



Whistleblowing policy and ethical channel guidelines

1 Background

At NEPower Oy, it is important to promote an ethical and transparent corporate culture in which potential misconduct can be reported safely and confidentially. Our operations are based on compliance with the law and our shared values: customer orientation, cooperation, professionalism, and results orientation.

In accordance with the Whistleblower Protection Act (1171/2022, as amended), NEPower Oy must maintain an internal reporting channel for breaches falling under the scope of the Act. In addition, we encourage reporting of any suspected misconduct or unethical behavior.

Through the ethical channel, employees and certain stakeholders can safely report unlawful or unethical conduct, practices that endanger health or safety, or actions that may harm the company's reputation. Reports may be made anonymously or under one's own name.

The purpose of this policy is to ensure compliance with ethical principles, maintain trust, and encourage reporting without fear of retaliation. This policy applies to NEPower Oy's operations in Finland. In Sweden, NEPower Oy Ab subsidiaries follow local reporting procedures.

2 Reporting misconduct

2.1 Reportable issues

Reports can be made concerning:

- Violations of legislation within the scope of the whistleblower protection act
- Breaches of NEPower's code of conduct or good business practices
- Actions that could harm the company or endanger a person's life or health

The Whistleblower Protection Act covers, among others, the following areas: public procurement, financial services, anti-money laundering, product safety, transport safety, environmental protection, radiation safety, food safety, public health, consumer protection, data protection, and cybersecurity.

The Act applies only to:

- Offences defined as punishable
- Actions leading to administrative sanctions
- Acts that endanger public interest objectives

Reports may also concern misuse related to EU funds, subsidies, state aid, competition rules, or taxation.

Other reportable matters include:

- Occupational safety violations
- Discrimination, bullying, or harassment
- Conflicts of interest
- Breaches of ethical guidelines

2.2 Submitting a report

Reports should preferably be made through NEPower's ethical channel using the QR code 012 or the [Whistleblow | Easoft form](#).

Reports can be submitted anonymously or with name and contact information.

Reports concerning occupational safety or harassment can be made via QR code 001 or Työturvallisuushavainto | Easoft, or directly to a supervisor or HR.

The ethical channel is managed by the whistleblowing team, which guarantees the reporter's anonymity. Only designated team members and, where necessary, external experts may process the reports.

All reports must be made honestly and in good faith. Intentionally false reports constitute a serious breach.

2.3 Protection of the whistleblower

No retaliatory actions may be taken against the reporter as a result of a report. This protection also extends to contractors and business partners. The rights granted under the whistleblower protection act safeguard the reporter's position.

2.4 Rights of the person concerned

Any person named in a report will be treated fairly. They have the right to access and correct personal data concerning them, within the limits of the investigation and data protection requirements.

3 Handling of reports

3.1 Handlers

The whistleblowing team consists of:

- Director of HR and Communications Henna Laitila
- Chief Executive Officer Mika Alatalo

- Occupational Safety Manager Olli Hanhikoski

Additional members may be appointed when necessary.

3.2 Handling process

Reports are handled confidentially and without undue delay. The team assesses the situation and determines necessary actions. An appointed responsible person leads the investigation and may involve external experts.

A receipt acknowledgment is provided within 7 days, and a status update within 3 months of submission.

3.3 Closure of a case

Processing may be concluded if:

- The report is unfounded
- The information is insufficient
- The matter has already been resolved

Decisions are documented, and a summary report is provided anonymously to the Board of Directors on a quarterly basis.

3.4 Consequences and corrective actions

Confirmed misconduct may result in disciplinary action, such as a notice, warning, termination of employment, or compensation claim. Training or guidance may also be provided when necessary.

3.5 Conflicts of interest

A team member who has a conflict of interest must recuse themselves. If necessary, external experts will be involved. In cases involving the CEO, the Chairman of the Board will participate.

3.6 Data protection and retention

Only the whistleblowing team processes the reports. All material is securely stored and deleted after five years, unless longer retention is required by law.

3.7 External reporting channel

The primary reporting channel is NEPower's ethical channel (QR code).

Reports can also be made to the Office of the chancellor of justice only if the exceptional conditions of the whistleblower protection act are met.

More information: <https://oikeuskansleri.fi/tietoa-ilmoittajansuojelusta>

3.8 Entry into force and updates

This whistleblowing policy has been approved by the NEPower Oy management team. Nordic Electro Power Oy may update this policy and its ethical channel guidelines as necessary and will communicate significant changes appropriately.