



Adform

Whistleblower Protection Policy

Adopted as of December 10, 2021



ADFORM

WHISTLEBLOWER PROTECTION POLICY (Version as of 10 December 2021)

This whistleblower protection policy and any future amendments are also available on the Company's Intranet, Adform Home and can be found [here](#).

The whistleblower protection policy and any future amendments are also available on the Company's website.

I. Overview

Adform A/S (together with its subsidiaries, "**Adform**") is committed to complying with, and requiring employees, directors, and board members to comply with, all applicable laws, regulations, accounting standards, internal accounting controls, audit practices, Adform's Code of Business Conduct and ethics, and all other policies and procedures established by Adform. Therefore, Adform is introducing an internal whistleblower scheme ("**Whistleblower Scheme**"). Adform has adopted this Whistleblower Protection Policy ("**Policy**") for the purpose of complying with the Whistleblower Directive ("**Whistleblower Directive**") and the Danish Whistleblower Act (the "**Danish Whistleblower Act**") supplementing the Whistleblower Directive and in order to:

- encourage disclosure and investigation of improprieties before they can disrupt the business operations of Adform or lead to serious loss;
- ensure that there is a venue for confidential reporting of violations of applicable law via an independent third party;
- promote a climate of accountability with respect to Adform resources; ensure that no individual feels at a disadvantage in lawfully raising legitimate concerns; and
- provide a venue for external parties to report any serious concerns which they have identified where Adform is involved.

The main purpose of Adform's internal Whistleblower Scheme is to enable the company's employees and any other parties with work relations to Adform to report their concerns in confidence to an independent entity, where there is reasonable suspicion of breaches of EU law in specific areas, serious wrongdoings or other serious matters likely to lead to a financial loss or cause other serious harm to Adform and its reputation or to impact the life and health of individuals. The Policy is also intended to inform the whistleblower about his/her rights under the applicable legislation.

All Adform's employees can report concerns under the Whistleblower Scheme. Adform has decided that the following persons can also report information about suspected wrongdoings which has been disclosed to them in the course of their work-related activities: independent contractors, shareholders, members of the executive board, the board of directors, volunteers, salaried or non-salaried trainees, employees of contracting parties, suppliers or sub-contractors, former employees or new employees who have not yet started work, who report information about alleged wrongdoings which has been disclosed to them in the course of the employment process or during other pre-contractual negotiations.

Further, Adform has decided that consultants, auditors, legal advisors, collaboration parties and other third parties that have a connection to Adform can report concerns under the Whistleblower Scheme. However, such external parties are not covered by the protection in the Danish Whistleblower Act. This entails that the special protection provided in the Whistleblower Directive and the Danish Whistleblower Act as described below in this Policy does not apply for these persons.

This Policy will promote the integrity of all above-mentioned persons, by providing a procedure that enables actual or suspected wrongdoing to be raised through the appropriate channels, allowing Adform to objectively investigate any allegations. Appropriate action will be taken to remediate any verified wrongdoing.

At the same time, this Policy fully respects the data protection legislation and due process of those who may be subject to a report and is designed to ensure an environment in which the individuals covered by this Policy will not suffer any consequence from baseless accusations.

Any individual can choose to report anonymously although Adform **encourages** you to report by name in order to facilitate the investigation. It is very important for Adform to protect the identity of the whistleblower, even in cases where the whistleblower identifies himself/herself and information provided will therefore be subject to confidentiality. Please find more information about anonymity under section IV.

II. Scope of Policy

The Whistleblower Scheme can be used to report the following categories of issues within Adform: (i) breaches of EU law that fall within the scope of the Whistleblower Directive and (ii) other serious breaches of Danish and EU law as well as other serious concerns.

Suspected breaches of the specific EU legal acts that fall within the scope of the Whistleblower Directive do not have to be serious. The Whistleblower Directive applies to breaches of those EU legal acts that are listed exhaustively in Part I in the annex to the Whistleblower Directive, inter alia in the following areas:

- public procurement;
- financial services;
- products and markets;
- prevention of money laundering and terrorist financing;
- product safety and compliance;
- transport safety;
- protection of the environment;
- public health;
- consumer protection;
- protection of privacy and personal data; and
- security of network and information systems.

Breaches affecting the financial interests of the EU and breaches relating to the internal market, including breaches of EU competition and state aid rules are also included in the scope.

As noted above, serious breaches of Danish and EU law and other serious matters may also be reported, including, inter alia:

- Criminal acts, such as, serious economic crimes and suspicion hereof, including but not limited to bribery, extortion, theft, breach of trade sanctions, competition law violations, forgery and fraud, including assisting third parties in committing such crime. Examples could be theft or misuse of company assets, falsification of records/documents, obtaining an unlawful advantage, or trying to influence public or private parties by providing business courtesies or gifts, hereunder Adform's anti-corruption policy (which can be found here);
- Suspicion of and breach of serious environmental rules, e.g. violation of environmental legislation or local requirements;
- Sexual harassment in the workplace
- Serious incidents involving individuals, such as physical assault, discrimination against employees and violation of human rights;

- Serious breach of work safety and suspicion hereof, such as failure to perform under secure and safe conditions in violation of work safety laws or regulation;
- Breach of Adform's Code of Business Conduct and ethics, to the extent the violation is serious, and may have significant impact on Adform or a particular individual's life or health;
- Serious breaches of data protection laws;
- Breach of policies and procedures established by Adform concerning accounting, internal accounting controls or auditing matters (together, "**Financial Matters**");
- Breach of any other code, policy or procedure established by Adform; to the extent such violation is considered a serious matter, cf. above.

The Whistleblower Scheme is **not** intended to address and handle personal or human resource related issues such as bullying and disrespectful behavior, incompetence, collegial difficulties, absence, breach of internal guidelines on smoking, consumption of alcohol or other forms of inappropriate behavior or conduct.

Such issues shall be reported via normal channels to either your superior or the superior of the individual you wish to report, or if the complaint regards the highest-ranking officer at your entity to the executive management.

1. Limitation of scope for Italy

In Italy, local laws do not permit to report any misconduct anonymously via the Whistleblower Scheme. If a report is submitted anonymously, Adform has no obligation to pursue a report, but it may choose to do so in its sole discretion.

2. Limitation of scope for Sweden

In Sweden, only internal parties such as employees, hire-ins, managers, executive officers and board of directors may report a misconduct through the Whistleblower Scheme (i.e. no external parties can use the Whistleblower Scheme).

Only misconduct by persons in a key or leading position within Adform may be reported via the Whistleblower Scheme. This includes Adform's board of directors, executive officers or individuals responsible for major purchases or other key business functions.

The Whistleblower Scheme may only be used to the extent that it is justified not to turn to Adform's normal information and reporting channels. This may, for example, be the case when the reported person is part of the management or the suspected misconduct, for that or other reasons, runs the risk of not being properly handled.

III. Reporting Process

As stated above, individuals are **encouraged** to report concerns regarding any questionable actions, activities or other matters outlined in this Policy to their supervisor, manager or other appropriate persons within Adform. External parties are **encouraged** to report the concern in question to the relevant contact person at Adform. Adform believes in an open and transparent environment for any such concerns.

If any individual wishes to use the whistleblower process instead, Adform has engaged the law firm Kromann Reumert in Denmark to host and administrate the Whistleblower Scheme. Kromann Reumert use EQS Group A/S (Got Ethics) as a supplier to handle the scheme. Reporting is done electronically online by either

- (i) filling out a simple written template via a link at Adform's Intranet or via this [link](#); or
- (ii) by submitting an oral recording of your complaint via this [link](#). If an individual submit an oral recording, the individual's voice will be distorted to keep anonymity by the software used by EQS Group A/S (Got Ethics).

Any complaints, reports or concerns submitted through the Whistleblower Scheme will be received by authorized employees at Kromann Reumert and forwarded to the following individuals (so-called whistleblower unit):

Financial Matters	Non-Financial Matters
SVP, General Counsel	SVP, General Counsel
Chief Financial Officer	Chief Human Resource Officer
Chairman of the Board of Directors	Chairman of the Board of Directors

Further, reports may be provided directly to the above individuals, to the Chief Executive Officer (“**CEO**”) or to the Vice-Chairman of the Board of Directors, but should not be discussed with or reported to any other person at any time. If a complaint involves any of the above-referenced persons, the CEO or any board member, the complaint can be reported to any of the non-involved persons, notwithstanding the subject matter of the complaint.

Wherever possible, the whistleblower should provide names, dates, places and other details necessary to facilitate an effective investigation. However, reporting can be done anonymously. Neither Kromann Reumert nor Adform will in anyway attempt to identify an individual reporting anonymously. Please see below under section IV.

IV. Confidentiality

1. Anonymity

The Whistleblower Scheme provides three levels of anonymity:

1. Full anonymity, either with or without a secure post box within the reporting system.
2. The reporting individual chooses to provide his/her contact information to the administrating law firm Kromann Reumert, who might approach the reporting individual by telephone or email to obtain further information. Adform will not be informed about the identity of the whistleblower.
3. Both Adform and Kromann Reumert will receive the contact information of the reporting individual and will be able to approach him/her if further information is necessary.

2. Duty of confidentiality

The above-mentioned members of Adform's whistleblower unit and the employees at Kromann Reumert who assist in managing the Whistleblower Scheme have a duty of confidentiality in respect of all disclosures made in whistleblower reports. The duty of confidentiality also applies to other members of staff who are authorized to receive or follow up on reports and, in doing so, receive information about your identity or other details that must be treated confidentially.

3. Disclosure of information about your identity

Information about your identity and other information from which your identity can be deduced, directly or indirectly, may not be disclosed without your explicit consent to anyone beyond the authorized staff members in Adform who are competent to receive or follow up on reports. You may withdraw your consent at any time. However, the withdrawal of consent will not affect the lawfulness of disclosures based on consent before its withdrawal.

Your identity may be disclosed to public authorities without your consent, where disclosure is necessary to address breaches falling within the scope of the Danish Whistleblower Act or to safeguard the rights of defence of persons concerned. Where Adform contemplates a disclosure from which your identity may be directly or indirectly deduced, Adform must notify you before the disclosure, unless such notification will jeopardize the related investigations or judicial proceedings.

Other information in reports from which your identity as whistleblower cannot be deduced may be disclosed to persons who are not a part of Adform's whistleblower unit and to Kromann Reumert only for the purpose of following up on a report or addressing breaches that fall within the scope of the Danish Whistleblower Act. The recipient will be subject to the same duty of confidentiality in respect of such information as the members part of Adform's whistleblower unit and in Kromann Reumert.

V. Handling of Complaints and Investigations

Subject to any specific requirements of an applicable policy, law or regulation, Adform will handle complaints and investigations in the manner described below.

After a report is filed in the Whistleblower Scheme, a notification is sent to (i) Adform's SVP General Counsel and (ii) an entrusted lawyer of Kromann Reumert, who screens the submitted information. When the report is submitted, the individual will receive an automated acknowledgment of receipt. If a report is within scope of the Whistleblower Scheme, Kromann Reumert will send the report in accordance with the procedure set out under this Policy regarding financial matters and non-financial matters.

If the concern reported is considered to be outside of the scope of the Whistleblower Scheme, Kromann Reumert will inform the whistleblower that the report will be deleted. The report will not be forwarded to Adform. If a report is out of scope according to this Policy, it will not be submitted for investigation under the Whistleblower Scheme.

All cases, which are not obviously unfounded, will be investigated. Subject to the specific confidentiality obligation, external legal specialists within the subject matter reported will be consulted before any final decisions are made.

1. Financial Matters

Any report concerning Financial Matters will be brought to the attention of Adform's SVP, General Counsel, Chief Financial Officer ("**CFO**") and Chairman of the Board of Directors. Upon receipt of such report, the SVP; General Counsel and CFO will undertake an investigation of the complaint; in the alternative, the CFO may subject to the specific confidentiality obligation appoint outside advisers or internal personnel to review, investigate, organize, collate or summarize any complaints before he or she undertakes an investigation.

After review by the SVP, General Counsel and CFO, he or she will discuss the findings with the Executive Management or the Chairman of the Board of Directors, as relevant, as promptly as practicable to determine whether any matters require additional investigation, a response or other treatment. Such action may subject to the specific confidentiality obligation include engaging outside advisors further or, where appropriate, delegating responsibility and disposition to appropriate company personnel.

2. Non-Financial Matters

Any report concerning non-Financial Matters will be brought to the attention of Adform's SVP, General Counsel, Chief Human Resource Officer and Chairman of the Board of Directors, and, as necessary, the CEO and the applicable committee of the Board. Adform's SVP, General Counsel and/or Chief Human Resource Officer will undertake a preliminary investigation to determine if the information can be substantiated and, as necessary, will advise the CEO, the Chairman of the Board of Directors and the applicable committee of the Board if any further action is required to fully evaluate the report. If so, Adform's SVP, General Counsel and/or Chief Human Resource Officer will take action as it deems appropriate and as approved by the CEO, the Chairman of the Board of Directors and applicable committee of the Board. Such action may subject to the specific confidentiality obligation include engaging outside advisors or, where appropriate, delegating responsibility and disposition to appropriate company personnel.

Where deemed necessary and only for documentation purposes, Adform's SVP, General Counsel and/or Chief Human Resource Officer will maintain an appropriate record of all communications and filings received and will track such communications and filings through his or her investigation and ultimate resolution. A periodic summary of such communications and filings will be made to the CEO, the Chairman of the Board of Directors or applicable committee of the Board.

3. Notification of Complaints

The Chairman of the Board of Directors, the CEO and the CFO will be apprised of the existence of any investigation, and they will be kept apprised of the status of the investigation regularly and in any case prior to the end of any reporting period for which the Chairman of the Board of Directors, the CEO and the CFO must provide written certifications and representations to the outside auditors, or any other applicable regulatory body. The whistleblower will not be kept informed about the progress and/or outcome of the submitted report.

4. Record keeping of reports received

Adform must keep record of your report and of all documents accompanying it.

Oral reporting is documented by recording the conversation or meeting in a durable and retrievable form with your consent, or by preparing accurate minutes of the meeting or the conversation with an opportunity for you to check, rectify and agree to the minutes by signing them. Oral reporting via the reporting system can be documented through an accurate transcript of the report with an opportunity for you to check, rectify and agree to the transcript by signing it.

Adform keeps such records subject to its non-disclosure obligation. Accordingly, Adform keeps records of your report in a manner that guarantees non-disclosure of e.g., your identity.

The purpose of the record keeping is, inter alia:

- to preserve evidence of the reports received to ensure that the disclosures can be used as evidence in enforcement proceedings;
- to safeguard the right of defence of the person concerned in connection with any criminal proceedings or other actions where the disclosures serve as evidence; and
- to enable the linking together of information from multiple reports on the same matter, where such linking makes it possible to address and follow up on the matter and where this would not be possible based on a single report.

Records of your report will be kept in accordance with applicable data protection legislation.

5. Further documentation

If further documentation is necessary, it is possible for Kromann Reumert to contact you via the platform that was used for the reporting, also where you have opted to stay anonymous, provided that you have kept the line of communication open and answer any additional questions that may be asked via the platform. The documentation may include correspondence, documents, photos, minutes of meetings, telephone recordings, emails, expenditure sheets, browsing history, etc. If Kromann Reumert obtains further information from you and you opt to stay anonymous, then all your personally identifiable information will be deleted before the information is disclosed to the relevant persons at Adform.

6. Feedback to the whistleblower

Adform will give you feedback on your report as soon as possible and no later than three months after the date of acknowledgement of receipt.

Subject to compliance with applicable law, including the rules on non-disclosure, we will inform you of the action envisaged or taken as follow-up to the report and the ground for the choice of that follow-up. Follow-up could include, for instance, filing of a police report, launch of an internal enquiry, or referral to a supervisory authority.

If Adform has not, within three months of having acknowledged receipt of the report, decided on the follow-up action to be taken, you will be notified of this and of any further feedback you may expect.

7. Notification of persons concerned

Adform must inform the person concerned and any third party referred to in the report about the processing of their personal data in connection with the handling of a report unless this can be exempted. As a general rule, they must receive this information within a reasonable time, but at the latest within one month after the personal data have been obtained. However, provision of this information may be postponed or omitted, for instance for the purpose of investigating a matter, complying with the special duty of confidentiality, or safeguarding the interests of Adform or the whistleblower in question e.g. because of an ongoing investigation and/or preservation of evidence, including where such interests override the interests of the person concerned. Deviation from this obligation to provide information will be allowed if and to the extent provided in Article 14(5) of the General Data Protection Regulation or section 22(1) of the Danish Data Protection Act.

VI. Protection of Whistleblowers

1. Protection criteria

The Whistleblower Directive and the Danish Whistleblower Act offer protection to whistleblowers against retaliation, etc.

As whistleblower, you will be afforded protection under the Whistleblower Directive and the Danish Whistleblower Act only if you had reasonable grounds to believe, based on the information available to you at the time of reporting that the matters reported were true, and that the matters were covered by the Whistleblower Scheme as described above. If you report inaccurate information on breaches by honest mistake, you will also be entitled to protection.

You will not enjoy protection under the Whistleblower Directive and the Danish Whistleblower Act if you deliberately report inaccurate information or information about breaches that are manifestly unfounded, including unsubstantiated rumours and hearsay.

2. Protection granted

Exemption from liability for breach of confidentiality and acquisition of information

If you meet the criteria for protection, you will not be deemed to have breached any statutory non-disclosure obligation and will not incur liability in that respect, provided that you had reasonable ground to believe that the report was necessary to disclose a breach falling within the scope of the Whistleblower Directive and the Danish Whistleblower Act. Nor will you incur liability for getting access to the reported disclosures, provided that such access did not constitute a self-standing criminal offence.

3. Protection against retaliation

If you meet the criteria for protection, you will enjoy statutory protection against retaliation, including threats of retaliation and attempts of retaliation as a result of the reporting, and no one can hinder or attempt to hinder you from reporting your concerns.

Adform will not permit any negative or adverse actions to be taken against any employee or other individual because that person has made a report in good faith about any of the policies, rules or regulations discussed even if such report proves to be mistaken. More specifically, Adform will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment because of any lawful act done by the employee with respect to good faith reporting of complaints. Furthermore, Adform could be subject to criminal or civil actions for acts of retaliation against employees who report via the Whistleblower Scheme.

As mentioned above, retaliation in any form against a whistleblower who has made a report in good faith will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated and resolved. Adform will take reports or complaints under this Policy seriously. Accordingly, any reports made in bad faith would be treated as a serious matter.

4. Request for dismissal of a case

You have a right to rely on a report to seek dismissal of a case, provided that you had reasonable grounds to believe that the reporting was necessary for revealing a breach that falls within the scope of the Danish Whistleblower Act.

VII. Protection of the person concerned

Any person who commits an act or omission which breaches EU law, which constitutes a serious wrongdoing or other serious malpractice, or which defeats the purpose of the rules can be reported. The person concerned is therefore the natural or legal person who is referred to in the whistleblower report as the person to whom the breach is attributed or with whom that person is associated.

All serious reports within the scope of the Whistleblower Directive and the Danish Whistleblower Act will be subject to careful, thorough, confidential and meticulous follow-up, evaluation and investigation.

The rights of the person concerned must not be derogated from by agreement when it is to the detriment of the person concerned. This means, inter alia, that Adform will ensure the rights of the person concerned when drawing up agreements, policies, forms and conditions of employment, including arbitration agreements before the dispute arises. Adform can - if it does not

conflict with the whistleblower's rights - choose to grant the person rights that put him/her in a better position than the rules of applicable legislation. Adform will ensure that the identity of the person concerned is protected in connection with the case processing and that the person has access to an effective defense, including by registering reports.

Further, Adform is aware that the person concerned has rights under the General Data Protection Regulation. The assessment of whether the person concerned can exercise his/her rights under the GDPR will be assessed case-by-case, as respecting the rights of the person concerned must not infringe the rights of the whistleblower or any other third party mentioned in the report.

VIII. Possible Outcomes

1. Consequences for whistleblowers

Reports submitted in good faith will not have any adverse consequences for you.

If, however, you deliberately report inaccurate information, for instance for the purpose of harassing or causing other harm to your colleagues or to members of the board of directors, it may have consequences for you as an employee. Anyone submitting a report in bad faith will risk disciplinary, civil (including contractual), criminal or administrative penalties as well as employment law sanctions.

2. Consequences for the persons concerned

Depending on the circumstances, a whistleblower report may have the following consequences for the persons concerned:

- imposition of disciplinary measures on the employee concerned, which may lead to a warning or termination of the employment;
- commencement of proceedings against the director concerned, which may lead to termination of the directorship;
- filing of a police report against the persons concerned and subsequent criminal proceedings; or
- contractual consequences for business partners, including termination of contract.

A whistleblower report will generally not have any consequences for the persons concerned if the allegations are not supported by evidence or by the outcome of the investigations.

IX. Interaction with Outsiders

No employee, director, or board member will take any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of Adform's audit.

In addition to the complaint procedures outlined in this Policy, employees, directors, and board members should also be aware that certain enforcement agencies are authorized to review improper internal accounting controls, auditing matters or potentially fraudulent reports of financial information. Nothing in this Policy is intended to prevent an individual from reporting relevant information to the appropriate agencies. No documents relevant to any such investigation or complaint will be intentionally altered or destroyed.

X. External Whistleblowing

1. External whistleblower schemes in brief

The Danish Whistleblower Act provides for the establishment of an external whistleblower scheme managed by the Danish Data Protection Agency, which allows all of the persons enjoying statutory protection (and not only employees) to report the wrongdoings that can also be reported under Adform's whistleblower scheme, including breaches of EU law, other serious breaches of the law, or other serious concerns. You can access the external whistleblower scheme [here](#).

In addition, a number of public authorities have established external whistleblower schemes for reporting of breaches

of special legislation, including the Danish Financial Supervisory Authority, the Danish Working Environment Authority, the Danish Environmental Protection Agency, and the Danish Business Authority.

2. Procedure for external whistleblowing

External whistleblower schemes allow for both written and oral reporting, and a report can also, upon request, be submitted at a physical meeting within reasonable time.

If you choose to report your concerns under an external whistleblower scheme, you will receive an acknowledgement of receipt within seven days, unless you have expressly requested otherwise, or there is reasonable ground to believe that such acknowledgement of receipt will jeopardize the protection of your identity. The public authority must provide feedback on your report within a reasonable time and no later than three months after the date of acknowledgement of receipt or within six months in duly justified cases. You will be informed of the outcome of the investigations if you have not already received this information in connection with the feedback.

3. Choice of reporting channel

You are free to choose whether to report your concerns under Adform's internal Whistleblower Scheme or under any relevant external whistleblower scheme or under both. However, we advise you to use Adform's internal Whistleblower Scheme if the breach can be effectively addressed internally and if you consider the risk of retaliation to be non-existent.

XI. Protection of Personal Data

Collection and processing of personal data submitted via the Whistleblower Scheme will be conducted in compliance with applicable data protection laws. All information will be handled pursuant to EQS Group A/S' (Got Ethics) applicable privacy terms (as can be accessed via the platform). This means, among others, that the individual reporting as well as the reported individual may request information about the following:

- If a report has been submitted regarding the individual in question;
- Which individuals at Adform have or can have access to the data submitted, and whether the information will be disclosed to third parties;
- The purpose(s) of the processing the data as well as the legal basis for the processing;
- The categories of personal data concerned;
- The period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
- The individual's right to rectification or erasure of the filed data or restriction of processing concerning the data and to object to processing as well as the right to data portability; and
- The right to lodge a complaint with a supervisory authority.

The identity of the individual reporting will as a clear starting point not be disclosed under the Whistleblower Scheme to the reported individual or any other third party, if Adform is informed of the identity of the individual in question. However, it cannot be excluded that such information might, under specific and special circumstances, be necessary for the investigation and thus, disclosure may very exceptionally take place to the extent it is deemed absolutely necessary and such disclosure is carried out pursuant to applicable legislation.

The reported individual will be notified when a report is received, and an investigation is initiated, unless specific exemptions apply. Please refer to the above regarding the exemption.

Any individual may object to processing of his/her personal data and if such objection is justified and reasonable under the circumstances, no further processing will take place.

Personal data collected via the Whistleblower Scheme will be deleted if the reported conduct is out of scope or obviously unfounded. Deletion will otherwise take place when the data serves no purpose for the investigation or the investigation has been finalized or if it is deemed not necessary to store the personal data for documentation purposes pursuant to the Whistleblower Directive and/or the Danish Whistleblower Act. If authorities have been notified, the data will be deleted after the case is no longer investigated by the authorities, unless it is deemed necessary to store the personal data for a specific period hereafter for documentation purposes.

If disciplinary sanctions have been imposed based on data collected or there are other justifiable and reasonable grounds to retain specific personal data, such may be retained in the file of the employee in question.

In addition, the individual reporting as well as the reported individual has the following rights:

- The right to rectification;
- The right to erasure; and
- The right to restriction of processing.

XII. Policy Review and Questions

This Policy will be reviewed annually by the Audit Committee and any amendments to the Policy will be adopted by the Board.

Any questions regarding this Policy or the Whistleblower Scheme may be directed to the SVP, General Counsel on phone +4553602393, email anders.pilgaard.andersen@adform.com.