

Whistleblower policy for

TEFCOLD GROUP

Preface

The TEFCOLD Group (hereinafter simply referred to as "TEFCOLD") wants to have an open corporate culture where everyone is free to come forward and report their reasonable suspicion or knowledge in relation to TEFCOLD's activities, employees, management, suppliers and the like.

TEFCOLD is aware that an open corporate culture is in some cases not sufficient to ensure that information about illegalities or irregularities is disclosed through TEFCOLD's regular communication channels.

TEFCOLD has therefore established an internal whistleblower hotline as a supplement. The whistleblower hotline is established as an individual scheme in each group company, but in such a way that all companies share one and the same reporting channel, and this whistleblower policy is also common to all companies in the TEFCOLD Group.

The whistleblower scheme for TEFCOLD A/S is established in accordance with the Danish Whistleblower Protection Act (Act no. 1436 of 29/06/2021) (the "Whistleblower Act"). The Whistleblower Act can be accessed via this link. <https://www.retsinformation.dk/eli/lt/2021/1436>.

The purpose of this whistleblower policy is to explain how the whistleblowing hotline works, including what information can be reported, who can report and how reports are handled, in order for potential whistleblowers to make an informed decision about whether, how and when to report. The whistleblower policy also outlines the protection of whistleblowers and persons reported.

We recommend that the entire whistleblower policy is read thoroughly before making a report.

The purpose of the whistleblower scheme

The purpose of the whistleblower hotline is:

- Increase opportunities for employees and certain other groups of people to speak up about reasonable suspicion or knowledge of illegalities and serious matters in TEFCOLD without fear of negative consequences,
- To protect individuals who report to the whistleblower hotline in good faith; and
- To increase the likelihood that errors and irregularities or illegalities are detected as soon as possible.

The whistleblower Hotline is an alternative and supplement to the regular communication channels in TEFCOLD.

It is voluntary to use the whistleblower hotline and it should always be considered carefully whether an observation can be handled more appropriately by contacting TEFCOLD management (immediate

manager or their manager), the health and safety representative or the HR department or other contact point.

The whistleblower hotline is particularly intended for situations where a potential whistleblower does not feel comfortable using the normal channels of communication, including (non-exhaustive) fear of being met with reprisals, as well as situations where an enquiry has been made via the normal channels of communication and where the observation has not been handled satisfactorily.

A whistleblower will only enjoy the protection defined in this whistleblower policy and applicable laws and regulations if a report is made in accordance with the policy and through the established whistleblowing reporting channel.

The whistleblower scheme is especially intended for situations where a potential whistleblower does not feel safe using the ordinary communication channels, including the whistleblower's fear of reprisals. The whistleblower scheme is also especially intended for situations where the ordinary communication channels already have been used by the whistleblower without the observation being handled and/or taken care of satisfactorily.

Who can report to TEFCOLD's whistleblower scheme?

The whistleblower hotline can be used by any natural person who has gained access to the information they wish to report through their work-related activities, if they belong to one of the following groups of persons;

- Employees in TEFCOLD
- Self-employed persons (including TEFCOLD's subcontractors),
- Shareholders, members of the management and/or members of the board of directors in TEFCOLD,
- Volunteers, paid or unpaid trainees,
- Employees of TEFCOLD's subcontractors or suppliers,
- All persons mentioned above whose work-relationship with TEFCOLD has ceased, and
- All persons mentioned above whose work-relationship has yet to commence, if the reported information relates to infringements which the person has obtained access to during the recruitment process or other pre-contractual negotiations.

A whistleblower does not have party status in the case. However, the whistleblower receives feedback as further described below.

What can be reported to the whistleblower scheme?

The whistleblower hotline can only be used to report information about certain matters related to TEFCOLD that have taken place, will take place or where there are reasonable grounds for suspicion. The matters that can be reported to the whistleblower hotline can be divided into categories. These are:

Category 1 (Applies only to TEFCOLD A/S):

Any violation of certain EU-law and the implementation in Danish law hereof. The violation must be within the areas of:

- Public procurement
- Financial services, products, and markets
- Prevention of money laundering and financing of terrorism
- Product safety and compliance
- Transport safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health, animal welfare, and public health
- Consumer protection
- Protection of privacy and personal data
- Security of network and information systems.
- Competition law and state aid.

There is no triviality limit for these matters and any violation may therefore be reported to the whistleblower scheme.

Category 2 (Applies to all TEFCOLD Group companies):

Other serious breaches of law, which in general means that the revealing of the information must be in the public's interest.

Generally, this includes information on criminal offenses, including theft, fraud, embezzlement, bribery, money laundering, hacking, wiretapping, unlawful recording of other persons conversations, document fraud, data fraud, breach of trust, extortion, violations of a duty of confidentiality, violations of tax law, violations of the bookkeeping act, breaches of security in the transport sector, misuse of funds, neglect of a statutory duty to act, violations of the environmental legislation, serious violations of workplace security, etc.

Category 3 (Applies to all TEFCOLD Group companies):

Other serious offenses, which in general means that the revealing of the information must be in the public's interest, or that the information may be of vital importance for individuals' life or health, or for TEFCOLD as an entity.

Generally, this includes information regarding sexual harassment or other serious interpersonal conflicts at the workplace, e.g., blatant harassment based on race, gender, political or religious affiliation, discrimination, and other special cases where interpersonal conflicts cause a significant risk for individuals' life, health, or product safety. Serious or repeated offenses of the workplace's internal guidelines, e.g. business travels or gifts, or violations of professional standards that may cause risks for individuals' safety and health are also generally included.

This list is not exhaustive. In each case reported via the whistleblower hotline, a specific assessment is made of whether the report falls within the scheme.

Which matters cannot be reported to the whistleblower scheme?

Information regarding minor or insignificant matters cannot be reported to the whistleblower hotline.

This could be information about violations of internal TEFCOLD guidelines of a less serious nature, such as for example dress codes, internal guidelines on smoking, alcohol consumption, use of email and internet, sick leave, private use of office supplies, etc.

Information about staff-related conflicts in the workplace, such as bullying, internal disagreements and incompetence, will generally not be covered by the whistleblower hotline, unless it is a more serious conflict or harassment case.

Reports about the whistleblower's own employment will generally not be covered by the whistleblower scheme, unless it is sexual harassment or other serious harassment. This means that the whistleblowing scheme cannot be used to provide information about a conflict between the whistleblower and other employees, internal disagreements or matters that fall under the labour law system.

If information is reported and deemed to fall outside the scope of the whistleblower scheme, the whistleblower is notified through the reporting channel. The report is not forwarded from to the appropriate point of contact. It is entirely up to the whistleblower to decide whether the information should be communicated to TEFCOLD by other means if the report has been rejected by the whistleblower hotline.

The above examples of information that cannot be processed in the whistleblowing scheme are not necessarily exhaustive.

Who can be reported to the whistleblower scheme?

The group of persons who can be reported through the whistleblower hotline includes all employees of TEFCOLD, members of the Board of Directors and the Executive Board as well as other persons associated with or related to TEFCOLD when the information concerns matters for which TEFCOLD is responsible or which affect TEFCOLD as a company or group. Actions that cannot be attributed to a single person, but are, for example, due to a fundamental (system) error at TEFCOLD, can also be reported.

How to submit a report to the whistleblower hotline

Reports can only be submitted or initiated via the established reporting channel operated by DAHL Advokatpartnerselskab. The reporting channel ensures that reports are handled confidentially, and that subsequent dialogue can be exchanged securely.

It is possible to submit a written report via the reporting channel at <https://TEFCOLD.dahlwhistleblower.com>.

Reporting can be done in English.

Who processes the reported information?

Reports are handled by TEFCOLD's internal whistleblower unit, which consists of a few trusted individuals assisted and supported by DAHL Advokatpartnerselskab.

Initially, all reports to the whistleblower scheme are received by DAHL Advokatpartnerselskab, who conducts an impartiality assessment to ensure that a reported person is not granted access to the report.

Reports are then handed over for further follow-up to the internal persons in the whistleblower unit.

Other external partners such as lawyers and accountants can be involved in follow-up. The Executive Board and the Board of Directors may also be involved when relevant and in accordance with the whistleblower's duty of confidentiality.

Involvement of persons outside the whistleblower unit is only done when necessary for the follow-up of the report and always taking into account the confidentiality of the whistleblower scheme. If a report concerns TEFCOLD A/S, sharing and access to the report will always respect the regulation in the Whistleblower Act.

How does TEFCOLD register and process reported information?

All reports to the whistleblower scheme are registered via the reporting channel. The registration is done in accordance with the confidentiality and secrecy obligations imposed on the whistleblowing unit.

The whistleblower receives an automatic acknowledgement of receipt of the report immediately upon submission. Within seven days, the whistleblower will receive an additional and manual confirmation that the report has been received if the whistleblower has chosen to follow the report on the reporting channel.

It is possible to have a dialogue and submit additional information via the reporting channel either via the created login or via a new report. This also applies when the whistleblower does not want to disclose their identity.

Reports are then processed by TEFCOLD's internal whistleblower unit, which consists of few trusted employees, who are all instructed in the confidentiality and secrecy obligations they are subject to.

The whistleblower unit is also instructed to carefully follow up on reports and ensure that feedback is given to the whistleblower as soon as possible and no later than 3 months from the acknowledgement of receipt of the report.

As a rule, feedback will contain information about the follow-up that has been carried out and the reasons for such follow-up. In many cases, feedback will be given on several occasions. Feedback is given via the reporting channel. In order to receive feedback, the whistleblower must therefore choose to follow the case when the report is filed.

The whistleblower unit decides on the specific activities to be initiated to follow up on the report. However, general procedures for follow-up have been established, which include suggestions for activities that should be considered to ensure that the follow-up is thorough and diligent.

The follow-up on reports always includes an initial assessment of whether the report falls within the scope of the whistleblower scheme.

If it is assessed that the report falls outside the scope of the whistleblower scheme (i.e. the report does not concern a matter that can be reported to the whistleblower scheme, or the report is

submitted by a person to whom the whistleblower scheme is not open), the report will be rejected and the whistleblower will be notified via the reporting channel.

If the initial investigation concludes that there may be a potential violation, the reported issue will be investigated further. In this connection, information from the report may also be passed on to the police or public authorities for further investigation, where relevant.

If it is assessed that the report is unfounded and there is no reason to follow up on the report or respond to the reported behaviour, the case is closed. The whistleblower will then be notified via the reporting channel.

Confidentiality and anonymity

A whistleblower chooses whether to reveal their identity when submitting a report to the whistleblower scheme.

Whistleblowers who do not wish to disclose their identity must ensure that their identity does not appear anywhere in the report, including in any attachments thereto.

TEFCOLD emphasises that even if the identity is not disclosed in the report, the information reported or the investigations conducted to follow up on the report may reveal the identity of the whistleblower. Therefore, it cannot be guaranteed that a whistleblower is or remains anonymous toward TEFCOLD.

If TEFCOLD does not know the identity of the whistleblower, the possibilities to follow up on the report may be limited. Whistleblowers are therefore encouraged to disclose their identity with the report, however it is voluntary.

The following section only applies to TEFCOLD A/S - for other companies, please see below:

If TEFCOLD A/S knows the identity of the whistleblower, the whistleblower will continue to be assured confidentiality of his/her identity and of information that may reveal the identity in accordance with this section of the policy.

By default, only the whistleblower unit has access to the information. Likewise, information that could reveal the identity of a whistleblower is kept confidential.

The whistleblower unit is subject to a statutory duty of confidentiality regarding all information in the report, cf. the Whistleblower Act.

Information about the whistleblower's identity and other information from which the whistleblower's identity can be directly or indirectly revealed can only be shared with persons outside the whistleblower unit with the whistleblower's explicit consent, please see for more information below.

Even if the whistleblower has not given consent, the information about the whistleblower's identity and other information that may disclose the whistleblower's identity, directly or indirectly, can be passed on to the police and/or other public authorities when it is necessary and proportionate. It is also a condition that the information is passed on to prevent violations or with the intent to ensure reported persons or other concerned persons' right to a defence. In general, the whistleblower will be informed before this information is passed on.

Information from the report, other than the identity of the whistleblower, may only be disclosed if it is done as part of the follow-up on a report or to prevent offences.

The following section applies to TEFCOLD Group companies except TEFCOLD A/S:

If TEFCOLD knows the identity of the whistleblower, this information is always treated with discretion and confidentiality. As default, the identity will only be known to the few trusted persons in the whistleblower unit.

Information that may reveal the identity of the whistleblower is kept confidential to the extent possible. Information about the whistleblower's identity and other information from which the whistleblower's identity can be directly or indirectly revealed is generally only disclosed with the whistleblower's explicit consent to others than the few trusted persons in the whistleblower unit, TEFCOLD's management, external advisors such as lawyers and auditors, as well as police and other relevant public authorities.

Information from the report, other than information about the identity of the whistleblower, will only be disclosed if the disclosure is necessary and proportionate and takes place as part of the follow-up on a report or to counteract the reported matter or in order to ensure the reported person's right of defence. Generally, the whistleblower will be informed before such disclosure is made.

Whistleblowers should be aware that in certain cases TEFCOLD may be obliged to disclose information to the reported person. TEFCOLD may therefore in some cases be obliged to disclose information about the whistleblower's identity to the reported person when the whistleblower's identity is known to TEFCOLD. This is described in more detail under the section "The rights of the reported person".

You can also report to the external National Whistleblower Scheme

The following section only apply to TEFCOLD A/S

The Danish Data Protection Agency has established the National Whistleblower Scheme, which is an independent external whistleblower scheme. The National Whistleblower Scheme receives and processes information about violations covered by Section 1 of the Danish Whistleblower Act.

This means that the information that can be reported to the National Whistleblower Scheme are the same as the information that can be reported to TEFCOLD A/S's internal whistleblower scheme, please see above.

It is up to the individual whistleblower to decide whether they want to report the information to the internal whistleblower scheme in TEFCOLD A/S or to the National Whistleblower Scheme. Potential whistleblowers are urged to report to TEFCOLD A/S's internal whistleblower scheme if the reported information/violation can be handled effectively within the company and if the whistleblower assesses that there is no risk of reprisals as a result of reporting the information.

Further information regarding the National Whistleblower Scheme, the procedure, case processing, and information on how to make a report is available on the Danish Data Protection Agency's website: www.whistleblower.dk.

The whistleblower's protection

The following section only applies to TEFCOLD A/S - for other group companies, please see below:

Whistleblowers are protected against reprisals and is covered by confidentiality in accordance with the Whistleblower Act. The whistleblower will only be protected if the following conditions are fulfilled:

- The reported information is submitted correctly to the internal whistleblower scheme or the National Whistleblower Scheme operated by the Danish Data Protection Agency. In some specific situations, the whistleblower may be protected in case of disclosure of the information to the public.
- The whistleblower must have reasonable causes to assume that the reported information was correct at the time of reporting. The whistleblower must also have reasonable causes to assume that the reported information is within the scope of the whistleblower scheme, as described above.

This means that the whistleblower must act in good faith when reporting information to the whistleblower scheme.

It may be a criminal offence if the whistleblower acts in bad faith when submitting a report to the whistleblower scheme. This means that the whistleblower may be reported to the police and the whistleblower may receive a fine. Submitting a report in bad faith may have negative consequences for the whistleblower's employment. Reports submitted in bad faith include, for example, deliberate reporting or disclosure of incorrect information - especially if the report is submitted with the intent to harass or harm other persons.

If the whistleblower acts in good faith and in compliance with this whistleblower policy when reporting information to the whistleblower scheme, the whistleblower will be protected by the duty of confidentiality described above.

The whistleblower will also be protected against reprisals. Reprisals are defined as any form of adverse treatment or other adverse consequences as a reaction to the information reported to the whistleblower scheme. This protection shall also apply to family members, assistants/representatives, etc.

If the report includes accusations about violations committed by the whistleblower themselves, this may have consequences for the whistleblower's own employment.

The whistleblower will not be considered to have breached a statutory duty of confidentiality and will not incur any liability for this, if the whistleblower act in good faith and in compliance with this whistleblower policy when reporting information to the whistleblower scheme.

The reported information must be obtained in a legal way by the whistleblower. Otherwise, the whistleblower may be punished for gaining access to the information unlawfully.

The following section apply to TEFCOLD Group entities except TEFCOLD A/S:

A whistleblower who reports their knowledge or suspicions through the whistleblower hotline must not be subjected to reprisals or other forms of negative treatment or adverse consequences in their employment.

If the report includes accusations about violations committed by the whistleblower themselves, this may have consequences for the whistleblower's own employment.

The whistleblower is further protected by a duty of confidentiality as described above in the section "Confidentiality and anonymity".

A whistleblower who reports in bad faith has no protection. In the case of such reports, the whistleblower can be reported to the police. In addition, the whistleblower may face civil and criminal sanctions and the case may have negative employment consequences. Reports made in bad faith include, for example, deliberately reporting or disclosing incorrect information - especially if done with the intention to harass or harm other people.

The reported information must be obtained in a legal way by the whistleblower. Otherwise, the whistleblower may be punished for gaining access to the information unlawfully.

The reported person's rights

In general, if the reported information relates to one or more specific persons, such persons has the right to be informed. However, there are significant exceptions which are described below.

The following section only applies to TEFCOLD A/S - for other group companies, please see below:

As the whistleblower's identity is protected under the Whistleblower Act, the identity of the whistleblower, including information that may reveal the identity of the whistleblower is not disclosed to the reported person without the whistleblower's prior consent.

Information to reported persons also does not include the report itself, as the report is covered by a statutory duty of confidentiality.

Generally, the notification to the reported person will be given after the reported information has been received, and the whistleblower unit has commenced the follow-up on the reported information. The notification may be postponed, delayed, or omitted entirely, according to Section 22, subsection 1 and 2 of the Danish Act on Data protection, if circumstances regarding the reported information necessitates this, e.g., to ensure the follow-up on the report, including prevention, investigation, exposure, and prosecution of criminal offenses; or to protect any fundamental and legitimate interests of the whistleblower or other persons which exceed the interests of the reported person; or in relation to breaches of ethical rules in sectors regulated by law.

If the notification cannot be done without revealing the identity of the whistleblower directly or indirectly, no notification is given.

The following section apply to TEFCOLD Group entities except TEFCOLD A/S:

Generally, the notification to the reported person will be given after the reported information has been received, and the whistleblower unit has commenced the follow-up on the reported information. The notification may be postponed, delayed, or omitted entirely, if circumstances regarding the reported information necessitates this, e.g., to ensure the follow-up on the report, including prevention, investigation, exposure, and prosecution of criminal offenses; or to protect any

fundamental and legitimate interests of the whistleblower or other persons which exceed the interests of the reported person; or in relation to breaches of ethical rules in sectors regulated by law.

The decision on whether or not to withhold information to the reported person is based on a specific assessment for each individual piece of information in the report.

Additional information is provided below under the section "Processing of personal data" below.

The notification should generally include information about:

1. The offence that the reported person is accused of having committed.
2. Any additional information which, having regard to the specific circumstances in which the data were collected, is necessary for the protection of the interests of the data subject, such as:
 - a. The type of information reported and possibly collected as part of the investigation
 - b. Who will receive the information
 - c. The rules on access to and rectification of the information relating to the reported person.

An investigation of a report may result in a finding that no misconduct or offence has been proven to have taken place. If this is the case, the reported person(s) will generally be informed of the outcome of the investigation.

The investigation of a report can also lead to a finding of proven or probable misconduct or offence. In this case, TEFCOLD may choose to investigate the case further, disclose the information from the case, and/or take sanctions against the reported person(s).

In these cases, TEFCOLD assesses specifically when the reported person(s) should be informed.

Processing of personal data

The individual TEFCOLD Group company to which a report relates is the data controller for the processing of the personal data processed as part of the whistleblower scheme. In addition, DAHL Advokatpartnerselskab is an independent data controller for the processing of personal data carried out by DAHL in the performance of its duties as part of the whistleblower unit.

The following section only applies to TEFCOLD A/S - for other group companies, please see below:

The processing of personal data is based on Section 22 of the Whistleblower Act.

The purpose of using the personal data is to secure and assess whether the reported information concerns violations of some parts of EU legislation, serious violations of law or other serious matters. The purpose is also to investigate the reported information further and make the required conclusions and steps. This includes decisions of whether the reported information must be passed on and/or if any sanctions should be made against the reported person(s).

The personal data may relate to the whistleblower, the reported person and/or any third party who has been mentioned in the reported information. Furthermore, the personal data may relate to

additional persons that have been questioned in connection with a follow-up on the reported information.

The personal data may include information that is included in the reported information and other information collected during the follow-up on the reported information. The personal data includes information regarding identity, contact information, job descriptions, descriptions of the reported matter, persons' relation to the reported matter, information on criminal offenses, information about purely personal matters (in cases of harassment), and potentially information of a sensitive nature (article 9 information). The case processing may also result in collection and processing of other categories of information.

If it is relevant for the follow-up on a report, personal data may be passed on to external advisors (e.g., lawyers and auditors); and/or public authorities (e.g., the police), if it is relevant for an investigation carried out by the police or another relevant authority. This is described further under "Confidentiality and anonymity" above.

Personal data will be deleted in accordance with the principles for retention and deletion as described below.

In general, registered persons have several rights when their personal data is processed. The ordinary rights pursuant to the GDPR are limited to a certain extent based on the duties of confidentiality according to the Whistleblower Act.

This means that the rights of persons reported to the whistleblower scheme or other persons who are mentioned in a report may be limited or precluded completely. This is the case for the following rights: the right to receive information in accordance with article 14 of GDPR, and the right to gain insight in accordance with article 15 of GDPR. The limitations are made in accordance with article 14(5) of GDPR and Section 22 of the Danish Data Protection Act.

The whistleblower is entitled to receive information about which information TEFCOLD A/S processes about them (right to access). The whistleblower is also entitled to have incorrect information about them rectified.

In some specific cases, the whistleblower is entitled to object to TEFCOLD A/S's processing of personal data about the whistleblower, even though the processing was legal. The whistleblower's rights may in some certain cases be limited if it is assessed that other fundamental interests exceed the interests of the whistleblower. Other fundamental interest could be considerations of other involved persons, and considerations of TEFCOLD A/S, if the purpose of the collected information would go to waste if the whistleblower became aware of the collection.

If the whistleblower, a reported person or any other person disagrees in the processing of their personal data, they are entitled to lodge a complaint with the Danish Data Protection Agency. More information about the general rights of data subjects and additional information can be found at www.datatilsynet.dk.

The following section apply to TEFCOLD Group entities except TEFCOLD A/S:

The processing of personal data is based on Section 6 of the Danish Data Protection Act, cf. article 6(1)(f) of the GDPR (balancing of interests) for general non-sensitive data. Data relating to criminal offences is processed based on the rules in Section 8(3) (balancing of interests) and Section 8(5) of the Danish Data Protection Act, cf. section 7(1) and article 9(2)(f) of the GDPR (establishment and pursuit

of legal claims). In exceptional cases, sensitive data may be processed based on the rules of article 9(2)(f) (establishment and pursuit of legal claims) of the GDPR, cf. article 6(1)(f).

The purpose of using the personal data is to secure and assess whether the reported information concerns serious offences or other serious matters that have been reported. The purpose is also to investigate the reported information further and make the required conclusions and steps. This includes decisions of whether the reported information must be passed on and/or if any sanctions should be made against the reported person(s).

The personal data may relate to the whistleblower, the reported person and/or any third party who has been mentioned in the reported information. Furthermore, the personal data may relate to additional persons that have been questioned in connection with a follow-up on the reported information.

The personal data may include information that is included in the reported information and other information collected during the follow-up on the reported information. The personal data includes information regarding identity, contact information, job descriptions, descriptions of the reported matter, persons' relation to the reported matter, information on criminal offenses, information about purely personal matters (in cases of harassment), and potentially information of a sensitive nature (article 9 information). The case processing may also result in collection and processing of other categories of information.

If it is relevant for the follow-up on a report, personal data may be passed on to external advisors (e.g., lawyers and auditors); and/or public authorities (e.g., the police), if it is relevant for an investigation carried out by the police or another relevant authority. This is described further under "Confidentiality and anonymity" above.

Personal data will be deleted in accordance with the principles for retention and deletion as described below.

In general, registered persons have several rights when their personal data is processed. The ordinary rights pursuant to the GDPR can be limited to a certain extent based on the purpose of the whistleblower scheme.

This means that the rights of persons reported to the whistleblower scheme or other persons who are mentioned in a report may be limited or precluded completely. This is the case for the following rights: the right to receive information in accordance with article 14 of GDPR, and the right to gain insight in accordance with article 15 of GDPR. The limitations are made in accordance with the Danish Act on data protection's section 22.

The whistleblower is entitled to receive information about which information TEFCOLD processes about them (right to access). The whistleblower is also entitled to have incorrect information about them rectified.

In some specific cases, the whistleblower is entitled to object to TEFCOLD's processing of personal data about the whistleblower, even though the processing was legal. The whistleblower's rights may in some certain cases be limited if it is assessed that other fundamental interests exceed the interests of the whistleblower. Other fundamental interest could be considerations of other involved persons, and considerations of TEFCOLD, if the purpose of the collected information would go to waste if the whistleblower became aware of the collection.

If the whistleblower, a reported person or any other person disagrees in the processing of their personal data, they are entitled to lodge a complaint with the relevant Data Protection Agency where more information about the general rights of data subjects and additional information is also available.

Retention and deletion of reported information

Reports and information collected to follow up on reports are only stored for as long as it is necessary and proportionate to investigate the individual reported and to deal with any sanctions.

If the report concerns TEFCOLD A/S, the information is stored and processed for as long as necessary and proportionate to fulfil the requirements of the Whistleblower Act.

This means that deletion is based on an ongoing and individual assessment case by case, and there is no fixed limit for how long reports are stored.

Reports that fall outside the scope of the whistleblower hotline are generally deleted immediately and no later than 7 days after the whistleblower (where possible) has been informed that the report falls outside the scheme and cannot be processed. The whistleblower thus has a reasonable opportunity to make a statement and protect his or her interests. If specific circumstances warrant it, rejected reports can be stored beyond the period of 7 days from the rejection is given.

The following section only applies to TEFCOLD A/S - for other group companies, please see below:

The assessment of whether it is necessary and proportionate to continue to keep a report or whether it should be deleted will at least include the following: whether it is likely that persons entitled to protection under the Whistleblower Act may need to document the report in question, consideration of TEFCOLD A/S' interests in following up on reports received - including by linking such reports to previously received reports and whether there is reason to assume that the report in question could be corroborated by later reports received about the same circumstances, e.g. because several reports have already been received on the same subject.

The following section applies to TEFCOLD Group companies except TEFCOLD A/S:

The assessment of whether it is necessary and proportionate to continue to keep a report or whether it should be deleted will at least include the following: consideration of TEFCOLD's interests in following up on reports received - including by linking such reports to previously received reports and whether there is reason to assume that the report in question could be corroborated by later reports received on the same matter, for example because several reports have already been received on the same subject.

For all TEFCOLD Group companies:

In addition, the following principles for deletion are applied in the assessments:

- If a report is made to the police or another relevant public authority, the information will immediately be deleted upon the conclusion of the case with the relevant authority.

- If a disciplinary sanction is imposed on an employee based on the collected information, or if there are other reasonable and necessary reasons makes it for TEFCOLD to continuously keep the information about the employee, the information will be kept in the relevant personnel file in accordance with applicable law.
- If no report has been made to the police or other relevant authorities within 2 months after completion of a follow-up on a report, or if the information has not been transferred to an employee's personnel file within this deadline, the information will generally be deleted.

Questions and contact information

Questions about the whistleblower hotline and requests for exercising rights under privacy law can be made to TEFCOLD by contacting Group CFO Henrik K. Christensen by email hkc@tefcold.com.

It is not possible to report via these contact details.

Questions about the whistleblower scheme can also be asked to DAHL Advokatpartnerselskab via the contact information available via the reporting channel.

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