Whistleblower Policy

Tabellae A/S

and subsidiaries

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Purpose

Tabellae A/S has established a whistleblower system to enable employees, former employees, customers, suppliers, business partners, shareholders, and other stakeholders to report suspected unlawful or unethical conduct in the Tabellae Group.

The system ensures protection of whistleblowers acting in good faith and compliance with:

- **Directive (EU) 2019/1937** of the European Parliament and of the Council on the protection of persons who report breaches of Union law ("EU Whistleblower Directive").
- **The Danish Whistleblower Act** (Whistleblowerloven, LBK nr. 1052 af 25/09/2020) for operations in Denmark.

Scope

The whistleblower system covers **serious matters**, including:

Criminal offences

- Fraud, embezzlement, misappropriation of assets, document falsification, accounting manipulation, bribery, corruption, money laundering, terrorist financing.

Regulatory and safety breaches

- Violations of competition law or public procurement rules.
- Serious risks to health and safety, including repeated breaches of occupational safety rules.
- Significant breaches of environmental regulations.

Confidentiality and data protection

- Breaches of professional secrecy, privacy laws, and data protection regulations.

Workplace misconduct

- Severe discrimination, bullying, harassment, threats, physical violence, or sexual harassment.

The above are examples only. Whistleblowers who are in doubt as to whether a report falls within the scope of the whistleblowing scheme or not are encouraged to use the whistleblowing scheme.

Reports related to employment terms, working environment, workplace conflicts, or customer complaints should generally be addressed and resolved through local management or HR channels, unless exceptionally serious or not reportable through regular procedures.

Customer complaints cannot be reported via the whistleblower scheme. Such complaints must be reported to the customer's contact person in Tabellae, unless the matter is exceptionally serious and cannot be reported through the normal channels.

Reporting Procedure

Reports must be submitted via Tabellae's whistleblower system here.

- Reports can be submitted anonymously or with identity; identification is encouraged as additional information may be needed for investigation.
- Reports should be detailed and in English or Danish.
- Reports may also be submitted via external channels under Danish law (through the Danish Data Protection Agency) or relevant EU sector-specific legislation.
- Whistleblowers may provide a separate email address for anonymous follow-up.

Receipt and Handling

- Reports are received and acknowledged by Tabellae's Legal and Compliance Specialist ("L&C") within 7 days.
- The L&C assesses if the report falls within the whistleblower system.
- Reports are investigated **confidentially and objectively**.

All concerns reported as instructed above will be received by the L&C. Thus, no other person will get insight into reported concerns before a screening of the report has been made. Any investigation will be registered and conducted confidentially. The L&C will investigate the concerns and proceed with appropriate action.

In case the concern involves the L&C, the concern must be sent to the People & Culture Manager of Tabellae A/S at JV@tabellae.com.

Investigation outcomes may include

- Case closed as unfounded.
- Case closed with reprimand or warning.
- Employee dismissal.
- Policy, procedure, or guideline updates.
- Referral to authorities (police, regulators).

Whistleblowers will be informed within 3 months about planned or completed follow-up measures, in accordance with Section 12 of the Danish Whistleblower Act.

Confidentiality

- The identity of the whistleblower, or any information that could reveal it, will be shared solely with the designated investigator and only with the whistleblower's explicit consent.
- Other information may be shared with relevant personnel for proper investigation and resolution, if strictly necessary.

Protection and Sanctions

- Whistleblowers acting in good faith are protected from retaliation, including employment consequences. Tabellae ensures no discrimination or retaliation against whistleblowers acting in good faith.
- Knowingly submitting false or misleading reports will have employment law consequences in accordance with legislation.
- Serious breaches of law or internal rules may result in warning, dismissal, or referral to authorities.
- Suspected retaliation should be reported through the whistleblower system and will be treated confidentially.

Review

- The Board of Directors reviews the whistleblower policy annually and updates it as necessary.

Approved by the Board of Directors on the 5th of January 2026.