



At DEIF, we want to promote transparency, accountability and democratic governance.

Having procedures for raising concerns about fraud, corruption or other serious wrongdoing is relevant for all responsible organisations and for the people who work there or people who have a working relationship with the company. While DEIF's good internal control systems can reduce the probability of something going seriously wrong, this risk can never be reduced to zero. The same situation applies to our external stakeholders as we want to act immediately if something is going seriously wrong and this requires a confidential channel for internal and external use.

To counter the risk of serious wrongdoings not being reported, DEIF has set up a Whistleblower system with clearly defined channels for internal and external reporting.

The whistleblower reporting system does not replace your possibility for requesting an open, confidential conversation with your manager or with his/her manager or your contact at DEIF. Our whistleblower system should only be applied in cases where our usual communication channels are considered inexpedient or inappropriate.

What is a whistleblower?

A whistleblower is defined as a person reporting or disclosing information on various violations, which they observe in their work-related activities.

Who can "blow the whistle"?

All employees, business partners and other stakeholders of the DEIF group can report a wrongdoing, and the report may cover wrongdoings performed by employees or persons associated with DEIF. Persons associated with DEIF includes (but is not limited to) board members, auditors, lawyers, suppliers, agents and dealers/distributors.

Basic principles

- You can address your concerns through the Whistleblower system on <https://www.deif.com/deif-whistleblower/> to Legal Department of DEIF who will not disclose your identity to anyone. Your reporting will be addressed by Legal Department in a partnership with the responsible function (as per the chart below), but your identity will remain confidential and only be known to Legal Department.
- If you report serious irregularities in good faith, you will under no circumstances be subjected to retaliation for "blowing the whistle". You will be protected, and your identity will remain confidential.
- The reported facts are verified in the appropriate manner and, if they are confirmed, all necessary steps to ensure the appropriate follow-up will be taken. You will be given feedback on the follow-up without delay.
- The rights of defence of any person implicated by the reported incident are of course respected.
- Malicious or frivolous denunciations will not be tolerated. A whistleblower should have reasonable grounds for believing that the information reported was true at the time of reporting. It should be noted that you will not be expected to prove that a wrongdoing exists, nor will you lose protection simply if your honest concerns turned out to be unfounded.

Responsible functions

INDIVIDUAL SUSPECTED OF MISCONDUCT	RESPONSIBLE FUNCTION
All employees of DEIF Group (with below exceptions)	Legal Department + SVP Human Resources
Executive Management	Legal Department + Group CEO
CEO or member of the Board of Directors	Legal Department + Chairman of the Board
Other persons associated with DEIF (business partners, representatives, lawyers, etc.)	Legal Department + SVP Human Resources



Which observations should be reported?

DEIF's whistleblower system can only be applied to report significant matters. Less significant matters such as, interpersonal difficulties, customer complaints, dissatisfaction with prices, etc., cannot be reported via our whistleblower system.

Significant matters which can be reported via DEIF's whistleblower system include information on:

- economic criminal offences, such as embezzlement, bribery, falsification of documents
- significant breaches of safety-at-work procedures
- significant breaches of environmental procedures or pollution
- physical or sexual violence and/or harassment
- infringement on human rights

The above list contains examples only. If you are in doubt of whether to report your observation or not, we recommend that you do report it.

How are observations reported?

Your observation can be registered via the dedicated whistleblower homepage (<https://www.deif.com/deif-whistleblower/>). From this homepage the information is sent in a secure way to Legal. The information will only be accessible for Legal.

Information on the reported observation to person(s) involved

DEIF is obliged to inform the persons suspected of wrongdoings of the observation reported by the whistleblower. In each individual situation, we conduct an evaluation of *when* such information can be given to the person(s) involved without this affecting the clarification process and collection of documentation.

The identity of the whistleblower will not be revealed to the person(s) mentioned in the report nor anyone else.

Whistleblower protection

DEIF does not accept anonymous reports, and you will therefore need to inform us your name and contact information to ensure we can follow-up on your report.

However, the protection of a person reporting a serious irregularity in good faith is guaranteed, first of all by the fact that their identity will be treated in confidence. This means that their name will not be revealed to anyone. Also, being a whistleblower does not affect your relationship with DEIF in any way.

Questions

Please forward all questions regarding DEIF's whistleblower system to Legal, Camilla Rosenkrantz Skovborg, crs@deif.com.

/Christian Nielsen