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WHISTLEBLOWER POLICY
7NA/S

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WHISTLEBLOWER POLICY

7N A/S

(CVR no. 50810216)

1. PURPOSE

1.1 This Whistleblower Policy (the "**Policy**") has been adopted by the Board of Directors of 7N A/S, CVR no. 50810216. This Policy comprise 7N A/S and all its European subsidiaries (hereafter defined as the "**Company**").

1.2 The Company has established an internal whistleblower scheme in order to allow reporting of potential violations of laws and serious violations of internal policies and procedures, the ("**Whistleblower Scheme**"). This policy governs the use and operation of the Policy.

1.3 This Policy is not intended to replace, limit, or supersede the existing internal communication paths of the Company and serves as an alternative to the ordinary reporting of irregularities. The person intending to report a concern (the "**Whistleblower**") should therefore consider whether the concern can be raised internally and not through the Whistleblower Policy, but only if the Whistleblower does not fear reprisals.

1.4 For the avoidance of doubt, reporting under this Policy is voluntary and can be done on an anonymous basis.

1.5 The Company is committed to resolve and immediately stop any misconduct, which has been reported through the Policy, in order to protect the Company, its employees, shareholders, freelance consultants and business partners.

2. WHO CAN REPORT THROUGH THE POLICY?

2.1 The Policy applies to all individual such as current or former partner, officer, director ("**Director**"), employee and company secretary, and individuals serving as independent contractors of the Company as well as agents, consultants, representatives, lobbyists, suppliers/vendors, contractors, advisors and other business partners of the Company.

3. TYPES OF CONCERNS THAT MAY BE REPORTED

3.1 The types of concerns that may be raised under the Policy are serious and sensitive concerns that could have an adverse impact on the reputation, operations and performance of the Company's business. Such concerns include, but are not limited to, concerns regarding:



- (a) bribery or corruption as further described in the Company's Anti-Corruption Policy;
 - (b) fraud (e.g. financial fraud, document fraud, or embezzlement, including deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company and deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of the Company);
 - (c) serious violations of the internal policies, hereunder the Company's Code of Conduct (including but not limited to discrimination), Harassment Policy and Anti-Bribery / Anti-Corruption Policy, and procedures, including deficiencies in, or noncompliance with, the Company's internal accounting controls;
 - (d) misrepresentation or false statement to management, regulators, the outside auditors or others or by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company;
 - (e) deviation from full and fair reporting of the Company's results or financial condition;
 - (f) breach of antitrust regulations (e.g. price fixing);
 - (g) financing of terrorism; or
 - (h) other irregularities of a general or operational nature, such as serious endangerments concerning the vital interests of the Company or the life or health of individuals, environmental crimes, major deficiencies as regards security in the workplace and serious forms of discrimination or harassment.
- 3.2 Please note that the examples above should not prevent you from raising, in good faith, any other issues which are not mentioned. We work to create a safe and healthy working environment within the Company. However, for the avoidance of doubt, the Policy does not cover less severe offenses such as violation of internal guidelines e.g. sick-leave, smoking, alcohol and dress codes etc., and excludes information regarding the Whistleblower's own employment, e.g. interpersonal conflicts between the Whistleblower and a colleague, and should instead be reported to your immediate superior and/or the HR-representative, unless the information involves sexual harassment, other aggravated harassment or discrimination.

4. **ABOUT WHAT AND WHOM CAN THE REPORTS BE MADE**

- 4.1 It is the intention that reporting can be made about concerns regarding serious issues and/or related acts or omissions made by directors, officers, employees, and individuals serving as independent contractors of the Company as well as agents, consultants, representatives,

lobbyists, suppliers/vendors, contractors, advisors and other business partners of the Company.

5. **INTERNAL REPORTING PROCEDURES**

5.1 The Company has, in cooperation with Nordic Whistle's digital whistleblower system ("**Whistleblower System**"), ensured the Whistleblower access to the Whistleblower Scheme through Nordic Whistle's IT-platform, which ensures anonymity of the Whistleblower and processes personal data in accordance with the GDPR-regulation.

5.2 With the Whistleblower System, the Company ensures the Whistleblower access to the internal Whistleblower Scheme that is designed, established and operated in a way that ensures confidentiality of the identity of the Whistleblower, the person(s) concerned and any third party mentioned in the report and prevents unauthorised access to it.

5.3 You can report suspected misconduct by following the link <https://nordicwhistle.whistleportal.eu> or insert the link in your web browser. Further instructions can be found at www.7N.com.

5.4 Your report can either be submitted in Danish or English.

5.5 The required logon information is:

E-mail: whistleblower@7N.dk

Password: Whistle.7N

6. **WHAT THE REPORT SHOULD INCLUDE**

6.1 When filing a report, you are encouraged to provide the following information:

- Date, time and location;
- a description of the misconduct/irregularity or any other subject of the report;
- if relevant, the identity, title, and contact information of any person who is responsible for the misconduct, or any person who may have knowledge about the misconduct;
- if relevant, any documents, evidence or other relevant information that may help the investigation of the misconduct; and

- any additional relevant information.

6.2 When filing a report, the Company urge you to be as accurate as possible in the description of the suspected misconduct, in order to enable us to assess the gravity of the matter as accurately as possible.

7. **WHISTLEBLOWER UNIT**

7.1 The Board of Directors has decided that reports filled through the Whistleblower System will be received by attorney-at-law Lars Lühjohan and his team (including attorney-at-law Mette Gahrn-Jensen) at Mazanti-Andersen Advokatpartnerselskab ("**Whistleblower Unit**"), as an impartial and external third party.

7.2 The Whistleblower Unit will have the contact with the Whistleblower, follow-up on reports and provide feedback to the Whistleblower.

7.3 The Whistleblower Unit undertake to comply with the requirements on independence, confidentiality and data processing, arising from the Protection of Whistleblowers Act.

7.4 The contact person, whom the Whistleblower Unit can contact of the Company is appointed by the board of directors ("**Whistleblower Officer**"), who will assist the Whistleblower Unit, if necessary, with e.g. further information. The Whistleblower Unit will furthermore inform the Whistleblower Officer of any reports filed, in order for the Company to be aware of such and therefore will be better suited to follow its obligations to the Whistleblower. If the report raises concerns relating to the Whistleblower Officer and raises a conflict-of-interest problem, the Whistleblower Unit's information and contact will instead be to another person appointed by the board of directors ("**Deputy Whistleblower Officer**").

8. **AFTER FILING THE REPORT**

8.1 The report process ensures the following:

- The Whistleblower receives a confirmation of receiving the report as soon as possible and within 7 days after the Whistleblower filed the report.
- The report will carefully be followed up by the Whistleblower Unit.
- The Whistleblower will as soon as possible and no later than three months from the confirmation of receiving the report receive feedback from the Whistleblower Unit.

- 8.2 The Whistleblower Unit is entitled to reject reports which are not covered by the Protection of the Whistleblower Act's scope and is not obliged to forward these reports to another authority. If a report falls outside the scope of the Whistleblower Scheme, the Whistleblower is encouraged to contact the immediate superior and/or the HR-representative.
- 8.3 If a report falls within the scope of the Whistleblower Scheme, the Whistleblower Unit initiates an investigation of the report and the circumstances described therein, including through any further dialogue with the Whistleblower and other specifically relevant measures. The actions relevant in the specific case will depend on the content of the report.
- 8.4 In all cases, the Whistleblower Unit will make a recommendation to the Company. On the basis of the recommendation the Company makes a final decision on the consequences of the report and the result of the investigation thereof. To the extent a report does not concern members of the Executive Management, the recommendation will be made to the Executive Management at the time of the report. If a report relates to one or more members of the Executive Management, the report shall be submitted to the Chairman of the Board of Directors of the Company at the time of the report, and the Board of Directors will make the final decision.

9. **PROTECTION OF THE WHISTLEBLOWER**

- 9.1 The Whistleblower Policy's protects against negative reprisals associated with reports filed through the Whistleblower Scheme and any discriminatory or retaliatory action. The protection applies to Whistleblowers who in good faith reports through the Whistleblower Scheme. A report is considered to have been reported in good faith when the Whistleblower had reasonable grounds to believe that the information reported was correct at the time of the report and that the information fell within the scope of the Protection of Whistleblowers Act.
- 9.2 Whistleblowers who report through the Whistleblower Scheme in bad faith do not enjoy protection and such reports may have negative reprisals for the Whistleblower and subject to disciplinary action. Thus, persons who knowingly report false information do not enjoy protection, just as the reporting of information about breaches already known to the public and the reporting of information about breaches that are manifestly unfounded, including unfounded rumours and gossip, are also not covered by the Policy's protection of Whistleblowers.
- 9.3 A Whistleblower who has made a report through the Company's internal Whistleblower Scheme in good faith is not considered to have breached a statutory duty of confidentiality and does not incur any kind of liability for this if the Whistleblower had reasonable grounds to believe that the reporting of the information in question was necessary to reveal violations of EU law as well as other serious offences or other serious matters. In that case, the Whistleblower will

also not be liable for obtaining access to the information reported, provided that such an act does not constitute an independent criminal offence.

However, the above exemption from liability for breaches of professional secrecy does not apply breaches covering very special cases where mainly national security interests or specially classified information.

9.4 A Whistleblower who in good faith has made a report through the Company's internal Whistleblower Scheme must not be subjected to retaliation, including threats or attempted retaliation, as a result of having made an internal report. Furthermore, the Whistleblower must not be hindered or attempted to be prevented from making reports. The Company's Whistleblower Policy should ensure that this does not happen.

9.5 This protection against retaliation extends, in addition to the Whistleblower, to intermediaries, third parties connected to the Whistleblower who are at risk of retaliation in a work-related context, as well as companies and authorities that the Whistleblower owns or works for or is otherwise associated with in a work-related context.

10. **PROCESSING OF DATA**

10.1 The Whistleblower Unit will only process personal data when this is deemed necessary in order to process reports received through the Whistleblower Scheme. In these cases, the processing of personal data will take place in accordance with the GDPR and the relevant legislation.

The personal data included in the Whistleblower Scheme are covered by the rules on data protection, and the rights derived from this generally apply to all data subjects in a report, including both the Whistleblower, the reported person and any others included in the report.

10.2 The Whistleblower Unit shall observe professional secrecy with regard to the information included in the reports, and reports received shall be recorded in accordance with that obligation of confidentiality. The reports are stored only to the extent that this is necessary and proportionate to comply with the requirements arising from the Protection of Whistleblowers Act.

Such information may, without the Whistleblower's consent, only be disclosed to another public authority when the disclosure is made to counter violations or in order to ensure affected persons rights to defense. In such cases, the Whistleblower Unit must notify the Whistleblower prior to disclosure, unless the notification would jeopardise related investigations or legal proceedings.

Other information from reports may only be disclosed to someone other than the Whistleblower Unit when this is done as part of follow-up on a report or to counter breaches.

11. **EXTERNAL WHISTLEBLOWER SCHEME AT THE DANISH DATA PROTECTION AGENCY**

11.1 As a supplement to the internal Whistleblower Scheme at the Company, it is possible to report concerns/matters e.g. as set out in section 3 through the external whistleblower scheme at the Danish Data Protection Agency.

11.2 The external whistleblower scheme at the Danish Data Protection Agency provides the opportunity to report by telephone, in writing or by physical attendance. The scheme also enables anonymous reporting. The Company would appreciate that such reports are also reported through our internal Whistleblower Scheme.

11.3 To read more about the external whistleblower scheme at the Danish Data Protection Agency and to make reports go to the scheme's website at <https://whistleblower.dk/>.

12. **PUBLICATION**

12.1 This Policy will be published on the Company's website.

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Approved and adopted by the Board of Directors of 7N A/S on 14th of June 2022 and comprising the Company.

13. **ABBREVIATIONS / DEFINITIONS**

Company	7N A/S, CVR no. 50810216 and all its European subsidiaries
Deputy Whistleblower Officer	If a report concerns the Whistleblower Officer, the Whistleblower Unit's contact and information will instead be to the Deputy Whistleblower Officer
Directors	Shall mean members of the Company's board of directors, executive management and management
Policy	This policy
Protection of Whistleblowers Act	The Protection of Whistleblowers Act, of 29 June 2021, no. 2021/1436
Whistleblower	The person reporting an issue using the company's Whistleblower Scheme
Whistleblower Officer	A person appointed by the Company's board of directors
Whistleblower Scheme	This whistleblower scheme including the Nordic Whistle's it-system and the Whistleblower Unit's investigation of the report etc.
Whistleblower System	Nordic Whistle's digital whistleblower system
Whistleblower Unit	Mazanti-Andersen Advokatpartnerselskab, Lars L�uthjohan