

Whistleblowing Policy – Arp-Hansen Hotel Group A/S

1. The object of the Whistleblowing Policy

The purpose of Arp-Hansen Hotel Group A/S whistleblower system, including all hotels affiliated with Arp-Hansen Hotel Group A/S (hereafter referred to as “**Arp-Hansen**”), is to ensure a safe environment in which employees and others with an affiliation to Arp-Hansen have the confidence to speak out about reprehensible practices without fear of repercussions.

The whistleblower system is intended to contribute to ensuring that serious errors and omissions are detected and to the widest extent possible prevented.

The whistleblower system is a supplement to the direct and daily communication at the workplace regarding errors and unsatisfactory conditions, etc.

Reports are filed electronically through the whistleblower system via a web portal, Safe2Whistle, which may be accessed via the Internet, www.arp-hansen.dk.

2. Who can report?

All employees at Arp-Hansen, the management team and board of directors and others affiliated with Arp-Hansen such as suppliers, guests, and other customers as well former employees may file a report through the whistleblower system.

3. What to report

The whistleblowing system is solely for the reporting of serious violations subject to the Danish Whistleblower Protection Act. Thus, you may file a report to the Company’s whistleblowing system regarding.

- violations of specific areas of the EU law
- serious offences and other serious matters

In regard to violations of specific areas of the EU law, you may e.g., file a report regarding

- Violations regarding EU law concerning financial services, products and markets, and consumer protection. For the remaining areas of relevant EU law, reference is made to article 2 of the EU Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.

By other serious offences and other serious matters, reports may e.g., concern

- Punishable offences, e.g. abuse of funds, theft, fraudulent misrepresentation, embezzlement, fraud, bribery, etc.
- Serious or repeated violations of legislation
- Serious or repeated violations of occupational health and safety legislation
- Serious or repeated violations of material internal guidelines, e.g. on business trips, gifts, financial reporting, etc.
- Serious workplace conflicts, e.g. in the form of sexual harassment or other serious harassment.

However, the whistleblower system cannot be used for expressing dissatisfaction with salary levels, minor offences such as violations of guidelines regarding smoking and drinking of alcohol and less serious workplace conflicts and disagreements.

4. How to report

If you file a report, the information listed below will generally be useful in connection with further investigation of the issue:

- A description of the issue in question, including date, place, and the name(s) of the person(s) involved
- Any documentation or evidence concerning the violation or other information which may assist the investigation

It is up to you whether you want to file the report in your own name or anonymously.

If you choose anonymity, it is important that you do not state your name anywhere in the report. In addition, you should be aware that your identity might be inferred from the information you have provided in the report.

Arp-Hansen may be under an obligation to make the report available to the persons affected by it or by the resulting measures.

5. How we handle the issue

As mentioned above, reports to the whistleblowing system can be made electronically via a web portal, Safe2Whistle, which is accessible via the internet.

Bech-Bruun is the data processor for purposes of managing the whistleblower system. The purpose of using an external party is to ensure impartiality and objectivity in the processing of the reports.

As external administrator of the whistleblowing system, Bech-Bruun, receives all reports and will begin by filtering out the reports that do not fall within the scope of the system, cf. clause 3. Filtered out reports are to be processed through the ordinary channels of communication.

Reports falling within the scope and purpose of the whistleblower system will be forwarded to Arp-Hansen's internal administrator, Ewa Axelsson, Head of HR, who will process and investigate the report. Bech-Bruun will be notified about the outcome of the investigation and will assess whether the matter may be considered as closed, or whether the report should give rise to additional investigations.

Reports concerning Arp-Hansen's internal administrator will be processed by Bech-Bruun. Reports concerning the management board or members of the board of directors will be processed by Bech-Bruun in collaboration with the chairman of the board of directors. Reports concerning the chairman of the board of directors will be processed by Bech-Bruun in collaboration with two members of the board of directors who are not disqualified in the relevant case.

No later than 7 days after your report has been received in the whistleblowing system, you will receive a confirmation of the receipt of your report. As a main rule, you will receive a notification concerning the closure of your report no later than 3 months from receiving this confirmation. If the processing of your report requires longer than 3 months, you will receive a notification regarding the reason why further investigation time is necessary. You will as a main rule, within the limits of Danish legislation, receive information about the outcome of your report.

All communication between you and Bech-Bruun will take place over the whistleblower portal. Thus, it is important that you follow your report on the whistleblower portal if you want to receive confirmation of receipt of your report, a reason for why your report requires longer processing time and if you want to receive a notification about the outcome of the investigations of your report.

6. Protection of the whistleblower

Arp-Hansen does not tolerate harassment, vengeful actions or other types of sanctions against any person who in good faith files a report.

You may not knowingly report incorrect or misleading information through the whistleblower system. Persons who report in bad faith may be subject to employment law sanctions, depending on the circumstances.

7. Duty of confidentiality

Bech-Bruun is together with Arp-Hansen's whistleblower unit subject to a special duty of confidentiality. Further, any person who is involved in the investigations of a report will be subject to the same special duty of confidentiality in regard to any information that has or is subject of the investigation of the report received through the whistleblowing system.

8. Notice to the reported person and to other persons

If information about you is reported in the whistleblower portal, and the report falls within Arp-Hansen's whistleblower system, you will as a general rule, not receive any information about the processing of your personal data.

If, on the other hand, the report does not fall within Arp-Hansen's whistleblower system, you will be informed of the processing of your personal data in accordance with the rules of the Data Protection Regulation and the Danish Data Protection Act.

9. Data protection

The processing of personal data in connection with a report received in the whistleblowing system will be on the basis of section 22 of the Danish Whistleblower Protection Act, according to which processing of personal data subject to articles 6, 9 and 10 of the General Data Protection Regulation may take place if the processing of the personal data is necessary to investigate a report received in the whistleblowing system established in accordance with the Danish Whistleblower Protection Act.

The General Data Protection Regulation and the Data Protection Act will apply to any further processing of personal data in the whistleblower system.

Arp-Hansen Hotel Group A/S, Nybrovej 75, 2820 Gentofte, CVR-nr.: 54399219 is the data controller for purposes of managing the whistleblower system.

For further information with regard to the processing of personal data please refer to the Privacy policy for employees [\[link\]](#) or Arp-Hansen's Privacy policy [\[link\]](#)

Please contact Lise Lauridsen +45 7227 3635 if you have any questions about the Whistleblowing Policy.

You may also file a complaint with the Danish Data Protection Agency (*Datatilsynet*), Borgergade 28, 5., 1300 Copenhagen, dt@datatilsynet.dk.

If you do not feel safe using Arp-Hansen's whistleblowing system, or due to other reason feel safer using an external whistleblowing system, you may file a report via Danish Data Protection Agency's external whistleblowing system, in which you may file a report either in writing or orally. The Danish Data Protection Agency's whistleblowing system is available via www.datatilsynet.dk