

# Whistleblower guidelines V 1.1

## Who can submit a report?

The Whistleblower Scheme applies to every person in or interacting with the Company. That includes but is not limited to employees (current and former), managers, board members, investors, contractors, vendors, or other individuals interacting with the Company. The Whistleblowers' rights are strongly protected by law concerning protection and confidentiality (refer to sections 5 and 7 of the Policy on Whistleblower Scheme, v.1.1 for further details)

### What can be reported?

At Continia Software, we aim to foster respectful communication.

Whenever possible, concerns should be addressed directly with the immediate manager or management team member without fear of retaliation, harassment, or discrimination.

However, the standard communication channels might not be adequate in certain situations. In such cases, Continia Software Whistleblower reporting system provides a safe and anonymous avenue to report concerns about unlawful or unethical conduct related to Continia Software and should not be used for false accusations or knowingly reporting untrue information.

For example,

- breaches of certain types of EU-law
  - prevention of money laundering and terrorist financing,
  - o product safety and compliance,
  - protection of the environment,
  - o public health,
  - o consumer protection,
  - protection of privacy and personal data, and
  - security of network and information systems.
- serious breaches of the law and other serious offences
  - criminal acts such as breaches of non-disclosure obligations, abuse of funds, theft, fraudulent misrepresentation, embezzlement, fraud, and bribery,
  - serious or repeated infringements of the law, including legislation on the use of force, the Danish Public Administration Act, the Danish Act on Access to Public Records and legislation intended to protect public health, provide safety in the transport sector, or protect the nature and the environment, etc.,
  - o sexual harassment in the workplace,
  - serious person-related conflicts in the workplace, for instance serious harassment on grounds of race, political affiliation, religious belief, etc., and
  - serious violations of occupational safety rules.



#### When you have submitted a report to Continia Software's Whistleblower Scheme:

As a standard procedure, you can expect to receive confirmation of the receipt of your report from Continia Software within **7 days** of submission. Typically, feedback regarding the status and outcome of your report will be provided no later than **3 months** after the initial confirmation. This feedback may encompass details about the actions taken or planned to address your report. However, in certain cases where a thorough and extensive investigation is necessary due to the specific nature of the case, the feedback period may be extended for up to **6 months**. Should such an extension be required, you will be duly informed within **3 months** from the date the whistleblower committee received your report. If your report addresses matters outside the scope of the Whistleblower regulations, the committee will provide detailed documentation of the reported issue as soon as possible, following the same timeline mentioned above.

Continia Software's Whistleblower Scheme can be found here: Continia Whistleblower Scheme.

In your employment you can also encounter matters that do not involve Continia Software, but you still feel that the matter should be addressed. In such a case feel free to contact our internal Whistleblower Committee, that will assist you in bringing the matter to the attention of the appropriate authorities or you can investigate the different national and international whistleblower Schemes (list not exhaustive)

EU sanction tool

EU competition Whistleblower Tool

EU Reporting system

<u>Den Nationale Whistleblowerordning</u> (Danmark), Through the National Whistleblower Scheme, you can report various serious offences and other serious matters (not only GDPR and data protection cases) that you have become aware of through your work,.

Other Danish whistleblower schemes can be found here.

Contact Legal: <u>legal@continia.com</u> and remember we offer full confidentiality regarding any inquiries.

### Link to the Danish Whistleblower Law and EU Whistleblower directive:

Danish Whistleblower law

EU Whistleblower directive