



ARVOS POLICY

WHISTLEBLOWING-POLICY

– Non-EU & Non-AUSTRALIA –
MAY 2025

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1. Introduction

ARVOS Group and their respective subsidiaries, (collectively, the “ARVOS”) embrace and adopt this revised ARVOS Whistleblowing Policy (the “Policy”) for its employees who do NOT work in the European Union or Australia, which provides the means for employees and business partners (e.g., vendors, suppliers, and customers) to come forward with credible and substantiated information about illegal conduct, violations of ARVOS policies, or violations of ARVOS contracts, all for the purpose of creating transparency and a responsible corporate environment. In doing so, this Policy also provides that the ARVOS will protect any individual from retaliation, if they have a reasonable basis and are reporting in good faith.

2. Policy Objective

ARVOS encourages all its employees to report, as soon as possible, their concerns related to any illegal conduct they can reasonably substantiate or prove, serious violations of ARVOS policies (especially its compliance policies), or major violations of ARVOS contracts harmful to ARVOS or its customers. All reported concerns will be taken seriously, will be tracked individually, treated confidentially, investigated appropriately and conclusions will be shared with top management or the Board. ARVOS encourages as much substantiation, corroboration, evidence or supporting information as reasonably available to enable ARVOS to conduct a thorough investigation. In all instances, the anonymity of each reporting individual will be respected, and no unfair retaliation will be permitted.

This Policy is within the responsibility of ARVOS Group’s Chief Compliance Officer and is subject to regular monitoring and review.

3. Background

This Policy is an essential element necessary to foster a work environment of openness, accountability, trust, and productivity. Protecting those who make reports under this Policy from unfair treatment, including retaliation, discrimination, or disadvantage, emboldens employees to report wrongdoing and increases the likelihood that wrongdoing is reported, uncovered, and brought to an end. For these reasons, persons in possession of such substantiated information are requested to report it.

4. What is encouraged by this Policy?

The Policy goals are met when an individual passes along information about a substantiated wrongdoing. For a matter to meet this goal, an individual who makes a disclosure must reasonably believe two things:

- a) The first is that the reporting individual reasonably believes that the disclosure shows past, present, or likely future wrongdoing, which properly falls within one or more of the following categories:
 - i. Criminal offense
 - ii. Failure to comply with the law
 - iii. Endangering health and safety
 - iv. Damage to the environment
 - v. Failure to comply with ARVOS/LJUNGSTRÖM code of conduct and corporate policies, including anti-corruption, anti-trust, anti-bribery, International Sanctions Policy, the use of data, and other policies identified by the Company
 - vi. Covering up the wrongdoing in any of the above categories
- b) The second is that they are acting in public interest.

Any other issues which are not covered by the categories above should be reported through the appropriate internal channel (e.g., HR, Compliance, Line Manager).

5. When to report a Concern?

Any person, including ARVOS employees, who have a reasonable belief of information that comprises such information described in the preceding paragraph, are requested to report that information. ARVOS encourages participation in the spirit of transparency and high standards of corporate conduct and ARVOS values.

However, the Policy is **NOT** designed to be a forum where disgruntled employees voice anonymously their criticism of management or their supervisor and such is unacceptable. Moreover, Whistleblowers should understand that false information or accusations submitted may result in decisions that affect other people's lives and careers, and such malicious use of the Whistleblowing Policy is unacceptable. Therefore, honest whistleblowers should only submit information that they have a good reason to believe is true (see Section 3).

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Under no circumstances will there be any reprisal against anyone who reports information under the Policy in good faith. However, if after reporting the information the person reporting learns that the information provided is incorrect or has been innocently misinterpreted, please immediately report this in order to avoid an unnecessary waste of Company resources in investigating and more importantly to prevent damage to your colleague's good reputation and career. Any malicious acts or attempts to cause damage to your colleague's reputation and career could lead to civil and/or criminal liability in some jurisdictions. Note, acting maliciously or abusing the Policy never will be tolerated and could result in disciplinary measures up to and including dismissal in appropriate cases.

6. How to report a Concern?

There are several ways to report a Concern or incident:

a) By regular mail or in person:

European Matters
ARVOS Holding GmbH
Chief Compliance Officer
Am Taubenfeld 21/2
69123 Heidelberg, Germany

US Matters
Arvos Ljungstrom LLC
Compliance Officer
3020 Truax Rd Wellsville
NY, 14895, USA

Japanese Matters
ARVOS K.K.
Compliance Officer
2-3-4, Minatojimanakamachi,
Chuo-Ku Kobe, Hyogo, 650-0046 Japan

Asian Matters
Ljungström Arvos New Energy Technology (Shanghai) Co. Ltd.
Compliance Officer
Room 604-605, 6th Floor, No.333, Lanhua Road, Pudong New
Area, Shanghai 201204, China

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b) By telephone:

Chief Compliance Officer ARVOS Group: +49 6221 7532 333

c) By Internet Application :

<https://arvos.integrityline.app/>

You do not need to disclose your identity and can remain anonymous. In contrast to an e-mail, it is not possible to trace your identity. You can create a mailbox, which is protected by a password created by you and to which only you have access. However, in order to facilitate a more fulsome investigation of the information reported, your identity would be appreciated. Note, the word “anonymous” is not equal to any of your reports using other person’s identity without having his/her prior authorization or even knowledge. If it has been found that you are pretending to be someone else or using another person’s identity, we reserve the right not to investigate your report. Furthermore, we will inform the actual person of your misuse of their identity and such behavior could lead to civil and/or criminal liability in some jurisdictions.

7. Information needed to raise a Concern

Please provide as much detailed information as possible so that your Report can be investigated. Some useful details include:

- a) date, time and location of the suspected Improper Activity;
- b) names of person(s) involved, roles and their business group;
- c) your relationship with the person(s) involved;
- d) the nature of your concern (*i.e.*, a fulsome description of the Improper Activity);
- e) how you became aware of the issue;
- f) possible witnesses; and
- g) other information that you have available to support your report.

The more detailed your Report is, the more likely it is that we will be able to investigate the suspected Improper Activity thoroughly. If you have any documents, files, pictures or the like to support your suspicion, feel free to attach them to the report. If you are afraid that your identity may be concluded on the basis of the additional content, feel free to anonymize before submitting the report and content.

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Our web-based Whistleblowing application referred to above in this Section (“**Application**”) is designed to provide a bidirectional, fully anonymous communication channel. Any identities you might mention within your Report will be kept confidential to the extent possible, *i.e.*, only employees responsible for the (possible) investigation of the reported suspected Improper Activity will have access to this information.

8. What happens next?

- Within seven (7) days of the alert being made via our Application (either by disclosing identity and contact details or by having created an anonymous mailbox) a response will be sent to acknowledge the receipt of the concerns raised. Those raising a concern anonymously without creating a mailbox are encouraged to follow up by using the same way they have used when making the first contact.
- The case will be reviewed internally and assigned for investigation. The person assigned the case will closely cooperate with one of the responsible Compliance Officers and the latter will maintain contact with the person making the report to help ensure clear communication about the progress of the case.
- Once the investigation is concluded, the person who made the report will receive an explanation about how the concern has been addressed. If there are legal constraints, e.g., in a criminal investigation, the reporting person will receive sufficient information in order to see that the concern has been dealt with. If no further action is proposed, the Compliance Officer will inform the reporting person about reasons for this in writing.
- If the investigation is not completed within 3 months or in the time originally estimated for the investigation, the Compliance Officer will provide regular updates to the reporting person.
- Throughout any investigation, employees who make a report under the Policy are expected to continue their duties/role as usual, unless deemed inappropriate. An employee should not suffer any unfair or negative treatment as a result of raising a concern. Any such treatment should be raised and discussed with the responsible Compliance Officer.

9. Effective Date

This Policy comes into force on May 1st, 2025.

12 May 2025

Fabian Immink

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Randolph Mossing