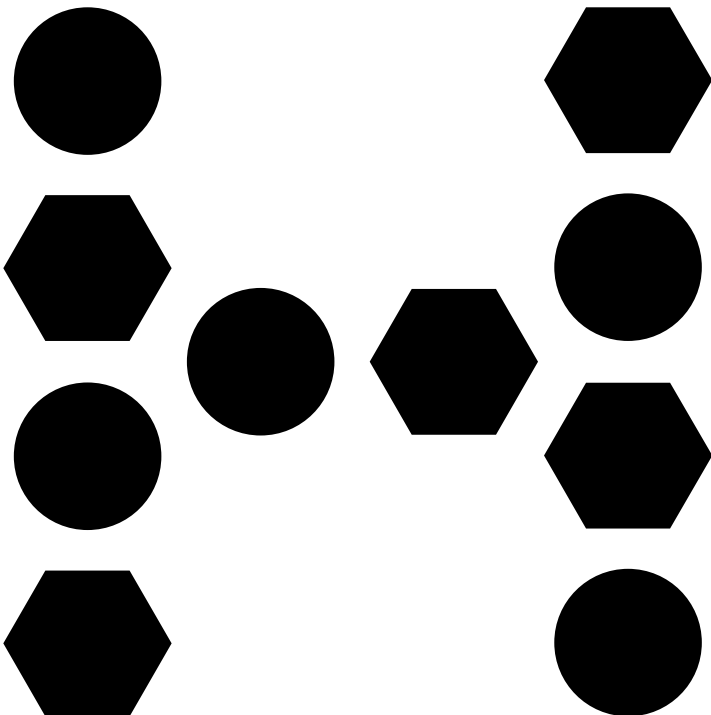


Whistleblowing Policy



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WHISTLEBLOWING POLICY

to remain in force until further notice.

1. Introduction

Hexatronic strives to achieve transparency and a high level of business ethics. This applies to every business decision in every area of the group worldwide. Hexatronic is committed to ensuring that the company fosters a culture where our people and stakeholders are encouraged to report concerns without fear of retaliation.

This Global Whistleblowing Policy applies to individuals who have a business relationship with Hexatronic and have concerns about possible wrongdoing that involves Hexatronic. This includes but is not limited to all current and former employees, directors, officers, contractors, and subcontractors of Hexatronic and its subsidiaries. This Policy sets out Hexatronic's commitment to protecting and supporting individuals who report such concerns, as well as to ensure an appropriate investigation process.

This policy is adopted by the Board of Directors' of Hexatronic (the "Board") and shall be revised and approved annually at the statutory board meeting, or when otherwise motivated.

2. Speak up

If you have knowledge of, or reasonable good-faith ground to suspect, a wrongdoing related to Hexatronic — we encourage you to speak up. You should feel comfortable about voicing your concerns so that Hexatronic can investigate.

Reporting of certain types of actual or suspected wrongdoing that relates to legal, regulatory, or criminal misconduct that impacts the public interest may fall within the scope of "whistleblowing". Depending on applicable law, whistleblowing reports may include, but are not limited to, actual or suspected of wrongdoing regarding:

- Financial malpractice, misrepresentations, impropriety, or fraud, including accounting and auditing or disclosure concerns

- Failure to comply with a legal or regulatory obligation
- Public health and product safety
- Risk or damage to the environment
- Criminal activity
- Bribery, facilitation of tax evasion or money laundering
- Anti-competitive conduct and consumer protection
- Insider trading
- Breaches of financial and economic sanctions or export control rules
- Violations of human rights, such as modern slavery and human trafficking
- Privacy and data protection breaches
- Facilitating or attempting to conceal any of the above misconduct
- Security at the place of work and severe forms of discrimination or harassment.
- Breach of the Hexatronic Code of Conduct or the Hexatronic Supplier Code of Conduct.

Reporting of certain types of actual or suspected wrongdoing can be used to alert Hexatronic about serious risks affecting individuals, our company/organisation, the society or the environment.

For issues relating to dissatisfaction in the workplace or related matters, for example, employees and any other stakeholders are asked to contact their supervisor or manager, or HR, as these issues cannot be investigated within the scope of the whistleblowing.

A person reporting a wrongdoing does not need to have firm evidence to express a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

Please note that there are restrictions on the use of a whistleblowing service in certain countries. In Sweden, processing of personal data concerning legal offences may only refer to persons in key positions or a leading position within the own company or group.

3. Reporting concerns

There are different ways to raise a concern:

- Alternative 1: Contact a supervisor or manager within our organisation.
- Alternative 2: Anonymous messaging through the whistleblower reporting channel: <https://report.whistleb.com/en/hexatronic>

If you are a Hexatronic employee, you can report concerns to your manager, HR, or the Group General Counsel.

Hexatronic's external reporting channel (<https://report.whistleb.com/en/hexatronic>) is available for both internal and external parties to report concerns, and provides the option of anonymous reporting. The external helpline is available at any time and provides online reporting.

We encourage anybody who shares their suspicions to be open about their identity. All messages received will be handled confidentially by the whistleblowing investigation team. For those wishing to remain anonymous, the external reporting channel can be used (Alternative 2). The external reporting channel allowing anonymous messaging, is administrated by WhistleB, an external service provider. The person sending the message also remains anonymous in the subsequent dialogue with the company/whistleblowing investigation team.

When making your report, we encourage you to provide as much detail as possible concerning the suspected wrongdoing. This will allow us to conduct any investigation promptly and effectively. Do not include sensitive personal information about anybody mentioned in your message if it is not necessary for describing your concern.

4. Confidentiality

Hexatronic will treat all disclosures of suspected wrongdoing in a confidential and sensitive manner and maintain your privacy. Confidential means that your identity will be shared only with those who have a need to know to effectively conduct any investigation and follow-up action (including, if necessary, disciplinary action) on your concern, or where there is a legal requirement to share your identity.

The external reporting channel allows anonymous messaging. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB does not save IP addresses or other meta-data, (that is data that can be related to the person sending the message). The person sending the message may also remain anonymous in the subsequent dialogue with the company/whistleblowing investigation team.

If you make an anonymous report, keep in mind that it may be more difficult to investigate an anonymous concern due to difficulty in obtaining specific details and/or answers to follow-up questions. Regardless of how a report is made, we encourage you to share all the information you have concerning

the suspected wrongdoing. Providing sufficient details will help Apple in conducting a thorough and effective investigation.

5. No Retaliation

Hexatronic will not retaliate — and will not tolerate any retaliation — against any individual for raising a good-faith and genuine concern within Hexatronic, or for participating in the investigation of any complaint. Any person who retaliates against a whistleblower, threatens any such retaliation, or is involved in any such conduct may be subject to disciplinary action.

6. The investigation process

The whistleblowing team

Access to messages received through our whistleblower reporting channel is restricted to appointed individuals with the authority to handle whistleblowing cases. The appointed individuals are the chairman of the Board of Hexatronic Group and the Group General Counsel. Their actions are logged, and handling is confidential. When needed, individuals who can add expertise may be included in the whistleblowing investigation process. These people can access relevant data and are also bound to confidentiality.

If a person raises a concern directly to a supervisor, manager, HR or Legal or by contacting the whistleblowing team in person, the message is inserted into the whistleblowing communication channel and treated according to this policy.

Receiving a message

Upon receiving a message, the whistleblowing team decides whether the report constitutes a whistleblowing matter according to the legal definition and whether the matter shall be investigated. If the whistleblowing team determines that the matter shall be investigated, 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 this Whistleblowing policy
- 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 this

Whistleblowing policy, the whistleblowing team should take appropriate actions to get the issue solved.

Investigation

All messages are treated seriously and in accordance with this Whistleblowing policy.

- The whistleblowing team decides if and how a whistleblowing message should be investigated.
- The whistleblowing team shall form an appropriate investigation team for the matters that shall be investigated.
- No matter shall be investigated by anyone who may be involved with or connected to the wrongdoing.
- 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.
- Whistleblowing messages are handled confidentially by the parties involved.

Subject to considerations of 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 overall outcome of the investigation of the reported concerns. An anonymous whistleblower will, if possible, be informed of the outcome via the whistleblower reporting channel.

In cases of alleged criminal offences, the whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

Protection of, and information to, a person specified in a whistleblower message

The rights of the individuals specified in a whistleblower message are subject to the relevant data protection laws. Those affected will be entitled to the right to access data relating to themselves and should the information be incorrect, incomplete or out of date to require amendments or deletion of data. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the

exception of when personal data must be maintained according to other applicable laws. Deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower messages that are archived should be anonymised; they should not include personal data through which persons can be directly or indirectly identified.

7. Questions and breaches against the Policy

Hexatronic's employees with questions concerning this Communication Policy may turn to the CEO or the General Counsel of Hexatronic Group.

Do not hesitate to raise a concern. Any Hexatronic employee who suspects violations of this policy is expected to speak up and raise the issue to their supervisor or manager, to the Hexatronic Legal department, or to use the Hexatronic whistleblower reporting channel.