

# Whistle Blower Policy

## Purpose

The purpose of the Whistle Blower system is to give possibility to raise awareness of improper activities within the Dinex Group to the company management.

## To whom is the system relevant

The Whistle Blower system is open to use for all employees, suppliers, customers, associates, and other stakeholders who are in either way involved in or affected by the activities of the Dinex Group.

The system is only available on the Dinex website [www.dinex.net](http://www.dinex.net) and on internal intranet DIMS.

A global solution is available, as well as local solutions for all countries in which Dinex has a presence of more than 15 employees.

## When to Use

The Dinex Group is a responsible and transparent company with a responsibility to follow the legal requirements under which we operate, the principles of our corporate policies and general ethical obligations.

Before considering use of the Whistle Blower system, we encourage all who may have knowledge or justified suspicion of issues that are not in line with the above-mentioned obligations, to raise it in direct and constructive dialogue with the involved parties.

If this is not possible, the Whistle Blower system gives a possibility to report the issue and any documentation deemed relevant, in a controlled process directly to the top management, without taking risk of any retaliation. Users may choose to stay anonymous, but it is not recommended in favor of the subsequent investigation.

Examples of issues to be reported could be:

- a) Embezzlement, theft, corruption, bribery, fraud, forgery, conflicts of interest, extortion and misuse of inside information.
- b) Accounting and auditing irregularities.
- c) Submission of incorrect or misleading information to public authorities.
- d) Indecent behavior, discrimination, violence and sexual abuse.

The above list is not exhaustive, and if in doubt we encourage to report anyway.

## When not to use

The system is not intended for personal conflicts, disagreements, collaborative challenges, unjustified accusations, or issues without relation to Dinex.

Consider the potential consequences of the information shared and stay in good faith. Otherwise, do not use the Whistle Blower system.

## What happens after reporting

All global cases received will be sent to the attention of the Group CEO and the Group CHRO.

All local cases received will be sent to the local responsible General Manager, HR Manager, and Group CHRO.

The reported issue will be investigated, and an initial reply will be provided within 7 days (if possible due to anonymity). Action will be taken as deemed suitable, which may lead to for example disciplinary actions, contract cancellation, or in extreme cases involvement of external authorities.

## Protection from Retaliation

Dinex promotes a company culture where all should feel safe about speaking their honest mind. Anyone who are sharing information via the Whistle Blower system in good faith, is naturally protected from any form of retaliation from Dinex side, disregarding conclusions of further investigations.

The Dinex Group will never disclose information that can be used to identify the source of information received via the Whistle Blower system, unless requested by external authorities and prior approval.

Deliberate misuse of the system in violation of this policy however, may lead to counter-actions as such practice is putting other people at risk, and drawing attention away from the intended purpose of the system.



*Torben Dinesen, CEO, Dinex Group 06/07-2022*



going the extra mile