

	ISO Certification – 9001 / 14001 / 45001 HCS' Whistleblower policy – English	Document – KMAS 05.2d
		ISO ref.: 05

HCS' Whistleblower Policy

The purpose of the whistleblower policy is to explain how HCS' whistleblower scheme works and thus avoid potentially important matters not being reported.

Introduction to whistleblower scheme

HCS' whistleblower scheme ensures a high level of protection for persons who report serious offenses and other serious matters. The scheme is to be used if you experience or suspect these serious conditions in HCS or conditions and activities related to HCS.

HCS is a responsible company with an open culture, where everyone can feel safe and express themselves if they experience potential breaches of the law. As a starting point, employees are encouraged to get with their immediate superior or a member of the Executive Board in these situations, but it is also possible to use the whistleblower scheme.

Using the whistleblower scheme, employees and other stakeholders are provided with the possibility to make (anonymous or non-anonymous) reports of suspected breaches of law, all in good faith, including circumstances that could cause HCS a financial loss or damage the reputation of HCS.

Who can report?

Reports can be submitted by anyone, including employees, suppliers, shareholders and others with a peripheral affiliation with HCS.

Who can be reported?

Matters in which HCS' employees and other stakeholders associated with HCS are involved in activities directly related to HCS can be reported. This applies to both employees and management.

What conditions can be reported?

The whistleblower scheme is only be used to report suspected potential breaches of legislation in activities related to HCS. Factors such as possible dissatisfaction with pay and co-operation difficulties cannot be reported using the whistleblower scheme.

Matters that can be reported using the whistleblower scheme are, for example, information regarding: Embezzlement, theft, corruption, bribery, fraud, fraud, forgery, conflicts of interest, extortion and misuse of inside information, accounting and auditing irregularities, providing false or misleading information to public authorities, physical violence and sexual offenses.

The above list is examples only. If you are in doubt about whether your observation should be reported or not, you are encouraged to do so. All inquiries are answered and processed.

Who processes reports?

Reports that fall within the scope of this policy are processed by the Working Environment Organization (WEO). Sometimes the processing will take place with the help of external parties, such as lawyers or accountants.

How to report?

Reporting is done by using the whistleblower portal [HCS-Whistleblower](#). That is the only way to do reporting. The whistleblower portal is secured so that only two selected members of the WEO can read the content of the reporting.

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How are the reports processed?

When a report is received, an initial examination of the reported is made.

If the report turns out to be manifestly unfounded, it will be rejected. The person who reported the case will be notified.

If the initial investigation concludes that the report cannot be characterized as manifestly unfounded, it will be further investigated. The case is processed internally and may have employment law consequences for the person or persons who are reported. The case is then deleted from the system.

The case may be of such a nature that it is passed on to the police for further investigation.

All reports must be submitted in good faith. It is important that the system is not used for accusations where innocent people are suspected.

Subsequent clarification and collection of additional documentation

When a report is made, the reporter is given the opportunity to log on to the system and see if the WEO has asked further questions about the case or requests further documentation. Any subsequent dialogue depends solely on the reporter's willingness to log on to the system and answer the WEO's questions.

Confidentiality and IT security

Anyone who reports matters in good faith is protected from any form of retaliation. HCS employees who attempt to retaliate against a reporter who has reported in good faith will be subject to employment law sanctions. HCS will treat the report as confidential as far as possible.

The system used to handle the reports is operated by an outside company, who are experts in handling whistleblower registrations, without the company being able to see the cases itself, but which guarantees the security and compliance with the GDPR rules in the system. The system does not log IP addresses and hardware IDs. Only those responsible in WEO have access to the case processing part of the system.

Information about the registration to the reported person

The WEO who receives the report is obliged to provide the person being reported with information about the reported situation. In each individual situation, a specific assessment will be made of when this notice can be passed on, so that the notice cannot have consequences for the coverage of the reported matter as well as the collection of evidence.

Information about who made the report is not enlightened, even though the reporter has chosen to state his identity.

Questions

All questions about the whistleblower scheme can be directed to the Secretary of the WEO Organization; Kim Hetner, kim.hetner@hcs.dk.

Glostrup, 1 st. December 2021

Mads Frederiksen
 Managing Director

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