



Axlab

Axlab Whistleblower Policy



POLICIES

Whistleblowers can make confidential and anonymous reports via this link [Axlabs Whistleblower](#)
Feel free to choose between Danish or English version.

At Axlabs, we are committed to always conducting our business with honesty and integrity. We strive for an open corporate culture where everyone can report suspicions of irregularities or circumstances that violate the law or the ethical standards we uphold.

It is our impression that Axlabs employees are largely comfortable with contacting their immediate manager to point out errors, negligence or inappropriate behaviour. However, there may be cases of such serious suspected illegalities or irregularities (e.g. criminal offences, serious violations of internal guidelines or sexual harassment) that an employee has reason to prefer using Axlabs's whistleblower scheme. The whistleblower scheme is thus a supplement to the open day-to-day communication that already exists within Axlabs.

This policy, which is relevant for all employees, external partners etc., provides a description of the whistleblower scheme. The scheme ensures that all reports are treated seriously and with the highest possible safety for both the whistleblower and the person or persons being reported.

This policy applies globally across the entire DENA Group, including DENA A/S and its subsidiaries, regardless of geographic or industry affiliation. Within the DENA Group, a so-called "whistleblower scheme" has been established for individual companies, enabling employees, external partners, members of management and the board of directors, as well as other stakeholders, to report suspicions of irregularities or violations of the law within a company completely anonymously. DENA itself also has a whistleblower scheme that applies to the entire group, covering overarching activities and business areas.

Everyone is encouraged to act immediately if they have reasonable grounds to believe that an offense that could harm the Axlabs's business or reputation is happening/about to happen.

Examples include:

- Financial crimes such as embezzlement, bribery, fraud, corruption, and forgery
- Significant breaches of workplace safety
- Major violations of environmental regulations and pollution
- Physical and psychological violence, discrimination, and sexual harassment
- Non-compliance with business practices, established codes of conduct, policies, and rules

The whistleblowing policy has been put in place to:

- Encourage employees, partners etc. to disclose this information or behaviour.
- Protect complainants from reprisals and ensure confidentiality as much as possible.
- Treat all parties to an investigation in a fair manner.

The whistleblower scheme must not be used for deliberately false accusations against individuals, and no knowingly untrue information should be reported.

If there is a suspicion of irregularities or violations of the law involving our customers or other parties, such as a hospital or suppliers, the whistleblower scheme of the respective customer or partner should be used.

To ensure anonymous electronic reporting, the whistleblower system is hosted by an external IT provider and operates independently from all other systems within the DENA Group. The system ensures, among other things, IP address anonymization and allows for ongoing anonymous communication via a PIN code login.

All reports on the whistleblowing scheme will be assessed. Axlabs is committed to following up on reports objectively, promptly and confidentially. Axlabs has committed to ensure that appropriate measures are put in place. Axlabs guarantees that there will be no negative consequences for employees or external partners who report actual or suspected violations in good faith. The system ensures that all reports are taken seriously and appropriately handled by a designated whistleblower officer. This officer assesses

whether the report falls within the scope of the whistleblower scheme and determines suitable measures, including whether further investigation is necessary. Reports will be processed as quickly as possible.

All Axlabs employees are obliged to cooperate in good faith when investigating reports.

The issue reported must involve a suspected legal/criminal violation taking place or about to take place. If you have concerns or dissatisfaction with workplace conditions, you should not use the whistleblower scheme. Instead, you should discuss the issue with your immediate manager or maybe top management or HR. The whistleblower system should not be used for concerns such as e.g.:

- Dissatisfaction with salary conditions
- Dissatisfaction with the work environment
- Difficulties collaborating with colleagues and/or managers
- Conflicts between colleagues and/or managers
- Disagreements regarding business operations and company development

Serious breaches of legislation or guidelines issued by Axlabs will be sanctioned in accordance with the legislation and Axlabs's applicable rules.