



## Policy on the Continia Software Whistleblower Scheme

### 1. Background and purpose

1.1 The board of directors of Continia Software A/S (the "**Company**") has adopted this policy on the Continia Software Whistleblower Scheme (the "**Policy**") in accordance with the Danish Whistleblower act and the act on Measures to Prevent Money Laundering and Financing of Terrorism art. 35-36.

1.2 This Policy describes the overall whistleblower principles of the Company.

1.3 The Company practices a high level of ethical standard in business and personal conduct. The entire management, all employees, and representatives of the Company must practice integrity in fulfilling responsibilities and comply with high moral standards and all applicable laws and company policies.

1.4 The Company has adopted this whistleblowing Policy to ensure access to anonymous and safe reporting of any potential violation.

The Company is committed to maintaining a culture of integrity, transparency, and accountability. This whistleblower Policy is designed to provide a mechanism for employees and stakeholders to report any concerns or suspicions of illegal, unethical, or fraudulent activities within the Company or any of the subsidiaries or projects which the Company, at any time, is a part of.

1.5 The whistleblower Policy includes the information and guidelines on the Continia Software Whistleblower Scheme, describing the whistleblower protection, the Whistleblower Committee, and the process for both internal and external whistleblowing.

### 2. Policy scope and strategic goal

The Policy applies to the Company's management, employees and representatives of the Company and it is mandatory to comply with this Policy.

The strategic goal of the Policy is to determine the overall principles for the protection of whistleblowers in the Company. These principles are implemented in operational procedures, guidelines and all relevant information on the Whistleblower platform.

### 3. Whistleblower risk identification

The risks associated with whistleblowing can be, but are not limited to, situations such as:



- Relevant incidents may not be reported to the management.
- A whistleblower may experience retaliation, inappropriate exposure or consequence based on reporting on relevant incidents.
- The whistleblower may not report on relevant incidents out of fear of retaliation.
- The whistleblower may report in bad faith.

#### **4. Risk management related to the Whistleblower Scheme**

- 4.1 The Company will not tolerate any violations of regulation or of the Company's policies and underlying business procedures.
- 4.2 The Whistleblower Scheme applies to every person in or interacting with the Company. That includes, but is not limited to employees, managers, board members, investors, contractors, vendors, or other people interacting with the Company.
- 4.3 The Company strictly prohibits retaliation against individuals who make reports in good faith.
- 4.4 The protection of whistleblowers against retaliation in the whistleblower scheme covers employees, intermediaries, third parties connected to the whistleblower and companies or authorities that the whistleblower owns, work for or is otherwise professionally connected to (hereafter collectively referred to as "**employee**").

#### **5. Protection of the whistleblower**

- 5.1 The Company shall not retaliate against any individual who reports an incident relevant for whistleblower reporting ("**Relevant Incidents**"). Any such retaliation or inappropriate exposure or consequence shall be considered a violation of the Policy and the Company's Code of Conduct.
- 5.2 The whistleblower scheme ensures the whistleblowers right to report anonymously. The anonymity of the whistleblower is ensured by the digital whistleblower solution the Company has implemented.
- 5.3 Any personal data of any individual involved will be treated confidentially in accordance with the personal data and employment legislation applicable.

#### **6. Roles and responsibilities**

- 6.1 The Company has established a Whistleblower Committee to handle whistleblower reports.
- 6.2 The Whistleblower Committees members responsibilities and procedures are described in the Continia Software Whistleblower Scheme, which ensures fair and effective handling of all whistleblower reports in accordance with the Policy.



- 6.3 Upon receipt of a whistleblower report, the whistleblower committee will promptly investigate the allegations in a fair, objective, and confidential manner.
- 6.4 The Company will maintain records of all whistleblower reports and related investigations in a secure and confidential manner, in compliance with applicable data protection regulations. The retention period will be determined based on legal requirements and the nature of the reported concerns.
- 6.5 The Whistleblower Committee will provide a written acknowledgement to the whistleblower as specified in the relevant guideline in the Whistleblower scheme within the specified timeframe, outlining the steps taken and the expected timeline for the investigation.
- 6.6 Upon completion of the investigation, the Whistleblower Committee will communicate the findings to the whistleblower, to the extent permitted by law, while respecting the rights of all parties involved.

## **7. Responsibilities of the CEO and the employees**

- 7.1 The Company's CEO has the overall responsibility for the whistleblower scheme and is supported by the Whistleblower Committee.
- 7.2 All board members and employees of the Company must report any concerns or suspicions of illegal, unethical, or fraudulent activities within the Company in accordance with the active guidelines, Code of conduct and regulations relevant to the Continia Software Whistleblower Scheme.
- 7.3 All management members and employees of the Company must comply with the Policy as well as underlying guidelines and standard operating procedures.

## **8. Reporting and sanctions**

- 8.1 All the Company's employees, regardless of their job description and function, must report situations that involve or could potentially involve any violations of regulation or of the Company's framework of policies, guidelines and operating procedures.
- 8.2 The Company will not subject the whistleblower to any unfavorable treatment or unfavorable consequences as a result of the reporting.
- 8.3 The Company considers any breach of the Policy or of any procedures and measures established based on the Policy, including applicable guidelines, a serious matter. Such breach will result in a warning, and serious or repeated breaches may result in dismissal or summary dismissal.
- 8.4 The Whistleblower Committee will report on whistleblower reports received to the management and the board of directors.



## 9. Review and update

- 9.1 Any amendments or addendums to the Policy must be adopted by the board of directors.
- 9.2 The committee will be responsible for preparing draft amendments or addendums to the Policy. Should the Policy no longer be appropriate or should laws, or rules promulgated thereunder, so require.
- 9.3 The Policy must be reviewed at least once a year.

## 10. Document history

Version	Changes	Responsible for changes	Document approved by	Date of approval
Version 1	New policy	Committee	Bord of directors	01.12.2023