



Whistleblower Policy

DSB

Department responsible: The internal audit department

Approved by: The Board of Directors

Date: 14 November 2024

1. Introduction

At DSB, we want to promote an open corporate culture where employees should feel safe in contacting management, colleagues, HR, union representatives or health and safety representatives if they experience unlawful activities or serious irregularities.

The whistleblower scheme should be seen as an additional opportunity for employees and our business partners to express themselves and escalate important issues and report suspicions of irregularities or unlawful activity involving DSB's employees, management or suppliers. Accordingly, the whistleblower scheme complements both the direct daily dialogue in the workplace and the employees' freedom to speak up and right to notify DSB.

In our opinion, it is very important that such matters come to light, and we have therefore established a whistleblower scheme.

The policy is to be updated once annually.

2. Purpose

The whistleblower scheme is intended to improve the opportunity for employees and business partners to point out objectionable matters at DSB without having to fear that doing so may have adverse consequences for them, to protect persons who in good faith report information through the whistleblower scheme, and to detect errors and omissions and thereby heighten the level of DSB's services. Accordingly, the purpose of the whistleblower scheme is to ensure openness and transparency in relation to potential (law) breaches and serious irregularities.

The whistleblower scheme enables DSB to assess the situation and take action. We do not tolerate retaliation against any persons who, in good faith, report a concern under to the whistleblower scheme.

This policy applies to all employees of DSB, including temporary workers, consultants and contractors working for DSB and its business partners.

3. Our ambition and targets

DSB wants to be an open, trustworthy and transparent company that acts in accordance with the law and the principles of our Corporate Social Responsibility Policy. It is essential that information on irregularities at DSB be brought to light and handled promptly. DSB's whistleblower scheme facilitates this by enabling people to submit – anonymous or non-anonymous – reports on objectionable matters or transactions, which may uncover unlawful activity, result in a financial loss to DSB or damage DSB's reputation.

4. How we achieve our ambition and/or reach our targets

The manager of the whistleblower scheme is responsible for maintaining and developing the policy, including ensuring that DSB complies with applicable legislation (the Danish Act on the Protection of Whistleblowers).



DSB has entered into an agreement with an external supplier to provide a reporting solution that can ensure anonymity for the reporter in connection with both the notification and subsequent communication. The reporting solution is provided by the law firm Kromann Reumert (data processor) and the system provider EQS Group A/S (sub-processor). Concerns are reported to the whistleblower scheme electronically using a link available on DSB.dk.

All reports are screened by Kromann Reumert before being forwarded to the manager of the whistleblower scheme, who is responsible for investigating the reports. The manager is also responsible for communicating with the Executive Board and the Board of Directors about the reports and the results of the investigations and for providing feedback on the individual report to the whistleblower.

DSB has prepared guidelines for the use of the whistleblower scheme, describing what can be reported under the scheme, case processing, anonymity, protection of the whistleblower, rights of the whistleblower and the person about whom the concern is reported, etc. The guidelines are available on DSB.dk. The manager of the whistleblower scheme is responsible for maintaining the guidelines.

4.1. Impacts, risks and opportunities

DSB encourages its employees and business partners to use the whistleblower scheme if they suspect that acts contrary to ethical business conduct, including our Corporate Social Responsibility Policy, take place at DSB. All reports are investigated and, if confirmed, the misconduct will be sanctioned, and any irregularities will be corrected. Regardless of whether a reported concern can be confirmed, it will give rise to a reassessment of whether DSB's business procedures and control environment adequately address and mitigate risks and DSB's impact on ethical business conduct.

We make our employees and suppliers aware of the whistleblower scheme via our website. In connection with the onboarding process, new employees are informed about our health and safety procedures and the ways of making a complaint, as well as the existence of the whistleblower scheme and its applications. Furthermore, a report is submitted annually to the main joint consultation committee on the use of the whistleblower scheme, whereby awareness of the scheme is communicated to the employees.

5. Organisation, responsibility and approval

The Board of Directors of DSB has overall responsibility for approving the policy. The Board of Directors has appointed the head of the internal audit department to manage DSB's whistleblower scheme.

6. Interaction with other policies and guidelines

The Whistleblower Policy should be seen in the context of a number of other policies governing DSB's business conduct and the employees' behaviour, including most importantly the Corporate Social Responsibility Policy, the Ethical Guidelines (Code of Conduct) for Suppliers and Business Partners, the Compliance Policy and the Health and Safety Policy.