



Whistleblower Policy

1 Scope

This Whistleblower Policy applies to Eltronic Group and its subsidiaries.

2 Basis

This policy is based on applicable national and international laws. In jurisdictions where local regulations impose stricter requirements or procedures, this policy shall be reviewed and adapted accordingly.

3 Purpose

The purpose of this policy is to ensure that all Eltronic Group companies operate under a consistent framework, upholding the highest standards of legal compliance and ethical governance.

4 Ownership

The Whistleblower Policy is owned and governed by the CEO and Board of Directors of Eltronic Group. The CEO of each subsidiary is obligated to implement and follow this policy unless it is replaced by a specific company policy covering at least the same purpose, statements, and targets.

5 Governance

Eltronic Group's Executive Board approves and defines the Whistleblower Policy and is regularly informed about performance and initiatives related to the topic. Eltronic Group has appointed an ESG Board with representatives from the major companies and relevant departments across Eltronic Group. The function of the ESG Board is to advise the Executive Board about the legal requirements and ongoing initiatives regarding the whistleblower system.

6 Evaluation

The Whistleblower Policy will be evaluated every two years, or more frequently in the event of significant changes to the subject of the policy.

7 Policy

It is the policy of Eltronic Group that business must be conducted in a lawful and ethical manner. Any conduct that violates Eltronic Group's values, policies, or applicable laws may be reported by employees, suppliers, or customers without fear of retaliation. To protect whistleblowers, reports can be made anonymously and will be handled confidentially to safeguard the identity of the reporter, if requested.

Employees can find more information on the whistleblower procedure in IMS-2578_EN_Whistleblower in internal IMS system and have access to the whistleblower portal through intranet and website.

7.1 Policy Statements

We will live up to our policy by:

- Ensuring that the whistleblower portal is publicly accessible, user-friendly, effective, and operated by an independent and trustworthy third party.
- Informing employees, suppliers, and customers about our Whistleblower Policy and reporting system.