whistleblower Committee.
- b. Reach out directly to anyone in the Whistleblower Committee, which consists of:
 - Kristin Widjer, SVP Legal, +46 733 378679, kristin.widjer@medius.com
 - Ahmed Fessi, CTIO, +33 6 27 35 25 57, ahmed.fessi@medius.com
- c. Send an email to whistleblower@medius.com, which is accessed and monitored by the Whistleblower Committee.
- d. Send a letter to:

Att: Kristin Widjer
Medius Whistleblowing
Klarabergsviadukten 90
111 64 Stockholm
Sweden



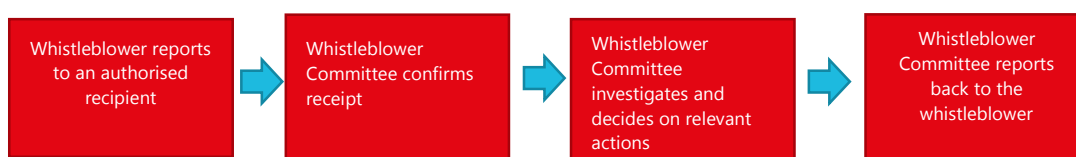
Whistleblowers may request a meeting directly with any member of the Whistleblower Committee.

A whistleblower who wants to report wrongdoing in which a member of the Whistleblowing Committee is involved, should escalate the matter directly to the CEO of Medius.

The Whistleblower Committee will confirm receipt of the report, follow up on the reports and, together with the Medius CEO (or another authorized representative of Medius), take action and report back to the Whistleblower.

4. Internal reporting - procedure for handling reports of wrongdoing

The procedure for handling reports of wrongdoing is as follows.



Receipt of reports

The whistleblower submits a report by one of the means described above (i.e., to their manager or directly to the Whistleblower Committee). The report can be made in writing or verbally and the whistleblower may request a physical meeting to be held within reasonable time. All reports must be provided to the Whistleblower Committee. The Whistleblower Committee shall confirm receipt of the report within seven days from the date of submittal.

Investigations and actions

The Whistleblowing Committee will make a preliminary evaluation and initiate an investigation of the matter. The committee may involve other representatives of Medius to participate in the investigation, provided such persons have suitable experience and competence for the matter and that there are no reasons to believe that the persons may not act independently. The investigation must be carried out without unauthorized disclosure of data and data will only be shared on a strict need-to-know basis. Anyone participating in an investigation must follow the rules of this policy. A whistleblower report must be investigated as soon as possible, taking into account the nature and complexity of the case.

If the report concerns any member of the Whistleblowing Committee, the matter shall be managed by the remaining members of the committee or by the Medius CEO.

When the Whistleblowing Committee has completed the investigation, the committee shall together with the Medius CEO (or any other authorised representative) determine potential and appropriate actions. Such actions may consist of introduction of new routines and trainings, disciplinary actions, referral to law enforcement or additional independent investigations.

Reporting back to the whistleblower



The Whistleblower Committee must, within three months of receipt of the report, provide the whistleblower with information on how the case was managed and what measures and actions that were taken as a result of the investigation.

5. Documentation

Medius must document all reports whether they have been made in writing or verbally. The documentation will be retained as long as necessary but in all events not longer than two years after a matter has been completed.

6. External reporting

A whistleblower may also report any wrongdoing to competent authorities by using external reporting channels. In case of external reporting, the whistleblower benefits from the same protection as in the case of internal reporting.

7. Governance

This policy shall be reviewed annually and updated if necessary. The CEO of Medius has the overall responsibility for the governance and implementation of this policy.

8. Personal data processing

The following requirements apply regarding personal data processing:

- Personal data may only be processed if the processing is necessary to manage a report of wrongdoing and the following investigation or as otherwise required under applicable legislation.
- Personal data may also be processed for other purposes, provided that the data is not processed in a way that is incompatible with the purpose for which it was collected.
- Personal data will only be accessed and processed by persons authorized to manage a report under this policy and access to such data shall only be granted to the extent necessary for such persons to fulfill their duties.
- Personal data that is clearly not relevant to the processing of a particular report will be deleted as soon as possible.
- Medius may share personal data with third persons in relation to a notification to the relevant enforcement authorities due to a suspicion of a crime.
- Personal data related to a report may not be retained for more than two years after finalization of the investigation.

For further information on the processing of personal data related to a) Medius employees, see Medius Privacy policy for employees and contractors, and b) others, see Medius privacy policy, www.medius.com/legal/privacy/

9. Updates of the policy

This policy may be updated from time to time. The latest version of the policy will be available on the intranet (Viva Engage) and on www.medius.com/trust-center/.



Contact

Please contact Kristin Widjer, SVP Legal, (Kristin.widjer@medius.com) or Ahmed Fessi, CTIO, Ahmed.fessi@medius.com if you have any questions related to this whistleblowing policy

