

"WHISTLEBLOWER POLICY @ FUJIREBIO EUROPE"
Policy for reporting violations of Union or national law

1. Introduction

Fujirebio Europe strives to eliminate any form of misconduct or irregularity within the group. Despite all efforts, misconduct may still occur.

- Our open-door policy allows colleagues to discuss such matters directly with a supervisor, designated person of trust, or contact within the HR team.
- Additionally, Fujirebio Europe has established a reporting procedure, as outlined in this policy.

The whistleblower policy describes the policy and procedure for reporting violations within Fujirebio Europe, as defined in the resp. Belgian, French, German, Spanish and Italian legislation executing the European Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union Law.

This policy is part of our overall policy through which Fujirebio Europe seeks an open and honest corporate culture. This policy applies to all organizations belonging to the Fujirebio Europe Group, i.e., Fujirebio Europe NV, ADx NeuroSciences NV, Fujirebio France SARL, Fujirebio Germany GmbH, Fujirebio Iberia SLU and Fujirebio Italia Srl, collectively referred to as Fujirebio Europe.

Fujirebio Europe provides its own internal reporting channel and ensures that the handling of such reports is done in a serious and discreet manner within the prescribed timeframe. Fujirebio Europe also refers to the option of making a report to the government's external reporting channel, whether or not together with an internal report.

The reporting procedure is intended for reporting (suspected) violations while maintaining the confidentiality of the reporter's identity.

All involved parties are expected to apply this reporting procedure in a correct and respectful manner.

2. Who can report?

Any person working or having worked at Fujirebio Europe or performing tasks in any capacity - employees, independent consultants, interns, directors, shareholders, managers, and anyone working under the supervision and direction of contractors, subcontractors, and suppliers of Fujirebio Europe can make a report and benefit from the protection provided by the law in that regard.

Reporters whose work relationship is yet to commence, in the event that information about violations is obtained during the recruitment process or other pre-contractual negotiations, can also make reports.

3. What can you report?

3.1. Reports covered by the whistleblower policy

The report concerns to information, including reasonable suspicions, about actual or potential violations that have occurred or are highly likely to occur, as well as attempts to conceal such violations, within the organization that the reporter is aware of within a work-related context.

This includes violations of regulations regarding:

- Public assignments;
- Financial services, products, and markets, and the prevention of money laundering and terrorist financing;
- Product safety and product compliance;
- Transport safety;
- Environmental protection;
- Radiation protection and nuclear safety;
- Food safety, animal nutrition and health, and animal welfare;
- Public health;
- Consumer protection;
- Protection of privacy and personal data;
- Security of network and information systems;
- Combating tax fraud;
- Combating social fraud;
- Financial interests and disruption of the internal market within the EU.

3.2. Reports not covered by the whistleblower policy

The policy does not apply to other domains than those mentioned under 3.1., and therefore not to, among others, personal work-related concerns such as dissatisfaction with job classification or wages, working hours, workplace conditions, interpersonal problems and/or performance evaluations, a work accident, misconduct, etc.

For these matters, the existing systems/reporting channels via HR and/or HSE apply.

4. Internal Reporting Procedure

4.1. How to report?

The report should be described as concretely as possible: name, contact information of the reporter and his/her relationship with Fujirebio Europe, any role or involvement of the reporter in the incident, detailed description of the incident/violation, name and contact information of other individuals who witnessed or have more information about the incident, any evidence or relevant documents related to the report.

Reports can be made in the following ways:

- In writing via e-mail to the following email address: whistleblowers@fujirebio.com, accessible only to the reporting management team.
- Verbally, a meeting is scheduled with the reporting management team. The reporter can contact one of the following individuals, every working day between 9 am and 5 pm:
 - *Inge Delputte, Legal/IP/Privacy Director at 0475 64 47 07;
 - *Eike Van de Cappelle, HSE Manager & Internal Prevention Advisor at 0494 56 55 99;
 - *Katty Wieme, HR Director at 0497 51 55 81;After a meeting with one of the reporting managers, a report can be prepared, with the reporter's consent, for the reporter to review, correct, and sign for approval. •
- By mail to Fujirebio Europe NV / ADx, for the attention of the reporting management team, Technologiepark-Zwijnaarde 6, 9052 Zwijnaarde, Belgium.

Every reporter must act in good faith. A collaborator who intentionally reports false information may be sanctioned based on the measures included under the respective labour regulations or may be criminally prosecuted.

4.2. Initial Screening

The Legal/IP/Privacy Director, in consultation with other members of the reporting management team, conducts an initial screening to determine if the report falls within the scope of the policy.

4.3. Acknowledgment of Receipt

The reporter receives an acknowledgment of receipt within 7 days of receiving the report. Even if the report falls outside the scope of the policy, the reporter will be informed within this period and encouraged to address the reported issue through the most appropriate reporting channel, considering the nature of the report.

4.4. Follow-Up

The reporting management team is responsible for the follow-up of the report and communication with the reporter. If necessary, the reporting management team may request additional information from the reporter.

Depending on the nature of the reported issues and the involved department, external consultants/experts may be added to the reporting management team. If a member of the reporting management team has a conflict of interest, they are excluded from further participation in the investigation to ensure the necessary objectivity. If a criminal offense has occurred, police forces may also be involved.

The reporting management team verifies the accuracy of the claims made in the report and determines if the reported violation can be addressed, among others through appropriate measures such as internal preliminary investigation, an inquiry, complaint filing, asset recovery, or termination of procedure.

The reporting management team is obligated to provide feedback to the reporter within a reasonable period and no later than 3 months after receiving the report.

4.5. Responsibilities of Reporting Managers

- To ensure the confidentiality of the report, all members of the reporting management team are bound by special confidentiality in the interest of the reporter.
- Reporting managers are obligated to analyze and investigate the reports and must provide feedback to the reporter within a reasonable timeframe.
- Data protection: Any processing of the report is done in accordance with GDPR. Reporting managers are required to record the reports in a register. The register complies with confidentiality requirements, and unauthorized individuals do not have access to the data. Reports are not stored longer than necessary for investigation and remediation.
- Reporting: Reporting managers prepare an anonymous annual report once a year. The Management Team and the Board of Directors of Fujirebio Europe NV receive this annual report for information.

5. External Reporting Procedure

Individuals who wish to report violations do not need to go through the internal reporting channel first; they can directly contact an externally established reporting channel by the relevant government authorities (for Belgium with the Federal Ombudsman, check for more information on <https://www.federaalombudsman.be/nl/klokkenuiders>).

6. Protection of the Reporter

6.1. Confidentiality of the Reporter's Identity

The reporting procedure guarantees - to the extent possible - that the identity of the reporter is not disclosed. The reporting management team is obliged to observe confidentiality.

However, during the investigation, Fujirebio Europe may be legally obliged to disclose acquired information to the relevant government authorities, including in the case of criminal offenses.

6.2. Protection Against Retaliation

A reporter who, in good faith, reports certain facts is entitled to a protected status and may not be subjected to retaliation (such as suspension, denial of promotion, negative performance evaluation, non-renewal of a temporary contract, dismissal, etc.) as a result of this report. The reporter enjoys this protection regardless of whether the internal or external reporting channel was used.

Individuals actively supporting the reporter during the reporting procedure or family members of the reporter also enjoy the same protection.

Complaints regarding retaliation against the reporter are immediately verified and, if necessary, investigated.

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