

Orifarm Group Whistleblower Policy

When being employed in Orifarm Group, it is important to conduct our business with integrity, responsibility and honesty. The Orifarm Group has zero tolerance towards discrimination, harassment, crime, corruption and breaches of environmental law and all employees must conduct themselves with good business ethics.

The Orifarm Group whistleblower scheme is for all Orifarm Group's employees to report misconduct or actions that are in violation of the law or a serious breach of Orifarm Group policies or guidelines.

Who can report and where?

All employees and members of Orifarm Group Board of Directors can report to the whistleblower scheme and become subject to investigations. The scheme can be accessed via a link on the Orifarm Group intranet [[Whistleblower](#)].

Examples of reporting

The whistleblower scheme should only be used in case of reasonable suspicion of serious and reprehensible circumstances or illegalities. Reasonable suspicions about serious circumstances as listed below can be reported in the scheme:

- Financial fraud
- Bribe, corruption, fraud, forgery or distortion of competition
- Violation of work environment and work safety or security regulations
- Violation of environmental regulations or major pollution of the environment
- Physical violence, discrimination, harassment and sexual offences
- Breaches to personal data and GDPR
- Serious breaches of Orifarm Group policies and guidelines

Examples of cases not relevant for the whistleblower scheme are i.e. conflicts between employee and manager, cooperation difficulties, dissatisfaction about salary or other HR-related personnel issues. In accordance with Orifarm Group practices these should be solved through e.g. dialogue between employees and managers or involving trade union representatives and colleague network.

How to report

If you file a report, the information listed below will generally be useful in connection with further investigation of the issue:

- Name and contact details of the person filing the report, unless you wish to report anonymously.
- Description of the issue in question, including date, place and the name(s) of the person(s) involved
- Whether the issue is likely to be repeated and, in the affirmative, a description of where and when



- Whether other persons inside or outside the Company have knowledge of the issue or are expected to have knowledge of the issue
- Any documentation or evidence concerning the violation or other information which may support the investigation

We understand that you may not wish to identify yourself and if this is the case, we would appreciate receiving your report anonymously. It is possible to be anonymous in the whistleblower portal and we can communicate with you in the whistleblower portal even though you are anonymous. However, you should be aware that anonymity may complicate the investigation. Furthermore, you should be aware that even though you do not state your name, address, etc., it is not guaranteed that the person who is investigating the report will not be able to determine your identity from the facts that you provide in your report.

How the report is treated

All reports will be treated seriously and appropriately and provide reassurance that any person, who reports in good faith will be protected from retaliation or the like.

An international law firm Bech-Brun is managing the whistleblower scheme and they ensure that the reports are handled correctly. The sender will be notified and receives an acknowledge receipt of the reported violation or suspected violation within 7 days.

After the preliminary assessment of whether the reports fall within the scope of the whistleblower scheme, the reports are forwarded to an internal administrator at Orifarm Group who is subject to special duty of confidentiality.

The reports will be evaluated, investigated and resolved by the Orifarm Group Ethics Committee, currently Erik Sandberg, CEO and Birgitte Ladefoged, CHRO. If necessary, the report will be directed at the Orifarm Group Board of Directors.

Reports concerning members of Orifarm Group Board of Directors, the Group Ethics Committee, or the internal administrator are processed in cooperation with the Deputy Chairman of the Orifarm Group Board of Directors. Reports concerning the Deputy Chairman are to be investigated by Chairman of Orifarm Group Board of Directors potentially assisted by an external consultancy.



In the investigation, it may be necessary to contact persons in or outside Orifarm Group. Any contact is confidential, and the persons involved are prohibited from disclosing such information unless required by legislation.

When a case is closed, the parties involved will be informed and the personal data in the web portal will be deleted. If the result of the investigation requires it, information can be



passed on to other departments for further processing, such as disciplinary sanctions or reporting to the police.

When the case is closed you will be informed in the portal. However, you should be aware that you do not necessarily receive information about details or the outcome of the case.

Protection of the person making the report (the whistleblower)

Orifarm Group does not tolerate harassment, retaliation or other forms of sanctions against persons who report in good faith a case in the whistleblower scheme.

If a reporting is made in bad faith via the whistleblower scheme, e.g. for the purpose of harassing or harming other employees or members of the Orifarm Group Board of Directors, the consequences may be met with employment law sanctions. The same applies to the reporting of false, incomplete or incorrect information unless the reporting was made in good faith (except in cases when the notifier is not aware that it is incorrect information).

Notification of the person to whom the report relates and of other persons

Persons, who are reported in the whistleblower scheme, will be notified in accordance with the rules of the Data Protection Regulation and the Data Protection Act.

Personal data

The Data Protection Regulation and the Data Protection Act apply to the processing of personal data in relation to the whistleblower scheme.

Orifarm Group A/S, located at Energivej 15, POB 69, 5260 Odense S, is the data controller of the whistleblowing system. For more information on the processing of personal data, see [Orifarm Group GDPR policy](#)

Please contact Kim Jensen if you have any questions about the whistleblower scheme.