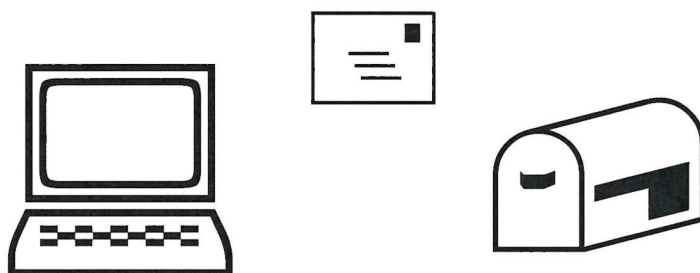


Whistleblowing and processing reports at SERTO Group



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1. Introduction and scope

Strict observance of the legality principle and responsible, fair and sustainable business dealing are fundamentally important for our company and form an integral part of SERTO's values. We are firmly persuaded that only by adopting such commercial behaviour can we achieve enduring success. Against the backdrop of global competition, however, we cannot achieve this goal unless we act together with our business partners. For this reason, we expect of you that you will comply with the full extent of the law, human rights, and environmental and social standards, at every step of the delivery chain.

Breaches of applicable laws or internal regulations represent a genuine threat to the company's long-term survival. These breaches can harm the company's reputation and have serious consequences such as having to pay damages or penalties and losing orders. People who are involved in such misconduct are not only risking consequences under employment law, but may also be faced with claims for compensation or criminal proceedings. Reporting potential breaches in good time is essential if we are to avoid this kind of negative ramification.

The SERTO whistleblower system, which is available via the channels described below, functions as an early warning system. It allows potential breaches of applicable laws and internal regulations to be reported. The central compliance organisation is responsible for the whistleblower system, under the authority of the company management. All reports received will be investigated promptly. If a breach is identified during these investigations, that breach will be rectified immediately and appropriate measures will be taken to prevent similar breaches in the future.

These rules of procedure set out the principles applied at SERTO to reports from whistleblowers. Multiple legal requirements are taken into account in this respect, including the provisions of the EU Directive 2019/1937 on the Protection of Whistleblowers and the Law on the Duty of Care in the Supply Chain (LkSG).

The bodies responsible for processing reports from whistleblowers have also issued internal provisions and guidelines. These rules define the internal handling process and the persons responsible.

2. Whistleblowing

2.1. Who can report?

Any person or organisation with information concerning a potential failure to observe applicable laws or internal regulations can report a potential breach within the company or even at any point in the entire delivery chain.

2.2. Where can reports be filed?

Reports can be filed via the following channels with the reporting centre run by Compliance Management:

2.2.1. E-mail

Incidents can be reported to Compliance-Whistleblowing@serto.com. One of the two Compliance Officers will confirm receipt and set the process in motion.

2.2.2. Letter

Incidents of which there is evidence can be reported to the following contact address:

STRICTLY CONFIDENTIAL
 SERTO AG
 Compliance Management
 Langfeldstrasse 117
 CH-8500 Frauenfeld, Switzerland

2.2.3. In person

E-mail Compliance-Whistleblowing@serto.com to book an appointment in advance or approach one of our two Compliance Officers (HR SERTO AG, QML Director).

2.3. What can be reported?

In general, reports can be filed of any suspected failure to observe applicable law and internal regulations. In addition, reports of potential misconduct by business partners, in particular the behaviour of suppliers where there are human rights-related or environment-related risks involved, can be reported.

The following issues in particular can be reported:
 Examples

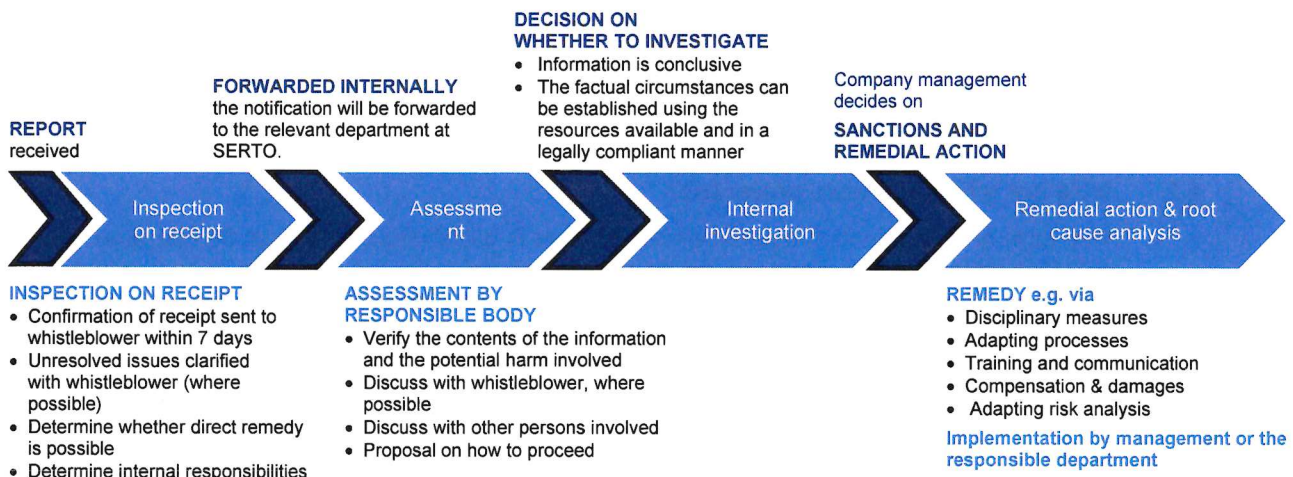
- ▶ potential failures by SERTO Group employees to observe applicable law (e.g. legislation or decrees) or internal regulations (e.g. the Code of Conduct),
- ▶ potential breaches by business partners of applicable law or the Code of Conduct for business partners of the SERTO Group,
- ▶ potential human rights-related or environment-related risks that can be allocated to the SERTO Group or its direct or indirect suppliers, and breaches of human rights and environmental obligations under the Swiss Supply Chain Duty of Care Law (LkSG).

2.4. Can reports also be made anonymously?

SERTO allows for anonymous reporting. The Compliance Officers anonymise all reports received to guarantee that whistleblowers will be protected and will remain anonymous. It is important for SERTO to know the identity of whistleblowers in order to settle any follow-up questions and to inform them of which further steps are being taken. Data protection guidelines are observed in this respect.

If reports are submitted in writing by letter, this may initially be done in a completely anonymous manner. However, if this reporting method is chosen, any further communication between the whistleblower and the Compliance Officer may not be possible without disclosing the whistleblower's identity.

3. Processing a report



3.1. What happens after a report is received?

The receipt of any report will be confirmed in writing within 7 days, depending on the channel used and the options for contacting the whistleblower.

3.2. How are reports processed and checked?

Once a report is received, it is recorded in writing and processed.

If a case involves potential misconduct within the SERTO Group's own field of business, a decision will be taken internally as to whether it falls within the responsibility of the compliance organisation or should be handled by another responsible body (e.g. an external legal advisor).

If a report concerns misconduct by a supplier, the information will immediately be forwarded to the corresponding location. The person who provided the information will be notified of which authority is processing the report.

If there are sufficient indications to suggest a breach, the information will be verified without delay, in strict compliance with the applicable legal provisions (particularly those on data protection) and in accordance with compliance culture at SERTO. The responsible body may also address follow-up questions to the person who provided the information in order to clarify any uncertainties and potentially to obtain further information. Furthermore, the specific measures to be taken will be determined on a case-by-case basis. This may involve carrying out an internal investigation or, if misconduct in the supply chain is involved, may include discussions with suppliers or a supplier audit.

Depending on the applicable legal provisions in the country in question, the person who provided the information may be informed of the progress or the outcome of the proceedings. If no measures are to be taken regarding the delivery chain owing to insufficient indications of misconduct or if any measures previously applied are discontinued, the whistleblower will also be informed.

3.3. How long does a report take to be processed?

Reports are handled with high priority as a matter of principle. The duration of processing will depend on the scope and complexity of the incident reported and can therefore last several months. Whistleblowers will receive a response within 3 months to any incident they report.

3.4. What effect can a report have?

If a breach of applicable law or internal regulations is established, this breach will be remedied immediately. Appropriate measures will be taken, such as implementing process improvements or human resources measures designed to prevent similar breaches in the future.

4. Additional principles

4.1. How are whistleblowers protected?

Any form of discrimination against whistleblowers is prohibited and will not be tolerated. This includes intimidation and punitive disciplinary action following the reporting of an incident. In addition to the ban on discrimination, internal procedures are in place to protect people who disclose incidents to the greatest extent possible. This includes the option of disclosing incidents anonymously, where this is permitted under applicable local law.

If the whistleblower is nonetheless subjected to discrimination, this constitutes a breach of the SERTO Code of Conduct and potentially also of applicable law. Discrimination against whistleblowers can additionally be reported as breaches via the communication channels mentioned above.

The only circumstance in which reporting an incident may have negative consequences for the person reporting is where the report is deliberately false (e.g. made in order to accuse a colleague unjustly).

4.2. How is confidentiality assured?

The bodies responsible for processing reports treat the information passed on to them (e.g. personal data) confidentially. Processing is done according to the 'need to know' principle, which means that only the persons or bodies strictly required for the processing are informed. The identity of the whistleblower is not disclosed, unless this is desired and legally permissible. Exceptions apply to statutory or official reporting obligations.

4.3. How is personal data protected?

The information transferred is processed in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Swiss Data Protection Law (DSG). Detailed information on the processing of and access to personal data can be found in the data protection declaration.

5. (External) reporting body

If a case involves potential misconduct within the SERTO Group's own field of business, a decision will be taken internally as to whether it falls within the responsibility of the compliance organisation and/or should be handled by another responsible body and an external legal advisor. Collaboration with an external legal advisor is sought after in order to involve an independent arbitrator.

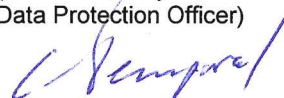
Frauenfeld, 31 December 2023

Compliance Officer
(Head of Human Resources)



Marius Biedermann

Compliance Officer
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Claudio Temporal