

DOCUMENT TITLE:

Global Whistleblower Policy

Table of contents

1	Purpose	2
2	Scope	3
3	Principles and Whistleblower Protection	4
4	Roles and Responsibility	5
5	Procedure	6
6	Confidentiality and Anonymity	8
7	Unfounded or False Allegations	9
8	Personal Data	9

DOCUMENT TITLE:

Global Whistleblower Policy

1 Purpose

This Global Whistleblower Policy (the “**Policy**”) sets out how PolyPeptide Group AG, together with its consolidated subsidiaries, (“**PolyPeptide**”) support whistleblowers so that they can safely express their concerns, know who to contact, understand how to make a report and know the protections available to them.

PolyPeptide Laboratories (Sweden) AB (“**PolyPeptide Sweden**”) and PolyPeptide SA (“**PolyPeptide Belgium**”) have established separate whistleblower programs in accordance with the respective national legislation governing whistleblower protection:

- PolyPeptide Sweden has adopted its program pursuant to the Swedish whistleblower act.¹ Further details are set out in **Appendix 1**.
- PolyPeptide Belgium has adopted its program pursuant to the Belgian whistleblower act.² Further details are set out in **Appendix 2**.

For matters concerning PolyPeptide Sweden and PolyPeptide Belgium, whistleblower reports should be submitted via the dedicated PolyPeptide Sweden and PolyPeptide Belgium whistleblower hotlines. For all other PolyPeptide subsidiaries, whistleblower reports should be submitted through the Global whistleblower hotline (see section 5 below).

The principles set out in this Policy apply to all PolyPeptide subsidiaries, including PolyPeptide Sweden and PolyPeptide Belgium, except to the extent that specific provisions in Appendices 1 and 2 provide otherwise. Where such differences exist, they are clearly marked within the relevant sections of this Policy using inline notes marked in green, so readers can easily identify when a provision is subject to local variation.

Introduction

PolyPeptide strives to remain focused on the needs of its customers and its business, while adhering to fundamental principles of ethics and compliance. The foundation of this commitment is the Code of business conduct and ethics (“**Code of Conduct**”), which is mandatory for all employees across PolyPeptide.

PolyPeptide’s managers have leadership responsibilities for setting a good example, encouraging an environment of open and honest communication without fear of retaliation, and taking prompt action when ethical or compliance issues are brought to their attention.

PolyPeptide’s whistleblower programs are an important element in detecting corrupt, illegal or other unethical conduct. PolyPeptide strongly encourages whistleblowers to **speak up** if they observe, have knowledge of or suspect any matters of concern.

PolyPeptide takes all reports made under this Policy seriously.

¹ Lagen om skydd för personer som rapporterar om missförhållanden.

² Loi du 28 novembre 2022 relative à la protection des personnes qui signalent des violations du droit de l’Union ou du droit national constatées dans le cadre d’une relation professionnelle dans le secteur privé.

DOCUMENT TITLE:

 Global Whistleblower Policy

PolyPeptide’s Board of Directors, with the support of the Audit and Risk Committee (“**ARC**”), urges whistleblowers who have observed or have knowledge of actual or reasonably suspected corrupt, illegal or other unethical conduct to use the whistleblower programs. Whistleblowers are encouraged to report such concerns and suspicions via the designated, autonomous and independent whistleblower hotlines as soon as possible, knowing that they can do so without fear of intimidation, harassment, retaliation, reprisals, discrimination or adverse employment consequences because of such report.

This Policy sets out the way in which whistleblowers may raise any concerns that they have through the whistleblower programs and how those concerns are dealt with. If a whistleblower is uncertain as to whether something is within the scope of this Policy, the whistleblower should seek advice from their manager, local HR department or their contact person at PolyPeptide.

Who is a whistleblower?

A whistleblower is someone who reports actual concerns or reasonable suspicions about corrupt, illegal or other unethical conduct, which have occurred or are very likely to occur, and about attempts to conceal such corrupt, illegal or other unethical behaviors.

A whistleblower can be a current or former employee of PolyPeptide, including (but not limited to) individuals performing functions in relation to PolyPeptide, such as agency workers and contractors, suppliers, business partners and other external parties with a connection to PolyPeptide.

2 Scope

The whistleblower programs cover reporting of breaches of applicable laws, breaches of internal policies and procedures within PolyPeptide, and other matters, including (but not limited to) the following:

- Criminal offences, including fraud, embezzlement, misuse of assets, forgery of documents, accounting manipulation, bribery, corruption and money laundering
- Competition law breaches
- Violations of applicable laws, legislations or regulations
- Breaches of occupational health and safety legislations
- Infringements of environmental regulations and pollution of the environment
- Breaches of internal guidelines at PolyPeptide
- Workplace conflicts, such as bullying, harassment, discrimination, physical violence, threats and sexual abuse.³

³ This section is without prejudice to applicable local legislations and/or local procedures/policies across each of PolyPeptide’s subsidiaries. Specifically, reference is made to the Sexual Harassment Prevention Policy applicable to PolyPeptide Laboratories Priv. Ltd. Complaints regarding sexual harassment in the workplace in India received through the whistleblower program must and will be referred to and handled by the Internal Complaints Committee in accordance with Indian law. In addition, reference is made to the Belgian legislation on (sexual) harassment, violence and discrimination at the workplace and the applicable specific legal procedures, as well as applicable local policies, for such claims and/or violations.

DOCUMENT TITLE:

Global Whistleblower Policy

The above are examples only. If whistleblowers are in doubt as to whether or not their report falls within the scope of the whistleblower programs, they are, nevertheless, encouraged to use PolyPeptide's whistleblower programs. The report is assessed, and the whistleblower receives feedback on whether their report is covered by the whistleblower programs.

Other matters, including HR matters, complaints about other employee's behavior or incompetence, dissatisfaction with salary conditions, including minor breaches of PolyPeptide's internal guidelines on sick leave, alcohol intake etc. are not covered by the scope of the whistleblower programs. These types of matters must be raised in a dialogue with an intermediate manager or the local HR department.

The whistleblower programs must not be used to report events that pose an immediate threat to life or health. If urgent help is needed, the public emergency services should be immediately contacted.

Note: For PolyPeptide Sweden, this paragraph is subject to specific provisions outlined in Appendix 1.

3 Principles and Whistleblower Protection

Everyone who works in or works with PolyPeptide should be aware of the importance of preventing and eliminating corrupt, illegal or other unethical conduct, whether at work or in the course of doing business. PolyPeptide's Code of Conduct sets out the values and expectations with which it conducts business. PolyPeptide encourages employees and business partners to be watchful for corrupt, illegal or other unethical conduct and report anything of that nature that they become aware of. All information is kept confidential to the fullest extent possible.

PolyPeptide does not tolerate harassment and retaliation against whistleblowers. No whistleblower will be victimized for raising a matter through the whistleblower programs as long as they have raised a legitimate concern in good faith.

A whistleblower who makes such a report via the whistleblower programs has the right not to be dismissed, subjected to any other detriment, or victimized because they have made a report. This protection applies from the moment a report is made and continues for as long as there is a risk of detrimental treatment or retaliatory measures connected to the report, in accordance with applicable local laws. If a whistleblower believes that they have suffered any such treatment or other retaliatory acts, they should immediately inform the Chief Legal Officer ("**CLO**") or Head of Internal Audit ("**Head of IA**") of PolyPeptide.

Note: For PolyPeptide Sweden and PolyPeptide Belgium, this paragraph is subject to specific provisions outlined in Appendices 1 and 2.

No one within PolyPeptide, including management and other employees, may threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

DOCUMENT TITLE:

Global Whistleblower Policy

Any instruction to cover up wrongdoing or obstructing whistleblowers from reporting will not be tolerated and is itself subject to disciplinary action.⁴

PolyPeptide does not accept reports via the whistleblower programs that are intentionally incorrect or contain misleading information. If an employee knowingly makes a false report or makes a report in bad faith, it can result in negative employment law consequences, including termination of employment.

4 Roles and Responsibility

I. CLO and Head of IA

The CLO has the overall responsibility for this Policy. The CLO is responsible for the Global whistleblower program and for reviewing the effectiveness of actions taken in response to concerns raised under the Global whistleblower program.

The CLO and Head of IA⁵ are responsible for deciding whether investigations of whistleblower reports shall be conducted, and, in the affirmative, whether the investigation shall be conducted internally and/or with external assistance. The CLO and Head of IA are also responsible for:

- Proper management of the Global whistleblower program and diligent follow-up on whistleblower reports concerning PolyPeptide subsidiaries, with the exception of PolyPeptide Sweden and PolyPeptide Belgium
- Maintaining a Global whistleblower procedure for describing the process for handling whistleblower reports, including internal investigations of whistleblower reports
- Ensuring that whistleblower reports are handled in compliance with applicable rules and this Policy
- Maintaining an overview of received whistleblower reports
- Quarterly reporting to the ARC and the Board of Directors about the number of reports handled, and notifying the chairs of the ARC and the Board of Directors in case a whistleblower report concerns matters regarding fraud, bribery or corruption.

The CLO must ensure that all managers and other individuals who may deal with concerns or investigations under this Policy as well as the PolyPeptide Sweden and PolyPeptide Belgium whistleblower programs receive regular and appropriate training.

The CLO reviews this Policy, including its Appendices, from a legal and operational perspective at least every third year.

Note: For PolyPeptide Sweden and PolyPeptide Belgium, the responsibilities outlined in this subsection I differ, as detailed in Appendices 1 and 2.

⁴ In Belgium, disciplinary sanctions follow the procedures set out in the Work Regulations.

⁵ If the CLO is absent, the responsibility will lie with the Head of IA. If the Head of IA is absent, the responsibility will lie with the CLO. If (i) neither the CLO or Head of IA are available or (ii) either the CLO or Head of IA have a conflict of interest, the responsibility will lie with the ARC. If the ARC are unavailable, or if the report concerns the ARC, the responsibility will lie with PwC (as administrator of the whistleblower hotlines).

DOCUMENT TITLE:

Global Whistleblower Policy

II. PwC

Whistleblower reports submitted through the hotlines are received by an external third party, PwC (*PwC Statsautoriseret Revisionspartnerselskab*, “**PwC**”). PwC is an independent audit, tax and advisory firm that receives reports submitted through the whistleblower hotlines on behalf of PolyPeptide to ensure independent and potentially anonymous reports.

For reports submitted through the whistleblower hotlines, PwC makes a preliminary assessment of whether the report falls within the scope of the whistleblower programs. PwC then assesses who can handle the whistleblower report in PolyPeptide impartially and competently, ensuring the report is not forwarded to a person whom the whistleblower report directly or indirectly relates to, or where there may be a risk of conflict of interest.

III. Employees

All employees of PolyPeptide are obliged to collaborate loyally and ethically during investigations of whistleblower reports.

5 Procedure

PolyPeptide encourages whistleblowers to speak up and report corrupt, illegal or other unethical conduct by taking the following steps:

I. STEP 1 – Reporting

The whistleblower needs to provide the following information through the whistleblower hotlines:

- the nature of concern and why they believe it to be true;
- the background and history of the concern; and
- any other relevant information and documentation supporting the allegation or suspicion.

The whistleblower hotlines offer the option to record the report as a voice message.

Whistleblowers have the right to request a physical meeting to submit their report. Such a request can be made through the hotlines, and a meeting will be arranged.

For matters concerning PolyPeptide Sweden, reports have to be submitted via the [PolyPeptide Sweden Whistleblower Hotline](#).

For matters concerning PolyPeptide Belgium, reports have to be submitted via the [PolyPeptide Belgium Whistleblower Hotline](#).

For all other PolyPeptide subsidiaries, the [PolyPeptide Global Whistleblower Hotline](#) has to be used.

DOCUMENT TITLE:

Global Whistleblower Policy

II. STEP 2 – Handling of reports and investigation

For reports received through the whistleblower hotlines, PwC makes a preliminary assessment of whether the report is covered by the scope of the whistleblower programs. PwC then evaluates who should receive the whistleblower report at PolyPeptide in order to ensure that the whistleblower report is handled by an impartial and competent person, and, importantly, that it is not forwarded to the person that the whistleblower report directly or indirectly relates to, or where there may be a risk of conflict of interest. PwC confirms the receipt of the report directly to the whistleblower within seven (7) days of receiving the report.

If the report does not fall within the scope of the whistleblower programs, PwC forwards it to PolyPeptide with a notice to this effect, along with a notice that there is no basis for processing the report, which must then be deleted.

If the report falls within the scope of the whistleblower programs and there is a basis for conducting an investigation, PwC forwards the report to PolyPeptide, who determines the appropriate steps to take and whether an investigation of the matter will be initiated.

Note: For PolyPeptide Sweden and PolyPeptide Belgium, this paragraph is subject to specific provisions outlined in Appendices 1 and 2.

Upon receipt of a report from PwC as outlined above, PolyPeptide may conclude and recommend the following based on an investigation:

- The investigation be closed if the report is unfounded.
- The investigation be closed by giving a reprimand/warning.
- The investigation be closed with an expulsion/dismissal of an employee.
- The investigation be closed with a recommendation to change policies, procedures or guidelines.
- The investigation be handed over to the police for further investigation.

Note: For PolyPeptide Belgium, this paragraph is subject to specific provisions outlined in Appendix 2.

Any matter raised under this Policy is investigated thoroughly, promptly and confidentially.

The investigation may include the whistleblower and other individuals involved giving a written statement.

The whistleblower may invite their trade union or professional association representative to be present for support during any meetings or interviews in connection with the concerns they have raised. The person supporting the whistleblower must respect the confidentiality of the report and any subsequent investigation.

DOCUMENT TITLE:

 Global Whistleblower Policy

Upon conclusion of any investigation, the whistleblower is told the outcome of the investigation and what has been done, or proposed to do, about it. If no action is to be taken, the reason for this is explained. This feedback must be given to the whistleblower within three (3) months of receipt of the report.

PolyPeptide aims to keep the whistleblower informed of the progress of the investigation and its likely timeline. However, sometimes the need for confidentiality may prevent PolyPeptide from giving the whistleblower specific details of the investigation or of any disciplinary action taken as a result. The whistleblower shall treat any information about the investigation as confidential.

III. **STEP 3 – Reports outside the scope of the whistleblower programs**

Reports and information judged to fall outside the scope of the whistleblower programs are destroyed in accordance with applicable laws and regulations on data protection and consequently not processed according to the procedures applicable for the whistleblower programs and within this Policy (see section 8 *Personal Data* below).

IV. **STEP 4 – Reporting to authority**

While whistleblowers are encouraged to report to PolyPeptide’s whistleblower hotlines, they may also choose to use the external reporting channels set up by the authorities in their country. Below are examples of national authorities that may handle whistleblowing reports:

- Belgium – [Autorité de protection des données](#)
- Denmark – [Datatilsynet](#)
- France – [Défenseur des droits](#)
- Sweden – [Integritetsskyddsmyndigheten \(IMY\)](#), [Arbetsmiljöverket](#), [Konkurrensverket](#) or [Finansinspektionen](#)
- United States – [US Food and Drugs Administration](#)

The list is not exhaustive. The relevant authority depends on the country and the nature of the misconduct. Whistleblowers should always consult information from local government to identify the correct authority for their specific concern.

A full list of designated competent authorities for each EU member state can be found on the European Commission’s website.

6 Confidentiality and Anonymity

All information and the identity of the whistleblower are safeguarded and kept confidential to the greatest possible extent. The whistleblower has the right to be anonymous.

The whistleblower hotlines are operated by PwC through a secured web-based platform, independent from PolyPeptide and its IT infrastructure. Specifically, PolyPeptide is not able to access the web-based platform or any reports contained therein.

DOCUMENT TITLE:

Global Whistleblower Policy

PolyPeptide encourages every whistleblower to disclose their identity when reporting. Proper investigation may be more difficult or impossible if PolyPeptide cannot obtain further information from the whistleblower. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to PwC through the whistleblower hotlines so that appropriate measures can then be taken to preserve confidentiality.

However, if the whistleblower wants to raise their concern anonymously, PolyPeptide, through PwC, ensures to keep the whistleblower's identity anonymous. If it is necessary for the PolyPeptide representative investigating the concern to know the whistleblower's identity, this will be discussed with the whistleblower through PwC ahead of time, and the identity of the whistleblower will not be shared with the respective PolyPeptide representative without the prior consent from the whistleblower.

7 Unfounded or False Allegations

If a whistleblower makes a report in good faith and reasonably believes their concern to be true, but the concern is not confirmed by the investigation or proves to be unfounded, PolyPeptide will recognize their concern and the whistleblower will have nothing to fear and will not be subject to any negative consequences, including consequences of an employment law nature.

If, however, a whistleblower makes an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

Making a false allegation and recurring reports by the same person regarding a matter that has already been investigated without a change in the circumstances may have disciplinary, civil and/or criminal law consequences.

8 Personal Data

Personal data and information submitted through the whistleblower programs is processed for the purpose of establishing the whistleblower programs at PolyPeptide, which can be used for reporting potential criminal offences and/or irregularities to PolyPeptide. All processing and storage of data resulting from this Policy is made in accordance with applicable laws and regulations on data protection.

The legal basis for investigating any unethical and/or illegal conduct or activity, irregularities, wrongdoing or dangers at PolyPeptide is to prevent and avert impermissible conduct and activities. It also includes the processing of personal for this purpose. This legal basis is derived from Regulation (EU) 2016/679 ("GDPR"), specifically:

- Article 6 (1) on the processing of personal data,
- Article 9 (2) on the processing of special categories of personal data, and
- Article 10 on personal data relating to criminal convictions and offences.

DOCUMENT TITLE:

Global Whistleblower Policy

Processing personal data is necessary for PolyPeptide to pursue its legitimate interest in investigating any criminal offenses or other unlawful conduct reported through the whistleblower programs.

PolyPeptide collects and processes personal data for the purpose of pursuing the legitimate interests of PolyPeptide to ensure compliance with applicable laws across all of PolyPeptide's operations. This is in accordance with point f in Article 6(1) under the GDPR.

PolyPeptide collects and processes personal data of the whistleblower for the purpose of complying with legal requirements in order to meet a legal obligation imposed by law, by regulation and/or national rules specific for the reported matter. This is in accordance with point c in Article 6(1) under the GDPR.

PolyPeptide collects and processes the following personal data in accordance with the outlined purpose and legal basis:

- Information regarding the reported matter, including potential breach of law, criminal offence or violations of internal policies, procedures and guidelines at PolyPeptide.
- Documents, information or evidence supporting the reported matter, and other information relevant to the investigation of the matter.
- The whistleblower's name, e-mail and telephone number, including other potential identifiable personal information (to the extent provided).
- Names of any persons mentioned in the whistleblower report, including other potential identifiable personal information, and names of persons within PolyPeptide or outside PolyPeptide who know or may know about the reported matter.

Transfer of personal data to third countries may occur when PolyPeptide transfers data to its subsidiaries in the US or India, or if the report concerns a sexual harassment case concerning employees working for or affiliated to the subsidiary in India. The basis for the transfer to India will be the EU Commission's standard contract for transferring data to a controller outside the EU.

Those PolyPeptide subsidiaries to which the GDPR is not directly applicable generally apply the same standards towards the protection of individuals' personal data as set out in the GDPR, and those subsidiaries apply any applicable local laws relating to personal data protection.

When a whistleblower's personal data is registered, they have the following rights:

- The right to be informed about the collection of personal data.
- The right to request access to personal data.
- The right to request that personal data be corrected or deleted, including request that processing is restricted if the whistleblower, for example, believes that the information is wrong.

DOCUMENT TITLE:

Global Whistleblower Policy

Personal data is processed in a manner that is compatible with the purposes of this Policy and personal data is not retained longer than necessary in relation to those purposes. Further, all personal data is processed in a manner that ensures appropriate security of the data. Personal data, including Personal data electronically stored, is deleted immediately after the completion of an initial assessment if it turns out that the whistleblower report is not within the scope of the whistleblower programs or overtly unfounded. If an actual investigation is initiated on the basis of the whistleblower report and if it turns out that the whistleblower report is unsubstantiated, personal data, including Personal data electronically stored, is deleted within six (6) months after the investigation has been completed. If an actual investigation is initiated on the basis of the whistleblower report and if it turns out that the whistleblower report is substantiated, personal data, including Personal data electronically stored, is deleted within two (2) years after the investigation has been completed. Personal data in substantiated reports that contain information that may lead to disciplinary, civil or criminal responsibility are kept until the conclusion of the respective proceedings or as per the requirements of the applicable law.

The person whose data is being processed, shall be notified of such processing as soon as possible. The notification shall include, *inter alia*, information on the personal data being processed, the duration of the processing and the rights conferred on the person whose data is being processed under applicable laws and regulations.

Reference is made to PolyPeptide's Data Privacy Policy.

The person whose data is being processed also has the right to submit a complaint with the relevant independent authority that supervises compliance with the rules on protection of personal data.

The complete list of European supervisory authorities can be found at https://edpb.europa.eu/about-edpb/about-edpb/members_en.

The relevant supervisory authority in the United States is the California Privacy Protection Agency (CPPA).

The relevant supervisory authority in India is Data Protection Authority of India.

26 May 2026

Appendices:

- Appendix 1 – PolyPeptide Sweden Whistleblower Program
- Appendix 2 – PolyPeptide Belgium Whistleblower Program

Appendix 1: PolyPeptide Sweden Whistleblower Program

This appendix sets out the specific provisions applicable to PolyPeptide Sweden, pursuant to the Swedish Whistleblower Act (*Lag (2021:890) om Skydd för personer som rapporterar om missförhållanden*). Where the provisions of this appendix differ from the Global Whistleblower Policy, this appendix shall take precedence for all matters concerning PolyPeptide Sweden.

2 Scope

The PolyPeptide Sweden whistleblower program covers the reporting of work-related misconduct or wrongdoing (*missförhållanden*) where there is a public interest (*allmänintresse*) in the information being disclosed.

This includes, but is not limited to, the examples listed in Section 2 of the Global Whistleblower Policy, such as criminal offences, breaches of applicable law, infringements of environmental or safety regulation, serious harassment, discrimination, or other significant deviations from internal policies.

Matters that relate exclusively to the own employment situation, such as individual salary disputes or minor workplace disagreements, are generally not considered to be of public interest and should be raised with the manager or the local HR department.

3 Principles and Whistleblower Protection

A whistleblower who makes such a report via the PolyPeptide Sweden whistleblower program has the right not to be dismissed, subjected to any other detriment, or victimized because they have made a report. Whistleblowers are protected from retaliation from the time of reporting and for as long as there is a potential risk of detrimental treatment or retaliatory measures connected to the report, in accordance with applicable Swedish law. If a whistleblower believes that they have suffered any such treatment or other retaliatory acts, they should immediately inform PolyPeptide Sweden's Local Head of HR.

4 Roles and Responsibility

I. PolyPeptide Sweden's Local Head of HR

PolyPeptide Sweden's Local Head of HR, together with PolyPeptide's CLO, have the overall responsibility for the PolyPeptide Sweden whistleblower program. PolyPeptide Sweden's Local Head of HR is responsible for reviewing the effectiveness of actions taken in response to concerns raised under the PolyPeptide Sweden whistleblower program.

PolyPeptide Sweden's Local Head of HR⁶ is responsible for deciding whether investigations of whistleblower reports shall be conducted, and, in the affirmative, whether the investigation shall be conducted internally and/or with external assistance.

⁶ If PolyPeptide Sweden's Local Head of HR is absent, or if the report concerns PolyPeptide Sweden's Local Head of HR, the responsibility will lie with PolyPeptide Sweden's Local Finance Director. If PolyPeptide Sweden's Local Finance Director is absent, or if the report concerns PolyPeptide Sweden's Local Finance Director, the responsibility will lie with PwC (as administrator of the whistleblower hotlines).

PolyPeptide Sweden's Local Head of HR is also responsible for:

- Proper management of the PolyPeptide Sweden whistleblower program and diligent follow-up on whistleblower reports concerning PolyPeptide Sweden
- Maintaining a PolyPeptide Sweden whistleblower procedure, with notice to the CLO, for describing the process for handling whistleblower reports, including internal investigations of whistleblower reports
- Ensuring that whistleblower reports are handled in compliance with applicable rules, the Global Whistleblower Policy and the PolyPeptide Sweden Whistleblower Program
- Maintaining an overview of received whistleblower reports
- Quarterly reporting to the ARC and the Board of Directors, through the CLO, about the number of reports handled, and notifying the chairs of the ARC and the Board of Directors, through the CLO, in case a whistleblower report concerns matters regarding fraud, bribery or corruption.

5 Procedure

II. STEP 2 – Handling of reports and investigation

If the report falls within the scope of the whistleblower programs and there is a basis for conducting an investigation, PwC forwards the report to PolyPeptide Sweden's Local Head of HR, who determines the appropriate steps to take and whether an investigation of the matter will be initiated. In assessing the report, PolyPeptide Sweden's Local Head of HR may consult or seek guidance from the CLO and/or the Head of IA of PolyPeptide.

Appendix 2: PolyPeptide Belgium Whistleblower Program

This appendix sets out the specific provisions applicable to PolyPeptide Belgium, pursuant to the Belgian Whistleblower Act (*Loi du 28 novembre 2022 relative à la protection des personnes qui signalent des violations du droit de l'Union ou du droit national constatées dans le cadre d'une relation professionnelle dans le secteur privé*). Where the provisions of this appendix differ from the Global Whistleblower Policy, this appendix shall take precedence for all matters concerning PolyPeptide Belgium.

3 Principles and Whistleblower Protection

A whistleblower who makes such a report in good faith via the PolyPeptide Belgium whistleblower program has the right not to be dismissed, subjected to any other detriment, or victimized because they have made a report. This protection applies from the moment the report is submitted and continues for as long as there is any risk of detrimental treatment or retaliatory measures connected to the report, in accordance with applicable Belgian law. If a whistleblower believes that they have suffered any such treatment or other retaliatory acts, they should immediately inform PolyPeptide Belgium's Local Head of HR.

4 Roles and Responsibility

I. PolyPeptide Belgium's Local Head of HR

PolyPeptide Belgium's Local Head of HR, together with PolyPeptide's CLO, have the overall responsibility for the PolyPeptide Belgium whistleblower program. PolyPeptide Belgium's Local Head of HR is responsible for reviewing the effectiveness of actions taken in response to concerns raised under the PolyPeptide Belgium whistleblower program.

PolyPeptide Belgium's Local Head of HR⁷ is responsible for deciding whether investigations of whistleblower reports shall be conducted, and, in the affirmative, whether the investigation shall be conducted internally and/or with external assistance. PolyPeptide Belgium's Local Head of HR is also responsible for:

- Proper management of the PolyPeptide Belgium whistleblower program and diligent follow-up on whistleblower reports concerning PolyPeptide Belgium
- Maintaining a PolyPeptide Belgium whistleblower procedure, with notice to the CLO, for describing the process for handling whistleblower reports, including internal investigations of whistleblower reports
- Ensuring that whistleblower reports are handled in compliance with applicable rules, the Global Whistleblower Policy and the PolyPeptide Belgium Whistleblower Program
- Maintaining an overview of received whistleblower reports
- Quarterly reporting to the ARC and the Board of Directors, through the CLO, about the number of reports handled, and notifying the chairs of the ARC and the Board of Directors, through the CLO, in case a

⁷ If PolyPeptide Belgium's Local Head of HR is absent, or if the report concerns PolyPeptide Belgium's Local Head of HR, the responsibility will lie with PwC (as administrator of the whistleblower hotlines).

whistleblower report concerns matters regarding fraud, bribery or corruption.

5 Procedure

II. STEP 2 – Handling of reports and investigation

If the report falls within the scope of the whistleblower programs and there is a basis for conducting an investigation, PwC forwards the report to PolyPeptide Belgium's Local Head of HR, who determines the appropriate steps to take and whether an investigation of the matter will be initiated. In assessing the report, PolyPeptide Belgium's Local Head of HR may consult or seek guidance from the CLO and/or the Head of IA of PolyPeptide. PolyPeptide Belgium's Local Head of HR may, where appropriate, delegate tasks related to the investigation of a report to PolyPeptide's CLO and/or the Head of IA, provided that the local entity ensures compliance with Belgian legal requirements including confidentiality, independence, and timely feedback to the whistleblower.

Upon receipt of a report from PwC as outlined above, the following may be concluded based on an investigation:

- The investigation be closed if the report is unfounded.
- The investigation be closed if the report is substantiated.
- The investigation be closed with a recommendation to change policies, procedures or guidelines.
- The investigation be handed over to the police for further investigation.

The written investigation report must not include recommendations for disciplinary measures or sanctions (e.g., reprimand, dismissal).

9 Works Council Consultation

In line with Belgian law, the Works Council of PolyPeptide Belgium was consulted during the preparation of the PolyPeptide Belgium Whistleblower Program.

The draft Policy was shared with the Works Council. A consultation meeting took place on 7 May 2026, and feedback was duly considered and documented.

Records of the consultation, including meeting notes and agreed changes, are maintained by HR and Legal for compliance purposes.

Future amendments will follow the same consultation process.