

WHISTLEBLOWING GUIDELINES

At Minova, we are committed to conduct our business with integrity and expect all associates to maintain high standards of business ethics. We encourage everyone to speak-up and report conduct that does not reflect our values or might be unlawful.

How can I raise a concern?

In order to raise any concern please use the link or QR code to reach our Whistleblower Software channel. It allows to report any misconduct in either written form or by audio recording. Our software will assign a case number and password which allows for follow-up. We assure that genuine concerns reported honestly can be raised without the fear of any retaliation.

What concerns should be raised?

Any reasonable suspicion of misconduct as follows:

- (i) **breach of our Code of Conduct**, such as fraud, theft, bribery and corruption, conflicts of interest or violation of antitrust, data privacy, trade controls, human rights, or other applicable laws;
- (ii) **non-compliance with our policies and procedures**;
- (iii) issues relating **health and safety or environment**.

The Group Legal Department will handle all reports received via the Whistleblowing Software and will lead the investigation.



How personal data and my identity will be protected?

We treat personal data pursuant to applicable data protection laws. By submitting the report via Whistleblowing Software you consent to the processing of your personal data for the purposes of registering your report, investigating the allegations, meeting the legal obligations, defending or enforcing our rights in courts and regulatory authorities, and others where applicable by laws, and in a manner that is compatible with these purposes. We will protect the identity of people who report concerns. A person's identity (and any information Minova has) will only be disclosed if consent to disclose the information is provided or where the disclosure is required by applicable laws.

How these Guidelines apply?

These Guidelines must be considered in conjunction with the laws of any country in which Minova operates.