

# Whistleblower Policy

## 1. Purpose

Nexam Chemical Group is committed to maintaining the highest standards of ethics, integrity, and accountability. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Nexam Chemical Group can address and correct inappropriate conduct and actions.

## 2. Scope

This policy applies to all employees, officers, board members, contractors, suppliers, and any third parties who interact with Nexam Chemical Group.

## 3. Objectives and Targets

Nexam Chemical Group is committed to maintaining the highest standards of ethics, integrity, and accountability

Nexam Chemical aim to ensure that all reports received are responded to within 5 working days and that all reports are investigated and closed within 8 weeks.

## 4. What can be reported

Less serious internal issues should be reported through normal internal reporting procedures.

However, if these are not resolved adequately then these and more serious issues can be reported through this channel. Examples of such issues include, but are not limited to:

- Fraud, corruption, or financial misconduct
- Harassment, discrimination, or abuse of power
- Unsafe workplace practices
- Breaches of legal obligations
- Violations of Nexam Chemical Group's policies or code of conduct
- Environmental damage or safety risks
- Retaliation against whistleblowers

## 5. Reporting Channel

Reports can be made via the following methods:

- **Online Platform:** <https://whistleblowersoftware.com/secure/NexamChemicalGroup>



- **QR Code:**

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### 6. Protection against retaliation

Nexam Chemical Group strictly prohibits retaliation of any kind against individuals who make a report in good faith. Any retaliation will be treated as a serious violation of this policy and subject to disciplinary action.

### 7. Confidentiality

All reports will be handled confidentially to the fullest extent possible. Information will only be shared with individuals essential to the investigation.

### 8. Investigation Process

1. **Acknowledgment:** The report will be acknowledged within 5 business days (unless submitted anonymously).
2. **Assessment:** An initial assessment will determine if a full investigation is warranted.
3. **Investigation:** Carried out promptly, fairly, and objectively by the appropriate internal or external parties.
4. **Outcome:** Findings will be documented, and appropriate action will be taken. Feedback may be provided where feasible and the report closed with 8 weeks.

### 9. Responsibility

The Nexam Chemical Group Sustainability Team is responsible for this policy and future updates.

Furthermore, all staff are responsible for working in compliance with this policy.

### 10. Review

This policy is to be kept under constant consideration and formal reviews are to take place at no longer than two years from the date of signature.

Signed :		Position :	CEO
Name :	Ronnie Törnqvist	Date :	8 <sup>th</sup> April, 2025
Signed :		Position :	Group Regulatory and EHSQ Manager
Name :	Adrian Pepper	Date :	8 <sup>th</sup> April, 2025