

## **Policy for Royal Greenland's whistleblower scheme**

### **Purpose of the whistleblower scheme**

Royal Greenland offers all employees in the Group a whistleblower scheme as a security measure that supports and promotes our values and policies.

The purpose of the scheme is to ensure a high level of protection for persons reporting serious violations of legislation, standards and code of conduct. As a responsible company, we have a culture where everyone can feel secure and express themselves if you experience potential breaches of the above.

Employees are generally encouraged to use the ordinary reporting channels by approaching their immediate superior with a suspicion of violation of the following conditions. The whistleblower scheme is an alternative to the ordinary reporting channels. Please note that reporting via other channels, including reporting to third parties, may be a breach of the duty of loyalty to Royal Greenland.

### **Topics within the scheme**

The scheme guarantees employees secure access to reporting.

Reports can be made in the following areas:

- Economic crime, including bribery, fraud, forgery, corruption, etc.
- Irregularities in connection with audits and internal audits
- Environmental pollution
- Infringement of food safety regulations
- Serious infringement of psychosocial and physical safe working environment regulations, as well as discrimination
- Violation of human rights and labour rights, including child labour, forced labour and freedom of association.

If other issues are reported, for example concerning cooperation, bullying, absence or similar, these reports will be rejected under this scheme and instead will be considered by the immediate manager. Exceptions to this rule are serious cases concerning immediate superiors within the framework of the above points.

Persons who can be subject to reporting under the scheme are employees, board members and suppliers.

### **Reporting**

The scheme is available to employees and board members of the 100% owned companies under Royal Greenland A/S in Greenland and other countries in which we operate.

Reports can be made anonymously or with an open identity. Openness is recommended, as this provides the best-case handling. All reports will be treated confidentially.

Reports can be made verbally or in writing via an online portal or directly at the meetings of the external lawyers. Contact information for the external lawyers can be found via the online portal.

### **Case officers**

Royal Greenland's scheme is managed by an external legal office in Greenland. The scheme is available in Greenlandic, Danish and English. If an incident is within the framework of this scheme, it will be

forwarded to Royal Greenland's contact persons, who on behalf of the Board of Directors are authorised by the Executive Board, to be responsible for the internal obligations.

The contact persons must take the necessary measures to ensure that all investigations are justified, appropriate and impartial. The contact persons therefore have unlimited access to all information that may be considered relevant in relation to a specific report. If required, the lawyers will be involved in the actual investigation.

### **Treatment of an adverse event**

Within one working day of receipt of a report, the incident is evaluated. As far as possible, the lawyer must within the same time limit give his/her recommendation on handling the case to the contact persons, who within a few days decide whether the case should be examined further and to what extent the lawyers should participate in the continued work.

The person or persons involved in the case will be informed of a given report if it is within the framework of the scheme. However, notification may be postponed or omitted if deemed necessary as a consequence of special circumstances.

When a report is sent, a secure mailbox is created with a password that is received on the website immediately after notification. With this password, you can log in to the mailbox and see the status of the notification and its subsequent process. All communication takes place solely via the mailbox and based on the information provided.

When a final assessment is available, the Executive Board will be informed.

### **Confidentiality and IT security**

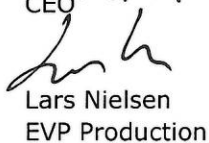
The applicable data protection legislation will be complied with at all times in connection with case processing. Royal Greenland has ensured that appropriate data security measures are used when the contact persons, the Lawyer and other parties involved (both internal and external) process personal data. The data security measures ensure, as far as possible, against accidental, unlawful and unlawful processing and loss, deletion or unauthorised use of personal data.

Investigational actions are carried out with complete discretion and confidentiality, which means that information concerning a report will only be available to the lawyer, the cContacts and any other persons relevant to the investigation, unless the information is required to be disclosed in accordance with legislation.

Further information can be obtained from contact persons.

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