



Operating principles of Quattro Mikenti Group's reporting channel

At Quattro Mikenti Group, we take suspected misconduct seriously and want to provide an easy and confidential channel for whistleblowing.

Quattro Mikenti Group companies have an internal reporting channel for reporting violations and misconduct. Reports can be made at any time via the Quattro Mikenti Group intranet or website. The reporting channel is available in Finnish and English.

These operating principles describe how reporting takes place, what measures result from a report, and the conditions under which the reporting party may receive whistleblower protection under the law (Act on the Protection of Persons Reporting Infringements of European Union and National Law, 1171/2022, hereinafter referred to as "the Whistleblower Act"). The operating principles are available to Quattro Mikenti Group's personnel, partners and customers.

What violations can be reported via the channel?

Quattro Mikenti Group encourages its employees to bring up issues and discuss them openly within the organisation. The primary channel for raising concerns is your supervisor, CEO, HR management or regional manager.

The reporting channel can be used to report suspected violations or misconduct regarding the rules and regulations. Reports may also concern activities contrary to the values of Quattro Mikenti Group.

The reporting channel may be used to deal with, for example, the operations or behaviour of Quattro Mikenti Group's personnel, as well as other activities that violate the rules and regulations.

What matters may not be reported via the channel?

The reporting channel is not intended for customer feedback, customer complaints or customer reports of crimes committed or attempted by third parties. Customer feedback will not be processed via the reporting channel. The whistleblower may be given instructions on how to submit feedback to the relevant channel.

The reporting channel is also not intended for handling personal employment matters, such as remuneration or working conditions.

Who may submit a report?

Anyone may submit a report in the channel. The reporting channel is primarily intended for use by employees of Quattro Mikenti Group companies, but a report may also be submitted by another person who has received information about a violation in their work or in connection with their work, such as a self-employed person or while working for a subcontractor or supplier of Quattro Mikenti Group. Our customers or other third party representatives may also report their suspicions in the channel.

Confidentiality of reports

All reports received via the reporting channel are treated confidentially. Reports are only processed by persons specifically appointed for this purpose in Quattro Mikenti Group. Experts who are appointed to investigate individual issues may be used to verify the validity of submitted reports. Confidentiality applies to all those involved in the investigation and processing of the matter. The identities of the whistleblower and the



person subject to the report are confidential information. The whistleblower's identity may only be disclosed to outside parties in situations required by law and otherwise only with the consent of the whistleblower.

Reports may be submitted anonymously. Even if the whistleblower reveals their own identity, the identity of the whistleblower will be kept confidential throughout the processing. The reporting channel is based on a secure and encrypted third-party service. The reporting channel is not connected to Quattro Mikenti Group's internal systems. No information that could be used to identify the whistleblower will be stored.

Data storage

Any reference to personal data, including that of the whistleblower or any other person, will be removed from the system when it is possible in terms of processing. The information regarding the case is stored for five years after the receipt of the report. After this time period, the data is deleted unless there is a special reason for its continued storage specified by law.

You can find more detailed information on the processing of personal data in the Privacy Policy.

How can a report be submitted?

The primary channel for raising concerns is your supervisor, CEO, HR management or regional manager. A whistleblowing report may be submitted via the Quattro Mikenti Group intra-page or via the login link on the www.qmg.fi website. When submitting a report, the whistleblower receives a case-specific login code, which allows the whistleblower to log in to the report again and provide additional information on the matter, answer any additional questions and receive information on the progress of the processing. The report must include the information necessary to investigate the matter. Sensitive information about the person is usually not necessary for investigating the matter.

Entity responsible for processing reports

Quattro Mikenti Group has designated report processors who handle the task impartially and independently.

Report processors are tasked with receiving incoming reports and ensuring that they are properly processed. In addition, report processors verify the accuracy of the report, process the report, and plan the necessary follow-up actions. In individual cases, other experts may be appointed for the investigation and processing of the report.

Processing of reports

Reports are processed in accordance with internal guidelines, which take into account the management of conflicts of interest and the escalation of the processing to a higher organisational level, if necessary. The report processor will promptly process the report and assess whether the report is eligible to be processed in the channel. Communication between the whistleblower and the report processors takes place in the reporting channel. The report processor will respond to the whistleblower and, if necessary, request additional information about the matter. The report processor will determine the accuracy of the report and take possible further action.

Reports are investigated and processed confidentially. Primarily, the confidential processing and investigation of reports, as well as careful documentation, protect the whistleblower from retaliation and the subject of the report from unfounded accusations.

The decision on further action and the closure of the case is made by the report processors. If necessary, the whistleblower is informed of any further action taken as a result of the report, as well as of the end of the processing.

The whistleblower's protection against retaliation

Whistleblower protection applies to a situation in which information about a violation received at or in connection with work is reported. However, obtaining whistleblower protection does not require an employment relationship with Quattro Mikenti Group companies. Obtaining whistleblower protection requires that the conditions laid down in the legislation are met. The conditions apply to the manner of reporting and require that the report relates to a violation of certain provisions that may result in the imposition of certain sanctions.

A prerequisite for whistleblower protection is that the whistleblower has reasonable grounds to believe that the information they have reported is accurate and falls within the scope of the law. It is not necessary to be able to prove the suspected infringement, but the report must be submitted only in good faith. Whistleblower protection may be obtained if the report concerns a violation of the regulation mentioned in sections 2 and 3 of the Whistleblower Act. A report of a breach of regulation may concern, among other things, regulations concerning the prevention of money laundering and terrorist financing, product safety and compliance, traffic safety, environmental protection, consumer protection or the protection of privacy and personal data, as well as the security of network and information systems. An additional condition for obtaining whistleblower protection is that the reported act or omission is punishable, may result in a punitive administrative sanction or may seriously jeopardise the achievement of public interest objectives defined in the legislation.

Whistleblower protection includes a ban on retaliation. Prohibited retaliatory measures are those measures in which a person is subject to negative consequences due to the reporting or public disclosure of an infringement. It is also forbidden to prevent the reporting of information about the violation or to prevent its disclosure. Retaliatory measures include, for example, the weakening of the whistleblower's terms and conditions of employment or termination of employment, adverse treatment or other negative consequences that have been taken as a result of the report without other appropriate grounds for them.

If they so wish, the whistleblower can inquire in the reporting channel whether the protection under the Whistleblower Act applies to the reported violation and what measures the whistleblower protection covers.

As a rule, whistleblower protection requires that internal reporting within the organisation is prioritised

According to the Whistleblower Act, in order to obtain whistleblower protection, a report of a violation detected in the operations of the organisation must be submitted primarily via the internal reporting channel of the organisation in question. The report may be submitted immediately to the authority if the whistleblower has reasonable grounds to believe that no action has been taken on the basis of the internal report made within the deadline, that the infringement cannot be addressed as a result of the internal report, or that the whistleblower is at risk of retaliation due to the report.

The Whistleblower Act allows the disclosure of information about a breach only if the whistleblower has reasonable grounds to believe that the breach may cause an immediate and obvious danger to the public interest. In addition, the disclosure of information about the infringement is possible on certain grounds related to the authority or its processing.

Reporting of reports



Reports received in the reporting channel and their processing are reported annually to the management of Quattro Mikenti Group at a general observations level without disclosing the personal data of the whistleblower.