

Whistleblowing Policy

HydrogenPro

1 Whistleblowing policy for HydrogenPro

All employees, hiring agency workers, and other persons performing services for HydrogenPro without being employed by HydrogenPro - such as independent contractors, consultants, vendors, and suppliers and other business partners - all hereafter referred to as a “Person”- should be informed about our whistleblowing policy as outlined below.

Any Person who becomes aware of reportable concerns, including but not limited to human rights violations, discrimination, violation of any other Company policy including as outlined in our Code of Conduct, or any violation of law, are encouraged to “speak up” and notify HydrogenPro in accordance with these guidelines.

2 What is whistleblowing?

Whistleblowing means notifying HydrogenPro, honestly and in good faith, of reportable concerns in the workplace or otherwise related to HydrogenPro.

As noted above, reportable concerns include, without limitation, information about criminal acts, breaches of law or other statutory requirements, breach of HydrogenPro’s policies such as the Code of Conduct and any employee personnel policy or rule, and breach of general ethical standards as well as other information in context of local laws on Whistleblowing. Concerns that a Person believes to be reportable based on the Person’s own ethical, moral or political convictions are not covered by this policy.

Other examples of reportable concerns include actions/omissions that entail or constitute:

- a risk to life and health or of inflicting serious bodily injury
- a risk for the environment and the climate
- corruption, theft of any kind, or other financial misconduct or dishonesty
- abuse of authority, intimidation, bullying, or retaliation for having made a report under this policy
- unjustifiable, hostile, or toxic working environment
- breach of personal information security
- human rights violations (including in the Company supply chain)

Complaints or reports about day-to-day personnel matters- that only apply to the employee’s own employment situation or working conditions and which do not involve any of the above-listed reportable concerns - are best raised to and resolved with the employee’s direct manager, supervisor, or a member of Human Resources.

Whistleblowing is highlighted in HydrogenPro’s “Code of Conduct” approved by HydrogenPro’s Board, and regulated in accordance with any applicable federal, state or local law.

3 Why is whistleblowing desirable and why do we encourage notifying?

Compliance with the law and HydrogenPro's policies is critically important, both from a business operations standpoint and based on HydrogenPro's values. HydrogenPro needs to be and wants to be made aware of any conduct or decisions occurring in the workplace or that otherwise are related to HydrogenPro that may be unlawful, improper, unethical or that otherwise violates any Company policy or value. "Speaking up" and making HydrogenPro aware of any such conduct or decisions occurring within HydrogenPro or in connection with HydrogenPro is strongly encouraged. HydrogenPro wants to address any such matters head on, investigate the matter if and as is needed, and resolve any such matters properly and quickly. By doing so, we honor our commitment to compliance and to a better and more positive work culture.

Consistently prompt reporting, investigation, and resolution not only makes our workplace culture stronger and our business better, but it also helps ensure that criminal offenses and reportable concerns are deterred and avoided in our business, which also creates a better working environment.

As discussed below, sharing information you have about a reportable concern also entitles you to not be subjected to retaliation for having raised a reportable concern. HydrogenPro prohibits any such retaliation, and will take action against any Person whom HydrogenPro learns is retaliating or has retaliated against anyone for having notified HydrogenPro about a reportable concern.

4 Who may report concerns?

All Persons, may report reportable concerns under this policy. HydrogenPro also subscribes to the principle of "Penalty free" for reporting as stated in our "Code of Conduct".

5 Who should you report your concerns to?

You can always notify your immediate supervisor, Human Resources or Chief Legal Officer. You can also notify your safety delegate, will subsequently follow up the report with the relevant managerial person in HydrogenPro.

Further, you might always report safe and anonymously with our whistleblower partner,

Littler|Whistle Protect: <https://report.whistleb.com/hydrogenpro>

Your report will be received by the local Littler office, who are experts on whistleblowing, in the country where HydrogenPro is located. They will, ensure proper and safe follow-up of your report, in line with the standards set by applicable local law.

You are always entitled to report reportable concerns to the appropriate national authority; of course, we encourage you to first raise any reportable concern with HydrogenPro so that HydrogenPro has knowledge of the concern and we can work together to address the concern, especially if it raises any immediate safety or health issue.

6 How can you report your concerns?

You can report them either verbally over the telephone, or directly to any of the individuals specified above in this policy. You can also send a letter or an email.

Notification pursuant to this policy also may be done anonymously through the whistleblowing channel, but, if possible, it is desirable that you provide your identity as this helps HydrogenPro more thoroughly investigate the reportable concern. This also ensures more effective and timely follow-up information requests. If reporting with your identity disclosed, your name will be kept confidential to the extent possible within the limited circle of people handling the concern within HydrogenPro, and within the framework of applicable law.

7 What should the report contain?

The notification should contain the following:

- Name of the reporter (may also be anonymous)
- Location of employment or service
- Date of notification
- Date, time and location of the conduct//act/incident/issue/or decision being reported
- Specific description of the conduct/act/incident/issue/or decision being reported
- Identity of any witnesses
- Knowledge of previous cases, including involving any of with the same person(s)

8 HydrogenPro's handling and Follow-up of the notification and reporting

- All reportable concerns are taken seriously.
- The person reporting the concern shall be, within a reasonable amount of time or within time limits in accordance with applicable law, be provided with confirmation that their report has been received.
- Any person about whom the report has been made shall, as a norm, be informed of the substance of the reportable concern and be given an opportunity to present their side of the matter, if this step can be implemented in line with applicable local law and the statutory standards on confidentiality in particular.
- HydrogenPro shall, as far as reasonably possible and in line with the statutory standards set by local law, process the reportable concern without divulging the identity of the reporter to anyone other than those who have a need or right to have such knowledge.

- The applicable regulations and laws on the right to information and access for the whistleblower will be respected where applicable. Persons reported on could have the right to know the identity of the whistle-blower, depending on applicable local law and personal data protection rules and other applicable laws
- HydrogenPro shall decide whether an investigation is warranted based on the facts and circumstances and, if so, will initiate an appropriate investigation to help ensure that the matter has been satisfactorily clarified and understood before a final decision is made.
- HydrogenPro also will consider whether any pro-active measures need to be implemented in order to protect the interests of the parties involved in the reportable concern before a conclusion is reached on the matter.
- The process must be documented in writing, including any final decision made in compliance with applicable local laws about whether the substance of the reportable concern has occurred and, if so, the appropriate resolution and any next steps as determined by HydrogenPro.
- The parties involved in the report and the reportable concern will be notified of the outcome accordance with applicable local law.

9 Security for the notifier/whistleblower

Reporting honestly and in good faith any reportable concern is strongly encouraged and must not be met with any form of retaliation, either by HydrogenPro or a hiring agency. Please see HydrogenPro's Code of Conduct item 5 and applicable local laws.

Retaliation for reporting means any adverse act, practice or omission adversely impacting the reporter's employment and that is a consequence of, or a reaction to, a reporter for having given notice of a reportable concern. It can, for example, be a warning, dismissal, discriminatory treatment, harassment, bullying, intimidation, change in work tasks or position, shunning, and more.

If you nevertheless experience retaliation, report this immediately to your immediate supervisor, Human Resources or Chief Legal Officer. You can also notify your safety delegate, will subsequently follow up the report with the relevant managerial person. Further, you might always report safe and anonymously with our whistleblower partner, Littler|Whistle Protect: <https://report.whistleb.com/hydrogenpro>

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