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1.0 Purpose/Scope

The purpose of this Corporate Whistleblower policy is to establish clear guidelines and procedures for employees, contractors, vendors, and stakeholders to report concerns, suspected violations of laws, regulations, policies, or unethical behavior within the organization without fear of retaliation. This policy aims to promote a culture of transparency, integrity, and accountability by providing a safe and confidential mechanism for individuals to raise concerns and protect the best interest of the Company, its employees, shareholders, and other stakeholders.

This policy applies to all employees, contractors, vendors, and stakeholders of Ascend Elements.

A whistleblower as defined by this policy is an employees, contractor, vendor, or stakeholder (defined herein as Whistleblower), who reports an activity that the employee contractors, vendors, or stakeholders considered to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state, or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. Additionally, conduct those compromises, contrasts or are in direct conflict with the mission, policies, vision, and values of Ascend Elements.

If an employee, contractor, vendor, or stakeholders of Ascend Elements has knowledge of or a concern of illegal or dishonest fraudulent activity, and wishes to report the concern, the Whistleblower can register the concern using the corporate third-party platform describe in this policy and procedure. A whistleblower who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

2.0 Policy

2.1 Guidelines

Our organization strives to achieve transparency and a high level of business ethics. Our whistleblowing third party service offers a platform to alert the organization about suspicions of misconduct in a confidential way. It is an important tool for reducing risks and maintaining trust in our operations by enabling us to detect and act on possible misconduct at an early stage. Whistleblowing can be done openly or anonymously.

2.2 Confidentiality

Reports of unethical behaviour, fraud, corruption, or illegal activities will be handled with the utmost confidentiality to the extent possible, consistent with conducting a thorough investigation.

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. Ascend Elements will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against must contact the human resources director immediately. The right of a whistleblower for

protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Defend Trade Secrets Act (DTSA) Compliance: “Immunity from Liability for Confidential Disclosure of a Trade Secret to the Government or in a Court Filing:

(1) Immunity—An individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney; and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

(2) Use of Trade Secret Information in Anti-Retaliation Lawsuit—An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order.”

Employees, contractors, vendors, and stakeholders with any questions regarding this policy should contact the director of human resources or Corporate General Counsel.

2.3 Compliance

All employees, contractors, vendors, and stakeholders are expected to comply with this Whistleblower Policy. Failure to comply may result in disciplinary action.

2.4 When to Blow the Whistle

The whistleblowing third party service should be used to alert us about serious risks of wrongdoing affecting people, our organization, the society, or the environment.

Reported issues include criminal offenses, irregularities and violations or other actions in breach of federal, state, local or international laws within a work-related context, for example:

- ✓ ***Corruption and financial irregularities****; for example, bribes, unfair competition, money laundering, fraud, conflict of interest*
- ✓ ***Health and safety violations;*** *for example, workplace health and safety, product safety, serious discrimination and harassments that are against the law.*
- ✓ ***Environmental violations;*** *for example, illegal treatment of hazardous waste*
- ✓ ***Privacy violations;*** *for example, improper use of personal data*

Employees are asked to contact their supervisor or manager for issues relating to dissatisfaction in the workplace or related matters, as these issues cannot be investigated in the scope of whistleblowing.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offense.

2.5 How to Blow the Whistle

There are different ways to raise a concern:

- ✓ **Alternative 1:** Contact a supervisor or manager within our organization.
- ✓ **Alternative 2:** Contact: HR and legal at whistleblower@ascendelements.com.
- ✓ **Alternative 3:** Anonymous or confidential messaging through the whistleblower reporting channel to the whistleblowing team: WITHHELD PUBLICLY.

All messages received through the whistleblowing channel (Alternative 3 above) will be handled confidentially. The whistleblowing channel is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the person sending a message, WhistleB deletes all meta data, including IP addresses. The person sending the message also remains anonymous in the subsequent dialogue with responsible receivers of the report.

2.6 The Investigation Processes

2.6.1 The Whistleblowing Team

Access to messages received through our whistleblowing channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged, and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process, upon consent from the whistleblower in case identity of the reporting person is disclosed. These individuals can access relevant data and are also bound to confidentiality.

The whistleblowing team consists of/or reports may be disclosed to the following persons:

- ✓ HR
- ✓ Legal

2.6.2 Receiving a Message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken, please see Investigation below.

The whistleblower will receive an acknowledgment of receipt of the report within 7 days.

The whistleblowing team may not investigate the reported misconduct if:

- ✓ the alleged conduct is not reportable conduct under these Whistleblowing guidelines.
- ✓ the message has not been made in good faith or is malicious.
- ✓ there is insufficient information to allow for further investigation.
- ✓ the subject of the message has already been solved.

If a message includes issues not covered by the scope of these Whistleblowing guidelines, the whistleblowing team should provide the reporting person with appropriate instructions.

The whistleblowing team will send appropriate feedback within 3 months upon the date of receiving the report.

2.6.3 Investigation

All messages are treated seriously and in accordance with these Whistleblowing guidelines.

- ✓ No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- ✓ The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication.
- ✓ A message will not be investigated by anyone who may be involved with or connected to the wrongdoing.
- ✓ Whistleblowing messages are handled confidentially by the parties involved.
- ✓ Corporate or external expertise may be included in the investigation upon consent from whistleblower.

2.7 Protection and Privacy

2.7.1 Whistleblower Protection

A person expressing genuine suspicion or misgiving according to these guidelines will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, if he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offenses, the non-anonymous whistleblower will be informed that his/her identity may need to be disclosed during judicial proceedings.

2.7.2 Processing of Personal Data

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, to investigate facts on the declared misdeeds and inappropriate behaviour eligible under our code of conduct or internal rules. This processing is based on statutory obligations and the legitimate interest of the controller to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case. Data is stored within the WhistleB platform. For any further questions or complaints please address your request to whistleblower@ascendelements.com.

2.7.3 Data Archive

Personal data included in a whistleblowing messages and investigation documentation is archived when the investigation is complete. Investigation documentation and whistleblower messages that are archived will be anonymized

under GDPR and any other applicable data privacy laws; they will not include personal data through which persons can be directly or indirectly identified.

2.7.4 Personal Data Controller

Ascend Elements responsible for the personal data processed within the whistleblowing service.

2.7.5 Personal Data Processor

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages. As such, neither WhistleB nor its sub-processors have access to readable content.

2.8 Review and Update

This Whistleblower Policy will be reviewed periodically and updated as necessary to ensure its effectiveness and compliance with relevant laws and regulations.