

1. Purpose of the whistleblower scheme

The whistleblower scheme at PR electronics A/S and its subsidiaries (hereafter collectively referred to as "PR electronics") aims to ensure a safe environment for customers, suppliers, employees, and others with relation to PR electronics to express themselves about seriously inappropriate conduct and actions in PR electronics without fear of negative consequences.

The aim of the whistleblower scheme is to facilitate detection and prevention of inappropriate conduct and actions as far as possible.

The whistleblower scheme is a supplement to the direct and daily communication and interaction at the workplace.

Reports to the whistleblower scheme are made electronically via a web portal, Safe2Whistle, which can be accessed from the internet.

2. Who can make a report?

All employees, and others associated with PR electronics, including customers and suppliers, members of PR electronics' management and board, may use the whistleblower scheme.

3. What can be reported?

The whistleblowing system is solely for the reporting of serious violations subject to the Danish Whistleblower Protection Act. Thus, you may file a report to the PR electronics' whistleblowing system regarding:

- Violations of specific areas of the EU law
- Serious offences and other serious matters

In regard to violations of specific areas of the EU law, you may e.g., file a report regarding:

- Violations regarding EU law concerning food and feed safety, protection of the environment as well as product safety and compliance. For the remaining areas of relevant EU law, reference is made to article 2 of the EU Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.

By other serious offences and other serious matters, reports may e.g., concern:

- Criminal offenses, e.g. misuse of financial means, theft, fraud, embezzlement, bribery etc.
- Serious or repeated violations of the law
- Serious or repeated violations of significant internal guidelines, e.g. in relation to business trips, gifts, financial reporting etc.
- Serious person related conflicts in the workplace, e.g. in form of sexual harassment or other serious harassments.

The whistleblower scheme is not to be applied to in relation to dissatisfaction with salary level, minor offenses such as violations of guidelines for smoking and alcohol and less serious personal conflicts and disagreements.

4. This is how you report

If you make a report, the following information will usually be useful in the further investigation of the case:

- Description of the relationship including the date, place, and name(s) of the person(s) involved.
- Any documents or evidence relating to the violation or other information that may facilitate an investigation of the case.

You can choose to submit the report in your own name or anonymously.

If you choose to be anonymous it is important that you do not write your name anywhere in the report. You should be aware that it cannot be ruled out that your identity may be referred from the information you have provided in the report.

PR electronics may be obliged to make the report available to persons affected by it or by the measures that this may cause.

5. How we handle the case

As mentioned above all reports to the whistleblower scheme are to be made electronically via a web portal. Safe2Whistle, which can be accessed from the internet.

The law firm Bech-Bruun, Gdanskgade 18, 2150 Copenhagen, will receive the reports and they administrate the schemes as a data processor. The purpose of the external anchoring is to ensure impartiality and objectivity in the processing of the reports.

As external administrator of the scheme, Bech Bruun will sort out the reports that do not fall within the purpose of the scheme, cf section 3. Instead, these must be processed via the ordinary communication channels.

Reports that fall within the scheme are forwarded to the internal administrator at PR electronics, Payroll & HR Admin Manager, who processes and examines the reports. Bech-Bruun is briefed on 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 the internal administrator of PR electronics will be processed by Bech-Bruun in collaboration with the registered management. Reports concerning the registered executive board or board members will be processed by Bech-Bruun in collaboration with the chairman of the board.

Reports relating to the chairman of the board will be processed by Bech-Bruun in collaboration with two members of the board who are not incompetent in the matter in question. If the chairman of the board is a partner of Bech-Bruun, Bech-Bruun, in collaboration with two members of the board who are not incompetent, decides how and by whom the report is processed. In this way it is ensured that the treatment of the report is carried out by persons who are not incompetent.

You will be notified when your report is received in the whistleblower scheme and when the case is closed, unless you have chosen not to follow the case. You will not receive information about the outcome of the case.

6. **Protection of the person making the report (the whistleblower)**

PR electronics does not tolerate harassment or revenge action or other forms of sanctions against persons who in good faith report a case on the whistleblower scheme.

False or misleading information must not knowingly be provided through the whistleblower scheme. Reports made in bad faith may, depending on the circumstances, have negative employment law consequences for the person who made the report. Reference is also made to the Danish Whistleblower Act (1436 of 29/06/2021, with any subsequent amendments).

7. **Duty of confidentiality**

Bech-Bruun is together with PR electronics whistleblower unit subject to a special duty of confidentiality. Further, any person who is involved in the investigations of a report will be subject to the same special duty of confidentiality in regard to any information that has or is subject of the investigation of the report received through the whistleblowing system.

8. **Notice to the reported person and to other persons**

If information about you is reported in the whistleblower portal, and the report falls within PR electronics whistleblower system, you will as a general rule, not receive any information about the processing of your personal data.

If, on the other hand, the report does not fall within PR electronics whistleblower system, you will be informed of the processing of your personal data in accordance with the rules of the Data Protection Regulation and the Danish Data Protection Act.

9. **Data Protection**

The processing of personal data in connection with a report received in the whistleblowing system will be on the basis of section 22 of the Danish Whistleblower Protection Act, according to which processing of personal data subject to articles 6, 9 and 10 of the General Data Protection Regulation may take place if the processing of the personal data is necessary to investigate a report received in the whistleblowing system established in accordance with the Danish Whistleblower Protection Act.

The General Data Protection Regulation and the Danish Data Protection Act will apply to any further processing of personal data in the whistleblower system.

PR electronics A/S, Lerbakken 10, 8410 Rønde, CVR-no. 73438411 is the data controller for the whistleblower scheme.

Please contact lawyer Lise Lauridsen on +45 7227 3635 if you have any questions to the whistleblower scheme.

If you wish to complain about the processing of personal data, you will have to contact the Danish Data Protection Agency, Borgergade 28, 5., 1300 Copenhagen, dt@datatilsynet.dk.

If you do not feel comfortable using PR electronics' whistleblower scheme, or for other reasons prefer to use an external whistleblower scheme, you have the option to use the Danish Data Protection Agency's external whistleblower scheme, where it is possible to make written and oral reports. The Danish Data Protection Agency's whistleblower scheme can be accessed via the Danish Data Protection Agency's website.