

## WHISTLEBLOWING POLICY – Non-EU/Australia

Arvos Bidco S.à r.l. and their respective subsidiaries, (collectively, the “Company” or “ARVOS” or “LJUNGSTRÖM”) embrace and adopt this revised ARVOS/LJUNGSTRÖM Whistleblowing Policy (the “Policy”) for its employees who do not work in European countries or Australia, which provides the means for employees and business partners (*e.g.*, vendors, suppliers, and customers) to come forward with credible and substantiated information about illegal conduct, violations of ARVOS/LJUNGSTRÖM policies, or violations of ARVOS/LJUNGSTRÖM contracts, all for the purpose of creating transparency and a responsible corporate environment. In doing so, this Policy also provides that the Company will protect any individual from retaliation, if they have a reasonable basis and are reporting in good faith.

### 1. POLICY OBJECTIVE

The Company encourages ARVOS/LJUNGSTRÖM employees to report, as soon as possible, their concerns related to any illegal conduct they can reasonably substantiate or prove, serious violations of ARVOS/LJUNGSTRÖM policies (especially its compliance policies), or major violations of ARVOS/LJUNGSTRÖM contracts harmful to ARVOS/ LJUNGSTRÖM or its customers. All reported concerns will be taken seriously, will be tracked individually, treated confidentially, investigated appropriately and conclusions will be shared with top management or the Board. The Company encourages as much substantiation, corroboration, evidence or supporting information as reasonably available to enable the Company to conduct a thorough investigation. In all instances, the anonymity of each reporting individual will be respected, and no unfair retaliation will be permitted.

### 2. BACKGROUND

This Policy is an essential element necessary to foster a work environment of openness, accountability, trust, and productivity. Protecting those who make reports under this Policy from unfair treatment, including retaliation, discrimination, or disadvantage, emboldens employees to report wrongdoing and increases the likelihood that wrongdoing is reported, uncovered, and brought to an end. For these reasons, persons in possession of such substantiated information are requested to report it.

The Company is committed to dealing responsibly and professionally with all genuine concerns. We expect all ARVOS/LJUNGSTRÖM employees to maintain high standards of behavior in accordance with the ARVOS/LJUNGSTRÖM values. Further, the Company abides by its Code of Conduct and all other Compliance Policies in its administration of this Policy and will not tolerate abuse of this Policy by reporting untrue or knowingly inaccurate which information.

### 3. WHAT IS ENCOURAGED BY THIS POLICY?

The Policy goals are met when an individual passes along information about a substantiated wrongdoing. For a matter to meet this goal, an individual who makes a disclosure must reasonably believe two things:

- 3.1** The first is that the reporting individual reasonably believes that the disclosure shows past, present, or likely future wrongdoing, which properly falls within one or more of the following categories:

- Criminal offense
- Failure to comply with the law
- Endangering health and safety
- Damage to the environment
- Failure to comply with ARVOS/LJUNGSTRÖM code of conduct and corporate policies, including anti-corruption, anti-trust, anti-bribery, International Sanctions Policy, the use of data, and other policies identified by the Company
- Covering up the wrongdoing in any of the above categories

**3.2** The second is that they are acting in public interest.

Any other issues which are not covered by the categories above should be reported through the appropriate internal channel (*e.g.*, HR, Compliance, Line Manager).

#### **4. WHEN TO REPORT A CONCERN**

Any person, including ARVOS/LJUNGSTRÖM employees, who have a reasonable belief of information that comprises such information described in the preceding paragraph, are requested to report that information. The Company encourages participation in the spirit of transparency and high standards of corporate conduct and ARVOS/ LJUNGSTRÖM values.

However, the Policy is **NOT** designed to be a forum where disgruntled employees voice anonymously their criticism of management or their supervisor and such is unacceptable. Moreover, Whistleblowers should understand that false information or accusations submitted may result in decisions that affect other people's lives and careers, and such malicious use of the Whistleblowing Policy is unacceptable. Therefore, honest whistleblowers should only submit information that they have a good reason to believe is true (see Section 3).

Under no circumstances will there be any reprisal against anyone who reports information under the Policy in good faith. However, if after reporting the information the person reporting learns that the information provided is incorrect or has been innocently misinterpreted, please immediately report this in order to avoid an unnecessary waste of Company resources in investigating and more importantly to prevent damage to your colleague's good reputation and career. Any malicious acts or attempts to cause damage to your colleague's reputation and career could lead to civil and/or criminal liability in some jurisdictions. Note, acting maliciously or abusing the Policy never will be tolerated and could result in disciplinary measures up to and including dismissal in appropriate cases.

#### **5. HOW TO REPORT A CONCERN**

There are three ways that someone can report a good faith concern:

- **In person:** You can speak with your line manager or another manager of trust about your concerns or with one of the following Compliance Officers who will not disclose your identity unless you agree:

- **Matthias Mautner**, Am Taubenfeld 21/1, 69123 Heidelberg, Germany,
  - **Steve List**, 2034 Hamilton Place Boulevard, Suite 220, Chattanooga, TN 37421, U.S.
  - **Peter Bi**, No 1515, Dazhong Mansion, West Zhongshan Road, Shanghai, China 200235
  - **Katsuhiro Kurita**, 7-1-18 Onoe-dori, Chuo-ku, Kobe city, Hyogo, Japan
- **Online:** Visit the **ARVOS Integrity Hotline** at the below listed links and choose in which language you wish to complete the form:

**English:**

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=1arv22&language=eng>

**Chinese (SC):**

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=1arv22&language=chi>

**Japanese:**

<https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=1arv22&language=jpn>

You do not need to disclose your identity and can remain anonymous. In contrast to an e-mail, it is not possible to trace your identity. You can create a mailbox, which is protected by a password created by you and to which only you have access. However, in order to facilitate a more fulsome investigation of the information reported, your identity would be appreciated. Note, the word “anonymous” is not equal to any of your reports using other person’s identity without having his/her prior authorization or even knowledge. If it has been found that you are pretending to be someone else or using another person’s identity, we reserve the right not to investigate your report. Furthermore, we will inform the actual person of your misuse of their identity and such behavior could lead to civil and/or criminal liability in some jurisdictions.

If you wish to remain anonymous, the report will be received by an external contact person (“The Ombudsman”), who is the only other person who has access to the data on the Company’s account which is located on a highly secured server. Even the system administrator of ARVOS/LJUNGSTRÖM does not have access to the data. The ARVOS Ombudsman is the following German external Law Firm:

Dr. Buchert & Partner Rechtsanwälte – Partnerschaftsgesellschaft mbB

Bleidenstraße 1, 60311 Frankfurt am Main, Germany

Phone: +49(0)69 710 33 33 0, Fax: +49 (0)69 710 34 44 4

E-Mail: [kanzlei@dr-buchert.de](mailto:kanzlei@dr-buchert.de).

Internet: [www.dr-buchert.de](http://www.dr-buchert.de)

Dr. Buchert & Partner Rechtsanwälte has an extensive experience in dealing with compliance issues and operate independently without any ARVOS/LJUNGSTRÖM instructions on how to deal with a reported non-compliance issue.

The Ombudsman has the task to evaluate and, if necessary, to clarify the reported issue and to provide her assessment of the issue to the ARVOS/LJUNGSTRÖM Compliance Officers.

- **Call:** Dial the above telephone number of The Ombudsman to report your concerns or call or write an E-Mail to one of the Compliance Officers:
  - **Matthias Mautner:** E-Mail, matthias.mautner@arvos-group.com; Phone, +49 171 228 6019
  - **Steve List:** E-Mail, steve.list@ljungstrom.com; Phone, +1 630 750 8000
  - **Peter Bi:** E-Mail, peter.bi@ljungstrom.com; Phone: +86 139 1899 8885
  - **Katsuhiko Kurita:** E-Mail, katsuhiko.kurita@ljungstrom.com; Phone : +81 90 5129 6186

## 6. INFORMATION NEEDED TO RAISE A CONCERN

**6.1** When raising a concern under this procedure, you should provide at least the following information:

- The nature of the concern and its key elements;
- When it happened;
- Who was involved and
- The reason you believe it to be true (*i.e.*, the substantiation/corroboration/evidence).

**6.2** In addition to details of the concern, an employee should try to provide the following information:

- The background behind the concern;
- Whether the concern was already raised with anyone and the respective response;
- Any other relevant dates; and
- If applicable, any personal interests must be declared from the outset.

**6.3** It is important that matters are not investigated by employees themselves. The employee should have a reasonable belief that wrongdoing, including breaches of the core values in the Company policies, laws or regulations, has occurred or is likely to occur.

## 7. WHAT HAPPENS NEXT?

- Within seven (7) days of the alert being made via our Integrity Hotline (either by disclosing identity and contact details or by having created an anonymous mailbox) a response will be sent to acknowledge the receipt of the concerns raised. Those raising a concern anonymously without creating a mailbox are encouraged to follow up by using the same way they have used when making the first contact.
- The case will be reviewed internally and assigned for investigation. The person assigned the case will closely cooperate with one of the responsible Compliance Officers and the latter (or

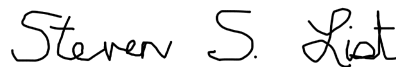
the Ombudsman) will maintain contact with the person making the report to help ensure clear communication about the progress of the case.

- Once the investigation is concluded, the person who made the report will receive an explanation about how the concern has been addressed. If there are legal constraints, *e.g.*, in a criminal investigation, the reporting person will receive sufficient information in order to see that the concern has been dealt with. If no further action is proposed, the Compliance Officer (or the Ombudsman) will inform the reporting person about reasons for this in writing.
- If the investigation is not completed within 3 months or in the time originally estimated for the investigation, the Compliance Officer (or the Ombudsman) will provide regular updates to the reporting person.
- Throughout any investigation, employees who make a report under the Policy are expected to continue their duties/role as usual, unless deemed inappropriate. An employee should not suffer any unfair or negative treatment as a result of raising a concern. Any such treatment should be raised and discussed with the responsible Compliance Officer.

Effective February 1, 2022

Approved

Matthias Mautner  
ARVOS Chief Compliance Officer



Steve List  
LJUNGSTRÖM Chief Compliance Officer

**Signature:** 

**Email:** matthias.mautner@arvos-group.com