

# Whistleblower Policy

## SP Group

SP Group A/S  
Snavevej 6-10  
5471 Sønderød  
Denmark

CVR no. 15 70 13 15



# Whistleblower Policy for SP Group

## 1. About SP Group's whistleblower system

SP Group has a whistleblower system through which serious concerns can be raised confidentially and anonymously. See section 5 for matters that can be raised.

The whistleblower system is intended to ensure that potential wrongdoings and other serious matters are quickly brought to the attention of SP Group and that the reports are processed by an independent unit that assesses and handles the matter.

The whistleblower system is a voluntary supplement to the standard communication paths at SP Group. Therefore, always consider whether your concern may be resolved via your immediate superior, HR or other relevant channels.

All reports are treated confidentially – even when made anonymously. We recommend that you read this policy before reporting a matter.

## 2. How can you use the whistleblower system?

Reports must be made in writing via the SP Group whistleblower portal:  
<https://sp-group.integrityline.com>

Reports made by other means are only protected under the system if agreed in advance with the whistleblowing unit.

You can make a report in Danish or English, and you can choose to be anonymous.

In order for SP Group to address the matter effectively, the report should be as accurate as possible, e.g. describe the incident, the persons involved and the time and place and include any supporting documents or evidence.

## 3. How are reports processed and registered?

Reports are received and registered by SP Group's external cooperative partner, DAHL Advokatpartnerselskab, via the whistleblower platform. Generally, the whistleblower will receive acknowledgement of receipt within seven days.

Initially, DAHL Advokatpartnerselskab will screen the report to assess if it falls within the scope of the whistleblower system. If not, the whistleblower will be notified of this and will usually be given the opportunity to provide additional information before a final decision is made.

Reports falling outside the scope of the whistleblower system will be referred to SP Group's in-house whistleblowing unit, who will investigate the matter. The whistleblowing unit is bound by a duty of secrecy and treats all information as confidential. If the report concerns a member of the whistleblowing unit, DAHL Advokatpartnerselskab will ensure that the person concerned is excluded from taking part in the investigation.

Once the investigation has been completed, SP Group's management will decide on actions or consequences, if any.

The whistleblower will receive feedback on the process to the extent possible and no later than three months after acknowledgement of receipt. The feedback may include information about the investigation and the background to actions taken or contemplated.

All reports are treated confidentially, and the whistleblowing unit is not permitted to disclose any information that could reveal the whistleblower's identity.

## 4. Storage and deletion of data

Information provided under the whistleblower system is only stored for as long as necessary

and proportionate in order to address the matter and comply with the law.

As a general rule, reports that are rejected are deleted immediately and no later than seven days after the whistleblower (if possible) has been informed of the rejection. In special cases, the data may be stored longer.

Reports being processed are stored on the basis of a case-by-case assessment. Thus, there is no fixed storage period. The assessment will include the following considerations:

- whether the person reported or the whistleblower may need evidence;
- whether SP Group has a legitimate need to follow up on the matter or compare it with other reports;
- whether new information may emerge about the same matter.

If the matter is reported to the police or other authorities, the report is generally deleted when the authorities' case has been closed.

If the matter results in disciplinary action, or if there are other legitimate grounds for continued storage, the data may be stored for an extended period, typically in the relevant

personnel file and in accordance with applicable law.

As a general rule, if the matter is not reported to the authorities or referred for disciplinary action within two months after an investigation has been closed, the data will be deleted.

### 5. What matters can be reported in the whistleblower system?

The whistleblower system can be used to report serious matters that relate to SP Group and have either occurred or are reasonably expected to occur. Matters are divided into three categories:

#### Category 1: Serious offences

Criminal offences and other severe wrongdoings, including:

- theft, fraud, embezzlement, bribery, money laundering
- hacking, communications interception, forgery
- serious breaches of confidentiality, accounting law and tax law
- serious breaches of environmental law or occupational health and safety regulations
- misuse of funds
- non-compliance with statutory requirements

As a general rule, the matters must be of such a nature as to make disclosure a matter of public interest.

#### Category 2: Other serious concerns

This concerns matters that may have a significant impact on the life or health of individuals or SP Group as a whole, including:

- sexual harassment or other gross harassment
- serious discrimination
- gross or repeated violation of internal guidelines (e.g. travel policy or rules on gifts)
- serious collaboration problems that pose a risk to safety, health or product safety
- non-compliance with professional standards, which may harm the health or safety of individuals

#### Category 3: Violation of certain EU regulation

Any violation – regardless of the degree of severity – can be reported under this category if it concerns EU regulation on:

- public procurement
- financial services and markets
- money laundering and terrorist financing
- product safety and compliance
- transport safety
- environmental protection

- radiation protection and nuclear safety
- food and feed safety, animal health and public health
- consumer protection
- data protection and privacy
- security in networks and information systems
- competition law and state aid

Any violation of the rules listed in category 3 can be reported regardless of its nature and severity.

### 6. What matters cannot be reported under the whistleblower system?

The whistleblower system can only be used to report serious matters (categories 1–3).

Less serious matters are not covered and therefore cannot be addressed under the system.

Examples of matters that cannot be reported:

- dissatisfaction with pay or working conditions
- general collaboration problems
- incompetence, absence or minor breaches of internal rules
- private use of office supplies
- violation of smoking or alcohol policies

- generally inappropriate conduct that is not gross or repeated conduct

Concerns about such matters must instead be raised through SP Group's standard communication channels, e.g. via the immediate superior or HR.

Reports that fall outside the scope of the whistleblower system will be rejected and deleted in accordance with the rules on storage and deletion. They are not automatically forwarded to the appropriate department. It is for the whistleblower to decide whether the information should subsequently be shared through the normal channels.

### 7. Who can report a matter under the whistleblower system?

The whistleblower system can be used by anyone who, through their work, has gained access to the information they wish to report. The following groups are covered:

- employees of SP Group
- independent contractors and other sub-suppliers
- shareholders, executive board members and board members
- volunteers, trainees (paid as well as unpaid)
- employees of suppliers and sub-suppliers

- former employees
- persons who are not yet employed but have obtained the information during the recruitment process or other pre-contractual processes

## 8. Who can be reported under the whistleblower system?

Any persons working for or otherwise associated with SP Group can be reported, including:

- employees
- management members
- board members
- suppliers and others with a work-related association

Matters that cannot be linked to a particular person but are caused by, for example, system errors or deficiencies in SP Group's processes can also be reported.

## 9. Processing of personal data

In connection with whistleblower reports, SP Group processes personal data about the whistleblower, the person reported and other persons mentioned in the report.

The processing of personal data is carried out in accordance with applicable data protection law. For a full description of the data processed, how they are stored and your

rights under SP Group's privacy policy applying to the whistleblower system, click here:

<https://sp-group.integrityline.com/app-page:appPageName=Privacy%20policy>

## 10. Confidentiality and anonymity

As a whistleblower, you can choose to report a matter anonymously. However, SP Group encourages you to disclose your identity, as this will often make it easier to investigate the matter and communicate with you. Regardless of your choice, all information will be treated confidentially.

If you wish to be anonymous, it is your own responsibility to ensure that your identity does not appear from the report or any supporting documents.

Your identity will only be disclosed with your consent – unless it is necessary to report information to the police or other authorities for purposes of resolving the matter or protecting the legal rights of the persons concerned. You will generally be notified prior to such disclosure.

## 11. What rights does a whistleblower have?

Whistleblowers are protected from retaliation if both of the following conditions are met:

1. The concern is reported through the SP Group whistleblower system or the Danish National Whistleblower

Scheme (and, in special cases, by publication).

2. The whistleblower had reasonable grounds to believe that the information was correct and fell within the scope of the system.

The protection includes, among other things, keeping the whistleblower's identity confidential and a prohibition against negative consequences of whistleblowing.

If the whistleblower has committed a wrongdoing, the report may have consequences for the whistleblower's own employment relationship.

The whistleblower must have obtained the information legally. Unauthorised access may lead to liability.

The whistleblower also has rights under the data protection rules as described in section 9.

## 12. What rights does the person reported have?

Persons reported also have rights.

Generally, the person reported will be informed that a report has been made and that an investigation will be carried out. However, notification of the person will be deferred or omitted:

- if it may reveal the identity of the whistleblower; or
- if it could impede the investigation.

Unless required by law, the identity of the whistleblower is never disclosed without the whistleblower's consent.

The report is subject to confidentiality and is therefore not shared with the person reported.

If the person reported cannot be notified without directly or indirectly revealing the identity of the whistleblower, no notification will be given.

## 13. Reporting to the Danish National Whistleblower Scheme

As an alternative to SP Group's own whistleblower system, you can report a concern under the National Whistleblower Scheme of the Danish Data Protection Agency, which considers the same types of reports.

SP Group recommends that internal matters are reported in-house, provided they can be handled effectively and without the risk of retaliation.

Read more at:  
<https://whistleblower.dk/english>.

### **Questions and contact details**

If you have any questions about the whistleblower system, please contact:

Attorney Søren Wolder, DAHL  
Advokatpartnerselskab  
[swk@dahl-law.dk](mailto:swk@dahl-law.dk)  
+45 88 91 92 45

If you wish to exercise your rights under data protection law, please contact:

SP Group  
CEO Lars Bering  
[lb@sp-group.dk](mailto:lb@sp-group.dk)  
+45 40 33 88 50

It is not possible to make a whistleblower report directly using the contact details above.

### **Adoption and annual review**

This Whistleblower Policy was adopted by the management of SP Group. The policy is reviewed and updated at least once every year, or more frequently to reflect any changes to legislation or SP Group's internal affairs.

## About SP Group

SP Group manufactures moulded plastic and composite components and applies plastic coatings on plastic and metal surfaces.

SP Group is a leading supplier of manufactured plastic products for the manufacturing industries and has increasing sales and growing production from own factories in Denmark, China, the USA, Latvia, Slovakia, Sweden, Finland and Poland. SP Group also has sales and service companies in Sweden, Norway, the Netherlands and Canada.

SP Group is listed on NASDAQ Copenhagen A/S and had 2,417 employees and about 4,750 registered shareholders at 30 September 2025.

## SP Group A/S

Snavevej 6-10  
5471 Søndersø  
Denmark

Tel: +45 70 23 23 79  
[www.sp-group.dk](http://www.sp-group.dk)  
[info@sp-group.dk](mailto:info@sp-group.dk)

CVR no.: 15 70 13 15