



**SonFlow**

# Whistleblower Scheme



**The whistleblower scheme ensures that you can safely report if you have knowledge or suspicion that something illegal is taking place in SonFlow or in relation to SonFlow's activities.**

The Whistleblower Act protects you as a reporter, ensuring your report is fully confidential and accessible only to a limited number of people. As a whistleblower, you are legally protected against retaliation, such as dismissal or other negative consequences, provided your report is made in good faith. This means you cannot intentionally cast suspicion on innocent people.

*For more information about the law, you can read it in full at [retsinformation.dk](http://retsinformation.dk).*

## What Can You Report?

You can report significant violations of Danish or EU rules within three main categories:

### Category 1 - Violation of Danish and EU Rules:

- Public procurement
- Product safety and compliance
- Environmental protection
- Animal welfare and public health

- Consumer protection
- Privacy and personal data protection
- Competition law and state aid

*There is no de minimis threshold for these matters; therefore, any offense can be reported.*

### Category 2 - Other Serious Offences:

- Misuse of financial resources (e.g., embezzlement, bribery, corruption, theft, fraud, and forgery)
- Breach of confidentiality obligations
- Significant breaches of labor safety
- Significant breaches of environmental regulations and pollution

*These are criminal offences that it is in the public interest to uncover.*

### Category 3 - Other Serious Offences:

- Sexual offences
- Serious personal conflicts in the workplace
- Physical violence
- Serious harassment based on race, sexuality, political or religious affiliation, discrimination, etc.



## What You Cannot Report

You cannot use the whistleblowing scheme to complain about salary, general cooperation difficulties, or violations of internal guidelines. These issues should instead be addressed with your manager.

## How to Report a Case

To make a report via the whistleblower scheme, visit [sonflow.eu](http://sonflow.eu) and click on "About SonFlow" > "For employees". Click on the Whistleblower Scheme and you will be redirected to an encrypted website where you can confidentially submit your report via a secure postbox. This postbox is monitored by our external partner, Deloitte Legal.

While anonymous reporting is possible, we encourage you to provide your name to facilitate communication and case processing.

Upon submitting the report, you will be assigned a case number and asked to choose a password. This information is necessary to log in and follow the case, so be sure to save both the case number and password.

We recommend making the report at a time and place where others cannot observe you, to maintain complete confidentiality.

## What Happens After Reporting?

Your report is initially reviewed by Deloitte Legal to ensure it falls under the categories of the Whistleblower Act. If it does not, the case will be rejected and deleted from the system. You will be notified and can choose to pursue the matter through other channels, such as your manager or management.

If the report is accepted, it will be forwarded to SonFlow's internal whistleblowing unit, which will initiate an investigation.

You will receive a confirmation within seven days, and feedback will be provided in the secure postbox no later than three months after the confirmation.

The whistleblowing unit at SonFlow consists of the CFO, Anders Rosendahl Poulsen, or Tine Skov if the report concerns Anders Rosendahl Poulsen. External parties, such as legal or auditing assistance, may be involved as needed.

If the investigation reveals real offenses within SonFlow or related to SonFlow's activities, sanctions or dismissals may be imposed, and serious cases may be handed over to the police.

When the case is closed, it will be deleted from the system unless it is deemed relevant to retain the information for future use.

## Do You Have Any Questions?

The whistleblower policy can be found on the whistleblower portal, where you can also report a case.

All questions about the whistleblower program can be directed to Anders Rosendahl Poulsen at +45 20 16 86 48 or via email at [arp@sonflow.dk](mailto:arp@sonflow.dk).