

Whistleblower Policy

Purpose

We encourage our employees, suppliers, customers, and all other stakeholders to report concerns, misconduct, and illegal activities which have occurred within Espersen or Espersen’s supply chain.

With the policy we ensure:

- Compliance with Directives 2015/849/EU and 2018/843/EU on the prevention of the use of the financial system for money laundering or terrorist financing
- Compliance with Danish Whistleblower Protection Act in accordance with the requirements set out in the EU Whistleblowing Directive (2019/1937)
- Compliance with Directive EU 2022/2555 (common high level of cyber security in EU)

Definitions

A **whistleblower** is a person who exposes any kind of information or activity that is deemed illegal, dishonest, not correct or not in accordance with Espersen policies or values.

Policy

There are some reasons to believe that people are more likely to take action with respect to unacceptable behavior, within an organization, if there are systems that offer a choice of options for absolute confidentiality.

In order to support the Espersen Code of Conduct, whistleblower protection and the very integrity of the Company, Espersen is providing a safe and public system, Espersen whistleblower system, to report concerns or illegal activities in the workplace and within Espersen’s supply chain.

The system is at all times a third party provided system to ensure as much credibility and trust in the system as possible. The whistleblower always has the choice to report anonymously or named. The platform has, as a minimum, the native languages of the countries where Espersen has its own operations.

The Espersen whistleblower system is to be used by Espersen employees as well as external partners to report on concerns or illegal activities in the workplace or supply chain, according to Espersen Code of Conduct and our whistleblower procedure.

Ideally, if an Espersen employee has any challenges regarding internal relationships, they should report to a direct manager or HR, to enable a fast resolution of a topic. However, if the employee prefers to report concerns confidentially and stay anonymous, the whistleblower platform is the tool of choice. The whistleblower system must however not be used to make false accusations against others, and deliberately untrue information may not be reported.

The system is not intended for product complaints, which should be sent to complaint@espersen.com

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Espersen commits to whistle-blower protection, such that whistleblowers should not fear threat of reprisal, intimidation or harassment due to any reported cases. Retaliation in any form against a whistleblower/s, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of this policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Responsible

The CEO appoints two administrators of the Espersen whistleblower system. The administrators are given the mandate to investigate and use the needed resources in order to investigate any reported cases. All handling of whistleblower cases shall follow the internal procedure, *"How to manage whistleblower cases"*, and shall furthermore ensure action is taken based on the outcome of the investigation. Finally, the CEO and the administrators will always work for protection of the whistleblower. At the end of the year, the administrators are responsible for reporting the number of whistleblower cases to the sustainability department and state if any had an impact on Espersen's business or operations.

Reporting:

The system can be accessed publicly on Espersen's website or via <http://whistleblower.espersen.com/>

Awareness:

HR is responsible to provide whistleblower information, such as where to find the system and when/how to use it, to all employees either through employee handbooks, trainings, or other means of communication.

Processing of personal and reported data:

A filed case in the whistleblower system expires six months after the last comment was created, however it can be stored at maximum 18 months when deemed necessary and justified. A deleted case cannot be recovered.

Espersen, as the Data Responsible, takes responsibility for the safe and compliant handling of all personal data, related to use of the Whistleblower portal and investigations related hereof. Espersen is responsible for ensuring that all appropriate data security measures are in place when handling personal data related to complaints sent via the Whistleblower portal, whether these data are handled by contact persons, internal or external parties, such as a Lawyer.

All entities within Espersen are responsible to comply with applicable national and international Data Protection laws and legislations. Investigational actions will be carried out discreetly and confidentially, and information will only be disclosed to other parties where the legislation requires it.

Persons under formal investigation have the right to request information about data being processed about them. The investigators or HR will provide such information when deemed appropriate and legally required. Persons under formal investigation have the right to have personal data rectified if it is inaccurate and to ask for deletion of such data if it is not otherwise required to be retained by law.

You also have the right to raise a complaint to your local data protection authority.

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