

September 2025

## PRIVACY POLICY – WHISTLEBLOWING

A. Ahlström Oy processes personal data in accordance with applicable data protection legislation. Data protection legislation means the data protection legislation in force from time to time, such as the EU General Data Protection Regulation (2016/679) and any applicable national data protection legislation. Any data protection related terms that are not defined in this privacy notice shall be construed in accordance with the data protection legislation. A. Ahlström Oy is the ultimate parent of the group and carries the overall responsibility and acts as controller. Other group companies act as controllers as applicable.

### 1 CONTROLLER

Controller	A. Ahlström Oy (hereafter "A. Ahlström" or "we")
Business ID	1670034-3
Address	Eteläesplanadi 14, 00131 Helsinki
Representative	Sandra Wickström, +358 10 888 18

### 2 LEGAL BASIS AND PURPOSE OF PROCESSING

A. Ahlström's whistleblowing channel enables our external stakeholders to report suspicions of any unethical conduct and practices that are contrary to applicable law, A. Ahlström's values or compliance requirements.

The channel enables reporting either by name or anonymously (without entering any personal data). The online whistleblowing service can be accessed by visiting the website: <https://report.whistleb.com/fi/aahlstrom>.

Any personal data related to the whistleblowing channel is only processed for the purposes of handling the whistleblowing reports as well as investigating and resolving the matters reported by using the online whistleblowing service or via other means and, where necessary, for the establishment, exercise or defense of legal claims and/or for participation in other administrative and legal proceedings or providing information to competent authorities.

The processing is conducted as it is necessary (i) for A. Ahlström to comply with its legal obligations; and (ii) to safeguard the legitimate interests of A. Ahlström. When the processing of personal data is based

on the legitimate interests, the controller weighs its interests against the data subject's right to privacy. A data subject has the right to object processing of personal data on the basis of legitimate interest. However, the controller may refuse such an objection in accordance with applicable legislation.

### **3 PERSONAL DATA COLLECTED**

Data stored in the register may contain the following personal data and other information:

- Contact information, such as name, address, e-mail, phone number, title and company;
- All information provided by the persons reporting the suspected misconduct, e.g. description and basis of the alleged misconduct and any other information related thereto;
- Actions taken during the investigation (including any personal data of individual(s) suspected of the breach, witnesses, investigators, and external advisors);
- Outcome of the investigation and the possible disciplinary and/or corrective actions.

### **4 RETENTION PERIODS OF PERSONAL DATA**

All personal data possibly contained within whistleblowing reports are deleted when they are no longer required for the purpose of investigating the matter(s) in question and implementing any subsequent measures. This usually occurs thirty (30) days of the conclusion of the investigation. All documentation associated with the investigation is anonymized and the contact details of the complainant are removed along with any other information that would allow the individual to be directly or indirectly identified.

Subject to the specific requirements in any jurisdiction, personal data shall be retained for a maximum period of five (5) years from the date when a whistleblowing report is received, after which such personal data shall be destroyed unless the personal data may be relevant to any pending or potential litigation, inquiry or investigation.

More information on the retention times shall be provided upon request.

### **5 HOW DATA IS COLLECTED**

Data is collected from the persons reporting the suspected misconduct by using the online whistleblowing service or via other

means and from persons involved in the investigation of the suspected misconduct.

In addition, during the investigation, data can also be collected from other sources such as A. Ahlström's internal systems, from employees or other third parties and other group companies when necessary and as applicable.

## **6 DISCLOSE OR TRANSFER OF DATA**

In general, personal data is not transferred to third parties. Personal data may occasionally be transferred to third parties, such as audit firms, law firms, external investigators or competent authorities in accordance with the applicable laws and regulations or if required for the purposes of the investigation. In addition, personal data may be shared with A. Ahlström Kiinteistöt Oy, Ahlström Konsernipalvelut Oy and/or Ahlstrom Capital B.V. if required for the purposes of the investigation. Online whistleblowing service tool provider People WhistleB is also a personal data processor.

## **7 TRANSFER OF DATA OUTSIDE THE EU/EEA**

Data is not transferred outside the EU or EEA, unless specific measures are taken to protect the data. Transfers of personal data are carried out in accordance with the requirements of the data protection legislation and in compliance with the adequacy decisions adopted by the European Commission or, if necessary, by using Standard Contractual Clauses approved by the European Commission as well as supplementary safeguards. More information on the safeguards used in transfers of personal data shall be provided upon request.

## **8 SECURITY MEASURES**

Personal data is protected appropriately by necessary technical and organizational measures, including technical data security and access control. The personal data is accessed and processed by A. Ahlström's whistleblowing team, which analyses each report and decides on any possible actions taken based on it. Each member of the team is committed to upholding the principles of confidentiality. The online whistleblowing service is operated by an external service provider, WhistleB, Whistleblowing Centre AB. The procedure is encrypted, and password protected. WhistleB does not store any of the metadata associated with whistleblowing reports and does not have access to the IP address of complainants. A. Ahlström Oy has contractually ensured that WhistleB, as a data processor, processes personal data in accordance with the applicable laws and regulations.

## RIGHTS OF THE DATA SUBJECT

As a data subject, you have certain rights under the General Data Protection Regulation 2016/679 (GDPR). Below are short descriptions of these rights. In all matters relating to the processing of personal data and in situations involving the exercise of rights, the data subject should contact the controller's representative.

**Right to access:** Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them.

**Right to rectification:** Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

**Right to erasure:** In certain cases, specified in Article 17 of the GDPR, the data subject has the right to have the controller erase data concerning them.

**Right to restriction of processing:** In certain cases, specified in Article 18 of the GDPR, the data subject can request the controller to restrict the processing of personal data concerning them.

**Right to object:** In certain situations, the data subject has the right to object to the processing of their personal data, that is, request the controller not to process it.

**Right to data portability:** The data subject has the right to receive the personal data that they have provided to a controller in a structured, commonly used, and machine-readable format and, if desired, transmit that data to another controller.

**Right to withdraw consent:** If personal data is processed based on consent, the data subject has the right to withdraw consent by informing the controller. Withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

**Right to lodge a complaint with the supervisory authority:** The data subject has the right to lodge a complaint with the competent supervisory authority if the data subject considers that the controller has not complied with the applicable data protection regulation.