Glaston Whistleblowing Guidelines and Privacy Notice

For customers, suppliers and other external stakeholders

Version 1.0, January 2024

1. Introduction

Glaston strives to achieve transparency and a high level of business ethics.

Glaston's whistleblowing channel offers you the possibility to alert our organization about suspicions of misconduct in confidence. It is an important tool for reducing risks and maintaining trust in Glaston's operations by enabling us to detect and act on possible misconduct at an early stage.

Whistleblowing can be done by any person openly or anonymously.

2. When to blow the whistle?

The whistleblowing channel can be used to report any suspected wrongdoings or violations related to our activities – including any breach of European Union law or national law or anything that is inconsistent with the ethical principles set out in Glaston's Code of Conduct.

The whistleblowing channel is intended both for the own workforce and for any external partner who is in business contact with Glaston or its representatives. The channel is also available for all Glaston group companies. However, normal employment matters that the employees are expected to discuss with their managers or HR are not investigated in the scope of the whistleblowing. In such case, our employees are asked to contact their manager or HR.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden.

3. How to blow the whistle?

For Glaston employees, as a first choice of action, suspected violations should be reported to the manager. The second option is to make a report to the local HR manager, or Group HR or Group Legal. As a third option, the employees can use the whistleblowing channel.

If external stakeholders, such as customers or suppliers, have any compliance concerns regarding Glaston's or its representatives' behaviour, they can always discuss this matter with their Glaston contact persons. Alternatively, anyone can report a suspected violation by sending a message through Glaston's whistleblower communication channel to the whistleblowing team.

The whistleblowing channel enables also anonymous messaging and is administrated by ComplyLog, an external service provider. All messages are treated confidentially.

Link to the whistleblowing channel is: https://glaston.integrity.complylog.com/

The person sending the message also remains anonymous in the subsequent dialogue with the responsible receivers of the report. In case the whistleblower has decided to use the anonymous reporting, they will receive a report specific token ID when submitting the report. This token ID should be stored carefully. The same token ID can be used later to follow up the cases and see the company's feedback.

Please do not include sensitive personal information (such as information on health status, political or religious beliefs or sexual orientation) about anybody mentioned in the message if it is not necessary for describing the concern.

4. Investigation process

The Whistleblowing Team

Access to messages received through our whistleblowing channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality. A report will not be investigated by someone who may be concerned or connected with the misgiving.

Receiving a Message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken (please see *Investigation* below).

The whistleblowing team may decline to accept a message if:

- ✓ the alleged conduct is not reportable conduct under these Whistleblowing guidelines
- ✓ the message has not been made in good faith or is malicious
- ✓ there is insufficient information to allow for further investigation
- ✓ the subject of the message has already been solved

If a message includes issues not covered by the scope of these Whistleblowing guidelines, the whistleblowing team should take appropriate actions to get the issue solved.

The whistleblowing team will send appropriate feedback within 3 months upon the date of receiving the report.

Investigation

All messages are treated seriously and in accordance with these Whistleblowing guidelines.

- ✓ No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- ✓ The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- ✓ A message will not be investigated by anyone who may be involved with or connected to the misgiving.

- ✓ The whistleblowing team decides if and how a whistleblowing message should be escalated.
- ✓ Whistleblowing messages are handled confidentially by the parties involved.

Whistleblower Protection in the Case of Non-Anonymous Whistleblowing

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of suffering any form of retaliation. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Subject to considering the privacy of those against whom allegations have been made, and any other issues of confidentiality, a non-anonymous whistleblower will be kept informed of the outcomes of the investigation into the allegations.

Please note that in cases of alleged criminal offences, the whistleblower's identity may need to be disclosed during judicial proceedings.

5. Data protection

For more information on how we process the whistleblower's personal data, please see the privacy notice below.

Privacy Notice for the Whistleblowing Channel of the Glaston Group

Created on 1 August 2023, updated 1 January 2024

This Privacy Notice explains how the personal data received through the whistleblowing channel of the Glaston Group may be processed and how the privacy rights of individuals may be exercised.

The controller of your personal data is Glaston Oyj Abp ("we" or "Glaston").

In case you have any questions or requests concerning your personal data or data protection, you may always contact us through the following email address: compliance@glaston.net

Further Information on the Processing of Your Personal Data

Sources and Types of Personal Data

We will only process personal data that is strictly necessary for the purposes described below.

We may obtain your personal data in the context of the use of the whistleblowing channel. In particular, we may obtain your personal data because you provide it to us (e.g. by filing a report), because others provide it to us (e.g. because you occur in a report) or because personal data relating to you is generated by using the whistleblowing channel (e.g. because you are involved in the investigation of a report).

Personal data concerning various data subjects can be processed in the context of the whistleblowing channel, such as a person making a report, individuals mentioned in a report, a person investigating a report or a person serving as a witness or otherwise being involved in the investigation.

If you report a case using the Glaston whistleblowing channel, the following personal data may be collected:

- ✓ Whether you want to remain anonymous,
- ✓ Your contact details (name, e-mail address, contact number) *in case of non-anonymous reporting*,
- ✓ For Glaston employees, your Glaston unit and manager *in case of non-anonymous reporting*,
- ✓ Any optional information that you record about yourself.

What Are the Purposes and Legal Basis for Processing of Your Personal Data?

We only process personal data when we have a legal justification to do so. In connection with the whistleblowing channel, we only process personal data for the purposes of reporting and investigating reports of alleged wrongdoings or violations related to our activities in accordance with our whistleblowing guidelines, as well as for the purposes of the subsequent processing of these reports and the reporting of the outcome to relevant parties.

The processing is based on the following legal grounds:

- ✓ Because it is necessary to comply with our legal obligations, in particular, concerning mandatory whistleblowing systems, and
- ✓ For the purposes of our legitimate interests, more specifically to monitor the compliance of our activities with applicable laws and our Code of Conduct.

With Whom May We Share Your Personal Data?

Other Glaston Group companies: Personal data may be transferred between authorised representatives of Glaston Group companies if necessary for conducting the whistleblowing process, at all times in compliance with the applicable confidentiality requirements regarding whistleblowing reporting.

Third parties: We may disclose your personal data to government agencies and regulators, courts and other government authorities where there is a legal obligation to do so. We may also disclose your personal data to external advisors (e.g. lawyers).

Service providers and other partners: Glaston contracts with third party service providers (e.g. IT systems and support providers), in particular external service providers hosting the whistleblowing channel. These partners process your personal data only at and according to Glaston's instructions to provide the services.

Where is the personal data processed?

Personal data is stored and processed within the EU/EEA.

How Do We Protect Your Personal Data?

Glaston complies with all applicable data protection legislation and aims to ensure that your privacy is not infringed in any phase of the processing and that the applicable confidentiality requirements regarding whistleblowing reporting are ensured at all times.

We continuously develop and implement administrative, technical and physical security measures to protect your data from unauthorised access and against loss, misuse or alteration (e.g. encryption). The rights of access to the data are predefined and limited. We also require our service providers to implement all appropriate security measures to protect your personal data. External service providers hosting the whistleblowing channel have no access to readable content.

For How Long Do We Retain Your Personal Data?

We retain your data only for as long as it is necessary for the processing purposes stated above or as long as we have a legal obligation to do so. Please note that the data retention periods may vary by data category. Inaccurate or outdated data is deleted regularly.

Personal data will be kept as long as necessary to process and investigate a whistleblowing report, or, if applicable, as long as necessary to decide on and carry out sanctions or other measures in a specific matter. In any case, if judicial or disciplinary proceedings are initiated, the personal data provided will be kept until those proceedings are definitively closed; if such proceedings are not initiated, relevant personal data will be kept no longer than 30 days after

completion of the investigation, with the exception of when personal data must be maintained according to applicable laws.

Your Rights and Options

You have the right to access your personal data and to correct your data. In some circumstances you may also have the right to have your unnecessary or inaccurate data deleted, to object to how we use or share your data, to restrict how we process your data, and to have your data transferred to another data controller.

You can exercise these rights by contacting Glaston's contact person in data protection matters through the contact details set out above.

Even though Glaston seeks to resolve any privacy related disagreements in co-operation with you, you also have the right to lodge a complaint to a data protection authority about our processing of your personal data. For more information, please contact your local data protection authority.