

## WHISTLEBLOWER POLICY OF THERMO-TRANSIT

### 1. Introduction

- 1.1** The purpose of Thermo-Transit's whistleblower scheme is to increase the opportunities for Thermo-Transit's employees, suppliers, customers, and other groups to express themselves about critical matters at the workplace without fear of negative consequences. Thus, the purpose of this whistleblower scheme is in a confidential way to ensure openness and transparency in relation to any (legal) violations and serious irregularities.
- 1.2** Thermo-Transit's whistleblower scheme must be seen as a supplement to direct and daily communication at the workplace about mistakes and unsatisfactory conditions, etc. The whistleblower scheme is also to be seen as a supplement to existing possibilities for contacting e.g., the employee's immediate leader.

### 2. Personnel groups eligible to report through the whistleblower scheme

- 2.1** The following personnel groups may report through Thermo-Transit's whistleblower scheme:
- Thermo-Transit's employees
  - Thermo-Transit's suppliers, customers, and other business partners, and
  - Other groups of persons.

### 3. When to blow the whistle?

- 3.1** The whistleblowing service can be used to alert about serious risks of wrongdoing affecting people, Thermo-Transit's organisation, the society or the environment. Reports may be made about matters that have taken place or will take place in Thermo-Transit.
- 3.2** An offense or another matter will generally be serious if it is in the public interest to bring it to light. Violations of a trivial nature are not usually regarded as serious, just as violations of accessory provisions are not usually regarded as serious.
- 3.3** Reported issues include criminal offences (violation of the Danish Criminal Code), irregularities and violations or other actions in breach of EU or national laws within a work-related context, for example:

- **Corruption and financial irregularities;** for example, bribes, document forgery, hacking, bugging, recording conversations between others, theft, embezzlement, fraud, data fraud, mandate fraud, extortion, unfair competition, money laundering, conflict of interest etc.
- **Health and safety violations;** for example, workplace health and safety, product safety, gross or repeated violations of the workplace's internal guidelines, serious discrimination and harassments that are against the law, e.g. sexual harassment or gross harassment due to race, gender, color, national or social origin, political or religious belief, etc.
- **Environmental violations;** for example, illegal treatment of hazardous waste
- **Privacy violations;** for example, improper use of personal data, breach of confidentiality clauses etc.

**3.4** Employees are asked to contact their supervisor or manager for issues relating to dissatisfaction in the workplace or related matters, as these issues cannot be investigated in the scope of whistleblowing. Thus, the following will fall outside the scope of the Danish Act of Protection of Whistleblowers:

- **Information of a trivial nature;** including information about violations of internal guidelines on sick leave, smoking, dress code or accessory provisions such as non-compliance with documentation requirements.
- **Information about the whistleblower's own employment relationship;** including conflicts between employees, cooperation difficulties or matters that fall within the scope of the professional legal system, unless it concerns sexual harassment or other forms of gross harassment.

**3.5** It is assumed that the whistleblower has a good faith belief about the accuracy of the information reported under Thermo-Transit's whistleblower scheme.

**3.6** A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

#### **4. How to blow the whistle?**

**4.1** There are different ways to raise a concern:

- **Alternative 1:** Contact a supervisor or manager within Thermo-Transit's organisation.
- **Alternative 2:** Anonymous or confidential messaging through the whistleblower reporting channel to the whistleblowing team: <https://report.whistleb.com/thermo-transit>
- **Alternative 3:** Reporting to external whistleblower scheme maintained by The Danish Data Protection Agency

**4.2** All messages received will be handled confidentially. The whistleblowing channel is administrated by WhistleB, an external service provider. All messages are encrypted. To ensure the anonymity of the

person sending a message, WhistleB deletes all meta data, including IP addresses. The person sending the message also remains anonymous in the subsequent dialogue with responsible receivers of the report.

## 5. The investigation process

### 5.1 The whistleblowing team

Access to messages received through our whistleblowing channel is restricted to appointed individuals with the authority to handle whistleblowing cases. Their actions are logged and handling is confidential. When needed, individuals who can add expertise may be included in the investigation process, upon consent from the whistleblower in case identity of the reporting person is disclosed. These individuals can access relevant data and are also bound to a special duty of confidentiality in relation to information included in the reports received.

The duty of confidentiality is limited to information included in the report. If a report gives rise to the initiation of a case, additional information collected in this case will not be covered by the duty of confidentiality.

The whistleblowing team consists of/or reports may be disclosed to the persons from the external law firm Littler | enevold.

### 5.2 Receiving a message

Upon receiving a message, the whistleblowing team decides whether to accept or decline the message.

If the message is accepted, appropriate measures for investigation will be taken, please see "Investigation below".

The whistleblower will receive an acknowledgment of receipt of the report within 7 days.

The whistleblowing team may not investigate the reported misconduct if:

- the alleged conduct is not reportable conduct under these Whistleblowing policy
- the message has not been made in good faith or is malicious
- there is insufficient information to allow for further investigation
- the subject of the message has already been solved.

If a message includes issues not covered by the scope of these Whistleblowing policy, the whistleblowing team should provide the reporting person with appropriate instructions.

The whistleblowing team will send appropriate feedback within 3 months upon the date of receiving the report. This means that, depending on the content and nature of the report, the Whistleblower team will inform the whistleblower of what actions have been taken or are planned and why the unit has chosen these follow-up initiatives, please see "Investigation below".

If it is not possible to provide feedback within the deadline above, the Whistleblower team will inform the whistleblower of this and whether any further feedback can be expected. Causes may include, for example, the initiation of an internal investigation that cannot be completed within the deadline.

The feedback must comply with applicable legislation, including data protection legislation. This means, among other things, that there must be a basis for disclosure in order to disclose sensitive information. It depends on a specific assessment which information can be provided in the follow-up to the whistleblower.

### **5.3** Investigation

All messages are treated seriously and in accordance with the Whistleblowing policy:

- No one from the whistleblowing team, or anyone taking part in the investigation process, will attempt to identify the whistleblower.
- The whistleblowing team can, when needed, submit follow-up questions via the channel for anonymous communication. Further, the team may make use of follow-up initiatives (depending on the case), such as the initiation of internal investigations within the company, Informing the company's senior management or board of directors, reporting to the police or other relevant supervisory authority, closing the case due to lack of or insufficient evidence.
- A message will not be investigated by anyone who may be involved with or connected to the wrongdoing.
- Whistleblowing messages are handled confidentially by the parties involved.
- Corporate or external expertise may be included in the investigation upon consent from whistleblower.

## **6. Protection and privacy**

### **6.1** Whistleblower protection

A person expressing genuine suspicion or misgiving according to the policy will not be at risk of losing their job or suffering any form of sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided that he or she is acting in good faith.

Sanctions or personal disadvantages include any form of unfavorable treatment or adverse consequence that causes or may cause harm to the whistleblower and is initiated in response to an internal or external report.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a whistleblower will be kept informed of the outcomes of the investigation into the allegations.

Information from a report may be disclosed under certain circumstances, e.g., for the purpose of following up on the reports. The whistleblower will be notified prior to disclosure of information about the whistleblower's identity unless this would jeopardize the investigation or legal proceeding. This could be the case, for example, if such notification is specifically assessed to entail a risk that evidence will be concealed or destroyed, witnesses will be influenced, or if there is a suspicion that the whistleblower has deliberately made a false report.

## **6.2** Processing of personal data

Information received in a report is processed in accordance with the processing rules in section 22 of the Danish Whistleblower Act and the General Data Protection Regulation and the Danish Data Protection Act. Thermo-Transit's Whistleblower Unit may, in accordance with section 22 of the Whistleblower Act, process personal data, including sensitive data and information about criminal offenses, if necessary to process a report received in connection with Thermo-Transit's whistleblower scheme.

This whistleblowing service may collect personal data on the person specified in a message, the person submitting the message (if not sent anonymously) and any third person involved, in order to investigate facts on the declared misdeeds and inappropriate behaviour eligible under our code of conduct or internal rules. This processing is based on statutory obligations and the legitimate interest of the controller to prevent reputational risks and to promote an ethical business activity. The provided description and facts under this processing are only reserved to the competent and authorized persons who handles this information confidentially. You may exercise your rights of access, of rectification and of opposition, as well as of limited processing of your personal data in accordance with the local data protection legislation. These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case. Data is stored within the EU. For any further questions or complaints please address your request to the external law firm Littler | enevold by e-mail [bo@littler.dk](mailto:bo@littler.dk) or phone + 45 44 14 30 90.

## **6.3** Deletion of data

Personal data included in a whistleblowing messages and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 30 days after completion of the investigation. Investigation documentation and whistleblower messages that are archived will be anonymised under GDPR; they will not include personal data through which persons can be directly or indirectly identified.

## **6.4** Personal data controller

The external law firm Littler | enevold is responsible for the personal data processed within the whistleblowing service.

## **6.5** Personal data processor

WhistleB Whistleblowing Centre Ab (World Trade Centre, Klarabergsviadukten 70, SE-107 24 Stockholm) responsible for the whistleblowing application, including processing of encrypted data, such as whistleblowing messages. Neither WhistleB nor any sub-suppliers can decrypt and read messages. As such, neither WhistleB nor its sub-processors have access to readable content.