

Tekla Grievance Mechanism and Whistleblower Policy

TEKLA

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Approved by: Kristoffer Juhl,
Managing Director and Co-Founder of Tekla



1. INTRODUCTION

Tekla is committed to operating with integrity, accountability and respect for the people and environment affected by our business. We believe that open, honest dialogue with our stakeholders is essential and a reflection of who we are as a company.

This policy establishes a clear, safe and accessible way for anyone affected by Tekla's operations to raise a concern, report wrongdoing or seek resolution. We take every concern seriously. We will not tolerate retaliation against anyone who raises a concern in good faith.

This policy is publicly available at teklafabrics.com and applies to all of Tekla's stakeholder groups: investors, customers, suppliers, employees, community and those raising concerns related to our environmental impact.

A note on employees: Tekla employees are additionally covered by the Tekla Employee Handbook, which sets out detailed procedures specific to the employment relationship. This policy applies to employees regarding concerns that fall outside the scope of the Employee Handbook and provides the overarching framework that connects all stakeholder-facing procedures.

2. SCOPE

This policy covers:

- investors and shareholders,
- customers,
- suppliers and supply chain partners,
- Tekla employees (in conjunction with the Employee Handbook),
- community and local stakeholders,
- anyone raising concerns about Tekla's environmental conduct.

Concerns may relate to Tekla's social, environmental, governance or business conduct – including but not limited to: supplier relationships, product quality, community impact, negative environmental and social impact, and legal or regulatory compliance.

3. UNDERSTANDING THE TWO MECHANISMS

This policy covers two distinct but related channels. It is important to understand the difference so that concerns reach the right process.

3a. Grievance procedure

A grievance is a concern raised by a stakeholder about Tekla's conduct, actions or decisions that have affected them directly or indirectly.

- A supplier raising concerns about payment terms or contractual fairness.
- A customer raising concerns about product quality, sustainability claims or service.
- Community raising concerns about Tekla's local impact.
- An investor raising concerns about governance or responsible business conduct.
- Any stakeholder raising concerns about Tekla's environmental and social practices.

3b. Whistleblower (protected disclosure) procedure

Whistleblowing involves reporting serious concerns that are in the public interest, where wrongdoing may affect others beyond the individual raising the concern.

- Suspected fraud, bribery or financial misconduct.
- Breaches of law or regulation.
- Serious health or safety risks.
- Environmental violations or deliberate concealment.
- Significant ethical violations contrary to Tekla's values and Code of Conduct.

If you are unsure which route applies to your concern, contact us at grievances@teklafabrics.com and we will guide you to the right process.

4. HOW TO RAISE A CONCERN

4a. Grievances

All stakeholders can raise a grievance by contacting us at grievances@teklafabrics.com

You may submit your concern by email. You do not need to have definitive proof of wrongdoing to raise a concern. If something does not feel right, we want to hear from you.

When raising a grievance, please include (where possible):

- a description of the concern,
- when and how it occurred,
- who or what was involved,
- any supporting information or documentation,
- your preferred contact details (optional – anonymous submissions are accepted).

4b. Whistleblowing

For serious concerns, particularly when anonymity is important, Tekla uses Walor; a secure, confidential and anonymous reporting platform.

Whistleblowing reports can be submitted via this [link](#)

Walor lets you submit a report anonymously, receive follow-up questions from our team without revealing your identity and track the status of your report via a secure case reference number. You do not need to identify yourself. Anonymous reports are treated with the same seriousness as identified reports.

Whistleblowing concerns can also be reported at grievances@teklafabrics.com, if preferred.

5. GROUNDS FOR ACCEPTING A GRIEVANCE

We will accept a concern as a formal grievance as it relates to Tekla's conduct, operations, products, supply chain, or impact on stakeholders or the environment when it is raised in good faith, meaning the person raising it genuinely believes the concern to be valid, even if it later cannot be substantiated.

We reserve the right to decline a concern as a formal grievance in the following circumstances.

- It falls entirely outside of Tekla's operations or sphere of influence.
- It is clearly malicious or vexatious in intent.
- It has already been fully resolved through a prior process.

Where we do not accept a concern as a formal grievance, we will communicate our reasoning to the complainant within 15 business days.

6. THE GRIEVANCE PROCESS

Step 1: Acknowledgement (within 5 business days)

Upon receipt of a concern, we will send an acknowledgement confirming that we have received it, provide a case reference number, and confirm the name and contact details of the person managing the case.

Step 2: Initial assessment (within 10 business days of acknowledgement)

We will review the concern and determine:

- whether it meets the criteria for a formal grievance,
- the appropriate course of action and level of urgency,
- whether any immediate interim measures are required.

The complainant will be informed of the outcome of this assessment.

Step 3: Investigation

We will gather relevant facts, which may include reviewing documentation, speaking with relevant parties, and engaging suppliers or third parties where appropriate. The duration of this stage will depend on the complexity of the concern. We aim to complete investigations within 60 calendar days of acknowledgement.

For complex cases requiring more time, we will notify the complainant and provide an updated timeline.

Step 4: Resolution

Depending on the nature of the concern, resolution may involve:

- corrective action (e.g. process change, policy update, remediation),
- mediation between parties,
- financial remedy or compensation where appropriate,
- escalation to the Managing Director for serious matters,
- referral to the relevant authorities in the case of legal violations.

Step 5: Communication and closure

We will communicate the outcome of the grievance to the complainant, including the steps taken and the resolution reached. Where full disclosure is not possible due to confidentiality obligations, we will explain this. We will confirm when the case has been formally closed.

If the complainant is not satisfied with the outcome, they may request escalation to the Managing Director within 10 business days of the resolution communication.

7. WHISTLEBLOWER PROCESS

Whistleblowing reports received via Valor or email are reviewed by the Head of Sustainability upon receipt. Where the report involves the Head of Sustainability, it is directed immediately to the Managing Director.

The investigation process follows the same steps outlined in Section 6 above, with additional protections.

- The identity of the whistleblower will be protected at all stages. Even when identity is known to the case manager, it will not be shared without the whistleblower's explicit consent.
- Anonymous reports are accepted and will be investigated based on the information provided.
- The whistleblower will be updated through the Valor platform (or by their preferred contact method if identified) at each key stage of the process.
- All whistleblowing cases are escalated to and reviewed by the Managing Director.

8. PROTECTION FROM RETALIATION

Tekla strictly prohibits any form of retaliation against anyone who raises a concern under this policy in good faith. This applies to all stakeholders: employees, suppliers, customers, community members and any other party.

Retaliation includes, but is not limited to, termination of a business or employment relationship, demotion or exclusion, unfavourable contract changes, harassment, intimidation or any other adverse action linked to the raising of a concern.

Anyone who experiences retaliation after raising a concern should report this immediately to grievances@teklafabrics.com or via Valor. Incidents of retaliation will be treated with the utmost seriousness and investigated independently.

Employees who engage in retaliation against a person who has raised a concern may face disciplinary action, up to and including termination of employment.

Making a deliberately false or malicious report is a violation of this policy and may result in appropriate action. However, raising a concern in good faith that is later unsubstantiated will never result in any adverse consequences.

9. CONFIDENTIALITY

All concerns raised under this policy are handled with strict confidentiality. We will share information about a concern only with those who need to know in order to investigate and resolve it.

Anonymous submissions are accepted through both our grievance email and our Ziik whistleblowing platform. Tekla will not attempt to identify anonymous reporters and any information that could reveal identity will be handled with care.

Where third parties (e.g., suppliers) are involved in an investigation, we will carefully manage the disclosure of information to protect the complainant while enabling a fair process.

10. ROLES AND RESPONSIBILITIES

HEAD OF SUSTAINABILITY

- Primary point of contact and case manager for all grievances and whistleblower reports.
- Conducts or oversees investigations.
- Maintains the grievance log and prepares the annual summary.
- Escalates cases to the Managing Director as appropriate.
- Reviews the policy annually and recommends updates.

MANAGING DIRECTOR

- Receives escalated or serious cases.
- Reviews the annual grievance summary report.
- Responsible for approving this policy.
- Oversight of grievance resolution for investor and customer concerns.

HEAD OF PEOPLE & CULTURE (HR)

- Manages employee-specific grievances in line with the Employee Handbook.
- Cooperates with the Managing Director and/or Head of Sustainability on any cross-cutting matters.

11. TRACKING, MONITORING & ANNUAL REPORTING

Tekla maintains a confidential grievance log, managed by the Head of Sustainability. For each case, the log records:

- Date received
- Stakeholder group (e.g. supplier, customer, community),
- Nature of the concern (categorised by topic)
- Current status (open / under investigation / resolved / escalated / declined)
- Date of resolution or closure
- Outcome summary (anonymised)

Tekla prepares an Annual Grievance Summary each year, which includes:

- Total number of concerns received, by stakeholder group and category
- Number resolved, pending, escalated, or declined
- Key themes or patterns observed
- Assessment of the effectiveness of the grievance procedure
- Recommended improvements for the following year

This summary is reviewed by the Managing Director and used to inform continuous improvement of Tekla's grievance procedures.

12. EXTERNAL REPORTING

While we encourage concerns to be raised directly with Tekla in the first instance, we recognise that there may be circumstances in which a stakeholder chooses to report concerns to an external authority or regulator. We fully support this right.

Examples of the relevant Danish external bodies.

- Datatilsynet (Danish Data Protection Agency): for concerns about data protection.
- Erhvervsstyrelsen (Danish Business Authority): for concerns about company law and governance.
- Arbejdstilsynet (Danish Working Environment Authority): for concerns about health and safety.
- Relevant environmental authorities for concerns about environmental harm.

Employees who wish to report to external authorities are protected from retaliation for doing so, in line with Danish legislation implementing the EU Whistleblower Directive (Directive 2019/1937).

13. POLICY REVIEW

This policy will be reviewed annually by the Head of Sustainability and approved by the Managing Director. It will also be reviewed following any significant change in legislation, B Corp standards, or Tekla's business operations.