

Whistleblowing Policy 1:3

1. Purpose and policy

Syre Impact AB and its affiliates (jointly, “**Syre**”) are committed to creating a safe, open, and transparent workplace culture, where concerns of any kind can be raised and where whistleblowers are supported, treated fairly, and anonymously.

The purpose of this policy is to set out how Syre encourages and protects whistleblowers who raise concerns about misconduct in good faith and how such concerns are handled through a fair investigation process.

2. Scope

This policy applies to all Syre’s employees, board members, shareholders, interns, volunteers, agents, candidates and all other third parties acting on behalf of Syre such as its consultants, suppliers, or joint venture partners (jointly, “**whistleblower**”). The whistleblowing protection also applies to those assisting the whistleblower.

This policy is based on applicable whistleblowing and speak-up legislation in the jurisdictions where Syre operates. This policy sets a minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, those higher standards must be followed.

This policy can be unilaterally withdrawn, adjusted, or amended by Syre at any time without prior notice.

3. How Syre defines whistleblowing

Syre defines whistleblowing as the passing on of information, often by an employee or a business partner, about wrongdoing or suspected misconduct at work, which the person considers to be illegal, unsafe, or unethical.

4. What can be reported

Any suspected incident that the whistleblower believes may violate laws, rules, regulations, or Syre’s internal policies or guidelines should be reported. An incident can also be reported if the whistleblower suspects that it can harm Syre’s brand or reputation, corporate culture, or otherwise be deemed to be of the public interest.

Reports should be made in good faith, with reasonable ground to believe that the information reported is true at the time of reporting. However, the whistleblower is not required to have firm evidence of the reported incident if the whistleblower is not deliberately providing false information.

5. Who can report and with what protection

A report can be made by a whistleblower and that whistleblower will be protected against reprisals.

Syre is committed to protecting whistleblowers against retaliation. Retaliation includes any direct or indirect adverse treatment as a result of raising a concern, such as dismissal, demotion, disciplinary action, discrimination, harassment, blacklisting or other unfair treatment or punishment. Any retaliation against a whistleblower is subject to disciplinary actions, and any suspected retaliation should be reported immediately to the General Counsel or the Chief People Officer so that it can be investigated.

All whistleblowers shall be protected by strict confidentiality to the extent possible. The identity of a whistleblower will not be disclosed without that whistleblower’s consent, unless required

by law. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary actions which can, in severe cases, include termination.

6. How to raise a concern

Any whistleblower can make an anonymous report by using Syre's external whistleblower platform called Lumgo by following the steps below. Individuals may also report concerns to competent authorities in accordance with applicable law. Syre does not require individuals to report internally before making a report to an external authority.

With regard to employees, in many circumstances, concerns from an employee will be best resolved by the employee raising the relevant issue with their manager or the manager's superior. All concerns can also be raised directly with the Chief People Officer, General Counsel, or Sustainability Director. In all cases, at least two of the above will be involved in the handling of the case, to make sure that the case is assessed properly and in a compliant way. However, Syre understands if a whistleblower prefers to remain anonymous.

In all cases, a report will be handled respectfully, carefully, with confidentiality, and with consideration for the integrity of all individuals involved. All reports will be treated as strictly confidential, in compliance with data protection regulations, and will only be disclosed to authorized persons on a need-to-know basis, in accordance with applicable law and whistleblowing regulations.

How is a report made via the whistleblowing system?

Suspicions of misconduct can be reported 24/7 via Lumgo's web form, using [this link](#). The link can also be found on Syre's website.

Reports can also be done through a physical meeting. A request for a meeting can be submitted via the Lumgo web form, and contact details are required for this option.

When submitting a report in Lumgo, the recipient of the report will be clearly indicated, and will always be the General Counsel and the Sustainability Director in the first stage.

The system also allows communication between the whistleblower and the recipient, even if the whistleblower has chosen to be anonymous. The handler of the whistleblowing case may ask follow-up questions or provide feedback through the platform. After submitting a report, a login code will be assigned. This code should be saved to access the case and review any updates. The case managers are subject to strict confidentiality obligations.

What to include when reporting?

The whistleblower should provide all relevant facts in as much detail as possible. The following information is particularly helpful:

- i) What the report concerns;
- ii) Who was involved;
- iii) Where the incident occurred;
- iv) When the incident occurred; and
- v) Whether the issue was a one-off event or an ongoing or recurring matter.

How is the report handled?

The General Counsel is responsible for overseeing the whistleblowing procedure and ensuring that reports are properly received and handled in an independent and impartial manner. In all cases, the General Counsel shall involve either the Chief People Officer or the Sustainability Director.

The General Counsel will ensure that issues raised directly with them or any manager or through the Lumgo platform are investigated promptly, fairly and thoroughly. This includes ensuring that reports are handled by a limited circle of people, all of whom adhere to strict confidentiality obligations. All whistleblowing cases that are of serious concern, or any cases related to senior management team, will be reported to the Chairman of the board of Syre immediately.

Syre will acknowledge receipt of a report within 7 days and will provide feedback on the handling of the report within 3 months, in accordance with applicable law.

The General Counsel will provide an annual report on whistleblowing activity to the senior management team and the board of directors, as a part of the annual impact reporting. The General Counsel will also ensure managers and employees receive advice and support, ensure that learnings are shared across the organization, arrange trainings when needed and improve the process where appropriate.

Information regarding the processing of personal data

Personal data provided via Lumgo is handled in accordance with the provisions of the data protection regulation, other applicable legislation, and the personal data policy that Syre implements at any time.

7. Non-compliance with this policy

All employees are responsible for complying with the policy. Violations of this policy may result in severe consequences, including termination of employment or legal action.

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