

WHISTLEBLOWER POLICY



Pankas Group – Whistleblower Policy

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Introduction

At Pankas, we are committed to maintain a culture of openness, accountability, and integrity. This Whistleblower Policy is designed to provide a safe and confidential way for employees and other stakeholders to raise concerns about any unethical or illegal activities within the company.

Pankas is committed to maintain the highest standards of ethical conduct. Your cooperation in upholding these standards is crucial to our success and integrity.

Purpose

The purpose of this policy is to:

- **Encourage employees and stakeholders to report any suspected wrongdoing as soon as possible.**
- **Provide a clear procedure for reporting concerns.**
- **Assure whistleblowers that their concerns will be taken seriously and investigated appropriately.**
- **Protect whistleblowers from retaliation.**

Scope

This policy applies to all Pankas' employees, contractors, suppliers, and other stakeholders who may have relevant information about misconduct or breaches of company policy.

What to report

You should report any concerns related to, but not limited to:

- Fraud, theft, or other financial irregularities.
- Corruption, bribery, or other forms of unethical behavior.
- Violations of laws, regulations, or company policies.
- Environmental harm or safety hazards.
- Harassment, discrimination, or other forms of workplace misconduct.

Matters such as dissatisfaction with terms of employment (wages or other contractual conditions), work-related disagreements with colleagues and supervisors etc. should not be reported via the whistleblower system.

We continue to encourage open and constructive dialogue with your colleagues and with your manager with the aim of mitigating or settling workplace disagreements and day-to-day problems.

Reporting procedure

Pankas provides a whistleblower system managed by an independent third party. The system and the internal complaints handling procedures ensure impartiality and objectivity in the assessment and handling of reports.

The whistleblower system is an external web portal accessible from Pankas' websites. The web portal is hosted and operated by an external party (Whistleblower Legal ApS).

Link: [Whistleblower program](#)

The report can be made in writing or verbally through the portal, and employees can also upload pictures or other materials on the portal. The portal can be accessed via phone, iPad, and computer.

Anonymity

We understand that you may not wish to identify yourself, in which case you may submit your report to the system anonymously.

In this event, you should be careful not to inadvertently state your name anywhere in your report. We will still be able to communicate with you via the whistleblower portal, though, of course, without knowing who you are. Upon submission, you will receive a code to access the system's anonymous mailbox. You are encouraged to save this code and check the mailbox regularly if you wish to be available for follow-up questions.

Your anonymity will always be respected, but you should be aware that it may complicate the investigation. Even if you choose not to be anonymous, the whistleblower committee will keep your identity in full confidence both internally and externally.

We may ask for your permission to disclose your identity if required to conduct adequate investigation, to comply with law and/or to provide accused individuals with their legal rights of defense.

If the whistleblower reporting concerns one or more named persons, these persons are entitled to protection of their identity in accordance with this policy.

How do we handle the report

When a report is submitted, Whistleblower Legal will conduct an initial screening to determine if the reported matter falls under the whistleblower scheme.

If it turns out that the report does not fall under the whistleblower scheme, for example, if it is unfounded, or does not concern a matter covered by the whistleblower scheme, the report will be rejected. The person who submitted the report will be informed of this, and the report will shortly thereafter be deleted from the system.

If it is determined that the reported matter is or could be covered by the whistleblower scheme, and the information provided is not unfounded, the reporter will receive a confirmation of the report within 7 days. Whistleblower Legal will then contact the company's trusted employee for further investigation.

If it is determined that the company's primary trusted employee is biased, the secondary trusted employee will be contacted. The trusted employee in the company will now initiate an investigation of the matter. This investigation will be conducted internally within the company and may have consequences for the person(s) involved in the report.

When the internal investigation is completed, Whistleblower Legal will inform the reporter of the outcome of the case. This notification will be given no later than 3 months after Whistleblower Legal has acknowledged receipt of the report.

Once the investigation is concluded, the case will be deleted from the system. However, if the investigation leads to further action, it may be kept in the personnel file of the person involved in the report. If the investigation shows that the matter may be criminal, it could be referred to the police for further investigation. If this occurs, the case will be handed over to the authorities.

Protection from retaliation

Pankas will not tolerate any form of retaliation against individuals who report concerns in good faith. Retaliation may include dismissal, demotion, harassment, or any other form of discrimination. Any employee found to be engaging in retaliatory behavior will face disciplinary action, up to and including termination.

Confidentiality

All reports and investigations will be handled with the utmost confidentiality. Information will only be shared on a need-to-know basis with those responsible for addressing the concern.

False reports

Making false or malicious reports will not be tolerated. Any employee found to have intentionally made a false report may face disciplinary action.

Review and amendments

This policy will be reviewed regularly and updated as necessary to ensure its effectiveness and compliance with relevant laws and regulations.

Contact information

For questions about this policy or to report a concern, please contact:

- **Whistleblower Hotline:**
 - Tel +45 4243 7020
 - Web: <http://www.whistleblower-legal.com/>
 - Email: kontakt@whistleblower-legal.com
- **Group CFO: Christian Thomsen**
 - E-mail: cat@pankas.dk
 - Tel +45 9137 7169
- **Group ESG manager: Helle Jacobsen**
 - E-mail: hj@pankas.dk
 - Tel + 45 2949 0092