



Whistleblower Policy

Kopenhagen Fur



Whistleblower Policy

1 Purpose

- 1.1 Kopenhagen Fur has established a whistleblower scheme in order to allow reporting of potential violations of laws and serious infringements of policies or internal rules. This policy governs the use and operation of the whistleblower scheme (the “Whistleblower Policy”).
- 1.2 This whistleblower scheme is not intended to replace, limit or supersede the existing internal communication paths of Kopenhagen Fur and serve simply as an alternative to the ordinary reporting of irregularities to partners, management or board of directors.
- 1.3 For the avoidance of doubt reporting under the Whistleblower Policy is voluntary can be done on an anonymous basis.

2 Types of concerns that may be reported

- 2.1 The types of concerns that may be raised under the Whistleblower Policy are serious and sensitive concerns that could have an adverse impact on the operations and performance of Kopenhagen Fur’s business. Such concerns include, without limitation, concerns regarding:
 - (a) money laundering or other violations of the Danish Act on Money Laundering;
 - (b) bribery or corruption;
 - (c) fraud (e.g. financial fraud, document fraud or embezzlement);
 - (d) breach of antitrust regulations (e.g. price fixing); or
 - (e) other irregularities of a general or operational nature, such as serious endangerments concerning the vital interests of Kopenhagen Fur or the life or health of individuals, environmental crimes, major deficiencies as regards security in the workplace and serious forms of discrimination or harassment.

3 Who can report?

- 3.1 Partners to Kopenhagen Fur, customers of Kopenhagen Fur, farmers associated with Kopenhagen Fur and employees of Kopenhagen Fur can report concerns under the Whistleblower Policy.

4 About whom can the reports be made?

- 4.1 It is the intention that reporting can be made about concerns, see clause 2, made by partners to Kopenhagen Fur, customers of Kopenhagen Fur, farmers associated with Kopenhagen Fur and employees of Kopenhagen Fur, members of the management, board of directors or other superiors in Kopenhagen Fur.

5 How to report



Page 3

5.1 In order to facilitate a confidential channel to raise concerns under the Whistleblower Policy the person intending to report a concern (the “Whistleblower”) is to report it via the whistleblower portal, which allows for full anonymity.

5.2 All information in the whistleblower portal is encrypted and only accessible for persons with a strict need for the information, see section 6. All information is strictly confidential and those with access is under confidentiality obligations.

5.3 When you have reported a concern you must, if you wish for full anonymity, avoid to report via:

- a) Workcomputer or other units handed out by Copenhagen Fur,
- b) Internet connection at Copenhagen Fur or similar Copenhagen Fur administered networks.

In order to ensure anonymity you should therefore report via a personal computer or similar not owned by Copenhagen Fur via a network not administered by Copenhagen Fur.

Link to whistleblower portal: <https://kopenhagenfur.whistleblownetwork.net>

5.4 The report should be made in Danish, but reports can be made in English.

5.5 After the report has been made via the whistleblower portal the law firm Gorrissen Federspiel will be notified. If the Whistleblower chooses to be anonymous, the identity of the Whistleblower will not be known by Gorrissen Federspiel or Copenhagen Fur.

6 Investigation of concerns

6.1 Once informed of a concern the Whistleblowing Supervisor shall evaluate the concern and – if the concern is deemed *bona fide* and within the scope of the Whistleblower Policy – initiate an investigation of the concern. For the purpose of conducting the investigation, the Whistleblowing Supervisor shall notify the other members of the Investigation Council: select members of the executive management together with the senior lawyer in Copenhagen Fur.

6.2 The Investigation Council shall then agree on and conduct the investigation of the concern and take the necessary action and preventive measures. A written report outlining the results of the investigation and the measures taken will be sent to the members of the Board of Copenhagen Fur.

6.3 An investigation of a reported concern will generally entail:

- a) Assessment by Gorrissen Federspiel, who will screen the reported concern and ensure further handling of the report will be in accordance with applicable legislation.



- b) The council will assess if the report should be reported to public authorities and whether further investigation is necessary and how such an investigation should be carried out and when to report to public authorities if applicable.

7 Notification of parties involved

- 7.1 As soon as reasonably possible, the person(s) whose behaviour has been reported shall be notified of the main object of the reported concern to allow that person to present objections. However, such notification may be delayed as long, as there is a substantial risk that such notification will jeopardise the investigation or have a detrimental effect on any future measures or actions which may be necessary to implement as a result hereof.
- 7.2 If possible and appropriate, the Whistleblowing Contact shall inform the Whistleblower of whether the concern has been disregarded, or whether it will be subject to further investigation.

8 No retaliation

- 8.1 When reporting concerns under the Whistleblower Policy, the Whistleblower is protected from any kind of retaliation or discriminatory or disciplinary action as a result thereof, including discharge, demotion, suspension, threats or any other kind of harassment. Any such retaliation against the Whistleblower is considered a serious breach of the Whistleblower Policy. However, such protection shall not apply if the Whistleblower maliciously makes a false allegation or makes an allegation that, bearing in mind all the circumstances, is unreasonable.

9 Deletion of whistleblower reports

- 9.1 Subject to other requirements under local law, the collected information will be deleted:
 - (a) immediately if the report is beyond the scope of the Whistleblowing Policy or should prove unfounded or if no internal action is made in relation to the concern;
 - (b) right after the closing of the case by the authorities if a report is filed with the police or other relevant authorities;
 - (c) 2 months after the investigation has been completed if no further action is taken; or
 - (d) at the latest 5 years after the time of the employee's departure if disciplinary sanctions are made towards the reported employee on the basis of the collected information, or other reasons for it being factual and necessary to continue storing the information. The collected information will be stored in the personnel folder in question.

10 Implementation of Whistleblower Policy

- 10.1 The Whistleblower Policy has been adopted by the Board of Directors of Copenhagen Fur. The Whistleblower Policy is to become effective on 20 December 2019.