

Whistleblower Policy for A/S JYDSK ALUMINIUM INDUSTRI

1. Introduction

- 1.1. This whistleblower policy is applicable to A/S JYDSK ALUMINIUM INDUSTRI (hereinafter referred to as “the Company”), Mørupvej 9, 7400 Herning, VAT no. 38523716.

2. What is a whistleblower scheme?

- 2.1. A whistleblower scheme aims to ensure that you as an employee can safely report reprehensible conditions concerning the Company without fear of negative consequences.

3. The purpose of the whistleblower policy

- 3.1. The purpose of this whistleblower policy is to inform you about in which situations you can use the scheme and to promote the reporting of information on violations, including reasonable suspicion of actual or potential violations that have occurred or are very likely to occur during work-related activities, and finally, to create a confidential reporting platform which can be used by the Company's employees according to Act No. 1436 of 29 June 2021 on the protection of whistleblowers.

4. What matters can be reported to the whistleblower scheme?

- 4.1. Reporting ground(s) could be:
- Criminal acts such as overbilling, embezzlement, bribery, fraud, document forgery, etc.
 - Matters relating to accounting, internal controls, and corruption
 - Serious breaches of occupational health and safety regulations
 - Matters that may affect the Group as a whole or have significant consequences for individuals' lives and health
 - Protection of privacy and personal data
 - Unwanted attention
 - Inappropriate or unacceptable conduct (including, for example, bullying, sexual advances, offensive behavior, and racism)
- 4.2. The whistleblower scheme is not intended to handle minor serious offences concerning internal guidelines, behaviors, dissatisfaction over salary or cooperation difficulties. Such should be addressed at the Management or HR, who can help provide a solution.

5. Who can report to the scheme?

- 5.1. The scheme is available to the Company's employees, including volunteers at the Company, paid or unpaid interns, board members, leaders, etc., and individuals whose employment relationship has not yet started, who report information about violations which the individual has accessed during the hiring process or other precontractual negotiations.

6. The Whistleblower Unit

- 6.1. Reports on the scheme are received by the Company's internal whistleblower unit. The whistleblower unit resembles employees in the HR dept, and if necessary, the COO and CEO.
- 6.2. The whistleblower unit is subject to a special duty of confidentiality and treats your information confidentially. In some situations, however, the unit may be obliged to disclose your identity, for example, if your observation leads to a police report of the matter observed.

7. How to report to the whistleblower unit

- 7.1. Written reporting is done using an online platform. Reporting is done at the link <https://whistlepilot.dk/portal/24bb3051-9138-431b-95bf-9f92d5a67f69> which securely handles your confidential information when you use the reporting form.
- 7.2. Reports are made to the Company's internal whistleblower unit using above link. You have the option to report verbally, and you choose as the person reporting whether this should be done by telephone or during a physical meeting with the whistleblower unit.
- 7.3. The Company has ensured that the scheme is designed in such a way that unauthorized employees cannot access the reports.
- 7.4. Additionally, you can make a report to The Danish Data Protection Agency's whistleblower scheme, where anonymous reporting is also possible.
- 7.8. It is optional which whistleblower scheme you wish to use. However, if the matter being reported can effectively and internally be addressed by the Company, and you as a whistleblower assess that there is no risk of reprisals, the Company encourages the use of the Company's internal whistleblower scheme.

8. How the whistleblower unit processes your report

- 8.1. When the whistleblower unit has received your report, you will receive a confirmation of receipt of your report within a maximum of 7 days, unless you have chosen to make your report anonymously.

- 8.2. The whistleblower unit initially screens your report. The screening involves that reports that are obviously unfounded, or do not pertain to matters that a report to the scheme can deal with, are rejected, which the unit in such case will inform the person who made the report.
- 8.3. If a report falls within the scope of the scheme, and there is a basis for processing the case, the unit investigates the case further and may obtain additional and necessary information from you and others in the Company to provide as detailed information about the case as possible. If necessary, the unit may seek assistance in processing the report from external advisers such as lawyers or accountants.
- 8.4. The personal data included in a report to the whistleblower unit is covered by data protection regulations. This applies as a rule to all individuals included in the report, i.e., both the whistleblower, the reported individual, and any other registered individuals involved in the report.

9. How the decision on the outcome of the case is made

- 9.1. The whistleblower unit decides on what consequences should be drawn based on the report.
- 9.2. The consequences drawn up based on the report may, for example, be; employment-related sanctions against the person or persons involved in the report; reporting the matter to the police; drafting new or amended internal guidelines; dismissal of the case due to insufficient evidence

10. As a whistleblower, you are entitled to receive feedback on your report

- 10.1. No later than 3 months after you have received confirmation of receipt of your report, you will receive feedback on the course and outcome of the case, unless you reported anonymously. The information will take place with due regard to the Company's obligations under data protection legislation.

11. How you are protected as a whistleblower

- 11.1. You are protected against negative consequences associated with a report you have made, provided that you have made your report in good faith, which means that at the time of reporting you had reasonable grounds to believe that the reported information was correct and if the reported information was also covered by the whistleblower scheme.
- 11.2. If, however, you have made a report in bad faith, i.e., against better knowledge, this can have negative consequences for you – including employment-related consequences - and in some cases, there may be grounds to report such a matter to the police.
- 11.3. Reports are not covered by the right to access information, and a whistleblower thus does not obtain party rights in the reported case.

- 11.4. Whistleblowers who have been subjected to reprisals because of a report or have been prevented or attempted to be prevented from making a report, are entitled to compensation.

12. Notification about the case to the reported person

- 12.1. The individual reported on will be informed about the received report. The notification occurs when the whistleblower unit assesses that it can appropriately be done considering that the notification should not be able to affect the investigation of the case, including the collection of evidence.
- 12.2. As the whistleblower's identity is protected under the whistleblower legislation, the identity of the whistleblower is not disclosed to a reported person without the whistleblower's consent.

13. Processing of personal data

- 13.1. The Company is responsible for processing the personal data that is processed in connection with a report from a whistleblower.
- 13.2. The processing of personal data in connection with a report from a whistleblower is based on the Whistleblower Law § 22.
- 13.3. If it is relevant for processing or following up on a report from a whistleblower, personal data may be disclosed to external advisers and public authorities such as the police or the Danish Tax Agency (SKAT).
- 13.4. Registered individuals have, as a rule, a number of rights when their personal data is processed. The general rights under the data protection regulation are, however, limited to some extent due to the confidentiality and secrecy obligations that the Company must observe according to whistleblower legislation.
- 13.5. The rights of a person who is reported to the whistleblower scheme, or mentioned in a report, can be limited or entirely cut off. This can affect both the right to receive information according to data protection regulation article 14 and the right to insight according to article 15.
- 13.6. As a whistleblower, you have the right to be informed about which information is processed about you based on a report, just as you have the right to have incorrect information about yourself corrected.
- 13.7. The whistleblower in some cases also has the right to object to the Company's otherwise lawful processing of their personal data. The rights of the whistleblower can however in some cases be limited, if it is assessed that the whistleblower's interest in the information must yield to decisive private interests for example due to other involved individuals, and to the Company under the

condition that the purpose of the collection will be lost if the whistleblower gains knowledge of the collection.

- 13.8. If a whistleblower, a reported person, or others disagree with the way in which their personal data is processed in the administration of the whistleblower scheme, a complaint can be filed with the The Danish Data Protection Agency.

14. Retention and deletion of reports

- 14.1. Reports that are assessed to fall outside the whistleblower scheme are as a rule deleted 7 days after the whistleblower has received notification that the report does not pertain to the whistleblower scheme, so that the whistleblower can express themselves about this.
- 14.2. Reports that fall within the whistleblower scheme are retained as long as it is necessary for the Company to comply with its obligations under the whistleblower legislation.

15. How to get answers to any further questions about the scheme

- 15.1. If you have further questions about the whistleblower scheme, you are welcome to contact the whistleblower unit (HR department) as mentioned under section 6.

This whistleblower policy was last updated: June 2026.