

Vingmed Whistleblowing Policy

Purpose

Vingmed is committed to transparency, integrity, and accountability. The Whistleblowing Policy and its associated procedures establish the framework for addressing allegations of illegal or improper conduct within any work-related activity, creating a safe channel for reporting and protecting those who come forward. It aligns with EU Directive 2019/1937 and guarantees confidentiality and safeguarding against any form of retaliation for those reporting breaches of Union law and any corresponding national legislation in Sweden. The whistleblowing procedures are aligned with the requirements set forth by the EU General Data Protection Regulation (GDPR).

Scope - Who can make a whistleblowing report?

This policy applies to everyone working for or on behalf of Vingmed and for all locations, roles and seniority levels. A whistleblowing report can be submitted by anyone who in any way represents or is active in the business in work-related contexts.

This includes:

- All employees: permanent employees, probationary employees, fixed-term employees, full-time and part-time employees
- Trainees
- Job seekers
- Consultants and contracted personnel
- Board members and shareholders
- Authorities and control bodies
- Third parties related to reporting persons who may be subject to reprisals, including colleagues and relatives of the reporting person

What can be reported in case of whistleblowing?

The whistleblower service is for alerting about serious breaches of European Union or local legislation which may impact people, the organisation, the society or the environment. It must be related to a work context and there must be a public interest in the matter.

This policy also applies to occurrences which have happened in the past and are no longer relevant, as well as events that may happen in the future. It should also be emphasized that there is no distinction between conscious and unconscious misconduct – they are both serious and should be reported.

Reportable matters include potential or suspected irregularities related to:

- Corruption, bribery, money laundering, fraud, conflicts of interest
- Crimes affecting health and safety, workplace, product safety, discrimination, and harassment
- Environmental crimes, like illegal handling of hazardous waste
- Privacy violations and data security flaws that can cause significant harm

A whistleblower can report irregularities through the whistleblower function when they cannot or do not feel comfortable reporting to their manager, Quality Manager or HR function. If you are unsure whether you want to raise falls within the scope of this policy, we advise you to consult with your manager, Quality Manager or HR function before reporting.

Reporting Requirements

Whistleblowers must have reasonable grounds to believe the information is true, though proof is not necessary. Reports should be based on first-hand information, not rumours or hearsay. False or malicious accusations are not protected.

Workplace dissatisfaction or personal complaints should be raised with the manager or local HR-function and will not be treated as whistleblower matters.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the police.

How can reports be made?

Reports can be made in writing, orally or, upon request by the reporting person, in a physical meeting. Contact routes and information can be found in Table 1. Unless requested otherwise, the reporting person will remain anonymous.

Written reports

The link below is used to report incidents anonymously in written form via the Vingmed Whistleblower Hotline. The system used ensures that reports are managed confidentially under secure frameworks and in compliance with data protection breaches according to The European Data Protection Regulation (GDPR). All feedback to the reporting person will be handled within the system according to set time frames defined in this policy.

[Vingmed Whistleblower Hotline](#)

Reports can also be sent via email or regular postal mail. If the email-address or sender information is disclosed at receipt, the reporting person is no longer anonymous and feedback regarding the report will be provided accordingly.

Oral reporting

- Oral reports can be made via a telephone call, voice mail or during physical visit.
- Phone call: Can be made with disclosed identity or anonymously by choosing a temporary hidden number, which means that your number is not displayed when you make an outgoing call and cannot be searched for.
 - Here's how to hide your number: Open the keypad in the mobile phone in the same way as when entering a phone number. Press #31# and then the number you want to call.
- A physical meeting can be arranged via any of the available reporting alternatives above and will be conducted by the assigned and qualified person within the organisation

Table1. Contact routes and information

Vingmed A/S - Denmark	
E-mail	integritet@vingmed.dk
Phone	+45 45 82 33 66
Postal address	Birkerød Kongevej 150B 3460 Birkerød, Denmark
Visiting address	Birkerød Kongevej 150B 3460 Birkerød, Denmark

Reporting information

Whether a written or oral report is made it is important that relevant information is provided, including but not limited to:

- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.
- Any available documents, pictures or other information which will facilitate the follow up of the report.
- If the reporting person wishes to remain anonymous, all attachment names and properties need to be adjusted accordingly before submission. This is the responsibility of the reporting person.

External reporting

Internal reporting channels should be used first and foremost. However, reporting persons are also able to report externally to the local competent authorities.

External reporting channels in whistleblowing can be used when:

- Internal reporting channels are unresponsive or ineffective
- High-level management is involved, and internal channels are compromised
- Legal obligations require reporting to external authorities
- There is an imminent threat or criminal activity
- Concerns about retaliation or compromised identity exist
- Internal reporting has been exhausted
- The issue is of significant public interest, such as safety or environmental impact

Follow-up

Vingmed has assigned impartial persons competent for following up on any reports made. There are also competent and impartial persons within Vingmed Holding who can assist when necessary to uphold a neutral position in the matter.

Within seven (7) days of receiving a report, an acknowledgment of receipt will be sent to the reporting person, unless the reporting person explicitly requests otherwise, or if the recipient has reason to believe that acknowledging receipt of the report would jeopardise the protection of the reporting person's identity.

The designated persons will follow up on the reports and provide feedback within a reasonable timeframe, not exceeding three (3) months from either the acknowledgment of receipt or, in cases where no acknowledgment was sent, three months from the end of the seven-day period following the report. In cases of anonymous reporting, diligent follow-up will be conducted as required by applicable national law.

Feedback should include but is not limited to:

- An indication of how the organisation propose to deal with the matter
- An estimate of how long it will take to provide a final response
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, an explanation why

The designated persons will record details of the allegation gathering as much information as possible, including:

- The record of the allegation
- The acknowledgement of the allegation
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality. Anonymous reports submitted via telephone call, email or otherwise will not be able to receive information regarding acknowledgment of receipt or the results of the follow up.

Closing

When the matter has been handled and closed, the reporting person is notified of the outcome of the investigation and any measures taken via the chosen communication channel, if applicable. When a case is closed, all collected information is deleted, provided that archiving is not required according to applicable regulations, then the documentation is handled in accordance with these requirements.

Confidentiality and anonymity

Allegations are treated confidentially, and the whistleblower's identity is protected. However, disclosure may be necessary in legal proceedings or internal procedures, with the whistleblower's consent. Vingmed will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

Protection for Whistleblowers

Vingmed recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so will be protected from reprisals, harassment, or victimization.