

Whistleblower policy for Østermark Grouting A/S

Purpose

The purpose of Østermark Grouting A/S' Whistle-blower Scheme Ethics Line is to:

- to increase the opportunity for employees and partners to comment on offenses and other serious matters in Østermark Grouting A/S,
- to protect employees who submit information to the Whistleblower Scheme in good faith, and;
- to detect and prevent serious or repeated violations of essential internal guidelines.

The whistleblower scheme is a supplement to the direct and daily communication in the workplace. As a starting point, please try to resolve issues through the collaboration with the immediate manager, if possible.

Voluntary whistleblower scheme

The Whistleblower scheme is voluntary, which means that Østermark Grouting A/S has chosen to establish the Whistleblower scheme, even though Østermark Grouting A/S is not obliged to do so under the Whistleblower Protection Act (the "Whistleblower Act").

A voluntary whistleblower scheme differs from the statutory whistleblower schemes in a number of aspects. Reports may contain so-called "sensitive personal information", and whistleblowers are not covered by the Whistleblower Act's protection against retaliation when a report is made. If you are employed by Østermark Grouting A/S, we guarantee you a corresponding protection as part of your employment.

You can read more about how you are protected when reporting via the whistleblower scheme below.

Who can submit information?

The scheme can be used by all employees, regardless of whether you are a full-time, part-time, hourly or monthly paid employee, partners and employees to report in good faith observed or suspected of serious or repeated offenses or other serious matters at Østermark Grouting A/S.

Scope

Reports must be submitted in good faith and relate to serious or repeated offenses or other serious matters that may have an impact on Østermark Grouting A/S as a whole, or that may have a decisive impact on individuals' lives or health, for example:

- criminal offenses, including breach of confidentiality, misuse of financial means, theft, fraud, embezzlement, fraud, bribery,
- serious or repeated violations of the law,
- serious or repeated violations of essential internal guidelines. For example, in relation to business trips, gifts and financial reporting,
- serious personal conflicts in the workplace. For example, aggravated harassment, including of a sexual nature, and

- deliberate misrepresentation by management, employees and business partners.

The scheme does not include reports regarding other matters, eg:

- conditions of other companies,
- HR conditions,
- information on minor violations of internal guidelines, such as sick leave, smoking, alcohol, clothing, use of office supplies
- information on minor employee-related conflicts in the workplace, such as collaboration difficulties, minor disagreements and lack of trust between employees and managers.

We draw special attention to the fact that reports must not contain sensitive personal information. This is because the Whistleblower Scheme is not covered by the Whistleblower Act.

Sensitive personal information is information about race or ethnic origin, political, religious or philosophical beliefs or trade union affiliation as well as the processing of genetic data, health information or information about a natural person's sexual relations or sexual orientation, cf. Article 9 (1). 1 of the Data Protection Regulation.

HOW ARE REPORTS MANAGED?

All reports are taken seriously, and Østermark Grouting A/S has appointed an internal whistleblower team that screens all reports for whether they are covered by the whistleblower scheme and whether the reports require a further investigation

Østermark Grouting A/S 'internal whistleblower team consists of:

- Inge-Lise Dinesen
- Sune Benn
- Conny Lund

If the report concerns one of these members, the recipient of the report will not forward the report to that person. This also applies in relation to proposals for decisions to be made in connection with the report. [This also applies to the proposed decisions that relate to the report.]

Once a report has been received, the internal whistleblower team will screen the report. If the internal whistleblower team finds that the report falls within the scope of the whistleblower scheme, the internal whistleblower team will decide whether the report should be investigated further.

Once the report has been examined in more detail, a decision will be made to follow up the investigation.

Rights and protection

Whistleblowers will be informed via the secured and anonymous mailbox about the processing of the case and any outcomes. How much or how little can be informed about, depends on the specific case and may be limited for privacy and effective resolution reasons.

The whistleblower's identity may be disclosed to the relevant public authorities without the whistleblower's consent. However, the whistleblower will be notified prior to such disclosure unless it is deemed to jeopardise a related investigation or lawsuit.

Registered persons may exercise their rights in accordance with Chapter III of the Data Protection Ordinance, however with the limitations that follow from the legislation, such as the consideration of Østermark Grouting A / S's interest in efficiently processing reports, including uncovering and solving criminal offenses, cf. the Data Protection Ordinance Article 14, paragraph 5, letter b and the Data Protection Act § 22, para. 1.

We draw special attention to the fact that whistleblowers are not covered by the Whistleblower Act's protection against reprisals when making reports. Employees at Østermark Grouting A / S, who contribute to the whistleblower scheme by conducting investigation or submitting information, will be, as much as possible, guaranteed equivalent protection against reprisals.

External people who report in good faith are not protected from retaliation. Nevertheless, we generally treat personal information confidentially, including information about identity, if it is known.

Should whistleblowers provide a statement in bad faith, this can lead to a police report, just as it can lead to negative employment legal consequences (for employees at Østermark Grouting A / S) or lead to contract legal consequences for collaboration (for external partners).

Confidentiality and anonymity

All information will be kept confidential to the fullest extent possible. Whistleblowers have the option to remain anonymous and the dialogue will take place via the secure and anonymous mailbox.

We recommend that whistleblowers disclose their identity when reporting, this gives us the best conditions to investigate the report.

External whistleblower schemes

Østermark Grouting A / S encourages people to report to the whistleblower scheme if the violation can be dealt with effectively internally, and if the whistleblower assesses that there is no risk of retaliation.

If the whistleblower considers that the infringement cannot be dealt with effectively internally and that there is a risk of retaliation, the whistleblower is free to report to an external whistleblower scheme. When reporting to an external whistleblower scheme, the whistleblower will always be covered by the Whistleblower Act's protection against reprisals, if the requirements for this are met. OR if the circumstances allow.

The procedure for reporting to an external scheme can be seen on the Danish Data Protection Agency's website: <https://whistleblower.dk/>.

Østermark Grouting A/S is responsible for

- maintaining this policy,
- conducting investigation on the basis of received reporting
- conducting the necessary measures (including employment legal consequences);

- reporting to relevant authorities in the event of an offence
- using external assistance if necessary to ensure anonymity of the reporter
- the Data Protection Regulation (GDPR) is complied.

You can find Østermark Grouting A/S' reports page here:

<https://app.sibilum.com/radserver/emsserver.dll/PUBWBSITE/oestermarkgrouting>