

## Genan Whistleblower Policy

The purpose of our whistleblower policy is to explain how the whistleblower scheme works – and thus avoid any potential reluctance to significant matters.

### 1. Introduction to the Genan whistleblower scheme

A whistleblower scheme is a safe and anonymous opportunity to sound the alarm, if employees or other stakeholders associated with Genan discover or suspect that anything illegal is taking place at – or in connection with activities related to – Genan, which might result in financial loss for or be detrimental to the reputation of Genan.

Genan is a responsible organisation with an open culture, where everyone is free to speak – also if they come across anything irregular or illegal.

The whistleblower scheme is a supplement to the direct, daily communication in the workplace about mistakes, unsatisfactory conditions etc. The preferred procedure must be to bring such matter to the attention of one's immediate superior, a member of the management group, HR or Genan's Group CEO; but if one does not feel comfortable speaking to a management member, a report can be submitted – anonymously or not – through the Genan whistleblower scheme.

### 2. Who can submit a report?

Any Genan employee (or employee of a Genan subsidiary) can submit a report, as can anyone associated with Genan. The latter may include suppliers, external consultants, customers, business associates etc.

### 3. Who can be the subject of a report?

Reports can be submitted about matters involving Genan's employees or other stakeholders associated with Genan. This applies to both employees, management members, board members and other persons associated with Genan, including suppliers, business associates, lawyers and accountants.

### 4. Which matters can be reported?

The whistleblower scheme can only be used to report serious matters – or suspicion of the same. Such matters must be violations of the law, rules, policies, guidelines or the like. Less serious matters, such as dissatisfaction with pay, interpersonal difficulties etc., cannot be reported via the whistleblower scheme. These must be reported via the normal communication channels.

Serious matters that can be reported via the whistleblower scheme, may include information on:

- Financial crime, such as embezzlement, bribery, fraud and forgery
- Submission of incorrect or misleading information to public authorities
- Workplace safety violations
- Environmental pollution
- Physical violence and sexual harassment

- Corruption
- Nepotism
- Incidents where employees gravely misuse system access to obtain information on their colleagues or others – without any work-related need
- Irregularities in relation to bookkeeping and auditing

The above list provides examples only. If in doubt whether an observation you have made should be reported or not, we urge you to do so. We will respond to and deal with all reports, as we appreciate every single one of them.

To facilitate further investigation of the report, i.a. to identify the offence, it is paramount that as many details about the offence as possible are included. Further investigation of a report is not possible, if the report is unsubstantiated, or if it merely makes very broad accusations without providing any details.

## 5. Who deals with reports?

Reports are submitted through a whistleblower system provided by the law firm HjulmandKaptain – and is accessible on Genan's website.

Genan encourages those submitting a report to state their name, so that Genan may ask clarifying questions – and subsequently convey further update on the investigation, provided that there are no misgivings related to such follow-up. Still, it is indeed possible to submit an anonymous report.

Reports are handled by Genan's lawyer at HjulmandKaptain, who will initially determine who will be able to process the report in question at Genan – based on impartiality. The report is then sent to the relevant person at Genan.

Everyone involved, including Genan and HjulmandKaptain, will keep all reports confidential.

## 6. How are reports processed?

Upon receipt of a report, an initial investigation of the matter is carried out.

If the report is clearly unsubstantiated, it will be rejected and deleted from the system; and if the person who submitted the report chose to state his/her identity, he/she will be advised accordingly.

If the initial investigation concludes that the report submitted cannot be characterised as unsubstantiated, it will be investigated in more detail. Cases are dealt with internally and may have consequences for the employment of the person who is the subject of the report. Reports are deleted from the system – but kept for up to five years in the employee file of the person who is the subject of the report.

A case may be of such nature that it must be reported to the police for further investigation. When the police (and perhaps the courts of law) have completed their investigations, and the period during which an appeal may be made has expired, the case will be deleted from the system. A case may come to trial, and the subject of the report may be fined or imprisoned.

It is important that the system is not used for accusations pointing fingers at innocent people. All reports must thus be made in good faith – and be based on actual knowledge of the matter reported, and not just based on rumours.

A report that falls outside the category of offences that can be reported via the whistleblower scheme (cf. item 4), will immediately be forwarded to Genan's Group CEO – and deleted from the whistleblower scheme.

## **7. How to submit a report**

All reports must be made via the internet portal: <https://whistleblowersoftware.com/secure/genan>

Reports cannot be submitted to Genan in any other way, e.g. by sending an e-mail to the person responsible for the whistleblower scheme, as confidential personal data is involved, which should not be sent unencrypted via the open internet.

As an alternative to submitting a report to Genan's own whistleblower scheme, submitting a report to an external whistleblower channel managed by the Danish Data Protection Agency (Datatilsynet), is an option. Each whistleblower is free to decide whether to submit a report via Genan's internal whistleblower scheme – or via the external channel offered by the Danish Data Protection Agency.

Information about the whistleblower channel of the Danish Data Protection Agency and how to submit a report through this channel, is accessible on <https://whistleblower.dk/english>.

Genan encourages whistleblowers to use Genan's own scheme, if they feel confident that Genan can handle submitted reports efficiently, and if they assess that they will not be subject to reprisals.

## **8. Subsequent clarification and gathering further documentation**

When a report is submitted, the whistleblower can access the system by logging on anonymously and see if the case processor has asked additional questions – or is asking for further documentation. Any subsequent dialogue is 100% anonymous and will depend solely on the whistleblower's willingness to log onto the system and answer the case processor's questions.

## **9. Protection of the whistleblower**

Any person submitting a report can choose to do so anonymously. All reports made in good faith are protected against any kind of negative consequence (reprisals). Anyone attempting to take reprisals against a whistleblower reporting in good faith will face employment sanctions. If a whistleblower opts not to remain anonymous, the company will process the report submitted in confidentiality in so far as possible.

If whistleblowers opt to reveal their identity, and legal proceedings are taken against the person about whom a report has been submitted, the whistleblower may, however, be called as a witness in court.

Genan does not accept that an employee or anyone else submits false reports. If anyone deliberately submits a false report, there may be legal consequences. If the submitter is a Genan employee, the submission of a deliberate, false report may have employment consequences, including consequent dismissal. Anonymous and unsubstantiated accusations against individuals will be filtered out by HjulmandKaptain – and will not be dealt with by Genan.

In principle, the identity of a whistleblower will not be disclosed to the person about whom a report has been submitted. Yet, if it turns out that a false report has been made deliberately, the identity of the submitter will be disclosed.

## 10. Registration details about the subject of a report

The recipient of a report is obliged to inform the person who is the subject of the report about the matter reported. A case-specific assessment will be made to determine when such notification can be made – to ensure that doing so will not compromise neither the investigation of the matter reported nor the gathering of evidence.

We furthermore make reference to Genan's information notice about the whistleblower scheme, according to which the obligation to provide information is dealt with in compliance with the GDPR – in relation to both report subjects and whistleblowers.

It will not be disclosed who submitted the report, even if the submitter has opted to state his/her identity. However, please take note that a non-anonymous whistleblower may be called as a witness, if legal proceedings are initiated (cf. the above).

## 11. Data security

The system used to register reports is delivered by Whistleblower Software ApS, an independent company that guarantees security and anonymity in its system. The system does not log IP addresses nor machine ID, and all data transmission and storage is encrypted. Only the designated case processor has access to the case management element of the system. Further details on security can be found in Genan's information notice about the whistleblower scheme.

All reports will be securely stored, and only relevant personnel will be able to access data. Only Genan's lawyers, HjulmandKaptain, have access to the whistleblower scheme, and will determine who at Genan shall process the report – based on evaluation of impartiality.

## 12. Questions

Any questions related to the whistleblower scheme can be addressed to Advokatfirmaet HjulmandKaptain on +45 72 21 17 30.

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