



# Whistleblower policy

June 2024

## Purpose and application

MT Højgaard Holding (hereinafter "the Group") does not accept violations of legislation, guidelines and internal rules. It aims to foster a culture that aligns with these standards. In continuation of this, a whistleblowing scheme has been established to report knowledge or suspicion of breaches of the law, fraud or other serious matters concerning the Group.

The scheme supplements the possibility within the Group of always being able to contact the immediate manager and HR for matters that do not comply with the Group's guidelines. The purpose of the whistleblower scheme is that inquiries can be made anonymously and to create confidence that serious matters are taken care of and thus avoid a potential reluctance to report significant cases. The whistleblower scheme also aims to ensure that it is possible to raise concerns, while ensuring that this is done within the framework of legislation and the Group's guidelines.

The policy sets the framework and rules in the area, including what can be reported via the scheme for MT Højgaard Holding and its subsidiaries. All employees within these companies are covered by the scheme, just as it can be used by external stakeholders in the value chain. The scheme applies regardless of geographical location.

## Focus areas

### Scope

Information about breaches of EU law can be reported to the whistleblowing scheme, which falls within the scope of the Whistleblower Directive (Directive 2018/0106).

The whistleblowing scheme can be used in the following main areas:

- Violations of the law
- Ethical violations, including bribery and corruption
- Financial violations, including money laundering-Health and safety issues
- Accounting and reporting irregularities
- Discrimination, harassment and abusive behavior
- Environmental and climate violations
- Violation of human rights and labor rights.

If you are in doubt as to whether an issue falls within one of the above areas and can therefore be reported, you are encouraged to make the report.

## ***Out of scope***

The whistleblowing scheme is only intended to deal with breaches of EU law in the main areas mentioned above, as well as serious offenses and other serious matters. Therefore, there are a number of matters that, as a general rule, cannot be reported to the scheme - even if it may be a breach of internal rules, ways of life, code of conduct, etc. This does not mean that the Group does not consider these matters to be serious, but that according to the data protection rules there is no basis for handling these matters through the whistleblower scheme.

Matters that cannot be used in the scheme:

- Personal conflicts that do not involve violation of laws or policies
- Personal preferences that do not directly involve Discrimination, harassment and abusive behavior
- General complaints that are outside the scope of compliance regulations
- Disagreements about pay and conditions, unless it is an illegal practice or breach of collective agreements

## ***Anonymity and Confidentiality***

All reports are initially received by an external lawyer under a duty of confidentiality. The scheme is subject to a number of safeguards so that information provided in the report remains confidential and anonymity can be maintained. If these conditions are to be lifted, an explicit agreement must be made to this effect, and the action must be justified in the interests of the further processing of the report.

It is always possible to report anonymously, but it is preferred that you provide your name and other contact details. If you have set up a secure mailbox, it is possible - whether you are anonymous or not - to return with clarifying questions, which will make the subsequent investigation process more efficient.

In situations where it is not possible to proceed with an anonymous report, the Group will always try to reach out to the anonymous reporter via the portal and the secure mailbox before a case is closed and point out that the report is of a nature where the case must be closed unless the reporter chooses to come forward.

No one in the Group receives reports directly from the scheme. Similarly, only a few trusted employees are responsible for the further processing of the report. If the report is not made anonymously, it will be treated confidentially, and the Group is obliged to do everything possible not to reveal the identity behind the report.

The Group does not tolerate any form of harassment or persecution etc. and will take necessary measures to protect whistleblowers.

## ***Processing of personal data in the scheme***

In connection with the operation of the whistleblower scheme, personal data is processed. The processing is covered by the rules of the General Data Protection Regulation and the Data Protection Act. The Group is responsible for the whistleblower scheme and the individual companies in the Group are data controllers for the processing of personal data that takes place via the scheme.

## Reporting and monitoring

### *Reporting*

If you report a matter against your better knowledge and thereby make an accusation that is frivolous, malicious or made for personal gain, it may have serious consequences, including liability for damages and police reporting. For employees of the Group, such reports made in bad faith may also result in consequences under employment law, including warnings, termination or, in extreme cases, dismissal.

### *Duty of confidentiality*

All reports are initially received by an external lawyer subject to confidentiality. Thus, no one in the Group receives reports directly from the scheme, as the Group's external lawyer performs the initial screening.

All information accessed through the whistleblower scheme is regarded as internal matters and as such is covered by the applicable duty of confidentiality.

### *Follow-up*

The Group Legal department has established an initiative to follow up on the whistleblower scheme. This includes dialog with the external lawyer and ensuring that there are updated processes in the Group to support the scheme. Reporting on the number of reports to the scheme is included as part of the Sustainability Report.

The policy is updated and approved annually by the Executive Board of MT Højgaard Holding.

Søborg, June 2024