

Whistleblowing Channel Policy

1. Introduction

Responsibility and trustworthiness are basic elements for Evac Group's operations, and we want our employees, customers, and other stakeholders to trust us. We are committed to conduct our business ethically, with integrity and in accordance with applicable laws, regulations, our Code of Conduct and our company values. Through our whistleblowing channel, we strive to ensure the implementation of our operating principles while maintaining trust in our operations.

The whistleblowing channel enables the reporting of suspected misconducts or unethical behaviour, e.g., corruption, bribery or harassment, without limitation to the matters concerning the material scope of the whistleblowing legislation (e.g., public procurement, transport safety, consumer protection and protection of the environment).

The purpose of this policy is to describe how such suspected misconducts or unethical behaviour can be reported, how Evac Group's whistleblowing channel is managed, and how the investigation process works.

2. When to raise a concern?

All Evac Group's employees are obligated to raise a concern without delay if they become aware of a potential or suspected misconduct or a violation of Evac Group's Code of Conduct.

Reports can concern suspected misconducts or unethical behaviour, e.g., corruption, bribery, or harassment, without limitation to matters concerning the material scope of the whistleblowing legislation (e.g., public procurement, transport safety, consumer protection and protection of environment).

Concerns related to matters falling outside of the scope of the whistleblowing channel are asked to be addressed with your supervisor, another member of the management, the occupational safety and health representative, or HR.

3. How to report concerns?

Primarily, we encourage you to contact your supervisor, another member of management, the occupational safety and health representative, or HR. If you feel you cannot be open with your information, you can also report the matter anonymously through the whistleblowing channel. Our whistleblowing channel is web-based, and it can be accessed via a laptop, a tablet or a smartphone.

A link to the whistleblowing channel can be found from the intranet and our website. At the end of the reporting session, you will receive a unique case code and password, which must be saved carefully. You need the case code and the password every time you log in to the system, where you can read your submitted report, give additional information, or discuss with the person processing the report. Evac Group's CFO and the Deputy Board Member of Evac Holding Oy process received reports and present them to Evac Group's CEO and the Board of Evac Holding Oy, who then shall decide on possible further actions.

4. Whistleblower protection

You can report your concern anonymously. If you do not identify yourself, you will remain anonymous throughout the investigation process. The whistleblowing channel is encrypted and secured. It does not save meta-data related to reports, nor can it identify the whistleblower's IP address.

Evac Group's CFO and the Deputy Board Member of Evac Holding Oy receive the reports submitted through the whistleblowing channel and process them confidentially. Access to the whistleblowing channel by non-authorised persons is prevented. All reports are processed confidentially.

Evac Group is committed to protect everyone who reports concerns through the whistleblowing channel. However, all reports must be made in good faith.

5. Prohibition of retaliation

Evac Group does not retaliate against the whistleblower or any other person, nor does it prevent or try to prevent anyone from reporting. Evac Group requests persons, who believe that they have been subjected to retaliation, to report such retaliation matter through the whistleblowing channel without delay. Retaliation can be e.g., weakening the conditions of employment, lay-off or other disadvantageous treatment.

6. The investigation process

The investigation process is described in [Annex 1](#).

Preliminary actions and case assessment

Upon receiving a report, Evac Group's CFO and the Deputy Board Member of Evac Holding Oy make an assessment of the situation, evaluate the severity of the case and gather necessary additional information for assessing the case as a whole. After these steps, the report is presented to Evac Group's CEO and the Board of Evac Holding Oy, for them to decide on possible further actions. The whistleblower will get an acknowledgement of receipt within seven days at the latest.

Investigation

All reports are processed confidentially, and anyone involved in the investigation is bound to confidentiality. Anyone who may be involved with or connected to reported misconducts themselves, will be excluded from all report processing immediately.

The whistleblower will receive feedback within three months from the acknowledgement of receipt at the latest, if not subject to other applicable laws. Feedback means the provision to the whistleblower of information on the action envisaged or taken as follow-up and on the grounds for such follow-up. In cases where a criminal offence is suspected and the matter is referred to the competent authority, the contact information of the non-anonymous whistleblower will be disclosed to that authority and the whistleblower will be informed.