

# WHISTLEBLOWER POLICY

## Green Hydrogen Systems A/S



## **1. Purpose of the whistleblower scheme**

- 1.1 The purpose of the whistleblower scheme of Green Hydrogen Systems A/S (the “Company”) is to create a secure framework for employees and external parties to speak up about problematic issues at the Company while being able maintain their anonymity and without having to fear negative consequences.
- 1.2 The whistleblower scheme is intended to contribute to the detection and, as far as possible, the prevention of serious errors and misconduct.
- 1.3 The whistleblower scheme is a supplement to the direct, daily communication in the workplace regarding errors and unsatisfactory conditions etc.
- 1.4 Whistleblower reports are submitted electronically via a web portal, Safe2Whistle, that can be accessed via the internet.

## **2. Who can submit a report?**

- 2.1 The whistleblower scheme is available to all employees of the Company as well as to members of executive management and of the board of directors of the Company (the “BoD”) and external parties.

## **3. What can be reported?**

- 3.1 The whistleblower scheme can only be used for reporting serious issues. Examples include:
  - (i) Criminal offences, e.g. misuse of funds, theft, fraud, embezzlement, bribery, accounts manipulation, etc.
  - (ii) Serious or repeat breaches of legislation, including, for example, breaches of environmental legislation and competition legislation.
  - (iii) Serious or repeat breaches of significant internal the Company group guidelines, e.g. regarding business travel, gifts of an inappropriate scope and purpose, conflicts of interest, and bribery, accounts submission, insider trading regulations (cf. internal capital markets rules), etc.
  - (iv) Serious interpersonal conflicts in the workplace, e.g. in the form of sexual harassment or other types of serious harassment.
  - (v) Serious threats to the environment, health and safety.
- 3.2 The whistleblower scheme is not, therefore, to be used in connection with dissatisfaction related to salary levels, minor breaches of guidelines on smoking and alcohol consumption, and less serious interpersonal conflicts and disagreements or any other HR-related matters.

## **4. How to submit a report**

- 4.1 If you submit a report, the following information will generally be useful for the investigation of the matter:

- (i) Description of the matter, including date, place and name(s) of the person(s) involved;
- (ii) Any documents or evidence related to the breach or any other information which may assist in the investigation of the matter.

4.2 It is your choice whether you wish to submit the report under your own name or anonymously.

4.3 If you wish to remain anonymous, it is important that you not include your own name anywhere in the report. You should also be aware that it cannot be ruled out that your identity can be deduced from the information that you provide in the report.

4.4 The Company may be obliged to make the report available to individuals affected by it or by the measures that it may give rise to.

## **5. How we handle the matter**

5.1 As mentioned above, whistleblower reports are submitted electronically via a web portal, that can be accessed via the intranet.

5.2 PWC is the data processor managing the scheme. The purpose of external anchoring is to ensure that reports are processed in a way that is unbiased and objective.

5.3 As the external scheme manager, PWC will screen out those reports which do not match the purposes of the scheme, cf. clause 3 of this policy, and which must instead be processed via standard communication channels.

5.4 Reports which align with the purposes of the scheme will be forwarded to the General Counsel of the Company, which will process and investigate the report. PWC will be notified of the outcome of the investigation and will assess whether the case can be considered to be closed or whether the report should result in further investigation.

5.5 Reports concerning the Company's General Counsel, or concerning members of the senior management team (other than the CEO and CFO) will be processed by PWC in collaboration with the CEO and CFO. Reports concerning the CEO or CFO or members of the BoD (other than the chairman of the BoD) will be processed by PWC in collaboration with the chairman of the BoD. Reports concerning the chairman of the BoD will be processed by PWC in collaboration with the vice-chairman and one other member of the BoD who are impartial in the matter in question.

5.6 You will be notified when your report has been received by the whistleblower scheme and when your case has been completed, unless you have elected not to follow the case. You will not receive any information about the outcome of the case.

## **6. Protection of the person submitting a report (the whistleblower)**

6.1 The Company does not tolerate harassment, acts of retaliation or any other type of penalty against persons who in good faith submit a report about a matter under the whistleblower scheme.

6.2 It is prohibited to deliberately submit incorrect or misleading information via the whistleblower scheme. Reports submitted in bad faith will, depending on the circumstances, result in negative employment law consequences for the person submitting the report.

## **7. Notification of the individual who is the subject of the report and of other individuals**

7.1 Individuals about whom information is reported under the whistleblower scheme will be notified in accordance with the rules of the General Data Protection Regulation and the Data Protection Act and be given the opportunity to respond to the report.

## **8. Data protection**

8.1 The General Data Protection Regulation and the Data Protection Act apply to the processing of personal data in relation to the whistleblower scheme.

8.2 Green Hydrogen Systems A/S, Nordager 21, DK-6000 Kolding, CVR-no. 30 54 87 01, is the data controller for the whistleblower scheme.

8.3 For further information about the processing of personal data, see "Personalehåndbogen".

## **9. Further information**

9.1 Please contact the General Counsel of the Company if you have any questions regarding the whistleblower policy.

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Adopted by the board of directors on 7 April 2021

**The board of directors**

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Thyge Boserup

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Troels Øberg

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Thomas Thune Andersen

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Lars Valsøe Bertelsen

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Christian Clausen

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Jakob Fuhr Hansen

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Simon Krogsgaard Ibsen

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Karen-Marie Katholm