WHISTLEBLOWER POLICY

Introduction and background

Grene's whistleblower scheme is managed through Bagger-Sørensen, the owner of Grene. The whistleblower policy below therefore applies to Grene and its employees. Reports must be submitted through Bagger-Sørensen's independent whistleblower portal, Safe2Whistle.

The Bagger-Sørensen Group (the "Company") wishes to be trustworthy and to maintain an open corporate culture in which everyone is free to speak up if they have knowledge of, or suspect, that other employees or management have violated or intend to violate applicable legislation.

As part of this commitment, the Company has established a whistleblower scheme. Reports submitted through the whistleblower scheme must always be made in good faith.

Reports are submitted through the "Safe2Whistle" portal, which is administered by the law firm Bech-Bruun. Bech-Bruun also screens all reports. If a report is considered to fall outside the scope of the scheme, it will be rejected and the reporting person will be notified. If a report is considered to fall within the scope of the scheme, it will be forwarded anonymously to the Company for internal handling and investigation.

Reports submitted through Safe2Whistle should, to the greatest extent possible, be transparent, meaning that the reporting person should provide their identity and contact information. If Bech-Bruun assesses that the report is covered by the whistleblower scheme and forwards it for internal handling, the reporting person may indicate in the report that they wish to remain anonymous to the Company. In that case, the Company will not be informed of the reporting person's identity.

The purpose of this Whistleblower Policy is to explain how the whistleblower scheme operates.

Bagger-Sørensen & Co. A/S, Tabletvej 1, DK-7100 Vejle, is the data controller for the whistleblower scheme.

Who may submit a report?

Reports may be submitted by employees of the Company and by other persons affiliated with the Company.

Who may be reported?

Reports may concern matters committed by the Company's employees, owners or members of the boards of directors within the Group.

What matters may be reported?

The whistleblower scheme may only be used to report serious misconduct that may be significant to the Company, or that may have a decisive impact on an individual's life or health, as well as suspicions of such misconduct. Examples include:

Financial crime, such as embezzlement, fraud and forgery

Breaches of good corporate governance, such as bribery or distortion of competition

Breaches of occupational health and safety requirements

Breaches of environmental regulations and environmental pollution

Physical violence and sexual harassment or abuse

Matters such as bullying, dissatisfaction with salary or employment conditions, breaches of the alcohol policy, or other HR-related personnel matters cannot be reported through the whistleblower scheme. Instead, such matters must be reported to your manager or directly to HR (BIRA).

The legal basis for processing the above information concerning criminal offences is section 8(3) of the Danish Data Protection Act, as such processing is necessary for the pursuit of a legitimate interest that clearly overrides the interests of the data subject. The legal basis for processing ordinary personal data is the Company's legitimate interest in processing the report, cf. Article 6(1)(f) of the General Data Protection Regulation.

Who handles the reports?

Following Bech-Bruun's initial assessment, reports are handled internally by Erik G. Hansen, an external board member and Deputy Chair of the Company's Board of Directors. Reports concerning Erik G. Hansen will be handled by Bech-Bruun in cooperation with Hans-Henrik Eriksen.

How are reports handled?

When a report is received, Bech-Bruun, acting as the external administrator, conducts an initial screening of the matter and filters out reports that fall outside the purpose of the scheme. This external administration is intended to ensure impartiality and objectivity in the handling of reports. In this context, Bech-Bruun acts as a data processor on behalf of the Company.

If a report falls outside the scope of the scheme or proves to be manifestly unfounded, it will be rejected immediately and deleted from the system, and the reporting person will be notified.

If the initial screening concludes that the report falls within the scope of the scheme, it will be forwarded to Erik G. Hansen, who will handle the matter. Erik G. Hansen is subject to a special duty of confidentiality.

A report may concern a matter of such a nature that it is referred to the police for investigation. Once the police, and any courts involved, have completed their handling of the matter and any appeal period has expired, the report will be deleted from the system.

It is important that the whistleblower scheme is not used to make false accusations against innocent persons. All reports must therefore be submitted in good faith. If a report is submitted in bad faith and proves to arise from personal hostility, a desire for revenge or similar motives, an unfounded report may have employment-related consequences for the reporting person.

How do you submit a report?

Reports must be submitted through the "Safe2Whistle" online portal. Reports cannot be submitted by any other means. To submit a report, enter the following address in your browser:

https://report.whistleb.com/da/baggersorensen

This provides access to the Safe2Whistle portal. It is recommended that reports be submitted from a private device, such as a PC or tablet.

Anonymity

When submitting a report through Safe2Whistle, you must provide your identity and contact details. If you indicate in the report that you wish to remain anonymous to the Company, only Bech-Bruun will have access to this information. It cannot be ruled out that the person within the Company who investigates the report may be able to identify the reporting person from the information provided in the report.

Subsequent clarification and collection of further documentation

When submitting a report, Bech-Bruun may request further information. You may also obtain an update on the status of the matter at any time. This communication takes place through Safe2Whistle.

We recommend that you make yourself available to provide further information, as it may not be possible to conclude the matter without supplementary information.

Protection against retaliation

All reports submitted in good faith are protected against any form of retaliation. Anyone who attempts to retaliate against a person who has submitted a report in good faith may be subject to employment-related sanctions. If the reporting person has consented to Bech-Bruun disclosing their identity to the Company, the Company will, to the greatest extent possible, treat the report confidentially.

IT security

The system used to register reports is operated by Whistleblowing Centre AB, an independent party that guarantees the security and anonymity of the system, where anonymity is requested.

Rights of registered persons

Persons whose information has been registered in connection with the whistleblower scheme, including the person who is the subject of a report, may request access to the registered personal data in order to verify its accuracy and have inaccurate, incomplete or outdated information corrected.

If a data subject requests access, the person concerned will receive information about: (i) the personal data processed about them; (ii) the purpose of the processing; (iii) the categories of recipients of the information; and (iv) any available information about the source of the data.

However, the right of access does not apply where the person's interest in obtaining the information must give way to overriding private or public interests. The person who is the subject of a report is not entitled to receive information about the identity of a person who submitted a report in good faith, or other factual information unrelated to them, unless otherwise expressly required by law.

Data subjects also have the right to object to the processing and to request restriction of the processing of their personal data. In addition, data subjects have the right to request rectification or erasure of their data where necessary. Under certain circumstances, a data subject may also request that the Company provide a copy of their personal data in a structured, commonly used and machine-readable format and request that the data be transmitted to another data controller.

Deletion of personal data

Personal data processed in connection with the Company's whistleblower scheme will be retained for as long as necessary for the purposes for which the data was collected.

If the outcome of a specific matter is that no evidence of irregularities is found, the personal data will be deleted immediately and, as a general rule, within two months after the matter has been concluded.

If evidence of irregularities is found, different retention periods will apply depending on the further course of the matter, including whether legal proceedings are initiated or disciplinary action is taken against the person who was reported or against the person who made the allegation, where the allegation was made in bad faith.

Information may also be retained if it is anonymised.

Questions

Any questions concerning the whistleblower scheme may be directed to TMI, HHE or Erik G. Hansen.

Vejle, September 2020

Contact information

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You may lodge a complaint with the Danish Data Protection Agency, Borgergade 28, 5th floor, DK-1300 Copenhagen K, Denmark, dt@datatilsynet.dk.