

**Whistleblower Policy**

**Matas A/S, CVR no. 27 52 84 06 2**

## **Whistleblower Policy**

*This Whistleblower Policy can be accessed by all internal and external stakeholders at [investor.matas.dk](http://investor.matas.dk).*

### **Introduction and background**

Matas is a responsible organization with an open corporate culture, in which everyone is free to raise concerns if they become aware of any irregularity or unlawful activity on the part of the Company's employees or suppliers. The employees are normally the first to detect irregularities or fraudulent behavior in a workplace. However, most employees tend to be reluctant to take their suspicions further because this makes them feel disloyal to their colleagues or their employer.

In recognition of the importance of bringing such information to light and realizing that an open corporate culture is sometimes insufficient to ensure this, Matas has set up a whistleblower scheme. Under this scheme, our employees and external stakeholders may submit anonymous or non-anonymous reports – made in good faith – of concerns they may have about serious matters, including matters which may be illegal, inflict financial losses on the Company, damage our reputation or have similar negative effects.

The purpose of the Whistleblower Policy is to explain how the whistleblower scheme works in order to create a preventive effect and counteract any potential reluctance to report serious concerns.

### **Who can report concerns?**

Concerns may be reported by our employees and by other persons who have a commercial or professional relationship with the Company. Other persons who have a commercial or professional relationship with the Company may include board members, auditors, lawyers and suppliers.

### **Who may concerns be reported about?**

Concerns may be reported about illegal or damaging activity in which our employees or other persons who have a commercial or professional relationship with the Company are involved. Other persons who have a commercial or professional relationship with the Company may include board members, auditors, lawyers and suppliers.

### **What can be reported?**

It is the intention that the whistleblower scheme only be used to report concerns about serious matters. Less serious matters such as dissatisfaction with salary conditions, collegial difficulties, violation of smoking or alcohol policies, etc. should not be reported via the whistleblower scheme. These concerns should instead be raised through the normal channels (immediate supervisor, HR, etc.)

Serious concerns that may be reported via the whistleblower scheme include:

- economic crimes such as embezzlement, bribery, fraud and forgery;
- material breaches of work safety regulations;
- material breaches of environmental regulations/environmental pollution;
- physical and psychological violence and sexual offences.

All reported concerns will be answered and dealt with. If a person files a non-anonymous report that cannot be dealt with under the whistleblower scheme, Matas will inform that person of which channel to use instead.

### **Who will deal with reported concerns?**

Any concern reported will be dealt with by the head of Human Resources and the head of Safety and Security. Any report concerning a member of the Board of Directors/management/the administrative staff will be referred to the Chairman of the Board. Any report concerning the Chairman of the Board will be referred to the Deputy Chairman of the Board.

In connection with the annual review of the policy, a list will be drawn up of any valid reports and submitted to the Board of Directors. The Board of Directors is immediately notified of any concerns raised about serious matters.

### **How will reported concerns be dealt with?**

When a report is received, an initial investigation will be conducted into the matter.

If the concern turns out to be unfounded, it will be rejected and deleted from the system, and the reporter will be informed if he/she has chosen not to be anonymous.

If the conclusion of the initial investigation warrants further examination, it will be subjected to a more detailed investigation. The matter will be dealt with in-house, and it may impact the employment of the person reported. After the conclusion of the investigation, the matter will be deleted from the system, but will be kept on the personnel file of the person in question for up to five years.

The matter may also be referred to the police for further investigation. When the police (and possibly the courts) have completed their processing of the matter and, where relevant, the period allowed for appeal has expired, the case will be deleted from the system. The matter may end up in court, and the person reported may face a fine or imprisonment.

### **How is a concern reported?**

Concerns can be reported via the <https://matas.whistleblownetwork.net>. Concerns cannot be raised in any other way (like sending an e-mail to the person responsible for the whistleblower

scheme), as the information is confidential personal data which should not be sent unencrypted on the open Internet.

## **Subsequent clarification and requests for additional documentation**

When you report a concern, you will have the opportunity to anonymously log on to the system at a later point in time to see whether the person processing the case has asked additional questions or requested additional documentation. Any subsequent dialogue is completely anonymous and relies entirely on the reporter's willingness to log on to the system and answer any questions raised by the person processing the case.

## **Anonymity**

When reporting a concern, the reporter chooses whether he or she wants to report the concern anonymously.

The system does not log IP addresses or machine IDs, and all data transmission and storage takes place in encrypted form. Only the responsible case processor has access to the case processing part of the system.

If a non-anonymous report of a concern leads to legal proceedings being instituted against the person reported, the person reporting the concern may be summoned as a witness in the proceedings.

## **IT security**

The system used to register reports is hosted by Got Ethics A/S, an independent party that guarantees the security and anonymity of the system.

## **Protection from harassment and victimization**

All concerns raised in good faith are protected from any and all harassment and victimization as a consequence of the report. Anyone who tries to harass or victimize a person who has reported a concern in good faith may be subject to sanctions under employment law. If a person reporting a concern chooses not to be anonymous, the Company will, to the greatest possible extent, treat the report as confidential.

## **Information about a registered concern for the person reported**

Matas is obliged to inform the person concerned about the report. Matas will determine in each individual case when the information can be provided without consequences to the investigation of the matter reported and the collection of evidence.

The identity of the person reporting the concern will not be disclosed, even if the reporter has chosen not to be anonymous. It should be noted, however, that non-anonymous reporters risk being summoned as a witness if legal proceedings are instigated, see above.

Adopted by the Board of Directors of Matas A/S on 7 November 2017

Adopted by the Board of Directors of Matas A/S on 7 November 2018

Adopted by the Board of Directors of Matas A/S on 29 October 2019

Adopted by the Board of Directors of Matas A/S on 4 November 2020