



Whistleblowing policy

Immunovia AB

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1 Purpose of our whistleblowing system

- 1.1 The aim of this whistleblowing policy is to manage notifications made through Immunovia AB's (the "**Company**") whistleblowing system Trumpet ("**Trumpet**"), administered by the independent party Whitepaper Advisors Sweden AB ("**WPA**").
- 1.2 For the Company, it is important that actions that violate laws, regulations, internal rules, and guidelines are known about as early as possible, so that the risk of personal, property and intellectual property damage, as well as damage to the Company's reputation, is minimized. Through this policy, whistleblowers who are prepared to highlight serious irregularities or malpractice should know that these are important resources for the company, which is why the Company strives to ensure a business climate where whistleblowers feel that they can report irregularities safely and without fear.
- 1.3 The starting point is that you, as the complainant, report serious irregularities or malpractice in the first instance to your immediate manager at the Company. All managers are obliged to manage and take action on suspicions of malpractice. If, for whatever reason, you do not consider it appropriate to report the matter to your immediate manager, it is also possible to consult another person in a managerial capacity within the Company, or alternatively someone in the HR department.
- 1.4 In the event that you have information that a person in a key position (e.g., a board member) or a person in a senior position (e.g., a CEO or someone else in a managerial position) within the Company has been involved in criminal activities or any other serious malpractice and you have good reason to assume that your fears will not be dealt with properly, you can instead report this through Trumpet.
- 1.5 Further information can be found in the Company's Code of Conduct.

2 Who can make a complaint?

A complaint can be submitted through Trumpet by anyone representing the Company in any way. This includes board members, all employees (permanent employees, probationary staff, fixed-term employees, full-time and part-time employees), trainees and hired staff (recruited staff) of the Company. Even employees of the Company's suppliers, consultants and partners of the Company have this opportunity.

3 What can be reported?

- 3.1 A complaint through the Trumpet whistleblower system must be based on concrete suspicions. You do not have to have proof of your suspicion, but no accusation may be made with malicious intent or in the knowledge that the accusation is false. False or malicious accusations are a serious breach of your employment contract.

In order for a complaint to be reported via Trumpet, there need to be concrete suspicions about an incident meeting **both criteria** below:

- that it refers to **serious malpractice** (see section 3.2), and
- that the malpractice was committed by someone in the **Company's management or by another key person at the Company** (see section 3.3).

A report meeting both of the above criteria is referred to within the framework of the Company's internal regulations for a qualifying report or whistleblowing.

- 3.2 Serious malpractice refers to:

- economic crime such as bribery, kickbacks, theft, fraud and forgery, corruption, accounting offenses and other breaches of accountancy and tax laws, and
- other serious malpractice concerning the vital interests of the Company or the life and health of individuals, such as serious environmental crimes, major deficiencies in workplace safety and extremely serious forms of discrimination and harassment.

3.3 The Company's management or other key persons refers to the following people within the Company:

- CEO
- Group management

4 **What should not be reported?**

4.1 Types of incidents other than those listed in section 3 above must be dealt with by reporting them to your line manager or to your manager's manager, or to another person in a senior position close to your organization.

4.2 Matters not to be dealt with in Trumpet can include:

- Incidents that do not constitute serious malpractice in accordance with section 3.2 above, such as general dissatisfaction with the way the business is run or with leadership, salary, or other personnel matters, or
- serious malpractice committed by persons who are not part of the Company's management or do not constitute a key person in the Company in accordance with section 3.3 above.

4.3 A report that does not meet the criteria for a report in the whistleblower system in accordance with section 3 above is known as *non-qualifying reporting* within the framework of the Company's internal regulations. Non-qualifying reporting will not be managed as whistleblowing. If you submit a non-qualifying report, you will be informed of this, and the report will be deleted from Trumpet within three weeks.

5 **How do I make a report?**

5.1 Suspicions of serious malpractice can be reported anonymously and confidentially to Trumpet via the Trumpet website, by telephone or by letter. Reports can be made 24 hours a day, 7 days a week and may be submitted in Swedish and English.

Reporting via the website

5.2 You can submit a report via the Trumpet website using the separate link on the Company's website. **Alternatively, enter the address www.trumpet-whistleblowing.eu on any device (computer, tablet, or mobile phone) and then enter the Company's organization code: imunowb to log in to the whistleblower page.**

Reporting by telephone

5.3 Reports can be submitted by telephone by calling the number +46 (0)20-10 30 91.

6 **What should a report contain?**

In the report, you must describe all the facts and develop your statement as accurately and in as much detail as possible. Also explain everything that may be relevant to the report. The information you submit must be as correct and detailed as possible. A report must, if possible, contain the following information as a minimum:

- what the report is about,
- who is/are involved,
- where the incident occurred, and
- if it was a one-off event, or if the problem is ongoing or recurring.

7 Handling of the report

7.1 Reports submitted through Trumpet are handled by a limited group of people subject to strict confidentiality. This limited group of people comprises:

- specially qualified staff at WPA, and
- the Company's whistleblower committee in accordance with *Annex 2 - Description of duties of the whistleblower committee* ("**Whistleblower Committee**").

If the report concerns someone on the Whistleblower Committee, an alternative committee will be set up in which the person involved is not included.

7.2 A report will be handled respectfully, carefully, with confidentiality, and respecting the integrity of all individuals involved. A report will also be addressed promptly and decisions on measures will be made as soon as possible, but never at the expense of quality or legal certainty for the individual or individuals who are the subject of the report.

7.3 Further information on how a report is handled can be found in *Annex 1 – Case handling procedure for whistleblowing*.

8 Measures to protect the person making the report

8.1 People making reports in the whistleblower system can be:

- completely anonymous,
- anonymous to the Whistleblower Committee/alternative committee, but identifiable to WPA, or
- Identifiable to both WPA and the Whistleblower Committee/alternative committee and the Company.

8.2 Communication can take place while maintaining anonymity and confidentiality through Trumpet.

8.3 If the Complainant chooses to be open regarding their identity, the Complainant's details will be handled with secrecy and kept secret as far as is legally possible. In the event of a report that leads to a police report or other legal action, the Company or WPA may, however, be forced to disclose the Complainant's personal details (because the person may need to testify in a trial, for example). In such a situation, the Complainant will always be informed before their personal details are passed on.

8.4 People who make a report will not suffer any negative consequences regarding work tasks, terms of employment or their work situation in general as a consequence of the report, neither at the time of the report nor at a later stage.

8.5 If a Complainant considers that they have been subjected to reprisals despite the fact that the report was made in good faith, after having reported or participated in an investigation, they must immediately report this to the HR department. All such reports will be investigated in confidence.

9 Information about the processing of personal data

9.1 Personal data submitted via Trumpet is processed in accordance with the provisions of the General Data Processing Regulation, other applicable legislation, and the Company's personal data policy applicable at the time. For such information, the Company is the personal data controller and WPA the personal data assistant. This includes the Applicant's personal data if he/she chooses to be open to the Whistleblower Committee/alternative committee and the Company.

9.2 If the Complainant chooses to be anonymous to the Whistleblower Committee/alternative committee and the Company, but identifiable to WPA, WPA will be the personal data controller for the Complainant's

personal data. This information will be processed in accordance with WPA's personal data policy available at www.whitepaperadvisors.se/personuppgiftspolicy (in Swedish). If at a later time the Complainant chooses to also be identifiable to the Whistleblower Committee/alternative committee and the Company, the personal data responsibility will be transferred to the Company, whereby WPA will be the personal data assistant for this information in accordance with point 9.1 above.
