

# Factofly Whistleblower Policy

## Introduction

This policy aims to provide a clear and confidential process for employees of Factofly to report any misconduct or unethical behavior within the organization. It ensures protection against retaliation for whistleblowers and outlines the steps for investigating and addressing such reports.

## Purpose

The purpose of this policy is to:

- Encourage employees to report any suspected violations of laws, company policies, or ethical standards.
- Ensure a safe and confidential mechanism for reporting.
- Protect whistleblowers from retaliation.
- Guarantee a thorough and fair investigation of reported concerns.

## Scope

This policy applies to all employees of Factofly, including full-time, part-time, temporary, and contract workers. It also extends to third-party individuals working on behalf of Factofly.

## What Can Be Reported?

Whistleblowing covers activities such as:

- Violations of human rights
- Corruption and bribery
- Criminal acts
- Actions endangering life, health, or the environment
- Unethical behavior

If there are any questions or concerns that do not fall under the whistleblower policy, employees should contact their team manager, HR manager, or safety representative.

## Reporting Channels

Employees can report their concerns through the following channels:

- **Email:** whistleblower@factofly.com
- **Postal Mail:** Factofly Whistleblower Unit, Denneskiold-Samsøes Allé 41, 1434 København K, marked as confidential.

Reports should include as much detail as possible, such as:

- Description of the misconduct
- Reasons for reporting
- Date and location of the incident

## **Investigation Process**

1. **Acknowledgment:** The whistleblower will receive confirmation within seven days of submitting a report.
2. **Initial Assessment:** An initial review will determine if the report qualifies as a whistleblowing case.
3. **Investigation:** If the report qualifies, an impartial investigator will conduct a thorough investigation.
4. **Action:** Urgent actions may be taken before the completion of the investigation if necessary.
5. **Feedback:** The whistleblower will receive feedback on the actions taken within three months of the report acknowledgment.

## **Protection Against Retaliation**

Factofly prohibits any form of retaliation against whistleblowers. This includes:

- Termination or demotion
- Unjustified negative evaluations
- Harassment or intimidation

Employees who believe they have been retaliated against should report the incident to the Whistleblower Unit immediately.

## **External Reporting**

If internal reporting is not possible or appropriate, employees can report their concerns to relevant external authorities or EU bodies, ensuring the same criteria for public interest and reasonable belief in the truth of the information.

## **Recordkeeping and Review**

All reports and investigations will be documented and kept confidential. The whistleblower policy will be reviewed regularly to ensure it remains effective and compliant with legal requirements.

## **Training and Communication**

Factofly will provide regular training to all employees about this policy and ensure it is communicated effectively across the organization.

## **Effective Date**

This policy is effective as of 01.01.2024 and supersedes all previous whistleblowing policies.

By implementing this policy, Factofly demonstrates its commitment to maintaining a safe, ethical, and transparent workplace environment.