



Whistleblower policy

HusCompagniet A/S

1 Purpose

- 1.1 HusCompagniet A/S, Agerøvej 31A, 8381 Tilst company reg. no. 36972963 (“HusCompagniet”, “we”, “us”, “our”) has established a whistleblower scheme in order to allow reporting of potential violations of laws and serious violations of internal policies and procedures. This policy governs the use and operation of the whistleblower scheme (the “Whistleblower Policy”).
- 1.2 HusCompagniet will as data controller operate HusCompagniet’s Whistleblower System to ensure that you know how to raise a compliance concern if you observe or suspect misconduct, and provide a remediation framework for serious and sensitive compliance concerns that could have an adverse impact on our business.
- 1.3 Below you will find a description of the personal data we will collect and process about you as well as the purpose on which basis we are processing the personal data when you use the Whistleblower System.

2 Types of concerns that may be reported

- 2.1 You can raise a compliance concern if you reasonably suspect a breach of **laws, policies**, and/or other **HusCompagniet obligation**. The nature of compliance concerns could include:
- a. Illegal activity;
 - b. Financial fraud (for example accounting manipulation, noncompliance with internal controls procedures, misappropriation of assets, fraudulent statements or money laundering);
 - c. Bribery or corruption (for example conflicts of interest or facilitation payments);
 - d. Violation of competition laws (for example price fixing, exchange of price sensitive information, collusion with competitors); and/or
 - e. Activities, which otherwise by law, treaty or agreement amount to serious improper conduct (for example discriminatory practices, sexual harassment, use of child labour, human rights violations)
 - f. Other serious compliance concerns (for example concerning consumer protection, transport safety, product safety and compliance, public procurement protection of the environment or protection of privacy and personal data, and security of network and information systems).
- 2.2 Reports on matters that are not a breach of law, policy and/or other HusCompagniet obligation, such as dissatisfaction with wages or difficulties with cooperation between colleagues, should be made via the usual internal channels if you are an employee of HusCompagniet or to any of our other entities.

3 Types of personal data and legal basis

- 3.1 **Legitimate interest.** HusCompagniet collects and process personal data about you for the purpose of pursuing a legitimate interest of HusCompagniet, in ensuring compliance with applicable laws throughout all of HusCompagniet’s operations and facilitating the provision of information by data

subjects from HusCompagniet regarding a suspected breach of such compliance and in order to provide a response to the requests made by you which interests in processing the personal data overrides your interests. Under the GDPR this is in accordance with article 6(1) (f).

3.2 **To comply with a legal requirement.** We collect and process personal data about you for the purpose of complying with legal requirement in order to meet a legal obligation imposed by law, by regulation or by community and/or national rules specific for the reported concern if applicable. Under the GDPR this is in accordance with article 6(1) (c).

3.3 HusCompagniet collect and processes the following personal data about you for the above purposes:

- a. Report made by (name, e-mail and telephone number);
- b. Depending on the concern reported e.g.:
 - i. Description of the alleged violation, including names of any persons involved in the violation, as well as the date and place of the violation;
 - ii. If the possible violation is expected to reoccur –specifying where and when;
 - iii. Specifying if any other person within HusCompagniet or outside HusCompagniet knows of the violation or is expected to have this knowledge as well;
 - iv. Any document or evidence relating to the possible violation attached when filing the report; and
 - v. Any other detail or information that may facilitate the investigation.

3.4 There is no log made in the Whistleblower System as to the IP address or machine ID of the computer on which the concern is reported.

4 How we process your personal data

4.1 Your personal data will be accessed by specially appointed employees at HusCompagniet and third party IT service providers engaged by HusCompagniet on a need to know basis only.

4.2 HusCompagniet will generally not disclose the data to third parties, however, we will transfer your personal data to our IT service providers. If third party services providers and/or HusCompagniet entities process your personal data outside of the EU/EEA, such transfer of personal data will be subject to the European Commission's standard contractual clauses.

4.3 HusCompagniet will also transfer your personal data to our external attorney or auditor in connection with the processing of the concern, including reporting the concern to relevant authorities.

4.4 HusCompagniet will keep your personal data for as long as is needed to fulfill our purposes of investigating compliance concerns and documenting our compliance with applicable laws, unless HusCompagniet is required under applicable law to keep your personal data for a longer period.

4.5 Different retention periods apply if legal proceedings or disciplinary measures are initiated.

5 Do reported concerns remain confidential?

5.1 All reports made through HusCompagniet's reporting channels are confidential. Only HusCompagniet's General Counsel and HusCompagniet's Head of IT have access to the reporting email and the Whistleblower System. HusCompagniet's Whistleblower System is monitored by an independent external assurance provider.

5.2 Information about your concern, including your personal data will only be shared with a limited number of people on a strict need-to-know basis, or if required to do so by law or an important public interest is at stake.

5.3 All HusCompagniet Compliance investigations are conducted under a qualified attorney for the purpose of preventing recurrence and for obtaining legal advice on behalf of HusCompagniet.

5.4 You can help us keep concerns confidential by being discreet and not discussing an ongoing investigation with others.

6 Your rights

6.1 **The right to information and access.** You have the right to ask us for information about or access to your personal data. There are some exemptions, which means you may not always receive all the personal data that we process.

6.2 **The right to object.** You have the right to object to HusCompagniet processing (using) your personal data. This effectively means that you can stop or prevent us from using your personal data. However, it only applies in certain circumstances, and we may not need to stop the processing of your personal data if we can give legitimate reasons to continue using your personal data.

6.3 **The right to erasure.** You have the right to ask us to erase your personal data in certain circumstances.

6.4 **The right to rectification.** You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete personal data you think is incomplete.

6.5 **The right to restriction of processing.** You have the right to ask us to restrict the processing of your personal data in certain circumstances.

6.6 **The right to complaint.** If you have any complaints about HusCompagniet's processing of your personal data, you may contact the Danish Data Protection Agency.

- 6.7 **The right to be protected (no retaliation):** You are protected for speaking up in good faith in accordance with applicable legislation. However, such protection does not apply in case of maliciously made false allegations or allegations which, all circumstances considered, are unreasonable.
- 7 Contact information**
- 7.1 If you observe or suspect breach of **laws, policies**, and/or other **HusCompagniet obligations**. You should report the compliance concerns through HusCompagniet's Whistleblower System which you can access here <https://huscompagniet.whistleblownetwork.net>.
- 7.2 You may otherwise contact us by contacting info@HusCompagniet.dk in regard to your personal data.