

# About Whistleblower Software

## What is Whistleblower Software?

Whistleblower Software is a comprehensive, confidential, and anonymous online reporting tool that enables management, employees, and our business associates to collaborate to address potential misconduct in the workplace while cultivating a positive work environment.

## Why do we need a Speak-Up Line like Whistleblower Software?

- BWSC employees are our most important asset. By creating open channels of communication, BWSC can promote a positive work environment and maximize productivity.
- BWSC further values our business associates. By working together, we can achieve the commitments that BWSC strives to achieve, as outlined in our Business Code of Conduct.
- An effective reporting system augments our other efforts to foster a culture of integrity and ethical decision-making.

## Who will receive my report?

The recipient of reports submitted via the BWSC Speak-Up Line is handled externally through Timbed ApS. Timbed an independent and impartial third party that will ensure the safety and confidentiality of your complaint. You can choose to remain anonymous or provide your contact details in confidentiality. Either way, your identity will be protected, and your report will be treated with respect and sensitivity.

Subsequently, once Timbed has conducted the initial screening, the information will be sent to the internal Speak-Up Administrator - Andre Jotle - Sustainability and Compliance Specialist, on a totally confidential and anonymous basis if you choose. In his absence, or if the report involves him, the report will be directed to Christa Bjerre, Chief People Officer.

Cases not involving the Executive Management will be shared with the CEO unless there are specific reasons not to do so.

Timbed has a dotted line to the BWSC Board of Directors for managing cases directly involving Executive Management.

# Reporting – General

## How can I report?

Whistleblower Software allows you to report (confidentially or anonymously) via text or using the oral function. The reporting portal allows you to distort the audio and remove metadata from any uploaded files should you wish to remain anonymous.

## What types of situations should I report?

The Whistleblower Software system allows employees and business associates to report any violation of the BWSC Business Code of Conduct or other concerns you may have.

## If I see a violation, shouldn't I just report it to my manager or HR and let them deal with it?

When you observe behavior that you believe violates our Business Code of Conduct, we expect you to report it. You can report direct manager or other relevant employees. However, we recognize that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for these circumstances that we have partnered with Whistleblower Software and Timbed. We understand that you may want the option to report anonymously. You can be assured that in this instance, neither BWSC nor the service provider for the Speak-Up Line has any means of identifying you.

## Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment, and with that right comes the responsibility of acting in an ethical manner. Further, corporate misconduct can threaten the very existence of our entire company. By working together, we can maintain a healthy and productive environment at BWSC.

## Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact to BWSC and our stakeholders. Further, offering positive input may help identify issues that can improve corporate culture and performance.

## Isn't this system just an example of someone watching over me?

No. Our Speak-Up Line is a positive aspect of BWSC's overall philosophy that allows us to ensure a safe, secure and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today's workplace and this is a great tool for enhancing that communication. We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

## Reporting Security & Confidentiality

**It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?**

Whistleblower Software by Formalize, does not create or retain any internal connection logs containing IP addresses, ensuring that no data associates your PC with Whistleblower Software. If submitting a report from your work PC feels uneasy, you can utilize a computer outside of your workplace, like one at an Internet café or a friend's residence, accessing the whistleblower Software secure website.

**Can I file a report from home and still remain anonymous?**

Submitting a report from home, a neighbor's computer, or any Internet portal guarantees security and anonymity. Internet portals never reveal a visitor's screen name, and the Whistleblower Software system removes Internet addresses entirely, ensuring complete anonymity.

**I am concerned that the information I provide Whistleblower Software will ultimately reveal my identity. How can you assure me that will not happen?**

While the Whistleblower system safeguards your anonymity, it's crucial for you, as the reporting party, to prevent inadvertently disclosing your identity within the report. Avoid phrases that will be able to identify who the reporter is or has a connection to.

**What if I want to be identified with my report?**

There is a section in the report to identify yourself if you wish.

## Tips & Best Practices

**I am aware of some individuals acting unethically, but it doesn't affect me. Why should I bother reporting it?**

BWSC promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a lapse in ethics can have on an otherwise healthy company. If you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and/ or your coworkers to report it.

**I am not sure if what I have observed or heard is a violation of BWSC's policies, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report. BWSC would rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

**What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?**

The Whistleblower Software system and report distribution ensures that implicated parties are not notified or granted access to reports in which they have been named.

**What if I remember something important about the incident after I file the report? Or what if Timbed has further questions for me concerning my report?**

When you file a report through Whistleblower Software, you receive a unique key. You can return to the Whistleblower Software system and access the original report to add more detail or answer questions posed by a company representative. We strongly suggest that you return to the site in the time specified to answer company questions.

**Are these follow-ups on reports as secure as the first one?**

All Whistleblower Software correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

**What if I lose my Report Key or forget the Password I created?**

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Kindly mention in the new report that it is related to a report or question you previously submitted.