Whistleblower policy

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For the purposes of this policy, “Egiss” and "Egiss Group” refers to Egiss A/S and its global affiliates.

EGISS

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1 Purpose

Egiss is committed to operating responsibly, ethically, and in full compliance with the law.
This Whistleblower Policy ensures that anyone connected to Egiss can safely raise concerns about serious matters that could harm people, the company, our partners, or the wider community.

The purpose of the whistleblower scheme is to:

- encourage early reporting of serious concerns
- ensure concerns are handled professionally, fairly, and confidentially
- protect individuals who report in good faith
- help Egiss prevent and correct wrongdoing

The policy supports an open culture where speaking up is welcomed and taken seriously.

2 Who can raise a concern

Our whistleblower system is open to:

- all Egiss employees
- agency workers and temporary staff
- contractors and consultants
- suppliers and business partners
- customers and any external parties with a relationship to Egiss

You do not need evidence to submit a concern - a genuine suspicion or reasonable doubt is enough.

Reports must, however, be made in **good faith**.

3 What you can report

The whistleblower system is intended for serious matters, including:

- suspected illegal acts (e.g., bribery, corruption, fraud, theft)

- irregularities or unethical behaviour
- serious breaches of law or Egiss policies
- gross harassment, sexual harassment, or abusive behaviour
- major breaches of personal data security (GDPR)
- significant environmental damage
- threats to health, safety, or security
- deliberate deception, manipulation, or cover-ups

These examples are not exhaustive.
If you are unsure whether something is covered, you are encouraged to report it so it can be assessed.

3.1 What should not be reported via the whistleblower system

This channel is not for everyday workplace issues such as:

- dissatisfaction with salary or performance reviews
- conflicts with colleagues or managers
- general HR-related matters

These should be raised through existing internal channels (line manager, People & Culture).

4 How to raise a concern

Concerns must be submitted through our secure external whistleblower platform, Formalize.
The link is available on www.egiss.net and at the end of this policy.
Through the platform you can:

- report anonymously, or
- share your identity confidentially

The system guides you through the process. You can also:
- upload documents or evidence
- add more information later

- follow the progress of your case through a secure inbox

We encourage the use of the anonymous mailbox option (even if reporting anonymously), as it enables dialogue while protecting your identity.

5 How your concern is handled

All reports are received securely by Formalize and made available only to the Egiss Whistleblower Panel - a group of trained individuals responsible for handling cases professionally and objectively.

5.1 The process:

1. Receipt of report
   You will receive confirmation within 7 days.
2. Initial screening
   The panel assesses whether the report falls within the scope of the whistleblower rules.
3. Investigation
   If the case is within scope, a factual investigation is carried out.
   Depending on the matter, this may involve speaking with relevant individuals or reviewing documentation.
4. Escalation
   The panel may inform Group Management or the Board of Directors when required.
   If the concern involves a person in management or the Board, that person is excluded from the process.
5. Outcome and feedback
   You will receive feedback within 3 months, as far as possible under the law.
   Feedback may be limited to protect confidentiality.

5.2 Possible outcomes

- no further action (no basis for the concern)
- corrective measures
- disciplinary actions
- referral to authorities in case of criminal acts

6 Protection and confidentiality

Egiss fully complies with the Danish and EU Whistleblower Acts.

When you report a concern in good faith:

- you are legally protected
- you cannot face retaliation, negative treatment, or reprisals
- your identity is kept confidential
- the whistleblower panel is bound by strict confidentiality obligations

Your identity will only be disclosed if you provide explicit consent or if required by law (e.g., by police order).
If you choose to report anonymously, ensure you do not include information that could unintentionally reveal your identity.
Using the anonymous mailbox is recommended so the panel can contact you if clarification is needed.

7 Third-party provider and information security

Egiss uses Formalize, an independent and specialised platform for whistleblower reporting.

This ensures:

- secure submission and storage of all reports
- strict access controls
- protection of anonymity
- neutrality and independence in case handling
- full compliance with EU and Danish whistleblower legislation

7.1 Information security and certifications

- Egiss and Formalize are ISO 27001 certified, meaning all whistleblower data is handled within a controlled and audited information security framework.

- Formalize's solutions are independently validated and certified to recognised international compliance and security standards.
- Additional details can be found on the Formalize Trust Center: Formalize.

This strengthens confidentiality and ensures that the Egiss whistleblower scheme meets high standards of integrity and data protection.

8 Data protection (GDPR)

Egiss is the data controller for personal data processed in the whistleblower system.
All data is handled in compliance with GDPR and Danish data protection rules.

8.1 Data retention

- If a report falls outside the system's scope, personal data is deleted immediately.
- Otherwise, data is stored only for as long as necessary to:
  - meet legal requirements
  - preserve evidence
  - follow up on related reports
  - manage disciplinary or legal processes

If information is added to an employee's personnel file due to misconduct, it will be deleted no later than 5 years after the employee leaves, unless there is a legal reason to keep it longer.

8.2 Your rights

Depending on the circumstances, you may request:

- access to your personal data
- correction of incorrect information
- restriction or deletion

You can contact:

Hanne Bak, Group CHRO
Email: hba@egiss.net
Phone: +45 20 852 390

You can also complain to the Danish Data Protection Agency (Datatilsynet).

9 External whistleblower scheme

If you prefer to report outside Egiss, you can use the National Whistleblower Scheme at the Danish Data Protection Agency: https://whistleblower.dk/english

This allows written and oral reporting.

10 Approval and review

This policy is approved by the Egiss Group Board of Directors.
It is reviewed at least every two years, or earlier if laws, operational conditions, or organisational structures change.

11 Link to the whistleblower system

Egiss Whistleblower System | Home