

## Whistleblowing Policy

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Current Revision is available in Corporate Intranet

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REV.	Date	Revision Descrip <b>ti</b> on	Author	Controlled	Approved
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## **ENEDO Whistleblowing Policy**

- 1. Introduction and Purpose: ENEDO is committed to maintaining the highest ethical standards and legal compliance. The purpose of this Whistleblowing Policy is to provide a structured framework for employees to report concerns related to unethical behaviour, illegal activities, product safety, or quality issues.
- 2. Reporting Channels: Employees, customers, suppliers are encouraged to report concerns through the specific link available in the 'Whistleblowing' section of the Enedo website
- 3. Confidentiality: ENEDO is dedicated to maintaining the confidentiality of whistleblowers. Information related to the whistleblower and the details of the report will be disclosed only to those directly involved in the investigation, to the extent permitted by law.
- 4. Protection Against Retaliation: ENEDO strictly prohibits retaliation against individuals who report concerns in good faith. Any form of retaliation will be treated as a serious violation of company policy, and appropriate disciplinary action will be taken.
- 5. Investigation Process: Upon receiving a report, ENEDO will initiate a thorough and impartial investigation. The investigation will be conducted by qualified personnel, and efforts will be made to protect the rights of all parties involved. The company is committed to addressing and resolving reported issues in a fair and just manner.
- 6. Non-Retaliation Assurance: Employees can rest assured that reporting concerns will not adversely impact their employment status, benefits, or work environment. ENEDO encourages employees who believe they have faced retaliation for whistleblowing to report such incidents promptly.
- 7. Compliance: This policy complies with all applicable laws and regulations. ENEDO aims to foster a culture of integrity, accountability, and transparency, valuing the contributions of employees in upholding these principles.
- 8. Communication and Training: ENEDO will communicate this policy to all employees and provide training to ensure awareness and understanding. Regular updates and reminders will be issued to reinforce the importance of whistleblowing in maintaining a culture of ethical conduct.
- 9. Record Keeping: Records related to whistleblowing reports, investigations, and outcomes will be securely maintained in compliance with legal requirements.
- 10. Continuous Improvement: ENEDO is committed to regularly reviewing and improving this Whistleblowing Policy to ensure its effectiveness and alignment with evolving best practices.

By adhering to this policy, ENEDO aims to create a work environment where employees feel confident in reporting concerns, contributing to a culture of transparency and accountability.

- 11. Anonymous Reporting: To encourage open communication, ENEDO provides the option for anonymous reporting through the hotline or designated channels. The company recognizes the importance of protecting the identity of whistleblowers who may fear potential repercussions.
- 12. Whistleblower Support Program: ENEDO is committed to providing support to whistleblowers throughout the reporting and investigation process. This includes access to counselling services, legal assistance, and measures to mitigate potential stress or anxiety associated with whistleblowing.



- 13. Reporting Guidelines: Employees are encouraged to provide as much detail as possible when reporting concerns, including dates, times, locations, and individuals involved. Clear and comprehensive information facilitates more effective investigations and resolutions.
- 14. Reporting External Concerns: In situations where employees believe that internal channels are insufficient or inappropriate, ENEDO recognizes the right of employees to report concerns to external regulatory bodies or authorities in accordance with applicable laws.
- 15. Whistleblower Education and Training: ENEDO is committed to educating employees about the importance of whistleblowing through training sessions. Training will cover the policy details, reporting procedures, and the company's commitment to non-retaliation.
- 16. Escalation Protocol: In cases where concerns involve senior management or the designated individuals involved in the investigation, employees have the right to escalate their reports to higher levels of authority within the organization or, if necessary, external bodies.
- 17. Periodic Policy Review: ENEDO will conduct periodic reviews of this Whistleblowing Policy to ensure its relevance and effectiveness. Updates will be made in response to regulatory changes or lessons learned from past incidents.
- 18. Communication of Investigation Outcomes: Upon the conclusion of an investigation, ENEDO will communicate the outcomes to the whistleblower to the extent allowed by law. Transparency in this process reinforces the company's commitment to addressing concerns and upholding ethical standards.
- 19. Legal Compliance: This policy is designed to comply with all relevant national and international laws and regulations governing whistleblowing, ensuring that ENEDO operates within the boundaries of legal frameworks.
- 20. Reporting Metrics: ENEDO will maintain metrics related to whistleblowing reports, investigations, and resolutions. These metrics will be used for continuous improvement and to demonstrate the company's commitment to accountability and transparency.
- 21. Continuous Employee Feedback Mechanism: ENEDO will implement a continuous feedback mechanism for employees to share their experiences with the whistleblowing process. Feedback will be used to make ongoing improvements to the policy, ensuring it remains responsive to the evolving needs of the workforce.
- 22. Global Application: Recognizing the global nature of the electronic industry, this policy applies to all ENEDO employees, regardless of their location. The company is committed to upholding consistent standards of ethical behaviour across all its operations worldwide.
- 23. Whistleblowing Policy Accessibility: The whistleblowing policy will be easily accessible to all employees through the company's intranet, and other relevant communication channels. This ensures that employees can readily refer to the policy whenever needed.
- 24. Annual Whistleblowing Report: ENEDO will publish an annual whistleblowing report summarizing the number and nature of reported concerns, investigations conducted, and actions taken. This report will be made available to demonstrate the company's commitment to transparency.
- 25. Continuous Legal Compliance Monitoring: The company will continuously monitor changes in laws and regulations related to whistleblowing to ensure ongoing compliance. Any necessary adjustments to the policy will be made promptly to reflect legal requirements.
- 26. Whistleblowing Policy Acknowledgment: Upon joining the company, employees will be required to acknowledge their understanding of the whistleblowing policy. This acknowledgment ensures that employees are aware of the reporting mechanisms and their rights as whistleblowers.



- 27. External Whistleblowing Platform: ENEDO may explore the use of external whistleblowing platforms to provide employees with an additional avenue for reporting concerns, particularly for those who may be uncomfortable using internal channels.
- 28. Whistleblower Advocacy Program: The company may establish a whistleblower advocacy program to provide ongoing support to individuals who have reported concerns. This program could include mentoring, counselling, and assistance in addressing any challenges faced by whistleblowers.
- 29. Inclusion in Supplier Contracts: ENEDO may include clauses in supplier contracts requiring adherence to ethical standards and the reporting of concerns. This extends the whistleblowing framework to the company's broader network and reinforces the commitment to ethical conduct throughout the supply chain.
- 30. Research and Development Oversight: Given the nature of the electronic industry, special attention will be given to whistleblowing within research and development. This includes establishing protocols to address concerns related to intellectual property, research integrity, and innovation ethics.

By implementing these advanced measures, ENEDO aims not only to have a robust whistleblowing policy but also to cultivate a workplace where employees actively participate in upholding ethical standards, culture of integrity and transparency, fostering innovation, continuous improvement and contributing to the long-term success and sustainability of the company.

ENEDO is dedicated to fostering a workplace environment built on trust, integrity, and ethical behaviour. This comprehensive Whistleblowing Policy reflects the company's commitment to addressing concerns responsibly and maintaining a culture of transparency and accountability.