

CapMan HR 11/2025

CapMan People Policies

A subset of CapMan's Corporate People Policies

Contents

1.	Introduction.....	3
1.1.	CapMan as an employer	3
3.	Travel Policy	4
4.	Policy for Voluntary Leave of Absence	5
5.	Foreign Assignment Policy	5
6.	Social Media Guidelines	6
7.	Recruitment and Onboarding	6
7.1.	Principles of using different types of employment	6
7.2.	Principles of recruitment	6
7.3.	Principles of introduction.....	7
7.4.	Processing of personal data of recruitment candidates	7
8.	Work Environment, Health and Safety	7
8.1.	Work Environment Policy	7
8.1.1.	Health & Safety Committees/Representatives	9
8.2.	Early Support Policy	9
8.2.1.	Early Support discussion	9
8.2.2.	Return to work discussion	10
8.3.	Alcohol and Drug Policy.....	10
8.4.	Smoking Policy.....	10
9.	Training and Development	10
9.1.	General guidelines	10
9.2.	The CapMan approach to learning	11
10.	Discrimination and Equal Opportunities Policy	11
10.1.	Action plan for ensuring equal opportunities	12
10.2.	Follow-up.....	12
11.	Anti-Harassment and Bullying Policy	12
11.1.	Definitions	12
11.2.	Efficient measures and zero tolerance.....	13
12.	Fairness Procedure	13
13.	Whistleblowing Policy	14
14.	Processing of Personal data of employees.....	14

1. Introduction

These People Policies will provide guidelines and processes implemented at CapMan. The document at hand is a subset of the CapMan Corporate People Policies, which is an internal document. The policies apply to all CapMan Group employees if not otherwise specified. The purpose of these guidelines is to give employees an overview of the terms and policies on a general level. These policies are subject to changes at CapMan's sole discretion in accordance with local legislation.

1.1. CAPMAN AS AN EMPLOYER

CapMan is a leading Nordic private assets management and investment company with a large international network. Rooted in the Nordics, we have successfully invested across a wide range of private asset sectors for over 35 years. We invest in real estate and infrastructure assets, natural capital and businesses. As active owners we create growth journeys, success stories, and turnarounds, improve Nordic infrastructure, strengthen societies and make businesses more sustainable. Our teams are locally based and guided by Nordic values, committed to honesty, teamwork, and action. Driven by our passion for growing businesses, driving sustainable change, and helping to build the society of tomorrow.

We are an employer who is committed to pursuing both environmental and social sustainability within all our business practices, including our work environment. CapMan respects and promotes human and labour rights throughout its operations. At a minimum, those are the rights set out in United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the International Bill of Human Rights. More information on our approach to sustainability can be found in our Sustainable Investment Policy on our website.

Altogether, CapMan Group employs people in Helsinki, Jyväskylä, Stockholm, Copenhagen, Oslo, Düsseldorf, London, and Luxembourg. As an employer, we offer a unique opportunity to work in an exciting industry and listed company environment with great colleagues and a low hierarchy culture. CapMan was established in 1989 and has been listed on the Helsinki Stock Exchange since 2001.

CapMan Mission

Our mission is to build value for the enrichment of society.

CapMan Vision

To become the most responsible Nordic private assets company.

CapMan's values

High ethics – We believe in integrity and transparency. We are a reliable partner and responsible owner respecting all our stakeholders. We always consider the long-term impacts of our actions.

Active ownership – Active ownership is the basis for all our actions. We deliver innovative solutions proactively and with a hands-on approach. We create lasting value by working closely with all our stakeholders.

Dedication – We are committed to entrepreneurial drive. We are hungry, but humble and encourage continuous development and learning.

2. Code of Conduct

Purpose, applicability and administration

The purpose of the Code of Conduct (the “Code”) is to establish basic principles regulating our decision-making and actions in business environment and the responsibilities of CapMan Group’s employees, officers and directors. The Code is a tool, which guides us beyond being compliant with laws and regulations: we also operate based on what is ethically the right thing to do. In many cases, more specific and practical guidelines and requirements are contained in the various corporate policies and procedures.

Each CapMan employee is personally responsible and accountable for knowing and complying with the Code. Each manager should through his or her own behaviour demonstrate the importance of the compliance with the Code and advise employees with their questions on the interpretation or applicability of the Code. Although the Code is non-exhaustive, any decision or judgement by CapMan employee should be based on the principles of the Code and high ethics. CapMan expects its portfolio companies and service-providers, suppliers, and other business partners and contractors to apply a similar set of standards in their operations.

The Code has been approved by CapMan Plc Board of Directors. The day-to-day implementation of the Code is the responsibility of CapMan’s Legal, Tax & Compliance department. Each CapMan employee, officer and director is personally responsible and accountable for knowing and complying with the Code. The Code in full detail is available on the CapMan website.

3. Travel Policy

The need for travelling at CapMan is always to be evaluated from a business-critical perspective. Business trips are to be planned in a way which keeps costs and time spent for travelling as reasonable as possible and is based on sustainable and climate conscious choices.

Business trips are always to be pre-approved by the travelling employee’s manager. The employee is responsible for obtaining the approval before travel arrangements are made. Travel between home and the ordinary place of work is not considered a business trip.

CapMan Group’s Travel Policy and associated Travel Guidelines applies to all business trips made by CapMan employees, consultants and other contacts travelling on CapMan’s cost. Each traveller and the assistants supporting the travel arrangements are responsible for following the guidelines described in this chapter.

When planning business trips, safety is always to be a priority. Employees should not travel to dangerous or unstable destinations. The Management Group members as well as a whole individual team should avoid travelling together if possible.

When travelling, information safety must also be considered. The company computers should not be checked in on a flight or left unattended. If working in public places during travel, employees must use secure internet connection and a screen shader to prevent outsiders seeing sensitive material on their computers (e.g. persons sitting next to or behind them on a plane).

If a crisis occurs in the area where the employee is travelling or in the means of travel the employee is using, he/she is requested to immediately (or as soon as possible) report him/herself to the manager.

All employees have travel insurance for CapMan business trips.

Whenever possible, the lowest price airline and an inflexible ticket should be used provided that it does not unreasonably extend the time spent travelling. In cases where the timing or other elements of the trip are likely to change, the most inexpensive possible flexible ticket may be booked. For long-haul flights, a business class ticket can be booked. If needed, a fast lane check-in may be booked.

In line with CapMan's ambitious greenhouse gas (GHG) emission reduction targets, which also include business-related travel, CapMan has committed to pay for carbon removal equivalent to the emissions generated from our business-related flights. Each CapMan team will be invoiced twice per year in accordance with the GHG emissions generated from their flights. Carbon removal along with CapMan's Travel Guidelines is setting us to achieve our GHG emissions reduction targets.

4. Policy for Voluntary Leave of Absence

This section outlines the principles to employees for applying for non-compensated, partly compensated or fully compensated leave of absence mainly for the purposes of developing their professional skills. CapMan strives to maintain as a workplace where both individual and collective renewal of skills and competencies is supported for the purposes of long-term work satisfaction and development.

When there is a mutual interest between CapMan and the employee to develop certain professional areas in a way that requires full-time focus, it is possible for the employee to apply for a leave of absence from his/her position in accordance with local legislation. Depending on the case, the degree of mutual interest in the development area that the employee is going to focus on, and the employees' capability to carry out some of his/her responsibilities during the leave, the company can decide to compensate for 0-50% of the duration of the leave in salary. Decisions are made on a case-by-case basis and the grandparent principle is always applied to in the decision-making process.

5. Foreign Assignment Policy

The Foreign Assignment Policy outlines the principles and practices we apply to our employees who are offered a job opportunity abroad within the CapMan Group. The aim of this policy is to ensure aligned general terms and conditions for foreign assignments in all CapMan Group companies.

When considering a foreign assignment, the objectives are always considered from the viewpoint of both the company and the employee. The objectives of foreign assignments at CapMan are as follows:

From company point of view

- Facilitate the strategy of a Nordic private equity company
- Take advantage of the Nordic organization in resource allocation
- Develop the competencies of professionals

From employee point of view

- Share competencies and extend own role in the Nordic organization
- Develop personal skills and competencies
- Provide steps in career path

6. Social Media Guidelines

CapMan uses relevant social media channels selectively and is present only in social platforms useful for its business and brand visibility. We have a social media policy that is updated by the Marketing and Communications team. The policy is available for employees on the intranet. All our employees are required to follow our social media guidelines and act as good ambassadors of the company in all respects.

All our employees are welcome to follow CapMan's social media channels and share our job postings and news. When using social media channels, we expect our employees to maintain their profiles updated in accordance with their current work role.

7. Recruitment and Onboarding

CapMan recruits skilled professionals to join the company in different roles. This chapter presents our general principles of using different types of employment and our principles of recruiting and onboarding.

7.1. PRINCIPLES OF USING DIFFERENT TYPES OF EMPLOYMENT

Employment relationships at CapMan are primarily on a permanent basis. Temporary assignments are used e.g. for internships, seasonal or project work or substituting for employees on different types of leaves of absence. These temporary assignments can be either full-time or on an hourly basis depending on the circumstances. Employees hired from an agency are used as needed to cover acute staffing needs or sometimes to replace employees on leave of absence or in short-term when suitable employees with right competences cannot be found by recruiting. External consultants are used primarily in projects and when providers of expertise are not available at the required time within the company.

7.2. PRINCIPLES OF RECRUITMENT

CapMan aims to recruit people who combine talent, education and skills with great attitude and drive. We also believe that the principles of Diversity, Equity and Inclusion (DEI) brings value to our organisation in the form of diverse views and ideas which are inextricably linked to our success. Cultural fit is emphasized in all recruitments as we seek candidates who share our values and want to be a part of an organisation on a mission to build value for the enrichment of society.

CapMan is committed to promoting an equal distribution of the genders across all positions and career steps in the company. This is supported by a recruitment process and a framework for promotions and internal recruitments which prioritize the experience and knowledge needed in the position as selection criteria over gender, age or other non-job-related traits.

CapMan's open positions are generally published on the company's web pages and other suitable recruitment channels such as LinkedIn. Internal applicants are encouraged to apply to the open positions, and they will be interviewed for the positions along with external candidates. When needed, we also use headhunting services.

In general, the recruitment process consists of at least two interviews, a case study and a personal assessment for information on candidate's personality, motivation factors, management style and ways of working. Reference calls are made for the last stage candidates with permission of the candidates. Credit information is checked in Partner, Head of, Director, Controller and Middle/Back Office positions in accordance with local legislation. To avoid conflict of interests,

new employees are also asked to notify any sideline activities, i.e. any other employment, paid work, own business, directorship, management assignment or other fiduciary duties or assignments.

As part of the recruitment process, candidates selected to permanent and certain fixed-term positions will undergo a healthcare check (including drug screening, where applicable), in accordance with local legislation, conducted by the company's healthcare provider.

To ensure that CapMan follows its Discrimination and Equal Opportunities Policy, there will always be more than one person involved in the different stages of the recruiting process.

7.3. PRINCIPLES OF INTRODUCTION

CapMan is committed to making all new employees feel welcome and have a solid start of employment by providing comprehensive introduction. The introduction of a new employee consists of three main dimensions: 1) the introduction concerning employment at CapMan, 2) the general introduction to CapMan and finance industry policies and 3) the introduction into the person's position, job tasks, team and colleagues.

In addition, all new employees around the organisation are invited to Introduction Days which are held bi-annually. At the Introduction Days, the newcomers will get a comprehensive overview of CapMan's businesses, culture and organisation.

7.4. PROCESSING OF PERSONAL DATA OF RECRUITMENT CANDIDATES

CapMan respects the privacy of all its stakeholders, including recruitment candidates. We process personal data in accordance with the EU's general data protection regulation ("GDPR") and other applicable legislation. Our Privacy Notice that applies to personal data of the individuals who seek to work for CapMan either through application or through recruiting agencies is available at the company's website.

8. Work Environment, Health and Safety

CapMan is committed to ensuring the safety of its employees and believes that good health and well-being is an important factor of success. This chapter deals with the company policies and regulations on matters regarding work environment and health and safety.

8.1. WORK ENVIRONMENT POLICY

CapMan endeavours to ensure a work environment that is safe and secure, where high performance is valued and achieved in a way that does not conflict with the employee's well-being. We thrive to create a work environment that is healthy, motivating and brings out the best in all employees. We promote Diversity, Equity & Inclusion (DEI) to ensure our employees feel respected and engaged. As such, we are dedicated to creating a workplace that encourages and supports all of us, advances positive change and leads by example.

At CapMan, we see all our employees in a key role in building a good workplace. We also recognize the importance of good managers and leadership skills. Work environment management is, and always remains, a work in progress at CapMan. Our general health and safety policy statements are to be viewed upon as goals to which we constantly must strive towards, taking measures and creating routines to live up to.

CapMan general policy statements

As a minimum, CapMan follows the local legislation concerning work environment and occupational safety in each country. Moreover, the following measures or policies apply in order to live up to the general policy statements.

To prevent accidents and increase work-related physical and mental wellbeing:

- Preventive health measures through occupational health care (health check-up, allowance for health promoting activities, terminal glasses, vaccines etc.);
- Work environment perspectives and ergonomics taken into account when purchasing office materials and other equipment;
- Alcohol and drug policy;
- Smoking policy.

To provide a work environment that will enhance the employee's mental or social well-being:

- Ability to combine work with private life and leisure time to achieve a good work-life balance;
- Possibilities to affect one's own work in accordance with the training and development policy;
- Discrimination and Equal Opportunities policy;
- Anti-Harassment and Bullying policy.

To take efficient reactive measures if the work-related physical, mental or social well-being of the employee is threatened:

- A fast and efficient rehabilitation process according to the Early Support policy;
- Sufficient number of employees with first aid skills in all offices;
- Regular fire drills;
- Zero-tolerance against all forms of harassment and discrimination;
- Whistleblowing policy;
- Fairness procedure;
- Issues of equality highlighted and brought to attention according to Discrimination and Equal Opportunities policy.

To include employees in the work environment management and to make it a naturally integrated part of the daily work:

- Consultancy of employees and safety representatives prior to any changes that might affect the work environment;
- All safety representatives have sufficient knowledge and training in relation to their mission;
- All employees know who their local safety representative is and whom to contact to discuss the work environment;
- Work environment related questions should be included in the periodical employee satisfaction surveys.

To review and revise this policy as necessary at regular intervals:

- Annual risk assessments on organizational level;
- Annual action plans for improvement of the work environment, which include DEI objectives and measures;
- This policy shall be reviewed in connection with the drafting of any annual action plans or more often if necessary.

8.1.1. Health & Safety Committees/Representatives

All locations maintain local occupational safety representation/committees following the local legislation. CapMan Group has the overall and final responsibility for the work environment and occupational safety.

8.2. EARLY SUPPORT POLICY

The CapMan Early Support Policy is designed to help managers identify and respond proactively to early signs of concern regarding an employee's wellbeing and working capacity. The aim is to address these signs early, provide timely support, and enable a sustainable return to full working capacity.

Voicing a concern, early intervention, and early support dialogue between the manager and the employee are key tools in ensuring that any challenges are identified and addressed promptly. These tools also help ensure that necessary rehabilitation or other corrective measures are implemented efficiently, supporting a swift and sustainable return to work.

CapMan promotes a culture of shared responsibility. While managers have a central role in identifying and addressing early support needs, employees are equally expected to take an active role in maintaining their own wellbeing. In the Early Support process, this includes being open to dialogue, participating in support discussions, and engaging with agreed-upon measures and follow-ups.

Through structured Early Support processes, including occupational rehabilitation and active preventive measures such as fostering a good working environment, CapMan strives to maintain high levels of job satisfaction and overall wellbeing, and low levels of sick leave among its employees.

Early Support is embedded in the day-to-day leadership. All CapMan people managers assume responsibility for ensuring that employees' Early Support needs are recognized and that appropriate actions are taken and followed up on. Employees, in turn, are encouraged to raise concerns about their own wellbeing or work capacity early and engage constructively in the support process. Everyone at CapMan are encouraged to voice concerns about a colleague's wellbeing if they notice signs of distress or change.

The HR team supports managers by providing guidance on relevant policies, prevailing rules, and legislation. Managers are also supported in conducting "Early Support discussion" and "Return to work discussion".

Early Support measures typically include structured discussions between the manager and the employee in cases of signs of concern arise (the "Early Support discussion") or in case of long or recurring sick leave (the "Return to Work discussion"). Occupational health professionals may be involved when needed. The HR team provides managers with templates and support throughout the process.

8.2.1. Early Support discussion

In addition to a long-term sick leave, other early indicators, such as frequent short absences, changes in performance, reliability, or appearance, may signal a need for support. These signs may be noticed by the manager or co-workers.

When such concerns arise, the manager should initiate an Early Support discussion with the employee in order to understand whether the origin of the concern is work-related and can be addressed through workplace measures. If the concern is of a personal nature, external support options may also be considered.

Employees are encouraged to proactively request an Early Support discussion if they feel the need for support. Open communication and mutual trust are essential to the success of this process.

8.2.2. Return to Work discussion

A Return to Work discussion is arranged to support a smooth and sustainable return after a long sick leave, in accordance with local legislation. The discussion covers practical arrangements and any necessary adjustments to facilitate the employee's return. The HR team and/or occupational healthcare may be consulted as needed.

Typically, such discussion should be initiated at the latest if an employee has been on sick leave for total of four weeks within a calendar year.

8.3. ALCOHOL AND DRUG POLICY

CapMan endeavours to ensure that any employee's use of either alcohol or other drugs does not impair the safety or efficiency of the organisation or the health of its employees. A drug screening test is included in healthcare check for all new permanent employees according to local legislation. New employees will be informed of the procedure during recruitment process. The check will be conducted within four months of the beginning of the employment relationship by the company's occupational healthcare service provider. The result of the test will be delivered to the HR Team and dealt with confidence. In case the drug screening test would prove use of narcotics for non-medical purposes in a manner that would impair the employee's work or functional capacity, CapMan may consider this as a reason to terminate the employment during the probationary period or to withdraw the offer of a permanent employment in case of transitioning from fixed-term employment to a permanent position.

It is strictly forbidden for employees to conduct their duties under the influence of either alcohol or other drugs. Employees are always to comply with company policies even during company events.

8.4. SMOKING POLICY

CapMan is a smoke-free company and promotes a healthy lifestyle. It is not under any circumstances allowed to smoke indoors at CapMan's offices under any time of day neither in work nor social contexts. Smoking is only allowed outside, however not by the main entrances. This applies to all employees of CapMan as well as guests. A cigarette break is considered to be employee's own time and must be compensated in working time. This policy applies to electronic cigarettes as well.

9. Training and Development

9.1. GENERAL GUIDELINES

CapMan offers opportunities for professional development by providing different types of training (external or internal) on a case-by-case basis. The aim for all individual training or team training is to reward, motivate and actively encourage the employees to develop skills and ways of working as well as to develop CapMan as a company. Training also aims to enable the employee to better meet the needs of the role and to better reach the employee's objectives at work.

All trainings should consider employee needs and best ways to learn. CapMan encourages employees and managers to consider multiple training methods such as workshops, e-learning, lectures and more. Both employees and their managers are responsible for continuous learning.

The company has an annual budget for training and development activities. The team-level budget is administered by the manager, who will determine the training needs of the team. When considering trainings, both individual and business needs are to be evaluated.

All CapMan employees are provided development opportunities regardless of the nature of the employment.

9.2. THE CAPMAN APPROACH TO LEARNING

The company's approach to training and development is based on 70-20-10 model. We believe, as research shows, that 70% of learning takes place at work. We thrive to nurture potential and offer interesting projects and new responsibilities to enhance learning. Besides work, 20% of learning takes place by getting feedback: paying attention to success factors, learning from mistakes and sharing experiences. The rest, 10% of learning takes place on formal, specified training sessions, such as work-related method courses or similar.

In general, we encourage the following employee trainings:

- On-the-job training
- Internal online trainings
- Formal training sessions (individual or corporate)
- Participating in conferences and other occupational events (preferably free of charge)
- Job rotation
- As part of learning and development, CapMan also arranges for subscriptions or educational material for employees to have access to news, articles and other material that can help them become better at their job.

Examples of corporate training programs

- Training new employees (introduction)
- Training teams in company-related issues (e.g. new systems or policies)
- Project management training
- Negotiation and presentation skills training
- Compliance training
- Leadership training for managers

10. Discrimination and Equal Opportunities Policy

Discrimination in the workplace is not tolerated. It is destructive and promotes inequalities. CapMan is committed to respecting and supporting the rights of employees to equal opportunities in a work environment that does not discriminate on grounds of gender, age, sexual orientation, race, religious faith, marital status, pregnancy, gender identity and expression, disability, political affiliation, and national or ethnic origin or any other criteria.

CapMan is firmly committed to creating strong business growth, which is not achieved at the expense of the environment, quality of life or social equity.

The aim of this policy is to ensure that CapMan has activities in place to prevent discrimination and promote equal opportunity within the workplace, enriching the diversity, rights and morale of employees and enhancing the organisation's relations.

10.1. ACTION PLAN FOR ENSURING EQUAL OPPORTUNITIES

CapMan provides equal opportunities and obligations for all employees regardless of gender, age, sexual orientation, race, religious faith, marital status, pregnancy, gender identity and expression, disability, political affiliation, and national or ethnic origin or any other criteria and prevents discrimination by:

- Annually reviewing equal opportunities/discrimination including a ratio between men and women, inconsistencies - if any - in promotions, and reviewing and promoting gender pay equity. If inconsistencies are found, a plan will be put in place to ensure equal treatment. Pay and promotions are also reviewed from this perspective annually in the HR Committees.
- Effectively communicating this policy and associated guidance and procedures to all employees and managers.
- Providing all new employees with access to the policy.
- Developing and updating procedures and guidelines to facilitate policy implementation and empower management to ensure policy aims are met (Fairness Procedure, Anti-Harassment and Bullying Policy, Whistleblowing Policy).
- Ensuring that gender, age, sexual orientation, race, religious faith, marital status, pregnancy, gender identity and expression, disability, political affiliation, and national or ethnic origin or any other criteria does not affect the setting of the salary or other benefits provided by CapMan.
- Implementation of zero tolerance to harassment and bullying.
- Investigating all allegations against breach of policy, taking them all seriously and treating them accordingly ensuring Fairness Procedure.
- Not tolerating discrimination towards CapMan employees by stakeholders.
- Keeping in touch with employees on parental leave by manager.
- Ensuring managers are given all support and consultation they might need.
- Understanding that discrimination is not always done consciously and therefore the HR Team is always to be consulted and/or involved in promotion or recruitment decisions. This does not mean that the manager's discretion is considered inferior, however, hiring managers undergo unconscious bias training to ensure equal opportunity in the hiring process.

10.2. FOLLOW-UP

CapMan reviews and revises this policy at regular intervals and take actions that enable us to ensure we live up to it. This is made by ensuring the company has an action plan for equal opportunities by:

- Annually reviewing the actions taken and related policies (Fairness Procedure, Anti-Harassment and Bullying Policy, Whistleblowing Policy)
- Conducting employee engagement surveys on a regular basis.

11. Anti-Harassment and Bullying Policy

11.1. DEFINITIONS

Bullying and harassment may be generally considered to cover essentially the same territory of unwanted intimidation, but there are some important differences to consider.

Workplace bullying can be primarily confrontational and involve physical threats and intimidation, while workplace harassment can be more of an ongoing series of mental, sexual or physical abuse.

An office bully quite often confronts his or her victim directly, while an office harasser could use more passive-aggressive methods to intimidate his or her target from a distance. Bullying and harassment are both considered to be offensive behaviour, but the legal remedies for bullying are often different from those for harassment. Bullying is generally considered workplace violence, while harassment is often categorized as workplace intimidation.

Examples of behaviours considered harassment or bullying:

- Ridiculing or disparaging generalizations of characteristics of a certain group
- Ignoring or withholding information which prevents someone from carrying out their work or in other way makes them feel insulted, abused or mistreated
- Unwanted and inappropriate physical contact or verbal comments whether sexually oriented or not.

We have zero tolerance for harassment and bullying both at the office and at personnel and customer events. All employees must be familiar with this policy and recognize every person's right to be treated with dignity and respect.

In line with CapMan guidelines for using internet and social media no pornographic material is allowed in the office or on the company's computers. The same applies to other material that may be perceived as sexist, racist or otherwise offensive. Moreover, employees are not to visit websites with pornographic or racist content using the company computers and/or during working hours.

11.2. EFFICIENT MEASURES AND ZERO TOLERANCE

If an employee feels of having become a victim of harassment or bullying of some other kind, the first step is to tell the offender that his/her behaviour is not acceptable. The employee may contact his/her manager and/or HR preferably as soon as possible if it is wished that the case will be investigated further.

When investigating whether harassment has occurred, the focus is on whether the behaviour has been perceived as harassment by the counterpart, rather than the intentions of the accused individual.

All employees are to be aware of how to report suspected discrimination, bullying or harassment according to the Fairness Procedure and the Whistleblowing Policy. The company will always investigate any complaint of discrimination, bullying or harassment sensitively and without prejudice. All complaints are taken seriously and must always be made in good faith.

12. Fairness Procedure

In working together day-to-day, employees might have occasional problems or complaints affecting their work-related activities. It is important to resolve these problems as quickly as possible. It is CapMan's view that most problems can be resolved through informal discussions between employees or the employee and manager. However, in some cases this may not be possible, and it is appropriate to turn to the formal complaints resolution process contained in this policy.

It is the intention of this procedure to resolve individual complaints as soon as possible and that both parties will try to do this at the earliest possible stage in the procedure and with the aim of achieving a durable solution. Efforts should be made by both parties to deal with the matter in a climate of mutual trust.

In the first instance, if an individual has a complaint, the person should raise the matter informally with their manager. The two parties will make every effort to resolve the matter informally. If this is not possible, the employee may refer to the Fairness Procedure described in detail in the CapMan Corporate People Policies.

13. Whistleblowing Policy

CapMan Group's Whistleblowing Policy is available on the intranet. CapMan has established a standardized whistleblowing channel and arranged a proper handling process for whistleblowing reports. CapMan has a separate whistleblowing channel for CapMan employees on its intranet and an external channel for other stakeholders such as suppliers, shareholders, former employees, human rights defenders, and business partners on CapMan's external website.

The whistleblowing channel can be used to alert CapMan about serious misconducts or abuses affecting individuals, our company/organisation, the society or the environment. Whistleblowing can be done by any person openly or anonymously through a whistleblowing channel or in person.

14. Processing of Personal data of employees

CapMan respects the privacy of its employees and processes personal data in accordance with the EU's general data protection regulation ("GDPR") and other applicable legislation. We process personal data, for example, for the purposes of managing your employment relationship and performing our customary HR functions, arranging occupational healthcare and other employment related services, and fulfilling other responsibilities we have as an employer.

CapMan Employment Privacy Notice is available for the employees on the company's intranet. The Privacy Notice includes information on personal data we process, the legal basis of processing, information sources, with whom we may share personal data, how long the personal data is retained and your rights as a data subject.