

Speak-Up Policy

Embla Medical is committed to conducting its business fairly, honestly, and ethically and encourages employees and other stakeholders to report any actual or suspected misconduct in relation to Embla Medical's ethical principles, the Code of Conduct or other Company Policies or applicable laws and regulations.

All Speak-Up reports are handled under conditions of strict confidentiality whether made anonymously or not. For a report made in good faith, any form of threat, retaliation or discrimination towards a reporter will not be tolerated. However, a reporter, who is found responsible for making allegations in bad faith or maliciously may be subject to disciplinary action.

Embla Medical has a platform in place for reporting concerns, "the Speak-Up Line" which is an online system, accessible on the Embla Medical website and on Plaza, the company's internal SharePoint platform. The Speak-Up Line is available for employees and other stakeholders where they can report anonymously. Reports can also be made through other channels, such as directly to next level manager, local People Business Partner or other members of management.

Embla Medical ensures protection of whistleblowers by providing the Speak-Up Line platform for reporting, including anonymous reporting, this Policy and the Investigation Manual.

Examples of the types of reports applicable for the Speak-Up Line:

- Unlawful activity;
- Financial fraud (e.g. accounting manipulation, non-compliance with internal controls procedures, misappropriation of assets or fraudulent statements);
- Bribery or corruption (e.g. conflicts of interest, bribery, sponsorships & donations, gifts or facilitation payments);
- Violation of competition laws (e.g. price fixing, exchange of price sensitive information, collusion with competitors);
- Serious endangerment to environment, health and safety;
- Any unlawful or unethical acts by senior management that cannot be reported using internal channels;
- Activities, which otherwise by law or agreement amount to serious improper conduct (e.g. discriminatory practices, sexual harassment, use of child labor, human rights violations, drug or alcohol consumption at work).

Purpose

The purpose of Embla Medical's Speak-Up Policy (the "Policy") is to ensure that the Company operates in accordance with all applicable laws and regulation on the subject and to encourage employees and other stakeholders to speak up if they observe wrongdoings or have concerns of unethical behavior or breach of Company policies. The Policy is intended to promote honest and ethical conduct and be Responsible for Tomorrow.

This Policy is designed in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD), European Sustainability Reporting Standards (ESRS), the United Nations Global Compact and all local legislation and regulations on the subject, including but not limited to EU Whistleblower Protection Directive, U.S. Whistleblower Protection Act and the UK Public Interest Disclosure Act. In case of conflict, local laws and regulations supersede this Policy.

Scope

This Policy applies to all persons employed by or affiliated with Embla Medical entities. It applies to Embla Medical's operations globally, including all legal entities owned or controlled by Embla Medical, its directors, officers, employees, agents, consulting clinicians, distributors, business partners, authorized representatives and any other third parties acting on behalf of the foregoing.

All employees receive training and awareness of this Policy through the Code of Conduct training. A separate Investigation Manual is provided to designated case handlers and decision-makers to secure proper process for investigations, objectivity, independency and process for reporting of the outcome to relevant parties.

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Policy Approver	CEO - Sveinn Sölvason
Effective Date	9 September 2026
Version and Date	2.0