

# Whistleblower policy



# Whistleblower policy JFM

JFM is a company with an open corporate culture. At JFM, employees are free to come forward and report suspicions about irregular or illegal activities, irrespective of whether the suspicions relate to the company's employees, its management or its suppliers. It is extremely important to JFM that irregular and illegal activities are revealed.

In June 2021, the Danish Parliament adopted a new act according to which it is now mandatory to set up a whistleblower system. Therefore, JFM has initiated a whistleblower system.

This whistleblower system means that employees, board members, suppliers and other stakeholders may make anonymous or non-anonymous reports in case of reasonable suspicions of serious and objectionable matters or illegal activities. Thus, the whistleblower system helps ensure that reports are handled appropriately and ensures that any person who in good faith reports a serious suspicion is protected from retaliatory measures, including reprisals related to employment law.

Irrespective of the whistleblower system, reports can always be filed through official channels.

## Purpose

The purpose of this whistleblower policy is to describe how the whistleblower system works. Moreover, it appears from this whistleblower policy which matters can be reported and how to report matters under the system.

The purpose of the whistleblower system is to unearth information about irregular or illegal activities and thereby also create a preventive effect without adverse consequences for the person reporting the activities.

The whistleblower system covers all of JFM's subsidiaries, divisions and businesses.

## Who can report and who can the report be about?

Reports can be filed by current as well as former employees of JFM, board members and other persons connected to JFM. Other persons connected to JFM are, for example, external consultants or suppliers.

Reports can be made about activities carried out by current employees of JFM, board members and other persons connected to JFM.

## Which activities can be reported?

The whistleblower system can only be used to report material matters. Less material matters, such as dissatisfaction with salary conditions, lack of cooperation, disagreements between colleagues or managers, etc., cannot be reported through the whistleblower system, but must be reported as usual, for example by contacting the immediate manager directly. Examples of material matters that can be reported through the whistleblower system:

- Financial crime (for example theft, embezzlement, bribery, fraud or forgery);
- Material breach of safety at work;
- Material breach of environmental regulations and environmental pollution;
- Physical and psychological abuse;
- Sexual harassment.

The matters in the above list are only examples.

Note: If you are unsure whether or not to report your observations, you are encouraged to do so. A response will be provided to all reports filed through the whistleblower system.

## How to file a report through the whistleblower system

Reports can be filed using the encrypted internet portal

**Click here to report**

There are no other ways to make online reports, for example by e-mail, as the reports may contain personal information that must not be forwarded in an unencrypted format.

As an alternative to the above, reports can be made by phone at +45 2020 1968 to attorney Martin Holm Land, Andersen Partners Law Firm.

You will receive confirmation of your report no later than 7 (seven) days after filing the report.

## Anonymity and confidentiality

It is up to the person filing the report whether he/she wishes to be anonymous.

If the person filing a report chooses not to be anonymous, JFM will still treat the report confidentially to the greatest possible extent. If a non-anonymous report leads to initiation of legal proceedings against the person(s) to whom the report relates, the person filing the report may be called as a witness in the case. In such cases, JFM cannot guarantee that the identity of the person making the report can remain confidential.

Everyone filing a report in good faith through the whistleblower system will be protected against any kind of employment law reprisals.

## Who handles the reports?

The whistleblower system is provided and administered by Andersen Partners Law Firm. Andersen Partners Law Firm receives, registers and handles the reports filed. Andersen Partners Law Firm guarantees to treat all reports anonymously and confidentially and are under a contractual obligation to do so.

## How are the reports handled?

All reports are taken seriously.

When a report is received, an initial investigation of the information in the report is carried out.

If the report is clearly unfounded, including if it relates to matters that are not material and do not need to be followed up or matters that do not provide material new information about already reported cases for which the relevant procedures have been concluded, it will be dismissed and deleted from the system and the person who has filed the report will be informed if the person's identity is known.

If the initial investigation shows that the report cannot be characterized as clearly unfounded, it will become subject to further investigations.

The report will be discussed with the management of JFM. The report may lead to employment-related consequences for the person(s) mentioned in the report.

The nature of the report may be such that it is handed over to the police for further investigation.

If you have chosen to reveal your identity, you will no later than 3 (three) months later receive information about any steps contemplated or already taken based on your report.

Moreover, you will receive information about the final result of the investigation triggered by your report if you were not informed about this initially.

Questions regarding the whistleblower system can be addressed to Julie Brink from JFM by email at jubr@jfm.dk.