

Whistleblower function

Vitrolife Group strives to achieve a high level of business ethics and transparency. Our employees and business partners are an important source of insight for revealing possible serious irregularities that must be addressed.

Whistleblowing service

Reports of violations against responsible business conduct may be done anonymously and confidentially via an external partner for [whistleblowing service](#).

While whistleblowing can be done openly or anonymously, all messages are encrypted to ensure the anonymity of the person sending a message. At Vitrolife Group, the whistleblowing function is managed by an internal committee consisting of the SVP HR & Sustainability (Chair), the Group General Counsel and the Head of Internal Control & ERM.

The whistleblowing service can be used to alert the company about serious risks of major wrongdoing affecting people, our organisation, the society or the environment.

Reported issues include criminal offences, irregularities and violations or other actions in breach of EU or national laws within a work-related context, for example:

- Corruption and financial irregularities; for example, bribes, unfair competition, money laundering, fraud, conflict of interest
- Health and safety violations; for example, workplace health and safety, product safety, serious discrimination and harassments that are against the law
- Environmental violations; for example, illegal treatment of hazardous waste
- Privacy violations; for example, improper use of personal data

Note that issues relating to dissatisfaction in the workplace or related matters, employees are asked to contact their manager, manager's manager or the HR function, as these issues are not covered by the scope of whistleblowing.

Whistleblowing can be done openly or anonymously and is allowing anonymous messaging. It is administrated by WhistleB (Navex), an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB does not save IP addresses or other meta-data, (that is data that can be related to the person sending the message). The person sending the message also remains anonymous in the subsequent dialogue with the company/organization whistleblowing team. A person expressing genuine suspicion or misgiving will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

[WhistleB, Whistleblowing Centre](#)

Privacy notice for the whistle blower

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he/she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower may be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the non-anonymous whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

Processing of personal data

The whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate actions eligible under Vitrolife Group's Code of Conduct or internal rules. This processing is based on statutory obligations and the legitimate interest of the controller to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case. Data is stored within the EU. For any further questions or complaints please address your request to dataprotection@vitrolife.com

Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower messages that are archived will be anonymised under the applicable laws; they will not include personal data through which persons can be directly or indirectly identified.

Personal data processor

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages.