

Whistleblower Policy 2021

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Whistleblower policy

Columbus A/S has made it possible for employees, former employees, customers, suppliers, business partners, shareholders and other stakeholders to report any suspected unlawful activity or unethical misconduct in the Columbus Group in the form of, for example: financial fraud, bribery, corruption, violation of competition laws, discrimination or sexual harassment, as well as infringements of EU law, which fall within the scope of the Directive of the European Parliament and of the Council on the protection of persons who report infringements of EU law.

Employees with concerns related to employment terms, working environment etc. should not report these issues via the whistleblower scheme. Instead such issues must be resolved locally with management or local HR, unless the matter is exceptionally serious or cannot be reported through the normal reporting lines.

Customer complaints cannot be reported via the whistleblower scheme. Such complaints must be reported to the customer's contact person in Columbus, unless the

matter is exceptionally serious and cannot be reported through the normal channels.

All communication can be reported anonymously and will be handled confidentially and securely. However, Columbus prefers that the person reporting a concern states his/her name and other contact details in order for Columbus to be able to ask additional questions if needed.

How to report

Concerns can be reported via e-mail to: whistleblower@columbusglobal.com or by post to:

Columbus A/S
Att.: Chairman of the Board, or Deputy Chairman of the Board in the event that the concern involves the Chairman of the Board
Lautrupvang 6
2750 Ballerup
Denmark

MARK THE LETTER "CONFIDENTIAL"

Confidential and sensitive personal information may be sent via e-mail if Secure

Email is used for sending, and if the recipient's email is also set up to receive Secure Email. If this is not the case, reports with confidential or sensitive personal information must be sent by post. Reports may not be made via text message.

In order to be able to facilitate thorough investigation of all matters, all concerns should be identified and described in sufficient detail. For this purpose, the reporting form in Appendix 1 can be used.

Reporting can also take place via an external whistleblower scheme established by, for example, the Danish Data Protection Agency or established pursuant to sector-specific EU legislation.

It is optional whether reports are made internally to Columbus A/S or via an external whistleblower scheme. Columbus encourages that reports are made internally to Columbus A/S when the violation can be dealt with effectively internally in Columbus, and when the sender of the report assesses that there is no risk of retaliation against the sender such as retaliation for having made the report, cf. section

"Retaliation or misuse of the whistleblower scheme" below.

Receipt of concerns and investigation

All concerns reported as instructed above will be sent directly to the Chairman of the Board. Thus, no other persons will get insight in reported concerns before the Chairman. The Chairman will investigate the concerns and proceed with appropriate action. Any investigation will be registered and conducted confidentially.

In case the concern involves the Chairman of the Board, the concern must be sent by post for the attention of the Deputy Chairman of the Board. All concerns reported as instructed above will be sent directly to the Deputy Chairman of the Board. Thus, no other persons will get insight in reported concerns before the Deputy Chairman.

The receipt of a report is confirmed to the sender, if the sender has provided a sender address. Confirmation of receipt of the report is sent within 7 days of receipt.

The sender of the report must be informed of the consequences of the report, including measures and investigations that have been carried out, as soon as possible and no later than 3 months from the confirmation of receipt.

Information about the sender's identity and other information from which the sender's identity can be deduced directly or indirectly may not be passed on to anyone other than the Chairman of the board without the sender's explicit consent (or -

where the report concerns the Chairman of the board and sent to the deputy chairman).

Information from the report that does not relate to the sender's identity, and from which the sender's identity can neither directly nor indirectly be deduced, may be passed on to anyone other than the Chairman of the board (or - where the report concerns the chairman and sent to the deputy chairman) takes place as part of

the follow-up of the report or to address the reported violation or violations.

Retaliation or misuse of the whistleblower scheme

Columbus A/S will ensure that there will not be discrimination or retaliation against anyone reporting a concern via the whistleblower scheme in good faith based on his/her personal knowledge.

If a person reporting a concern believes that he/she has been retaliated against for

reporting or participating in an investigation, he/she should immediately report this via the whistleblower scheme. All such reports will be investigated confidentially. Abuse of the whistleblower scheme for false reporting made knowingly and in bad faith will be duly sanctioned.

The whistleblower scheme was adopted in November 2015 and updated at a Board meeting on 17 August 2021.

Appendix 1 – Reporting form**Reporting form for Columbus' whistleblower scheme**

When reporting a concern via Columbus' whistleblower scheme, we recommend that you – to the extent possible - answer the questions below.

Reporting form:

What does your report concern?	
Who does your report concern?	
Where did the actions concerned take place?	
Do you know if the actions concerned are still taking place?	
Does the report involve an financial value?	
How did you come into possession of the information?	
Who are you? (voluntary)	
How can we contact you, if necessary? (voluntary)	