

Policies	HR Dept
CMP Whistleblower Policy	EFFECTIVE FROM: 1. February 2021

PURPOSE

The purpose of this Whistleblower Policy is to explain how the Whistleblower Scheme is meant to function, including how you can make a report via the scheme and what circumstances or situation you can report.

At CMP we have a strong desire and interest to conduct our business operations in accordance with applicable law and ethical standards. CMP’s Whistleblower Policy aims to:

- establish a platform where our employees, business partners, cooperative partners, suppliers/vendors, customers and other stakeholders can report via an impartial party any serious irregularities, information or allegations of wrongdoing that they may become aware of;
- provide reassurance that any person who reports a serious suspicion or observation in good faith will be treated seriously and appropriately
- ensure that all persons who disclose information in the system are protected from retaliation

AREA OF COVERAGE

CMP’s Whistleblower Scheme encompasses all employees, management, Board members, customers, suppliers/vendors and other stakeholders who may make a report in the event of a reasonable suspicion of serious and objectionable circumstances or wrongdoing.

GUIDANCE

Use the management system or the HR Dept. first

Different views in everyday life and disagreements between co-workers, or between employee and a manager, must, as is done now, be resolved in the daily dialogue. For our employees, the Whistleblower Scheme complements the internal dialogue and openness of CMP and is primarily intended for situations where the situation or circumstances is of such a serious nature that it cannot or should not be dealt with directly with one’s manager or in the HR Dept.

CMP invites you as an employee to discuss observations and concerns with your immediate supervisor, their manager, or the HR Dept. Matters relating to one’s own employment terms and conditions, the working environment, health & safety, disciplinary actions or pay, or dissatisfaction with decisions of senior management must be dealt with in the management system.

You can use the Whistleblower Scheme to

You can use the Whistleblower Scheme to report serious and sensitive information and cases that might have a negative impact on CMP’s reputation and financial performance and which, by their very nature, mean that there is a difficulty in reporting this via the normal CMP channels.

Therefore use the Whistleblower Scheme to report circumstances in which you believe a person is aware of or in which you in good think that the violation is serious or illegal/unlawful. Such circumstances or situation could be:

- criminal offences, e.g. misuse of financial resources, fraud (e.g. accounting manipulation, embezzlement or misrepresentation), theft, and serious breaches of professional secrecy
- serious breaches of legal provisions, internal rules and control procedures, as well as non-compliance with legal obligations
- criminal acts such as bribery, fraud, forgery or corruption (e.g. conflicts of interest, bribery, sponsorship and donations, gifts or “greasing”)
- acts by senior management and/or the Board of Directors, which cannot be reported via the local channels
- intentional misrepresentation of information, including false or misleading statements about CMP’s business operations to, for example, public authorities
- conflicts of interest in interactions with external auditors, bankers, etc., including unlawful conduct in relation to accounting, auditing, taxation, accounting policies, etc.
- infringement of fair competition laws/antitrust laws (e.g. pricing, exchange of price sensitive information, collusion with competitors)
- serious violations against the environment, health and/or safety
- violence or sexual assault or other activities that otherwise constitute, by law or agreement, serious, inappropriate behaviour (e.g. bullying, discrimination, sexual harassment, use of child labour, violation of human rights)

The examples given above do not prevent reporting of matters of a different nature.

Anonymity - if you do desire

CMP has chosen the company Got Ethics as an external vendor of the digital platform for the whistleblowing system, as well as external lawyers in both Malmö and Copenhagen as case processors of reports made. All reports made via the CMP Whistleblower system will be kept confidential and anonymous unless you as a notifier provide your consent to deal with it otherwise. The reason for this to ensure a completely anonymous handling of the reports, if you so desire. However we encourage you as a notifier to provide your identity at the time of making the report, as the subsequent investigation of the case can be made more concrete and objective.

How do you file a report

You can report serious misconduct/wrongdoing on this webpage:

<https://cmport.whistleblownetwork.net>. From here, you can send an anonymous report to the selected external advisor. You can make the report in Danish, Swedish or English.

CMP encourages you to provide the following information when you report a wrongdoing:

- a description of the wrongdoing/irregularity – detailed and complete

- where applicable, the identity, title and contact details of any person responsible for the wrongdoing or any person who may have knowledge of the wrongdoing;
- where applicable, any documents, evidence or other relevant information that may assist the investigation of the misconduct/wrongdoing;

When you make a report, CMP encourages that the information provided is as accurate as possible. CMP and the external advisers will thus have the possibility to assess the seriousness of the case more accurately.

- No later than the day following the receipt of the report, the external lawyer will review the report to determine whether there are grounds to investigate further. The external lawyer then informs CMP's contact person, CHRO Pia Fabricius, of this decision. If it is then decided to continue with an investigation, the external lawyer will conduct it.
- If the report made relates to unacceptable conduct by a member of the Board of Directors, a member of the Executive Board or the internal contact person, the external adviser shall instead inform and work together with CMP's Chairman of the Board.
- The external lawyer and CMP's contact person (alternatively the Chairman of the Board) may set up an investigative team to investigate the matter in depth.
- False reports made knowingly in bad faith and with the intention of harming a colleague or CMP will be transferred to disciplinary follow-up in the HR Dept.

The processing of information submitted to the whistleblower scheme

- Notification of CMP's Whistleblower Scheme to the Danish Data Protection Agency has been made in accordance with the provisions of the Danish Data Protection Act.
- The external adviser will conduct the initial screening to assess whether the reporting falls within the purpose of the scheme.
- Information concerning circumstances or situation which fall outside the scope of the scheme will be rejected by notification being given to the party making the report (the information has been submitted anonymously).
- The lawyer forwards information submitted to the scheme to the HR Dept. The external lawyer, in accordance with internal practice, carries out further investigations and proceedings. The lawyer may ask the HR Dept. to assist with the investigation and the handling of the case.
- In exceptional cases where, for reasons of safety, etc., it is not considered appropriate to transfer the case to the HR Dept., the lawyer will be responsible for the investigation and the handling of the case.
- Persons who have reported information to the Whistleblower Scheme will be informed of the allegations made, including the type of information, the information to which the information is disclosed, and the rules concerning access to and the ability to correct information.
- However, the obligation to inform the information being reported may be deferred if necessary for the purpose of securing evidence – and in some cases may entirely be avoided.
- conclusions will also be communicated to the person making the report.

Sanctions/penalty

If after an investigation it has been found that serious irregularities have occurred, a proportionate sanction/penalty will be imposed.

Follow-up

The Executive Board/Board of Directors is regularly informed of the number and nature of reports to the Whistleblower Scheme.

Summary of reports made

CMP is responsible for having a copy of all reports made with associated evidence/documentation. The HR Dept determines the retention period in accordance with the then-prevailing legislation.

Questions

Should any questions about the policy arise, you are always welcome to contact CHRO Pia Fabricius, Containervej 9, 2150 Nordhavn. Mobile phone: +45 60 98 23 29 or via e-mail: pia.fabricius@cmport.com