

Whistleblower Policy

Scope of this policy

This policy applies to all Kangamiut Group companies in which Kangamiut Holding directly or indirectly is the majority shareholder.¹

Background & purpose

The Kangamiut Group strives for an open corporate culture where everyone can come forward freely and report suspected irregularities or illegalities concerning Kangamiut Group employees, management, board of directors and other stakeholders.

Employees will often be the first to detect irregularities or fraudulent behavior. However, it often turns out that most people are reluctant to go ahead with their suspicions. Recognizing this, the Kangamiut Group has chosen to set up a whistleblower scheme where all employees can report violations or omissions in relation to legislation as well as other serious and sensitive matters.

The whistleblower scheme aims to increase the ability of Kangamiut Group employees to

- express an opinion on illegal or objectionable facts
- protect those who report information to the whistleblower scheme
- detect maladministration

The whistleblower scheme is a supplement to the group's direct and daily communication concerning errors, unsatisfactory conditions, etc. Problems should therefore be addressed in the first instance by contacting, the immediate manager, a union representative, the CEO or group management.

Policy

Scope of the whistleblower scheme

The Kangamiut Group whistleblower scheme allows employees to make anonymous reports if there is reasonable suspicion of serious and objectionable facts or illegalities that could cause punitive, financial loss or serious damage to the Kangamiut Group's reputation.

Only persons or issues associated with companies in the Kangamiut Group may be reported.

Reporting via the whistleblower portal

All employees and board members may report either anonymously or including identity and contact information. Both current and former employees may submit a report.

¹ Group companies: Kangamiut Holding A/S, Kangamiut Seafood A/S, Alimex Seafood A/S, DanSea Nordic A/S, Northcoast Seafood A/S, DanMarin A/S, Fish and Feeds Ghana, Ståle Nilsen Seafood AS, North Atlantic Seafood A/S

Furthermore, the whistleblower portal allows external stakeholders to report, e.g., customers, suppliers, business partners, etc.

Content of the report

The notification may relate to the following categories:

- Employees in the Kangamiut Group regardless of terms of employment (permanent, part-time, hourly, temporary)
- Individual company and group management
- Business partners, customers and suppliers
- Basic system errors that cannot be attributed to specific persons

Facts that can be reported via the whistleblower portal

The report should be based on knowledge or serious suspicion of serious offences or other serious circumstances or suspicions thereof and as such be limited to:

- Serious and/or criminal offences such as theft, embezzlement, fraud, bribery, corruption, accounting fraud/manipulation, improper use of assets, misuse of financial resources
- Serious issues relating to discrimination, violence, assault and harassment
- Serious violation of internal guidelines (serious infringement is defined as systematic, repeated and material violation of internal guidelines, procedures or policies)

Inquiries related to the employment relationship, e.g., absence, cooperation or collegial difficulties, smoking, alcohol, clothing, salary conditions, etc., as well as other matters that are not deemed serious, should not be reported through the whistleblower portal and as such are out of scope. Such matters should be reported directly to, for example, the nearest manager, a union representative, or group management.

To the extent possible, the report should be substantiated by attaching relevant documentation.

Reporting procedure

Reports can only be made electronically by completing and sending an online report, which may be accessed at the following link: <https://kangamiut.whistleportal.net>. The link is also available via the Kangamiut Group website (www.kangamiut.com) as well as individual group company websites.

Reports cannot be filed by other means, as an alert typically contains confidential information that should not be sent without encryption. Reports may be submitted in English or Danish.

Confidentiality and anonymity

All information is treated confidentially and with full discretion.

If a case is submitted as an anonymous report, it is essential that the reporter pays attention to removing metadata from files which may be attached as documentation, and that the reporter does not provide information that can be traced directly back to him or her.

Should a reported incident be subject to an investigation by an external body, e.g., the police, the Kangamiut Group may be forced to disclose the identity of the reporter if the Kangamiut Group is aware of the reporter's identity.

If information is reported from the Kangamiut Group network or other monitored network, there may be a risk that visits to the whistleblower portal will be tracked and logged internally as part of the regular logging of user activities. This risk can be avoided by entering the web address itself in a browser on a private or public computer that is not connected to a monitored network.

The whistleblower portal is designed to remove or restrict the storage of information when visiting and using the portal. The whistleblower portal supports the use of a TOR browser, which can be used to visit the whistleblower portal, and ensure anonymity to the highest possible extent.

Processing of reports

BDO Chartered Audit Company is appointed by the Kangamiut Group as the data processor. BDO Chartered Audit Company provides and manages the technical solution of the whistleblower portal.

The submitted reports via the whistleblower portal are accessed by three employees of Kangamiut Group management. These employees are: Anne Vinther Morant, Director, Sustainability & CSR; Annette Mortensen, Management Support; and Ulrik Bjerre Rasmussen, CEO, Kangamiut Holding A/S. Of note, should the reporting concern any of these three employees, the systems allows for the reporter to deselect one or two of the recipients.

A preliminary review of the report is conducted to evaluate whether it is within the scope of the whistleblower policy and to determine if regular case administration is required, or if the report should be dismissed as manifestly unfounded (for example, if the report includes incidents or reports by a person which is not covered by the whistleblower policy).

If it is found that there are grounds for active consideration of the report, a closer investigation of the incident will be initiated. If required, assistance from legal or other advisors may be obtained for this process.

Processing of personal data

The processing of personal data provided, including collection, storage and, possible disclosure, is subject to applicable data protection law.

The processing of the data is subject to Kangamiut Group legitimate and objective interest in processing personal data submitted in the report – and the processing is considered to exceed the interest of the data subject. The processing is carried out based on the balancing of interest rule laid down in Article 6(1)(f) of the General Data Protection Regulation.

Handling of reported cases

It is possible to report anonymously – and at the same time follow the case by using a 16-digit key code, which is displayed after the submission of the report on the whistleblower portal.

Subsequently, it is possible to communicate anonymously with the Kangamiut Group using the 16-digit key code. The communication channel is used to acknowledge receipt of the report and it allows for any additional questions to be addressed to the reporter to ensure the report includes adequate information for it to be processed while respecting the anonymity of the reporter.

The communication channel will also be used to communicate a possible conclusion of the case to the reporter if he or she is anonymous. The following deadlines apply in the whistleblower portal:

- Acknowledgement of receipt will be provided within 7 days of the submission of the report
- Case processing will take place as soon as possible, with the target of not exceeding three months. A conclusion of the case is communicated to the reporter via the anonymous communication channel
- Generally, all cases will be deleted from the whistleblower portal within 90 days of the reporting date, unless the deadline has been manually extended by the recipient
- The reporter will have access to the case on the whistleblower portal with the 16-digit key code until the case is deleted. However, the reporter will have access to the case for maximum one year from the time of reporting

Persons subject to reporting

Unless specific and justified investigative considerations apply, if a specific person is concerned by the report, the concerned person will be notified of the handling of the case once the report has been received and an investigation has been initiated

Rights

Reports submitted in good faith will not have adverse consequences for the reporter. Reports filed in bad faith or filed to harass or harm any person concerned by the reported information may have consequences for the reporter (e.g., result in police reporting or have contractual consequences).

Persons submitting information to the whistleblower portal will, as a general rule, be informed of the handling of the case and, where appropriate, of the outcome.

Deleting data

If the report does not fall within the scope of the whistleblower policy, or if the report is unjustified, the personal data will be deleted immediately.

In general, personal data is deleted when the investigations have been completed.

Reports are generally deleted after 90 days in the whistleblower portal, unless the deadline is manually extended by the recipient.

The general rules for deletion of data also apply. If, based on the information collected, disciplinary action is taken against a staff member, or if there are other necessary and objective reasons why it is required to keep information about a staff member, the information will be kept in his or her HR records.

Questions

Questions relating to the whistleblower policy may be directed in writing to Anne Vinther Morant, Director Sustainability & CSR by email, see the Kangamiut Group website.

UN Sustainable Development Goals Context

This policy supports UN Sustainable Development goal 8 “Decent Work and Economic Growth”.

