

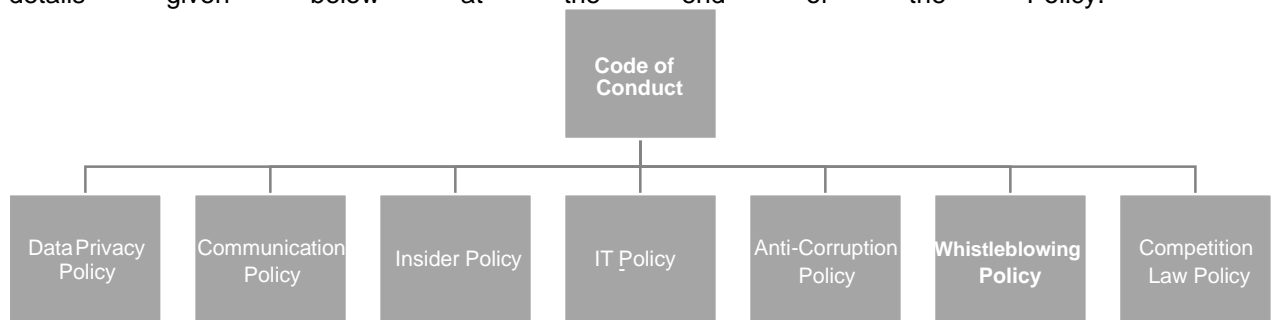
WHISTLEBLOWING POLICY

1. Policy statement and introduction

Fingerprint Cards AB, 556154-2381 with subsidiaries (“**Company**”) are committed to the highest possible standards of transparency, honesty and accountability. This Whistleblowing policy (the “**Policy**”) aims to ease and facilitate for the Company’s employees, and relevant third parties who deal with the Company, to come forward and voice all serious concerns about certain aspects of the Company’s work, violation of laws or breaches of Code of Conduct (“**Whistleblower**”). Furthermore, this Whistleblowing policy is to inform the Whistleblower about how the company ensures, so that concerns can be expressed safely, and how to file a whistleblowing report (“**Whistleblowing report**”). This Policy is prepared by Fingerprints’ Security Forum including Legal, Representative from Management Team, HR and IT and is a part of the Company’s overall compliance structure as set below.

The Policy describes how the Company ensures that the provided support is in a responsible manner and in accordance with the law, including the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (the “**Whistleblowing Directive**”). Finally, the policy describes what rights the Whistleblower has and how to exercise them.

If any questions about this Policy and/or how to file a Whistleblowing report, use the contact details given below at the end of the Policy.



2. Who can be a whistleblower?

- 2.1 The Whistleblower can be an employee of the company or a person having self-employed status, shareholder or person belonging to the administrative, management or supervisory body of an undertaking, as well as a volunteer and paid or unpaid trainee. The Whistleblower can also be any person working under the supervision and direction of contractors, subcontractors and suppliers of the company.
- 2.2 The reporting person may still be a Whistleblower even though work-based relationship with the Company has ended or if it is yet to begin.

3. Who is responsible for the Whistleblowing report?

- 3.1 The Company is responsible for Whistleblowing reports pursuant to this policy. As such, the Company has a responsibility to protect the Whistleblower, including not disclosing the identity to anyone beyond the authorized persons that receive the Whistleblowing report (unless the Whistleblower explicitly consent or if the Company is required to disclose the Whistleblower pursuant to law) and making sure the Whistleblower is not subject to retaliation.
- 3.2 The Whistleblower has a responsibility in this Whistleblowing policy. The Company expects the Whistleblower to only report information and personal data that is relevant for the handling of a specific Whistleblowing report or breaches of the Companies Code of Conduct. The Company asks not to report personal work-related grievances, such as interpersonal conflicts between the Whistleblower and other employees or a decision relating to employment or engagement. Personal work-related grievances should be raised with HR personnel and/or manager or the relevant person in charge.

4. What can be reported in a Whistleblowing report?

- 4.1 If one has information in a work-based relationship with the Company and there are reasonable grounds to believe that there is, in relation to the Company, misconduct or actual breaches of applicable rules or regulations or Code of Conduct, it is possible to file a Whistleblowing report on that matter.
- 4.2 The Whistleblowing Directive particularly specifies the importance of reporting in the following areas: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and welfare; (viii) public health (ix); consumer protection; or (x) protection of privacy and personal data. The Company strongly encourages to file a Whistleblowing report on such matters.
- 4.3 “Reasonable grounds to believe” means that, considering the circumstances and the information at the time of filing a Whistleblowing report, the Whistleblower believes that the reported matter is true.

5. Where can a Whistleblowing report be filed?

- 5.1 The Company enables the Whistleblower to file a Whistleblowing report in writing or orally, or both. Oral reporting is possible through voice messaging systems, and, upon request by the Whistleblower, by means of a physical meeting with such designated impartial person or department as specified in the contact details below.
- 5.2 Filing a Whistleblowing report in writing is possible by using the Company’s external whistleblowing system *Whistlelink*. The product is managed by the external party Izezy AB and is available 24 hours a day. File a Whistleblowing report here: <https://fingerprint.whistlelink.com/>

- 5.3 All reports are received by an independent external company, Izefy. Izefy will make an assessment of the report before any further action is taken. The company will get back within seven (7) days to confirm that the report is received.
- 5.4 When filing a Whistleblowing report, the Whistleblower can choose to file a Whistleblowing report anonymously. This does not affect the rights and protection of the Whistleblower in the EU Whistleblowing Directive. However, complete anonymity may make it more difficult for the Company to investigate the issue or take appropriate actions.
- 5.5 If the Whistleblower has difficulties or if internal reporting would not be appropriate, it is possible to file a Whistleblowing report externally to competent authorities and, where relevant, to institutions, bodies, offices or agencies of the EU.

6. Personal data

- 6.1 The goal is to protect the personal data that the Company processes. This means to always undertake to safeguard the privacy of the Whistleblower and to comply with applicable personal data legislation, including but not limited to the General Data Protection Regulation (GDPR).
- 6.2 When a Whistleblower files a Whistleblowing report, the Company will process the personal data contained therein to fulfil legal obligations according to, among other things, the Whistleblowing Directive. Find more information about how the Company processes personal data contained in a Whistleblowing report in the privacy policy [here](#).

7. What are the Whistleblower's rights?

- 7.1 The Company is committed to implement and maintain necessary and adequate measures to prohibit any form of retaliation against the Whistleblower by reason of filing a Whistleblowing report, including threats of retaliation and attempts of retaliation.

- 7.2 To exemplify further, prohibition against retaliation by reason of filing a Whistleblowing report means, for instance, prohibition against (a) suspension, lay-off, dismissal or equivalent measures; (b) demotion or withholding of promotion; (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours; (d) withholding of training; (e) a negative performance assessment or employment reference; (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; (g) coercion, intimidation, harassment or ostracism; (h) discrimination, disadvantageous or unfair treatment; (i) failure to convert a temporary employment contract into a permanent one, where the Whistleblower had legitimate expectations of being offered a permanent employment; (j) failure to renew, or early termination of, a temporary employment contract; (k) harm, including to the Whistleblower's reputation, particularly in social media, or financial loss, including loss of business and loss of income; (l) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the Whistleblower will not, in the future, find employment in such sector or industry; (m) early termination or cancellation of a contract for goods or services; (n) cancellation of a license or permit; or (o) psychiatric or medical referrals.
- 7.3 In addition to the information provided in this Whistleblowing policy, the competent authority provides comprehensive and independent information and advice, which is easily accessible and free of charge, on procedures and remedies available, as well as the protection against retaliation, and on the rights the Whistleblower has.

8. Contact details

If any questions about this Whistleblowing policy and/or how to file a Whistleblowing report, use the following contact information:

8.1 Company's contact information

8.1.1 CHRO Caroline Krüger, caroline.kruger@fingerprints.com, +46 73 059 75 22

8.2 Izefty AB's contact information

8.2.1 Aria Chavoshi, aria@izefy.com, +46 76 240 93 06

Local deviations in addition to the Whistleblowing Directive may be applicable. Use contact details above for more information.