

INTERNAL WHISTLEBLOWING GUIDELINES

1. Introduction

Whistleblowing is an opportunity for everyone to promote legitimate, fair, open, and transparent operation of SKONTO GROUP and its subsidiaries (hereinafter – SKONTO GROUP) by using the right to express his or her views freely.

2. Purpose of the Guidelines

- 2.1. SKONTO GROUP Whistleblowing Guidelines (hereinafter – the Guidelines) is a corporate governance tool that regulates the protection of individuals who blow the whistle on possible misconduct (violation of legal norms or ethical or professional norms) while fulfilling the work duties.
- 2.2. The purpose of the Guidelines is:
 - to promote the sustainability of SKONTO GROUP as well as the openness and transparency of its activities;
 - to rise the trust of employees, investors, and business partners;
 - to help SKONTO GROUP to create an internal culture of openness and cooperation.

3. Basic principles of the internal whistleblowing system

- 3.1. *Promotion of whistleblowing.* SKONTO GROUP supports and promotes rather than discourages whistleblowing of good faith of potential misconduct in the company's activities.
- 3.2. *Better corporate governance.* The internal whistleblowing system is a management and internal control tool that helps SKONTO GROUP to prevent misconduct in a timely manner.
- 3.3. *Involvement.* The purpose of the internal whistleblowing system is to promote everyone's involvement in the activities and sustainability of SKONTO GROUP.
- 3.4. *Compliance.* The internal whistleblowing system is designed in accordance with the size and operational nature of SKONTO GROUP and its potential risks.
- 3.5. *Protection of the whistleblower's identity.* The whistleblower can feel safe: SKONTO GROUP does not disclose the details of the person who has reported on misconduct.
- 3.6. *Fair and responsible reporting.* The whistleblower reports potential misconduct in good faith. Whistleblower is not responsible for the accuracy of the information provided but shall responsibly assess how true and reliable the information is.
- 3.7. *Non-retaliation, protection of whistleblower.* SKONTO GROUP does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating.
- 3.8. *Available process.* The information on whistleblowing process in SKONTO GROUP is easily accessible and understandable to everyone.
- 3.9. *Examination of reports.* The whistleblower reports are registered and carefully and responsibly examined. An appropriate action follows detection of violation.
- 3.10. *Feedback.* The whistleblower receives confirmation and feedback about the progress of the report.

4. Internal whistleblowing procedure

- 4.1. The internal whistleblowing system is designed for:
 - SKONTO GROUP employees - to provide information about possible violations and misconduct that they observe in the course of their work and using their professional knowledge and experience to assess the danger of such violations or misconduct;

- persons contracted by SKONTO GROUP (for example, based on an enterprise agreement or hired by SKONTO GROUP to provide a service or perform a specific job on behalf of it) - as a violation in the activities of SKONTO GROUP or misconduct may also be observed by those persons;
- SKONTO GROUP owners and persons who manage or supervise the activities of SKONTO GROUP;
- volunteers;
- natural persons establishing legal relations with SKONTO GROUP (e.g., candidates for job interview);
- service providers during the contracting process or during its performance; (hereinafter – the whistleblower).

4.2. A whistleblower is entitled to blow the whistle especially on the following violations:

- failure to act, negligence, or abuse of the position by SKONTO GROUP management or employees;
- corruption;
- fraud;
- squandering of financial resources or property of SKONTO GROUP;
- tax avoidance;
- public health threat;
- food safety threat;
- construction safety threat;
- environmental safety threat;
- labour safety threat;
- public order threat;
- infringement of human rights;
- violation in the field of public procurement;
- violation in the financial and capital market sector;
- violation of competition law;
- any other significant violation or threat.

However, it is necessary to remember that whistleblowing is not:

- reporting only of personal interest infringement or private law dispute;
- deliberate provision of false information.

4.3. To inform of a violation or misconduct the whistleblower submits a report (hereinafter – the report) describing the identified violation and the manner in which the information on the violation has been obtained.

4.4. The whistleblower can submit the report:

- electronically by filling in a special form available on SKONTO GROUP website: www.skontogroup.com;
- electronically by sending information to e-mail: report@skontogroup.com;
- in the form of a paper document in a specially arranged mailbox installed in each SKONTO GROUP company;
- or calling by phone +371 67096120.

4.5. The recipient of the report ensures that appropriate measures are taken to protect the whistleblower.

4.6. The Board of SKONTO GROUP appoints a special workgroup to examine the report.

4.7. Reports are examined immediately, with due diligence, by providing feedback and appropriate action – internal corrective measures or reporting to external bodies in cases of misconduct or preventive actions on process improvement.

4.8. If the report is not anonymous, the whistleblower is being informed about the progress of the examination and follow-up actions.

Guidelines have been revised and approved:

Riga, Latvia, year 2020

SKONTO GROUP
Chairman of the Board

Andris Vilcmeiers