

Whistle Blowing Procedure

(January 30th, 2026, v. 3.0)

Purpose

The purpose of this policy is to define roles and responsibilities related to WhistleBlowing in Milarex.

Application

WhistleBlowing in Milarex should be available for all – both employees, customers, contractors or others.

Responsibility

HR manager

WhistleBlowing set-up

Milarex has established a contract with a company called WhistleB. The purpose of this relationship is to create an anonymous channel where concerns and/or concrete observations regarding unwanted actions of behavior of Milarex employees and contractors can be reported (“whistleblowing”).

The Milarex WhistleB platform has been configured by the Milarex IT Department and is available in Polish, English and Ukrainian through the following URL <https://report.whistleb.com/milarex>.

In WhistleB, there shall always be specified two recipients in order to prevent whistleblowing regarding one of the recipients to not be processed further. In Milarex, the two recipients shall be the Head of HR and the CFO. The main processor shall be the Head of HR unless the whistleblowing information regards the person holding this position. In that case, the process shall be handled by CFO.

Giving information to employees and accessibility to the WhistleBlowing channel

Information about the WhistleB platform shall be given to Milarex employees at least on an annual basis in the usual way of communication with employees (eg. mailing, notice board, leaflets) and a link to the platform shall be available from the Milarex homepage.

Handling of reported cases

All incoming whistleblowing cases shall be reviewed, processed and without unnecessary delay be reported to the Group Management Team (GMT) The GMT shall review the case and discuss next steps and actions together with the Head of HR, who will handle the follow-up. Each case shall be numbered, and the case handling and actions shall be documented in writing by the Head of HR.

If deemed relevant by the GMT, the Head of HR will set up a committee to consider the case. The committee shall consist of employees not directly involved in the case from at least two different departments and the

Head of HR. The committee formulates conclusions and recommendations, the implementation of which is approved by the Head of HR

In case the incoming report is concerning one or more members of the GMT, these persons should be omitted from receiving any information about the reported case, and the case be handled by the other members of the GMT. Should the case be regarding the CEO, the information about the reported case should be communicated directly to the Chair of the Milarex board and the further process shall be coordinated with the Chair.

Reporting

The Head of HR shall on a regular basis update the GMT on the status of reported whistleblowing cases. On an annual basis, before the end of June, the Head of HR shall present a detailed report to the GMT on all whistleblowing cases that have been received since the last annual review.