

# **WHISTLEBLOWERPOLICY**

## **For Globe Malerfirma A/S company no. (CVR) 29 79 66 53**

This whistleblower policy is in effect for Globe Malerfirma A/S. It is available to everyone, including employees, business partners and suppliers as well as others.

### **1. INTRODUCTION AND PURPOSE**

Globe Malerfirma A/S's internal Whistleblower scheme has been established in accordance with Danish Act No. 1436 of 29 June 2021 ("Whistleblower Act").

The purpose of this whistleblower policy is to explain how the whistleblower scheme works, thus create a preventive effect, and avoid a potential reluctance to report significant cases.

Among other things, the purpose of this whistleblower scheme is to create better opportunities for employees, business partners, etc. can point out and speak about illegal or serious matters in a safe and secure manner, without the person(s) concerned needing to fear that reporting will have negative consequences.

Globe Malerfirma A/S first and foremost wants problematic matters to be addressed directly in free and open dialogue with the immediate manager or other relevant colleague. If a specific matter is not suitable for discussion in such a forum, a report can instead be submitted confidentially and/or anonymously, using Globe Malerfirma A/S's whistleblower scheme.

### **2. WHO CAN REPORT**

Reports can be made by all employees of Globe Malerfirma A/S as well as other persons associated with Globe Malerfirma A/S, for example business partners, customers, suppliers, external advisers and board members as well as persons who have attended job interviews etc.

### **3. WHO CAN BE REPORTED ABOUT**

Reports can be made of acts committed by employees and other persons connected to the company. Other persons associated with the company may for example be board members, accountants or suppliers.

### **4. WHAT CAN BE REPORTED**

The whistleblower scheme can only be used to report significant acts. Non-exhaustive examples of this include:

- Financial crime such as fraud, embezzlement, bribery and forgery

- Physical and psychological violence and sexual abuse
- Significant breaches of environmental regulations and pollution of the environment
- Significant breaches of occupational safety

Less significant acts cannot be reported via the whistleblower scheme, but must be reported via the usual channels for this, e.g. by direct contact with the immediate manager. Non-exhaustive examples of this include:

- Dissatisfaction with salary conditions
- Cooperation difficulties
- Violation of smoking or alcohol policy etc.

In cases of doubt, Globe Malerfirma A/S encourages a report to be made rather than the act not being reported. All reports will be recorded processed and taken seriously.

## **5. HOW REPORTING IS MADE**

Reporting can be done using [this link](#).

## **6. REPORTING**

A report can be made both in writing and orally, but only via the above link. It is not possible to make reports in other ways, as this is confidential personal data that must not be sent unencrypted.

It is possible in connection with a report to request a physical meeting. In such cases, reporting cannot be done anonymously, as it is necessary to be able to address the person who reported, in order to be able to hold a physical meeting within a reasonable period of time.

## **7. WHO – AND HOW WE PROCESS A REPORT**

Lou Advokater administers the whistleblower scheme and thus acts as an independent data controller. The purpose of the external anchoring is to ensure impartiality and objectivity in the processing of the reports.

Lou Advokater will as an external administrator process all reports. Lou Advokater will sort out the reports that do not fall within the whistleblower scheme, cf. section 4 which must therefore instead be processed via the normal communication channels. Lou Advokater confirms receipt of a report within 7 days.

Reports that fall within the scheme are forwarded to Globe Malerfirma A/S's specially selected employee, Lise-lotte Tagmose, who processes and examines the report, whereby Globe Malerfirma A/S also acts as an independent data controller. Lou Advokater is informed of the outcome of the investigation and assesses whether the case can be considered closed, or whether the report should give rise to further

investigations. Reports concerning Globe Malerfirma A/S's specially selected employee will be processed by Nadja Tagmose.

You will be informed when your report has been received in the whistleblower scheme, regardless of whether it falls within or outside the scheme. If it falls within the scheme, you will also be informed when the case has been concluded, unless you have chosen not to follow the case.

Reports are deleted immediately if they do not fall within the scope of the whistleblower scheme or are obviously unfounded. If the report leads to a report to the relevant authorities, or a report is made to the police, the report is deleted immediately after the case has been closed by the relevant authority. If a report falls within the scope of the whistleblower scheme, the report is deleted as a starting point 2 months after the investigations have been completed, when no further steps are taken. A report is deleted no later than 5 years after the resignation of a reported employee, if disciplinary sanctions have been taken against the reported employee on the basis of the report and the information collected, or there are other reasons that make it factual and necessary to continue to store the information. The collected information will be stored in the person's employee folder.

## **8. CONFIDENTIALITY AND ANONYMITY**

The person who make a reports can choose to be anonymous or to make the report confidentially. All reports that are not reported anonymously will be treated confidentially to the greatest extent possible. If you wish to be anonymous, you must choose a form of reporting that ensures your identity will not be revealed. You must also ensure that the report and the material you may attach is information that can not be attributed to you.

Processing of personal data in connection with reports under Globe Malerfirma A/S's whistleblower scheme takes place in accordance with the Whistleblower Act and other data protection regulation. Please refer to Lou Advokater's and Globe Malerfirma A/S's privacy policy.

## **9. SECURITY FOR REPORTER (THE WHISTLEBLOWER)**

All reports made with reasonable cause are protected from retaliation of any nature. Globe Malerfirma A/S does not tolerate harassment etc. against or other forms of sanctions against persons who in good faith report a case via the whistleblower scheme. This will be met with workplace disciplinary sanctions.

You must not knowingly submit false or misleading information that casts suspicion on innocent persons. Reports made in bad faith may depending on the circumstances be met with workplace disciplinary sanctions for the person who made the report.

## **10. INFORMATION FOR THE REGISTERED PERSON(S)**

Globe Malerfirma A/S is obliged to inform the person(s) about whom reports have been submitted. Prior to any briefing, a concrete assessment will be made of which information can be passed on and when, so briefing the people involved does not have consequences for the disclosure of the reported matters.

The person(s) on whom reports have been submitted will not be informed of who has made a report. This is not the case even if the reporting person's identity appears from the report. However, in connection with a possible court case, it may be relevant to call the reporter as a witness if his identity is known.

## **11. CALL FOR INTERNAL REPORTING**

Globe Malerfirma A/S encourages the use of the whistleblower scheme so that any violations can be dealt with quickly and effectively internally. However, the whistleblower is free to choose between submitting a report to the workplace's whistleblower scheme or an external whistleblower scheme (e.g. the Danish Data Protection Authority). The Danish Data Protection Authority's contact information can be found on their website [www.datatilsynet.dk](http://www.datatilsynet.dk).

Globe Malerfirma A/S's whistleblower scheme does not exclude the possibility of reporting via external channels such as e.g. supervisory authorities.

## **12. CONTACT INFORMATION**

If you have any questions about Globe Malerfirma A/S's whistleblower policy, including the scheme itself, how reporting takes place or otherwise, you are welcome to contact Lise-lotte Tagmose from Globe Malerfirma A/S, either on telephone no.: +45 28 87 92 40 or via email at [globe@globe-maler.dk](mailto:globe@globe-maler.dk)

Inquiries about and questions about the whistleblower scheme will of course be treated confidentially.

This whistleblower policy has been adopted by Globe Malerfirma A/S on 1 November 2023.