

Whistleblowing Policy in Scandi Standard

It is noted that Scandi Standard AB's (publ) (556921-0627) ("Company") shares are listed on NASDAQ Stockholm. This document has been adopted in order to align the work of Corporate Governance and the Internal Control Framework with the requirements imposed by: Swedish Companies Act, the Swedish Annual Accounts Act, the Company's articles of association, directions given by the general meeting, the Swedish Corporate Governance Code and NASDAQ Stockholm Rulebook for Issuers as well as other applicable Swedish and foreign laws, regulations and requirements. This document is in addition to said laws, regulations and requirements although certain provisions thereof are included in this document in order to facilitate their application. Thus, in addition to what is provided for in the above-mentioned laws, regulations and requirements, this document shall apply during the time period until the next review. References herein to the "Company" shall, unless otherwise clear from the context include not only Scandi Standard AB (publ) but also the group in which Scandi Standard AB (publ) is the parent company.

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1 Introduction

Scandi Standard strives to be an open and transparent company with a high business ethic. Whistleblowing is an important tool for maintaining good corporate governance and preserving our stakeholders' (e.g. owners, co-workers and customers) trust in us.

Scandi Standard's Whistleblowing Service helps us to ensure compliance with our values, our Code of Conduct, policies and guidelines in all countries where we operate. Our Whistleblowing Service is available for people outside our organization as well as for our co-workers.

There are many reasons why it can be good to speak up. It may be ethically correct, or necessary on legal or regulatory grounds, and it may be to protect the lives and safety of our co-workers or to minimise the risk of damage to the company's reputation. After reading this document you should know who can use the Scandi Standard's Whistleblowing service, for what purpose, where to find it and how the process works. You should also know what not to report via the Whistleblower service. This policy affects all employees in the Scandi Standard Group. The Whistleblower service is also available through our external Scandi Standard website.

All countries in the Scandi Standard Group are obliged to have a local Whistleblowing service, or use the Group Whistleblowing service if in accordance with local legislation.

1.1 Purpose

Scandi Standard's Whistleblowing service is a way to get early indication regarding risks in the business activities. The service helps to ensure compliance with the company's internal steering documents such as values, Code of Conduct, other codes, policies, instructions and manuals etc. as well as external laws and regulations. All employees are offered a secure and structured way to report in the event of something that is not in line with these internal steering documents and external laws and regulations. This opportunity is also given external stakeholders, via the Scandi Standard website. There are many reasons why it can be good to speak up. It may be ethically correct, or necessary based on external laws and regulations or internal steering documents, to minimise the risk of damage to the company's reputation, or to protect the lives and safety of employees.

1.2 Scope

This Policy applies to all employees, in all countries and in all legal entities in Scandi Standard Group and all other representatives acting on behalf of the company including consultants, auditors, contractors, senior management, and board members of Scandi Standard Group companies. All employees and other representatives are responsible for following this Policy.

Our values and standards are important to us, and we will all have a responsibility to speak up where we see a colleague not living up to them. In most instances, this will require us to have the courage to challenge our colleagues appropriately and politely in respect of the behavior. Sometimes, this option is not possible, and you should then raise the concern with your manager or other suitable person or function within the company, e.g. HR, Group Legal, Group Compliance, Group Sustainability, relevant Policy holder or Country Management.

The anonymous whistleblowing function <https://report.whistleb.com/en/scandistandard> is an alternative way of reporting serious misconduct in cases where you do not feel comfortable reporting through the above mentioned channels. If somebody suspects an abuse of trust or suspected misconduct within our organization, local processes should always be followed first. If this is not possible, the Scandi Standard secure Whistleblowing service is available to our employees, business partners and their employees, as well as other third parties.

All of us can be confident that issues raised via the Whistleblowing service will be reviewed by independent people and when necessary, an investigation will be performed and, under normal circumstances, we will receive feedback within 30 days. Anyone reporting a concern should know that Scandi Standard has a strict non-retaliation policy. This ensures that there are no adverse work-related consequences for any employee who, in good faith, alerts management of possible violations of our Code of Conduct.

2 The Whistleblowing service

Scandi Standard's Whistleblowing Service can be used to alert us of serious risks of misconduct affecting individuals, our company, the society or the environment.

Reported issues can include criminal offences, irregularities and violations or other actions in breach of our Code of Conduct, EU or national laws within a work-related context, for example:

- **Corruption and financial irregularities**; for example, bribes, unfair competition, money laundering, fraud and serious conflicts of interest
- **Health and safety violations**; for example, workplace health and safety violations, serious deficiencies in product safety, serious discrimination and serious harassments
- **Environmental and animal welfare violations**; for example, breaches against animal welfare regulations and illegal treatment of hazardous waste

Matters outside the scope indicated above, e.g. workplace dissatisfaction, should not be reported in the Whistleblowing Service. In these cases, you should contact your immediate manager or the HR department.

Scandi Standard provides both a web-based Whistleblowing Reporting Channel and a telephone answering service for oral reporting. Both alternatives provide for anonymous reporting and is managed by an external party. Metadata connected to a whistleblower (such as their IP address) is not saved. It is not possible to trace an anonymous whistleblower.

It is also possible to schedule a meeting for reporting. A co-worker who reports a situation in accordance with the above may not be subjected to reprisals or other negative treatment due to having filed a report.

The person who is accused is also entitled to be treated correctly. If the accusation cannot be documented, the case will be closed.

Scandi Standard has appointed a Whistleblowing Committee that welcomes reports on situations in accordance with the above, and which is responsible for handling our whistleblowing reports in accordance with this policy and in full confidentiality. The Whistleblowing Committee reports annually, or more often if needed, to the Board of Directors concerning the number of reports received, their categories and actions taken.

Further instructions regarding the whistleblowing process, case management handling etc. can be found in the Whistleblowing Guidelines.

3 Document Directives

3.1 Ownership

Compliance with this Policy is monitored by the Group HR & Communications Director and Group CFO.

This Policy is owned by the by the Group HR & Communications Director.

3.2 Approval

This Policy is reviewed and approved every second year by the Board of Directors.

3.3 Maintenance & Updates

The owner of this Policy is responsible for ensuring that this document is reviewed and updated, as applicable. If updated the owner of the document is responsible for making sure that the updates are communicated to the organization in a suitable way, e.g. via the intranet, all staff meeting etc.

3.4 Accessibility

A current version of this Policy is available to all employees of Scandi Standard AB (publ) and its wholly owned subsidiaries on the intranet. It does not contain any confidential information and can be released to relevant external parties. It should be published on the external Scandi Standard website along with a comprehensive text about its content and to whom it applies.

4 Document Breaches

4.1 Document Deviation

The Board of Directors of Scandi Standard AB (publ) may resolve to deviate from the Whistleblowing Policy if special circumstances justify a deviation. Any deviation to the Policy must be justified and documented.

5 Version

Version No.	Owner	Author	Purpose/Change	Date of approval	Document Reference
5.0	Group HR & Communications Director – Samir Törnblad	Group Communications Manager – Lina Berggrén	Updated to align with EC regulations. Detailed instructions moved to guideline	2026-03-18	Board of Directors meeting minutes
4.0	Group HR & Communications Director – Samir Törnblad	Group Communications Manager – Lina Berggrén & Group HR – Monica Bränn	Updated to meet ESRS requirements	2024-10-24	Board of Directors meeting minutes
3.0	Group HR Director - Karin Jansson	Group HR Director - Karin Jansson	Update of Whistleblowing committee	2022-05-03	Board of Directors meeting minutes no. 8
2.0	Group HR Director - Karin Jansson	Group HR Director - Karin Jansson	NA	2019-12-10	