

**ALVOTECH**  
**Whistleblowing Policy**

**1. Overview**

**1.1 Purpose**

Alvotech Holdings SA and its direct and indirect majority owned or controlled affiliates and subsidiaries (“**Alvotech**”) are committed to maintaining a corporate environment that encourages any officer, director, or employee of Alvotech, without fear of retaliation, to report in good faith potential violations of law, Alvotech’s Code of Ethics and Business Conduct (the “**Code**”), other Alvotech guidelines and policies, by any person or entity (whether company personnel or a third party). The purpose of this Policy is to provide a legally compliant framework for such reporting and appropriate protection of any person who makes a report.

**1.2 Scope**

This Policy applies to all officers, directors, (full-time and part-time) employees of Alvotech; consultants and other independent contractors, interns and volunteers within Alvotech:

**1.3 Compliance**

Failure to comply with this Policy or falsification of documentation required by this Policy may be grounds for disciplinary action, including termination, or other legal consequences.

**1.4 Miscellaneous**

This Policy has been implemented following consultation with Alvotech’s employee association.

This Policy does not form part of any Alvotech contract of employment or service agreement and it can be amended at any time:

This Policy was approved by the board of directors of Alvotech Holdings SA (the “**Board**”)

## 2. Definitions

“**Alvotech Whistleblowing Line**” means *SpeakUp*<sup>®</sup> being a reporting tool provided by an external service provider on behalf of Alvotech, which is available by phone at the phone numbers provided on the Alvotech intranet across all Alvotech locations twenty-four hours a day/seven days a week. The reporting person can choose between leaving a voicemail or writing an email in their native language.

“**Good Faith**” means that the Reporting Person believes that the content of the report is true.

“**Reporting Person**” means any officer, director, (full-time and part-time) employee of Alvotech; consultant and other independent contractor, intern and volunteer within Alvotech who reports an event he or she perceives to be an Issue.

“**Issue**” an issue includes the following:

- a perceived violation of the laws or statutory regulations of any jurisdiction in which Alvotech does business, including but not limited to directly applicable legal acts of the European Union, the Republic of Iceland, Switzerland and the United States of America on the field of:
  - public procurement;
  - financial services, products and markets, and prevention of money laundering and terrorist financing;
  - product safety and conformity;
  - transport safety;
  - protection of the environment;
  - food and feed safety; animal health and welfare;
  - public health;
  - consumer protection; as well as
  - protection of privacy and personal data, and security of network and information systems.
- a perceived violation of the Code or Alvotech’s guidelines and policies;
- a perceived violation of Alvotech’s internal accounting rules or accounting controls;
- any perceived effort to conceal evidence of any of the above; or
- any other matter which a Reporting Person believes in Good Faith could cause substantial harm to the business or integrity of Alvotech.

## 3. Requirements

Good Faith reporting of Issues is a key component of Alvotech's compliance program. To encourage Reporting Persons to report Issues without fear, Alvotech follows the principles of non-intimidation, non-retaliation, anonymity (where applicable), confidentiality, and review, as further described below.

### **3.1 Reporting Issues**

Any report by a Reporting Person under this Policy may be made (at his own discretion and convenience):

- to his or her immediate supervisor or manager; or
- to the department within Alvotech that is responsible for overseeing the subject of his or her concern (e.g. Alvotech's Human Resources department, if the issue concerns employee relations, policy or compensation), or
- to the Alvotech Whistleblowing Hotline.

If the above mentioned ways do not resolve the issue, the report can also be directed to one of the following:

- a more senior manager; or
- the Alvotech Compliance Officer; or
- the Alvotech General Counsel.

In case a dedicated external reporting channel is provided by relevant national authorities, a Reporting Person may also provide a report of Issues to such external channel.

When making a report, a Reporting Person shall provide all information available to him or her.

Supervisors, managers or any other officer, director or employee of Alvotech (including the Compliance Officer and the General Counsel) shall file reports received from Reporting Persons, which they consider to be of substance, as soon as possible to the Alvotech Whistleblowing Hotline. When filing a report received, they shall provide all information available. For filing a report, they shall receive the protection of non-retaliation.

### **3.2 Non-Intimidation**

Alvotech does not tolerate intimidation. An Alvotech manager, employee or co-worker will not intimidate or otherwise obstruct a person from reporting an Issue. A Reporting Person who believes he or she is experiencing intimidation may always contact the Compliance Officer for assistance.

### **3.3 Non-Retaliation**

Alvotech does not tolerate retaliation. If a Reporting Person reports an Issue in Good Faith, he or she will not be subject to dismissal, disciplinary action or any other form of retaliation by Alvotech for providing the report, even if the report is not confirmed by subsequent review. A Reporting Person who believes he or she

is experiencing retaliation may always contact the Compliance Officer for assistance.

Reporting Persons cannot, however, exempt themselves from the consequences of personal wrongdoing by reporting their own misconduct. In such cases, self-reporting will be taken into account in determining the appropriate form of discipline but will not operate as a waiver of personal accountability.

### **3.4 Anonymity**

The Alvotech Whistleblowing Line provides the option to remain anonymous if a Reporting Person expressly wishes to remain unknown. However, Alvotech encourages individuals to identify themselves when reporting an Issue so that Alvotech may appropriately review the report, including by discussing it with the Reporting Person.

The Reporting Person may waive his or her claim for anonymity by way of explicit documentation.

### **3.5 Confidentiality**

Alvotech will keep the identity of the Reporting Person and the content of the report confidential, unless a legal exception exists under applicable law.

In order for Alvotech to review the issue, and as permitted by applicable law, the reporting person is requested to keep the information contained in the report confidential.

### **3.6 Review of Issues**

Alvotech will take reasonable steps to review all reports of Issues, irrespective of individuals or positions concerned.

Reviews will be conducted confidentially and discreetly, taking into account the nature and complexity of the Issue(s) raised.

### **3.7 Remedial Measures**

In the course of or at the conclusion of a review, Alvotech may determine that corrective and/or disciplinary action is appropriate, and will be taken in accordance with applicable law, the Code and other Alvotech guidelines and policies. The following are some examples of corrective and disciplinary action:

- Re-education and training;
- Increased monitoring;
- Additional auditing;
- Process review and improvements;

- Disciplinary action up to termination or other legal consequences (such as the filing of a civil action or reporting of a criminal complaint); and
- System upgrades.

The Board will receive periodic updates prepared by Alvotech's Legal and/or Compliance Department regarding reported Issues and subsequent remedial measures taken under this Policy.

### **3.8 Response to Reporting Person**

The Reporting Person receives an acknowledgement of receipt of the report within a period of seven (7) days from the date of receipt.

In less than three (3) months after the acknowledgement of receipt, the Reporting Person receives a response.

### **3.9 Named Persons**

Alvotech will pay due regard to fairness to any individual named in a report, the seriousness of the Issue(s) raised, and the credibility of the report.

If required by applicable law, persons named in a reported Issue will be notified.

## **4. Recordkeeping and Review**

Alvotech will retain documentation relating to the Alvotech Whistleblowing Line, any assessment or review following any report directed through this medium, and this Policy, in accordance with applicable data retention policies.