

WHISTLEBLOWING POLICY

1. OBJECTIVE

The objective of this Whistleblowing Policy is to set the framework for the shared whistleblower system of Dansk Ejerkapital which can be used to report any violations of EU law covered by the scope of application of the Whistleblower Directive, report any serious offences and report other serious matters, including any suspicion or knowledge of illegal, unethical or irregular conduct concerning the companies comprised by the whistleblower system.

The whistleblower system comprises the companies below:

- ICEpower A/S (CVR no (business registration no) 25053591)
- John Bjerrum Nielsen A/S (CVR no (business registration no) 13703582)
- Sports Group Denmark A/S (CVR no (business registration no) 34704074)
- Wila A/S (CVR no (business registration no) 27230350)
- Aabo-Ideal A/S (CVR no (business registration no) 77117911)
- Tic Elkas A/S (CVR no (business registration no) 16610178)

The objective of the system is to bring to light matters that the comprised companies would not know of otherwise. It is a supplement to the usual reporting channels such as the direct and day-to-day communications in the workplace about errors and unsatisfactory conditions, etc.

2. WHO CAN SUBMIT REPORTS?

The whistleblower system may be used by the following categories:

- The employees of the comprised companies
- Self-employed persons (with whom the comprised companies collaborate)
- Shareholders and members of the executive board, the board of directors, the supervisory board or the corresponding governing body of the comprised companies
- Volunteers at the comprised companies
- Paid or unpaid trainees at the comprised companies
- Persons who work under the supervision and management of the contracting parties, sub-suppliers and suppliers of the comprised companies
- Persons reporting information of which such person has gained knowledge in an employment relationship with the comprised companies that has since terminated

- Persons whose employment relationship with the comprised companies has not yet started who report breaches of which such person has gained knowledge during the hiring process or other pre-contractual negotiations.

3. HOW ARE REPORTS SUBMITTED?

Reports may be submitted to the whistleblower system in writing and orally via the whistleblower portal that can be accessed on the websites of the comprised companies.

If you so request, it will also be possible for you to submit a report to the whistleblower system by attending a meeting in person. It is possible to make a request to attend a meeting in person in the whistleblower portal.

4. WHAT REPORTS CAN BE SUBMITTED?

You can use the whistleblower system to report all serious offences and other serious matters concerning the comprised companies. It could be suspicion or knowledge of any illegal, unethical or irregular conduct, including matters regarding bribery and corruption, abuse of funds, theft, deceit, embezzlement, fraud and other white-collar crime as well as any personal data security violation, serious environmental damage, sexual harassment or other gross harassment as well as gross or repeated offences.

You can also report violations of EU law covered by the scope of application of the Whistleblower Directive and which concern the comprised companies. It could be violations in public procurement, financial services, product safety and product compliance as well as environmental protection.

We will specifically assess in each case whether the report is within the scope of application of the whistleblower system. The report will be within the scope of application of the system if it is within the scope of application of the rules of the Act on the protection of whistleblowers in Denmark in force from time to time.

If you are an employee, we note that dissatisfaction with your employment such as salary and management style and other contractual terms and conditions are not to be reported to the whistleblower system. Instead, such matters are to be addressed through the usual channels for example to your line manager, your trade union representative or the person responsible for HR matters.

Reports must be submitted in good faith. It means that you must have good reason to believe that the reported information is correct when the report is submitted and that the information is covered by the

system. It also means that the system may not be used to submit reports containing information that the whistleblower knows is incorrect.

5. HANDLING REPORTS

Law Firm Poul Schmith will screen every report submitted to the whistleblower system.

As a whistleblower you will receive acknowledgement as quickly as possible and no later than within 7 (seven) days after you submitted the report that the report has been received. You will receive acknowledgement of the receipt of the report via the whistleblower portal or through the personal contact details that you provided when you submitted the report unless you explicitly requested otherwise or there is a good reason to assume that confirmation of the report will put the protection of your identity at risk. If you submit the report anonymously, you will only receive the acknowledgement in the whistleblower portal if you keep the password that you receive when you submit the report.

It will be assessed in connection with the screening whether you as the whistleblower and the reported matter are covered by the whistleblower system. If not, the report will not be dealt with any further in the system and you will be informed.

If, however, the initial screening shows that you and the reported matter are covered by the whistleblower system or that there is no immediate reason why it should not be the case, the report will be investigated in more detail. The scope of the investigation depends on the specific circumstances of the matter including whether it is established as part of the investigation that you are not or the reported matter is not covered by the whistleblower system.

The further investigation will generally be conducted by the whistleblower entity of the company that the report is about.

The starting point is that you will receive feedback on the status of the report within 3 (three) months, including the type of follow-up on the report that has been made, if any. You will receive feedback in the whistleblower portal or through the personal contact details that you provided when you submitted the report unless you explicitly requested otherwise or there is a good reason to assume that feedback on the report will put the protection of your identity at risk. If you submit the report anonymously, you will receive feedback via the whistleblower portal.

6. ANONYMITY AND PROTECTION OF THE WHISTLEBLOWER

It is your sole and absolute discretion whether you wish to submit the report anonymously or whether you wish to provide your personal contact details.

If you decide to submit the report anonymously, your personal data will generally not be processed. If, when submitting the report, you provide data that make the relevant company able to identify you, the relevant company will, however, be entitled to process such data. This is the case even if you have submitted the report anonymously.

If you submit the report anonymously, you will have the option to decide whether you want to be available for any further investigation by keeping the password that you receive when you submit the report. The password makes it possible for you to get access to and follow up on your report in the whistleblower portal and communicate with the relevant whistleblower entity. We recommend that you as a whistleblower keep the password as it can be difficult for the whistleblower entity to conduct an investigation without any further information from you.

If you decide to reveal your identity when you submit a report covered by the whistleblower system, the whistleblower entity is obliged to keep your identity confidential under the Danish Act on the Protection of Whistleblowers. As a consequence, your identity will generally only be disclosed if you *explicitly* give your consent. But your identity may be disclosed to public bodies, such as the police or the prosecution, if it is necessary to respond to the reported matter or to ensure the right to a defence of the people affected. You will be notified before the disclosure to the extent possible considering the specific handling of the report.

No reprisals may be carried out against a whistleblower who submits a report in good faith covered by the whistleblower system because the report has been submitted.

If, however, you deliberately report incorrect information, it may have negative consequences for you, including fines, consequences under employment law or contract law.

The reporting system does not log the IP address or the machine ID of the computer from which the report is submitted, and the system does not use any cookies. If the computer from which the report is submitted is owned by a company comprised by the system or connected to the network of such company, there is a risk that the IP address and/or the machine ID of the computer from which the report is submitted will be logged in the browser history and/or such company's log through the log that is made in the company's IT systems.

You can eliminate this risk by submitting the report from a computer that is not owned by a company comprised by the system or connected to the network of such company.

7. PROTECTION OF THE PERSON THAT THE REPORT IS ABOUT

The identity of the natural person or the legal person that the report is about or a natural person or legal person with a connection to such person, for example the person's spouse, will be protected during the processing of the report and will only be disclosed to persons outside of the relevant whistleblower entity if it is part of following up on a report to prevent serious offences, other serious matters or violations of EU law (which are covered by the scope of application of the Whistleblower Directive) or if required by law.

Such persons are entitled to an effective defence in matters where the reported information is part of the proof and this is one of the reasons why reports submitted are registered and information about your identity may be disclosed in such cases.

8. SUBMITTING A REPORT TO AN EXTERNAL WHISTLEBLOWER SYSTEM

It is your sole and absolute discretion whether to submit a report to this whistleblower system or a so-called external whistleblower system. For example, the Danish Data Protection Agency has established the Danish National Whistleblower Scheme that supplements employers' duty to establish a whistleblower system. You can read about the procedure for submitting a report to the Danish National Whistleblower Scheme here: <https://whistleblower.dk/english>. There is also a link to the whistleblower portal of the Danish National Whistleblower Scheme where you can submit your report.

We recommend that you submit your report with this whistleblower system if the violation can be effectively restrained in the comprised company and you are of the opinion that there is no risk of reprisals so that the company in question quickly and immediately can follow up on the reported matter.