



WHISTLEBLOWING - GUIDELINES FOR REPORTED PERSONS (DK)
NETCOMPANY GROUP A/S

TABLE OF CONTENTS

1	INTRODUCTION	3
2	INFORMATION TO THE PERSON REPORTED	3
3	RIGHT OF ACCESS, OBJECTION, JUSTIFICATION, DELETION AND BLOCKING	3
4	RIGHT TO JUDICIAL REVIEW.....	3
5	QUESTIONS	3
6	YOUR RIGHTS UNDER THE DANISH DATA PROTECTION ACT	3
7	REVIEW AND AMENDMENT	4
8	PUBLICATION.....	4

WHISTLEBLOWING - GUIDELINES FOR REPORTED PERSONS (DK)

NETCOMPANY GROUP A/S

(CVR-no. 39 48 89 14)

1 INTRODUCTION

1.1 In these guidelines, we will describe your rights if you are reported through Netcompany Group A/S', CVR no. 39 48 89 14 (the "Company") whistleblowing system.

2 INFORMATION TO THE PERSON REPORTED

2.1 If you are reported through the Company's whistleblowing system, you will be informed as soon as possible after a preliminary investigation has taken place and all relevant evidence has been secured.

2.2 You will be informed about:

- (i) The identity of the person/group responsible for the investigation of the report.
- (ii) A description of the accusations.
- (iii) The persons who have seen the report.

3 RIGHT OF ACCESS, OBJECTION, JUSTIFICATION, DELETION AND BLOCKING

3.1 You are entitled to obtain access to the report that has been filed against you. But you are not entitled to be informed about the identity of the person who has reported you.

3.2 If it is concluded that the report was false, you will be informed of the identity of the person who reported you.

3.3 You are also entitled to request the Company to correct the information in the report that you believe is false, misleading, incomplete or outdated. If the Company cannot accommodate the request, your comments will be added to the information.

4 RIGHT TO JUDICIAL REVIEW

4.1 If you become subject to sanctions related to employment law as a consequence of being reported and subsequently investigated, you have the right to have your case referred to a court of law.

5 QUESTIONS

5.1 If you have any questions regarding these guidelines, please do not hesitate to contact:

- Tine K. Boye on tkb@netcompany.com / +45 24 91 75 33.

6 YOUR RIGHTS UNDER THE DANISH DATA PROTECTION ACT

6.1 The following is a description of some of your general rights under the Danish Data Protection Act. For instance you are entitled to request access to the information that the Company, as data controller, processes about you, including:

- (i) the information that is processed;
- (ii) the purpose of the processing;
- (iii) the categorisation of the recipients of the information; and
- (iv) available information about the source of such information.

6.2 If you wish to receive the above information, you can contact the Company's Group HR by e-mail.

6.3 The Company will then reply to your request as soon as possible. If the request has not been answered within 4 weeks from the receipt, the Company will inform you of the reason and the time at which the decision is expected to be made.

6.4 If you have received the information above, you are not entitled to a new notice until 6 months after the last notice, unless a particular interest in such notice is proved.

6.5 You are also entitled to complain to the Danish Data Protection Agency if you are dissatisfied with the Company's processing of your information.

7 REVIEW AND AMENDMENT

7.1 The Audit Committee shall continuously review, and if relevant update, these guidelines.

8 PUBLICATION

8.1 These guidelines will be published on the Company's website.