

GROUP POLICY STATEMENT

WHISTLEBLOWING

Nuventura's vision of becoming a global leader in climate action through the manufacturing and provision of sustainable switchgears requires the highest levels of corporate governance in our business activities to ensure that we meet the expectations of all our stakeholders. We live by our core values of innovation, safety, collaboration, care and respect, integrity, and excellence, and we all play a vital role in upholding them through our own conduct and in holding others accountable for their conduct. Nuventura therefore requires and encourages its stakeholders, whether internal or external, to report any actual or suspected unethical, illegal, fraudulent, and/or undesirable conduct involving Nuventura's business and those engaged within it.

Nuventura expects all reports to be made in good faith by the whistleblower. The whistleblower must therefore have the reasonable belief that the facts available to them at the time of making a report are true to the best of their knowledge. Nuventura will not tolerate any form of retaliation, victimisation, or disadvantage against a whistleblower as a result of having made a report in good faith. Additionally, any acts of bullying, intimidation, or attempts at reprisal intended to prevent someone from reporting are also considered retaliation, victimisation, or disadvantage under this Policy.

Nuventura has developed this Group Policy Statement in alignment with its Group Whistleblowing Policy (NUV-ESG-POL-003) to outline how external stakeholders (i.e., investors, customers, external providers, business partners, etc) of Nuventura can easily, confidentially, and, if preferred, anonymously report any actual or suspected misconduct without fear of retaliation, victimisation, disadvantage, or reprisal. This Group Policy Statement also details the process external stakeholders can expect once a report has been made. Internal stakeholders (i.e., employees, contractors, etc) should refer to the Group Whistleblowing Policy (NUV-ESG-POL-003) for detailed guidance as this statement is not intended to replace the comprehensive policy already implemented at Nuventura.

At Nuventura, we are committed to¹:

- Conducting business in an ethical, transparent, accountable, and fair manner in compliance with applicable laws while continuously striving for operational excellence and delivery.
- Facilitating the detection, reporting, prevention, and eradication of instances of reportable conduct.
- Promoting a culture facilitating the reporting of information relating to reportable conduct in a responsible manner.
- Ensuring that whistleblowers who make a report can do so without fear of retaliation, victimisation, disadvantage, or reprisal.
- Providing remedies for whistleblowers in connection with retaliation, victimisation, or disadvantage suffered as a result of making a report.
- Providing confidentiality of the whistleblower and the subject of a whistleblowing report, and providing anonymity, if required, of the whistleblower.

¹ Subject to and in accordance with the provisions of Nuventura's Whistleblowing Policy (NUV-ESG-POL-003) and applicable laws.

- Conducting thorough, fair, and objective investigations of reportable conduct reported by whistleblowers.

The scope of reportable conduct is intended to be broad and comprehensive and to include any matter which, in the view of the whistleblower, is unethical, illegal, fraudulent, or undesirable. Examples of reportable conduct include, but are not limited to:

- Violations of or the failure to comply with applicable laws;
- Breaches of Nuventura's policies and procedures;
- Dishonest, fraudulent, or corrupt activity including bribery, extortion, money laundering, or acts of corruption;
- Deliberate error in the preparation, evaluation, review, or audit of any financial records or statements of the Company;
- Unlawful discrimination or harassment of any form (i.e., verbal, physical, sexual, etc);
- Human rights abuses, including the use of child or forced labour; and
- Activities that endanger the health or safety of individuals or that are potentially harmful or damaging to Nuventura and/or its employees (i.e., unsafe work practices, environmental damage, abuse of property and resources, etc).

HOW TO MAKE A REPORT

Nuventura has established its Whistleblowing System to ensure that a confidential and anonymous process exists whereby persons can report any actual or suspected unethical, illegal, fraudulent, and/or undesirable conduct relating to the Company. Nuventura's Whistleblowing System is independently managed by two delegated members of Nuventura's Board of Directors and is available to all internal and external stakeholders who wish to make a report confidentially and, if preferred, anonymously.

A report of reportable conduct may be made using Nuventura's Whistleblowing System via the dedicated email address:

- whistleblowing@nuventura.com

To facilitate an efficient investigation and proper management of all reports, a whistleblower is encouraged to provide sufficient, factual information and to provide access to any additional information required for the investigation. While whistleblowers may not have all the facts available to them at the time of reporting, they can still report actual or suspected misconduct provided the report is made in good faith.

Should the report involve any member of Nuventura's Board of Directors, whistleblowers are encouraged to submit their report via email marked for the attention of Nuventura's Chief Executive Officer (CEO) and/or Chief Officer Business Operations (CBO), acting as Group Head Compliance and Internal Audit. To maintain confidentiality and to ensure whistleblower protection, all reports will be handled discreetly in accordance with the Whistleblowing Policy (NUV-ESG-POL-003) and applicable laws.

REPORTING ANONYMOUSLY

A report may be submitted anonymously if a whistleblower does not wish to disclose their identity provided anonymity is possible under applicable laws. The whistleblower must make it clear in the

report that they wish to remain anonymous to ensure that the delegated Board members² maintain whistleblower anonymity throughout the investigation process.

INVESTIGATION & OUTCOME

Upon receipt of a reportable conduct, the delegated Board members will be responsible for the investigation thereof in accordance with the Whistleblowing Policy (NUV-ESG-POL-003) and applicable confidentiality requirements. The delegated Board members will determine the appropriate process and resources required for the investigation taking into consideration the nature of the report, the level of employees implicated, and all other relevant circumstances. As each report is unique, the delegated Board members have full discretion in deciding how each investigation will be conducted. In most circumstances, however, investigations will be assigned to the CBO and Human Resources provided that these business functions have not been implicated in the report.

DocuSigned by:



990E8ADA75C7411...

Fabian Lemke
Chief Executive Officer

16/10/2024

Date

² Chief Executive Officer (CEO) and/or Chief Officer Business Operations (CBO) in the case of Board involvement.