

Grievance and Whistleblowing Procedure

Professional Technologies Sweden AB · PT-PRO-01 · Version 2026.1

1. Purpose

This procedure describes how anyone can raise concerns about suspected wrongdoing connected to Professional Technologies Sweden AB, and how we handle those concerns. It also covers the Company's obligations under the Swedish Whistleblower Act (2021:890) to the extent they apply.

2. Who can report

The channel is open to **internal stakeholders** – employees, temporary staff, job applicants, trainees, Board members and owners – and to **external stakeholders** – customers, suppliers and their employees, subcontractors, local communities and any other person.

3. What can be reported

- Human rights and working conditions, including discrimination and harassment.
- Health and safety risks.
- Environmental violations.
- Unethical business practices, such as corruption, fraud, anti-competitive behaviour, counterfeit products or breaches of sanctions.
- Breaches of our Code of Conduct, Supplier Code of Conduct or the law, including in our supply chain.

4. How to report

Channel	Details
Online form (anonymous possible)	www.protech.nu/visselblasning (Swedish) and the English version on www.protech.nu
Letter	Professional Technologies Sweden AB, att. Björn Hillefors, HQBM, Munkerödsvägen 5, 444 32 Stenungsund, marked "Confidential – Whistleblowing"

Reports can be made in Swedish or English, openly or anonymously.

5. Who handles reports

Reports are received and handled by our external handler, **Björn Hillefors, HQBM**, who is impartial, independent of the Company's management and not bound by instructions in the handling of the case. Reports submitted via the online form are sent by e-mail directly to the external handler; no reports are stored in the Company's systems. The external handler involves the Company only as far as needed to investigate and remedy the case. If a report concerns the CEO, it is handled without the CEO's involvement.

6. Handling process

1. **Confirmation of receipt** to the reporter within 7 days (where contact details have been provided).
2. **Assessment and investigation**, carried out confidentially. The reporter, or their representative, may be contacted for more information and is consulted on possible remedies.
3. **Feedback** to the reporter on the actions taken within 3 months.
4. **Remediation** – where a concern is confirmed, the Company takes corrective action and, where appropriate, provides or contributes to remedy for those affected.
5. **Documentation** – all cases are logged and stored securely in accordance with GDPR.

7. Confidentiality and protection

The identity of the reporter is kept confidential and is only shared with those handling the case, unless the reporter agrees or the law requires otherwise. **Anyone who reports in good faith is protected against retaliation**, such as dismissal, demotion, harassment or exclusion. Retaliation is itself a serious breach of the Code of Conduct.

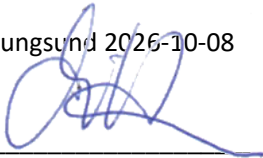
8. Appeal

A reporter who is not satisfied with how a case was handled may appeal via the external handler. The appeal is reviewed by an independent person appointed by HQBM, who has not been involved in the case and is not part of the Company's management, Board or owners' families. Reporters may also report externally to the competent Swedish authority, for example the Swedish Work Environment Authority.

9. Effectiveness review

The CEO and the external handler evaluate the effectiveness and accessibility of this procedure at least every 12 months, and after any significant case, as part of the management review. This includes a test submission through the online form to verify that reports reach the external handler. The procedure is published on www.protech.nu and communicated to employees at the annual policy training held in connection with the internal audit.

Stenungsund 2026-10-08



Michael Rumler, CEO

Document control

Document	Owner	Approved by	Version	Next review
PT-PRO-01 Grievance and Whistleblowing Procedure	CEO	CEO and Board	2026.1	Annually, latest 2027-10