

# Whistleblowerpolicy

## **1 PURPOSE OF THE POLICY**

At Tech-Huset A/S ("Tech-Huset") we strive for an open culture where all employees, freelancers, customers and business partners safe and secure can report suspected irregularities or illegal matters happening at Tech-Huset.

The purpose of this policy is to explain how our whistleblower scheme works, including how to file a report, which matters you can report and your rights in connection hereto.

If you experience or suspect serious irregularities or illegal matters at Tech-Huset, we encourage you to report these via our whistleblower scheme.

## **2 WHO CAN USE OUR WHISTLEBLOWER SCHEME?**

You can use our whistleblower scheme if you are an employee, former employee, freelancer, customer, business partner etc. of Tech-Huset or otherwise in possession of information about irregularities or illegal matters concerning us.

You can always file a report via our whistleblower scheme, regardless of whether the matter is covered by the protection under the whistleblower scheme or not.

If you file a report that is covered by the protection under the whistleblower scheme, it means that you are protected against retaliation as a result of the report. This means that you are protected against any direct or indirect act or omission that takes place in a work-related context based on your report, including for example discrimination or dismissal.

## **3 WHAT MATTERS CAN BE REPORTED?**

You can use our whistleblower scheme to report serious irregularities, unsafe work environment, unethical behavior, violations of law or reasonable suspicion thereof.

You can report matters that concern one or more persons associated with us, including employees, freelancers, management, board members, etc. but you can also report matters that cannot be attributed to a specific person.

For example, a report may concern information or reasonable suspicion of financial crime (e.g. fraud, embezzlement, theft or forgery), violation of data protection rules (GDPR), violation of competition or environmental legislation or similar violations.

A report may also concern information or reasonable suspicion of unsafe work environment, sexual harassment, other serious harassment, discrimination, offensive behavior or bullying.

If you are in doubt about whether a matter should be reported or not, we encourage you to file a report. All reports will be answered - even if the matter is not covered by the whistleblower scheme.



## **4 HOW DO YOU REPORT?**

Reports can be filed via a secure portal managed by CLEMENS Law firm ("CLEMENS").

You can find our whistleblower portal here: <https://whistleblowersoftware.com/secure/9e416de3-8135-4ce1-bb68-63b189ff565f>.

The report can be filed by following the instructions in the portal.

Once you have filed a report, you will receive a code that you must use to log in to the portal afterwards and communicate with CLEMENS, including receiving feedback on the report.

It is important that you save the code as it is unique and cannot be recreated. This helps ensure your confidentiality and anonymity.

## **5 HOW ARE REPORTS HANDLED?**

All reports are taken seriously and treated confidentially. You decide if you want to file a report anonymously. When you report anonymously, your identity and documentation cannot be traced back to you. You do not leave any electronic traces in the reporting system.

If you also ensure that you do not use any employer-provided PC or mobile phone, you will achieve the best possible anonymity, as we log internet history for security reasons. However, such logs are only accessed in case of concrete suspicion of abuse or likewise suspicion.

CLEMENS receive and register your report on our behalf and CLEMENS is both contractually and legally obligated to treat your report confidentially and anonymously.

CLEMENS will only disclose information about your identity to us if you have given your consent. However, it is important to be aware that your identity may be derived indirectly from the information in your report, depending on the nature of the report.

It is also important to be aware that information about your identity in exceptional cases may be disclosed to relevant authorities, for example if it is necessary in connection with a police investigation or legal proceedings. If CLEMENS discloses your data to relevant authorities, this will only be done if CLEMENS is legally obliged to do so, and you will be informed of this as far as possible.

When you have filed a report, you will immediately receive a confirmation of receipt in the portal, which you can see by logging in with your unique code.

CLEMENS' trusted employees will then assess your report and inform us about it so that we can initiate the necessary investigations. We will only receive information about the report in anonymized form, unless you have given your consent for CLEMENS to disclose your information to us.

No later than three months after your report, you will receive feedback on the report via the portal. You can view the feedback by logging in with your unique code.

CLEMENS may also ask you additional questions or similar via the portal if needed.

If a report does not fall within the scope of the whistleblower scheme, CLEMENS will also notify you via the platform.



## **6 OTHER OPTIONS FOR REPORTING**

Please note that in addition to our internal whistleblower scheme administered by CLEMENS, there are public external whistleblower schemes that you can use and obtain the same protection and rights as under the Whistleblower Act.

The primary external whistleblower scheme is administered by the Danish Data Protection Agency. You can find more information about this scheme on the Danish Data Protection Agency's website: [www.datatilsynet.dk](http://www.datatilsynet.dk).

In exceptional cases, it is also possible to obtain protection under the Whistleblower Act if information about illegal matters or similar is published. However, it is, among other things, a condition that (i) you have made a report to both us and the Danish Data Protection Agency but no appropriate action was taken in response to the report within the mandated timeframe, (ii) you have reasonable grounds to assume that the matter may constitute an imminent or manifest danger to the public interest, (iii) you have reasonable grounds to assume that you will be met with reprisals by an external report, or (iv) there is little prospect that the violation will be effectively countered by an internal/external report.

However, we hope that you will always use our internal whistleblower scheme in the first instance.

## **7 PERSONAL DATA**

CLEMENS processes the personal data you provide as part of a report as an independent data controller. You can read more about how CLEMENS processes your personal data here: <https://clemenslaw.dk/en/privacy-policy/>

To the extent that you have authorized CLEMENS to disclose information about your identity to us, we process the personal data we receive from CLEMENS as an independent data controller. If you are an employee or freelancer, you will find our privacy policy on our intranet. If you are a customer or business partner you can read more about our processing of personal data in our privacy policy on our website: <https://www.tech-huset.com/media/nqkku1gr/privacy-policy.pdf>.

