

Nets Whistleblowing Group Policy

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1 Introduction

The Nets Group requires all employees to conduct themselves with the highest standard of integrity.

This Whistleblowing Group Policy sets out the principles for whistleblowing in the Nets Group and encourages a culture where serious violations or misconduct, or suspicions thereof, can be addressed quickly and in a confidential and secure manner.

2 Scope and application

This Policy shall be approved by the Board of Directors of Nets Denmark A/S and Concardis Holding and presented to the local boards for direct adaptation unless local regulation requires otherwise. In addition, the Board is responsible for having enough and proper resources allocated to the compliance function. The local executive management is responsible for locating enough and proper resources to comply with this Policy.

The Policy shall be adopted by all subsidiaries and branches in the Nets Group.

If local regulation is stricter than this Policy, the local regulation in the relevant country will apply. Any deviation that collides with this Policy must be approved by Group Compliance & Regulatory, and Group Compliance & Regulatory will notify the relevant board. Upon notification, Group Compliance & Regulatory shall assess if a derogation from this procedure is needed or if additional requirements can be added in an appendix.

3 Purpose of the Whistleblowing Group Policy

This Whistleblowing Group Policy sets forth the procedures to report any concerns or suspicions regarding possible violations of laws, rules or regulations or possible violations of internal Nets policies, standards or procedures for:

- Current and former employees
- Members of the management and the board of directors of the Nets Group companies
- External customers, vendors, consultants and other persons related to the Nets Group.

The above-mentioned are collectively referred to as Relevant Individuals.

The Nets Group is committed to fostering a workplace contributing to open communication regarding their business practices and to protecting the Relevant Individuals from retaliation and discrimination for their having properly disclosed or reported illegal conduct or conduct violating or potentially violating the areas within the scope of this Policy.

The Nets Group hopes that, in the first instance, the Relevant Individuals will feel comfortable raising a concern or question with their supervisors, other managers, or the relevant business unit or group unit in accordance with internal guidelines for the Nets Group on how to report incidents and issues. If, for whatever reason, the Relevant Individuals feel that the Relevant Individuals cannot speak with their supervisors, other managers, or the relevant business unit or group unit about the matter, or if the Relevant Individuals have already done so, but believe that the concern has not been addressed, the Relevant Individuals can report the complaint or concern in accordance with this Policy, provided that the complaint or concern falls within the scope of the Policy.

Issues reported using the whistleblower channel will be handled strictly confidentially by Group Compliance & Regulatory.

Each issue reported will be treated with the required due diligence.

Group Compliance & Regulatory has the responsibility across the Nets Group to assess and handle issues reported through the whistleblower channel.

4 Where to report violations or suspicions thereof

The Relevant Individuals may report possible violations through one or more of the following channels:

- **Direct supervisor or head of department:** reports of possible violations may be made to a direct supervisor or the head of the Relevant Individual's department
- **Head of Group Compliance & Regulatory:** reports of possible violations may be made to the Head of Group Compliance & Regulatory (or respective regional heads), who is responsible for managing investigations of whistleblowing information
- **Electronic whistleblower scheme:** possible violations may be reported via the electronic platform: <https://www.nets.eu/Pages/Whistleblower.aspx>

Reports submitted via the electronic platform are handled by persons appointed by Head of Group Compliance & Regulatory. The appointed persons must be anchored in the local 2nd LoD Compliance function

5 What to report under the Whistleblowing Group Policy

By implementing this Policy, the Nets Group ensures that suspected violations of laws, rules or regulations or possible violations of internal Nets policies, standards or procedures may be reported quickly and confidentially in order to react on reported violations depending on the nature of the violation.

The Relevant Individuals may, under this Policy, report violations, misconduct or suspicions thereof that may influence the Nets Group as a whole or the life or health of individuals. This could (non-exhaustive list) be:

- a) Economic crimes, including
 - Making or offering bribes, payoffs or kickbacks
 - Corruption
 - Committing or attempting to commit fraud
 - Committing or attempting to falsify documents and committing or attempting to commit forgery
 - Involvement in money laundering or terrorism financing;
- b) Material violations of occupational safety rules and regulations;
- c) Material matters directed towards employees, including, but not limited to, assault and battery and sexual harassment;
- d) Criminal offences, including, but not limited to, the EU General Data Protection Regulation and national data protection acts regarding the processing of personal data as implemented in national law and national penal codes;
- e) Unlawful behaviour under relevant competition law, such as abuse of a dominant market position or entering into anti-competitive agreements;
- f) Use of unfair or deceptive acts and practices, including
 - Provision or endorsement of false or misleading statements about the Nets Group's affairs or contact partners, and
 - Improper influence on others to obtain or reward favourable treatment, intentional provision of inaccurate or misleading reports, certifications, claims or statements to any employee, customer, partner, government agency or official;
- g) Use of illegal discrimination or harassment;
- h) Unlawful behaviour in connection with accounting, internal accounting controls or auditing and financial matters;
- i) Material violations of the Supplier Code of Conduct and Ethical Guidelines applicable within the Nets Group;
- j) Efforts to conceal the above.

6 Matters not eligible for reporting

The matters that are not eligible for reporting under the Whistleblowing Group Policy are matters such as, but not limited to:

- a) Complaints about day-to-day personnel issues
- b) Routine employee matters
- c) Interpersonal conflicts and cooperation problems.

Such matters must be reported through the usual reporting channels within the Nets Group, e.g. through a manager, the HR department, the legal department or another designated method of reporting within the Nets Group.

7 Anonymity and handling of a report

The Nets Group has established an anonymous channel for digital whistleblowing. The digital platform ensures that reported concerns are treated 100% anonymously. The Relevant Individuals are not asked to provide personal information unless they choose to do so themselves. The confidentiality of the identity of the reporting person and any third party mentioned in the report is protected. The system prevents any access by non-authorised staff members.

All information can only be accessed and processed by appointed persons in Group Compliance & Regulatory and is handled with strict confidentiality.

The digital whistleblowing function will generate a unique ID for each Relevant Individual in order to use the secure and anonymous mailbox. This mailbox enables Group Compliance & Regulatory to communicate with the Relevant Individuals, if further information is needed, without revealing their identity. When using the reporting platform, IP addresses cannot be traced.

All communication will go through this channel, and the Relevant Individuals will receive an acknowledgement of receipt of the report within seven days of that receipt. Feedback will not exceed three months from the acknowledgment of receipt. By feedback is meant the provision to the reporting person of information about the action envisaged or taken as follow-up and about the grounds for such follow-up.

Depending on the actual circumstances, the Relevant Individuals are not legally entitled to receive material feedback on the report. If the complaint or concern falls outside the scope of the Whistleblowing Policy, the person who has reported the concern will be notified through the whistleblower system.

8 Protection of the whistleblower

The Nets Group is committed to fostering a workplace contributing to open communication and to protecting the employees from retaliation and discrimination since they have properly reported a breach.

The Nets Group will not tolerate retaliation or punishment of any kind against employees making a good-faith complaint or assisting the Nets Group in the investigation of any violation reported under this Policy. This includes any reprimand, reprisal, change in work duties, change in employment amenities, change in reporting requirements, damage to career prospects or reputation, threats to do any of the above or deliberate omissions that may harm the employee.

Employees who knowingly and maliciously make a false claim against somebody will not be protected by the Whistleblowing Policy. Employees who report in bad faith may be subject to civil, criminal and administrative penalties as well as disciplinary action, including termination of employment.

9 Retention

All documents related to reports must be retained in accordance with applicable laws, regulations and Nets policies and procedures.

If documents may be relevant to any pending or potential litigation, inquiry or investigation, the information must not be destroyed and must be retained for duration of that litigation, inquiry or investigation and thereafter, as necessary, in accordance with applicable laws, regulations or Nets policies and procedures.

10 Monitoring

Group Compliance & Regulatory performs internal monitoring/controls regarding the effectiveness of the tool according to a monitoring plan.

11 Training and awareness

Group Compliance & Regulatory provides mandatory and general awareness training to all employees.

12 Review

This Policy is managed and updated at least annually by Group Compliance & Regulatory and presented for adoption by the Board.

13 Implementation

This Policy shall be implemented by the business units within three months from publishing the Policy.

14 Approval

This Policy was adopted by the Board of Directors of Nets Denmark A/S on 12th of December 2022.