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Whistleblowing Policy and Procedures

Green Shift Group has developed this Whistleblowing Policy to demonstrate its commitment to open and accountable management. This policy is designed to allow staff to disclose information that they believe shows malpractice, unethical conduct, or illegal workplace practices without being penalized. This includes protecting staff from any detriment or discrimination if they do report (i.e., blow the whistle on) improper or illegal conduct within the organization. The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, staff should not find it necessary to alert anyone externally. However, the law recognizes that in some circumstances, it may be appropriate for staff to report their concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage any staff member to seek advice before reporting a concern to anyone externally.

Green Shift Group is committed to maintaining an open culture with the highest standards of honesty and accountability. Staff can report any legitimate concerns in confidence as soon as possible in every area of its operation.

This policy applies equally to all Green Shift Group employees, officers, consultants, contractors, volunteers, casual workers, and agency workers, regardless of seniority or length of service. This policy is not part of any employee's employment contract, and we may amend it anytime.

Scope and definitions

This Whistleblowing Policy is intended to allow concerns related to suspected wrongdoing or danger at work to be reported if they are reasonably believed to be in public interest. These concerns may be investigated separately but might then lead to the investigation of other Green Shift Group policies and procedures.

Examples of such concerns (which are not exhaustive) might include:

- A criminal offense
- The breach of a legal obligation or regulatory requirement
- A miscarriage of justice
- A danger to the health and safety of any individual
- Damage to the environment
- Bribery or financial fraud
- Unethical conduct
- Deliberate attempt to conceal any of the above

If a staff member fails to notify Green Shift Group when certain of an occurrence is included in, but not limited to, the list of categories of disclosures stated in section page 1, it may be regarded by Green Shift Group as misconduct.

It may be more appropriate for a particular concern to be raised by way of another policy or procedure (for example Green Shift Group Anti-Fraud and Corruption Policy) and not under this Whistleblowing Policy. In particular, this policy should not be used for complaints relating to a

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member of staff’s personal circumstances, such as the way they have been treated at work. If any staff member has any concerns about which policy the disclosure should be made under, they should check with their HR Business Partner.

Definitions

Whistleblowing is when a member of staff raises a concern relating to any of the matters stated on page 1 Officially this is called ‘making a disclosure in the public interest’.

Protected Disclosure is a disclosure of information that the staff member reasonably believes tends to show malpractice. As a member of staff, you are protected from suffering any detriment because of your ‘disclosure’.

The Whistleblowing Policy is designed to enable employees to report inappropriate behavior that is not specifically directed at them personally.

The Anti-Fraud and Corruption Policy specifically concerns intentional acts of dishonesty and deception. If an issue reported under the Whistleblowing Policy is deemed fraud, it will also be forwarded to the individuals named under the Anti-Fraud and Corruption Policy.

Confidentiality is an express term in the employment contract, stating that an employee or staff member will not disclose confidential information that concerns Green Shift Group. However, where a member of staff discovers information that they believe shows malpractice, unethical conduct, or illegal practices within Green Shift Group, then the option to disclose the information independently of line management and without fear of reprisal for breach of confidentiality is made available under this Whistleblowing Policy.

Principles

This policy offers guidance and protection to staff who disclose whistleblowing concerns. Green Shift Group aims that the well-being of any member of staff should not be harmed because of that protected disclosure, whether the item reported proves to be true or not, provided the reporting was carried out in good faith.

Subjecting any member of staff to a detriment because of a protected disclosure, including a member of staff who has been investigated as part of the disclosure, may be regarded as gross misconduct which will result in disciplinary action. A detriment includes dismissal, disciplinary action, threats, or other unfavorable treatment.

Green Shift Group undertakes to protect any staff member from any personal claims and from any detriment, victimization, harassment, or bullying because of their disclosure.

Green Shift Group complies with all applicable laws relating to the prohibition of retaliation against good-faith whistleblowers who raise issues of concern.

This policy is not designed to support a member of staff who wishes to question financial or business decisions that have been taken by Green Shift Group, nor should it be used to seek reconsideration of matters which have already been addressed under other Green Shift Group policies.

In most cases, whistleblowing claims need to be made promptly and at the latest within the three-month period following the date of the act complained of. Limited exceptions may apply only to particular circumstances.

Confidentiality of concerns raised

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We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, Green Shift Group will treat all disclosures confidentially and sensitively. As part of this, the identity of any staff member making an allegation may be kept confidential so long as it does not hinder any investigation. However, the individual disclosing may need to provide a statement as part of the evidence-gathering process. Their identity may be revealed or implied as part of the investigation process.

The staff member may be needed as a witness if a criminal investigation follows. If this occurs, the HR Business Partner will notify the staff members immediately.

Anonymous disclosures

This policy encourages staff to put their name on any disclosure they make. Concerns expressed anonymously are less powerful and may be less easy to investigate; however, they will be considered and reviewed at Green Shift Group’s discretion.

In exercising this discretion, the factors considered will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Staff who are concerned about possible reprisals, if their identity is revealed, should come forward to an HR Business Partner or one of the other contact points listed in this policy, and appropriate measures can then be taken to preserve confidentiality.

Untrue allegations

If a staff member makes a genuine allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against them. If they make malicious or vexatious allegations, particularly if they persist in making them, then disciplinary action may be taken against the individual concerned.

Procedures for making a disclosure

For locations outside Denmark, any local employment law requirements related to whistleblowing, in addition to this policy and procedure, should also be applied. If in doubt, seek advice from your HR Business Partner.

If a staff member believes that a matter or practice within the scope of this policy is or has been taking place, they should disclose it immediately to their line manager. If the matter or practice is more serious and/or concerns the line manager, it should be reported to their HR Business Partner. Staff may also report their concerns confidentially to mgmt@greenshiftgroup.dk, which will be received by the group CEO and managing partner.

There is no specific method that staff should use to make a disclosure; they can use email, telephone, or post, for example. Any reasonable personal expenses incurred in the disclosure can be claimed as reimbursable business expenses.

Exceptionally, if the staff member believes it is inappropriate to report the concern to the HR team, they may report it to the Chief Executive Officer.

An investigation will then take place into the alleged matter or practice. This may involve meeting with the staff members to discuss their concerns. When disclosing any concerns, the staff member

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would not be expected to have absolute proof of malpractice or illegal practices but would need to show sound reasons for their concerns.

Once a protected disclosure has been received, it will be referred to the HR Business Partner, who will report it to the relevant senior management team member as appropriate, giving details of the protected disclosure, including:

- Date and substance of the protected disclosure
- Identity and level of seniority of the alleged wrongdoer(s)
- Level of risk associated with the alleged wrongdoing.

The HR Business Partner and CEO will decide whether sufficient information exists to allow the allegation(s) to be investigated and, if so, the appropriate process to determine:

- The nature and scope of the investigation
- Who will lead the investigation (that person may be external to Green Shift Group)
- The nature of any technical, financial, or legal advice that may be required
- A timeframe for the investigation (paying regard to the level of risk)
- Whether any individual(s) under investigation should be suspended.

They will also consider the appropriate time to inform any alleged wrongdoer(s) of the investigation process. We will also aim to keep the members of staff who raised the concern informed of the progress of any investigation and its likely timescale. However, sometimes the need for confidentiality may prevent Green Shift Group from giving specific details of the investigation or any disciplinary action taken as a result. Staff should treat any information about the investigation as confidential.

Possible outcomes

Possible outcomes of the investigation may include:

- No further action
- Disciplinary action
- Further investigation by an external authority.

Note that the CEO and the HR Business Partner would review cases relating to suspected criminal activity, including but not limited to fraud, to decide whether they should be referred to the police or other relevant bodies.

While we cannot always guarantee the outcome any whistleblower is seeking, we will try to deal with their concerns fairly and appropriately. However, if the discloser is unhappy about an investigation's outcome, they should report further to the HR Business Partner outlining their concerns. If there is good reason to do so, particularly if there is new evidence, the concern will be investigated again.

Whom to Contact

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