

WHISTLEBLOWER SCHEME

POLICY FOR EUROWIND ENERGY GROUP

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1. Background and purpose

The Eurowind Energy group have employees in many different countries - both inside and outside the European Union. Eurowind Energy A/S including subsidiaries, joint ventures and therefore departments in every relevant country will be referred to as "Eurowind".

Eurowind wants to offer a platform for its employees to speak out anonymously about objectionable and criticizable conditions in the workplace without fear of repercussion. Therefore, Eurowind has established a whistleblower scheme ("Whistleblower Scheme").

The purpose of this policy ("the Policy") is to establish the overall guidelines for the use of the whistleblower scheme and describe how reports from employees should be handled.

This Policy is based on the directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of people reporting breaches of EU law (the "EU-directive").

2. Who can use the Whistleblower Scheme?

Eurowind wants to give everyone who know Eurowind the possibility to speak out if they know about any breaches or other serious issues that pertains to Eurowind.

The management would rather deal with any breaches and/or serious issues internally than learn about it from an external source.

Everyone who uses Eurowind's Whistleblower Scheme will have the same rights and are treated the same way no matter who they are and what they report on.

This is a decision made by Eurowind, though it is important to note that people outside the organization and who are not somehow employed by Eurowind are not protected by the law and the EU-directive. This means that if Eurowind doesn't comply with the rules of the EU-directive, Eurowind cannot be prosecuted.

3. What can be reported?

Any use of the Whistleblower scheme is to be done in good faith, which means that facts documented in the report are truthful and is covered by the EU-directive.

3.1. Breaches of the European Union

A whistleblower can use the Whistleblower Scheme to report on breaches to laws of the European Union which are covered by the scope of the EU-directive.

This is expanded upon in the procedure for the Whistle Blower Scheme.

3.2. *Serious breaches and circumstances*

A whistleblower can furthermore use the Whistleblower Scheme to report on serious breaches to national law and breaches to parts of the laws of the EU and other serious circumstances.

A breach to the law and other circumstances is serious if it's in the public interest to bring it to light.

This is expanded upon in the procedure for the Whistle Blower Scheme.

Eurowind recommends its employees to use the in-house whistleblower scheme for internal issues, breaches of law and other circumstances, that can be reported, instead of using the public externally whistleblower schemes established by governments outside of Eurowind. Eurowind will in most cases have better options for handling and following up on a whistleblower report concerning internal issues.

3.3. *What cannot be reported?*

Issues pertaining to one's own employment, and relationships with colleagues and management, will not be covered as a rule, unless it is sexual harassment or other serious harassment.

Information about matters of a trivial nature is also not covered.

4. How does the Whistleblower Scheme work?

4.1. *How to access the Whistleblower Scheme*

The software Eurowind Energy has chosen to use, is supplied by Legal Tech and accessed through our website <https://eurowindenergy.com/>.

At the bottom of the website, you will find a link called "Whistleblower scheme".

4.2. *How are the reports handled?*

Eurowind has made procedures that secures the following:

1. The whistleblower will receive confirmation within 7 days of receiving it,
2. That the reports are processed carefully, and
3. That the whistleblower receives feedback as soon as possible and no later than 3 months after, the confirmation is sent to the whistleblower.

4.3. *Who receives the reports?*

Eurowind has appointed a whistleblower-unit to handle and process any reports.

The whistleblower-unit consists of:

- Head of Legal M&A, and
- Head of HR

The further processing of any pertinent reports will be handled by the whistleblower-unit and an additional management team consisting of:

- COO of Eurowind Energy A/S, and
- CFO of Eurowind Energy A/S.

This collective will handle and process the reports and ultimately determine which actions needs to be taken.

4.4. If the report concerns a person in the management team or the whistleblower-unit

If the whistleblower report concerns (or in any way relates to) one or more individuals from the collective, the further processing should circumvent the liable party, and be escalated directly to the Chairman of the Board of Directors, and the CEO of Eurowind. These two is then responsible for the processing, gathering of evidence and determining of a course of action.

5. Obligation to provide information to all mentioned data subjects

In Eurowind, we are committed to notifying individuals referenced in a whistleblower report that we are processing their information as part of an ongoing whistleblower investigation, in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR).

However, there are several exceptions outlined in Article 23 of the GDPR that we must adhere to when managing a whistleblower report.

We are **not** required to contact individuals mentioned in a whistleblower report if doing so could potentially disrupt or otherwise limit our ability to, for example, investigate criminal activities, such as financial or sexual crimes.

We are, however, obligated to contact individuals mentioned in a whistleblower report if it is certain that the notification will not impact the aforementioned interests.

6. Protection of the whistleblower

Eurowind protects the whistleblower in compliance with the EU-directive and the national legislation. This means that Eurowind will not expose the whistleblower to reprisal in any way if the whistleblower files a report.

7. Considerations related to a company-wide Whistleblower Scheme

The Whistleblower Scheme is accessible to all, allowing every employee within Eurowind to utilize the same program, which is managed and overseen by the parent company, Eurowind Energy A/S. All individuals working in or alongside Eurowind, as outlined in Section 2, are thus protected under the EU directive and relevant national laws.

Nonetheless, the EU directive does not consider the potential for establishing a shared whistleblower program for a group of companies, such as Eurowind.

Should the EU or any of the countries where the Eurowind Group operates determine that a shared whistleblower program is not permissible, Eurowind will reevaluate and modify its Whistleblower Scheme accordingly.