



EET Whistleblower policy



EET's procedure for reporting (Whistle Blowing) and handling of non-conformities

Everyone in the EET and affiliated companies is obligated to report breaches, or reasonable suspicions of breaches, of the Code of Conduct and Anti-Corruption Policy by following the procedure outlined below.

1. Purpose

EET is committed to the highest standards of conduct and ethical behaviour in all of our business activities and to promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

EET encourages the reporting of any instances of suspected unethical, illegal, fraudulent, or undesirable conduct involving EET and affiliated companies. EET provides protections and measures so that any employee or any person affiliated with EET, including business partners or suppliers can make a report confidentially and without fear of intimidation, disadvantage, or reprisal.

The purpose of this policy is to ensure that EET employees and business partners can report any concerns or potential violation of our code of conduct without a fear of negative consequences.

Questions relating to the interpretation of the Code of Conduct, Anti-Corruption and Anti-Bribery Policy or their practical application should be addressed to the general manager of the EET entity concerned.

2. What can be reported?

The EET Whistleblower policy can only be used to report serious violations or suspicion of serious violations within EET.

The following are only a few examples of types of activities that should be reported:

- An employee believes that a manager, executive or employee has engaged in questionable accounting or auditing practices.
- A vendor or supplier offers an employee, and the employee accepts an inappropriate gift or money.
- A manager or executive requests employees to falsify Company data.
- An employee falsifies payroll or expense reimbursements.
- An employee uses corporate property, information, or his/her position for improper personal gain.
- An employee competing with EET directly or indirectly.
- An employee's private interest interferes in any way with the interests of the Company.
- An employee, or members of his/her family, receives improper personal benefits as a result of his/her position at EET.
- An employee discloses non-public information that might be of use to competitors or harmful to EET.
- An employee is involved in theft of EET's property and assets.
- An employee disclosing of proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.
- The Company cheats customers, suppliers or others who have a financial interest in it.



- Antitrust or competition law violations.
- A company superior asks employee to engage in activities they consider illegal or questionable.
- An employee steals cash, merchandise, or other Company assets.
- Environmental violations committed by an employee or the Company.
- Any other activity that may violate applicable law or the Company's policies.

It is the responsibility of everyone at EET to report incidences that may be in breach of the EET's Code of Conduct or anti-Corruption Policy. All reports must be made without undue delay from the incident occurring.

- The report shall include the name of the employee making the report, the date and time of the report, and the nature of the report.
- The completed report must be forwarded to the CFO.
- If the persons reported are the CEO or CFO of EET or persons employed in their departments, the reports should be sent to the Chairman of the Group.
- The CFO shall at his/her discretion inform and advise the CEO or the Chairman of the Board of EET. The CFO shall immediately notify the CEO of any reported concerns or complaints regarding EET's accounting practices, reporting procedures, internal controls or auditing.
- Each completed report will be investigated.
- Local resources may be used to conduct the investigation if deemed necessary. The decision regarding who will conduct the investigation will be based upon the nature of the violation reported and the resources available to conduct the investigation.
- The final results of the report will be completed within 60 days and reviewed by the CEO, and a copy of which will be kept on file in the Accounting, Finance and Administration Department.
- The Board will be informed at every board meeting about incident reports received and the outcome of the investigation.
- Any violation of the Code of Conduct that is found will be dealt with accordingly.
- Violation of the Code of Conduct is a serious matter, and as such will be dealt with accordingly.
- Based on the outcome of such investigation, CFO, CEO or Chairman of the Board shall take any such action and/or impose such sanctions as are deemed appropriate and/or necessary, including any preventative measures, disciplinary sanctions, or termination of supplier contract etc.
- For employees, consequences may involve verbal or written warnings or, if the matter is very serious, termination of, or summary dismissal from, their employment.

3. Process of whistleblowing

All employees, members of management and business partners can anonymously report critical concerns under the Whistleblower Policy.

We handle reported cases in three steps

1. Acknowledge receipt
2. Follow up and investigate
3. Give whistleblower feedback

4. Personal Data

In relation to this Whistleblower Policy, EET may receive information on both the whistleblower and persons involved in the suspected misconduct. Such information may contain sensitive information on suspected criminal behaviour and other personal matters.



All information received according to the Whistleblower Policy will be handled in accordance with applicable law on processing of personal data. Generally, all information received according to the Whistleblower Policy will only be retained for as long as it is necessary unless otherwise required by law.

5. Confidentiality

It is as important for EET to provide a mechanism for employees and board members to safely report illegal activities and/or serious misconduct, as it is for the company to protect and to avoid damage to the reputation of innocent employees or board members who are the subject of a reported violation. For these reasons, EET will conduct its investigations of any reported violation as discretely as possible and in a confidential manner to the greatest extent possible commensurate with carrying out a thorough and adequate investigation. Furthermore, to the extent possible, all reasonable efforts will be made to treat the whistleblower's identity as confidential.

6. Whistleblower Protection

The EET takes the accusation of wrongdoing very seriously. Therefore, it is our policy that:

- The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within EET prior to seeking resolution outside the company.
- No one shall suffer adverse employment consequences, harassment, be discriminated against or retaliated against for making a claim in good faith of a violation of EET's Code of Conduct and Anti-Corruption Policy.
- An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or summary dismissal.
- However, any employee who is found to have intentionally made a false claim of violation of EET's Code of Conduct and Anti-Corruption will receive disciplinary action as deemed necessary, up to and including termination of employment.
- We trust that all EET employees will make the right decision and report any violations of the Code of Conduct to the appropriate personnel.
- Beware that while we will make every effort provide a certain degree of confidentiality, there are situations under which the confidentiality cannot be kept throughout the whistleblowing cycle. This applies e.g. to the process of finding clarifying evidence as well as the presentation of the complaint to the person(s) subjected to retaliation.

7. Contact list

At EET we foster an open-door policy and encourage employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's line manager is in the best position to address an area of concern. If this reporting channel is deemed inappropriate due to the individuals involved or the severity of the breach in question, the breach or suspected breach should be reported to one of the contact persons listed below. We encourage you to use the internal channels before the external, and we also require that whistleblower cases are reported in writing with a clear indication that it is a whistleblower report.

Company/Role	Name	Telephone	E-mail
CFO EET	Jan H. Iversen	+45 40 95 10 20	jh.iversen@eetgroup.com
CEO EET	Søren Drewsen	+45 21 61 95 30	s.drewsen@eetgroup.com
CHRO EET	Pernilla Aadal Lund	+45 23 28 21 71	pa.lund@eetgroup.com



Lawyer at Sirius Advokater in Copenhagen. If you send a mail then write in Danish or English with "whistleblower" in topic field to Gitte and cc Helle.	Gitte Løvgren Larsen Helle Nøhr Larsen	+45 88 88 85 85	gll@siriusadvokater.dk hnl@siriusadvokater.dk
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Adopted by the EET Group Executive Management November 2023