

# **Global whistleblower policy**

**See something? Say something!**

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## 1) Introduction

Don't let your concerns go unresolved.

It is in everyone's interest that Ørsted is a transparent and trustworthy company. We are committed to ensuring that all our activities are conducted in accordance with all relevant international, national, and regional laws and regulations as well as high ethical standards.

We can all contribute by acting responsibly, being alert to irregularities, asking questions, and speaking up when we have concerns. To enable this, Ørsted has a Whistleblower Hotline which is used for reporting and handling of all investigations and for coordinating with affected areas and stakeholders.

### 1.1 Scope

The Whistleblower Hotline is subject to national and international laws and regulations that aim to protect the rights and freedom of persons with respect to the reporting of cases and the associated processing of personal data. The whistleblower policy promotes integrity by providing a procedure that enables actual or suspected wrongdoings to be raised through the different means provided by Ørsted.

Neither leaders, employees, nor any stakeholder should carry out any investigations unless specifically requested to do so by Internal Audit. If a leader becomes aware of matters involving potential irregularities, such matters should be reported to Internal Audit or to the Whistleblower Hotline.

### 1.2 Purpose

The purpose of the policy is to:

- encourage a culture in which whistleblowers can raise concerns in good faith, know what, how, and where to report, and are safeguarded against any retaliations
- ensure that the whistleblowers can report wrongdoings swiftly and confidentially through the appropriate channels. It is vital to Ørsted to protect the identity of the whistleblower, even in cases where they identify themselves
- prevent and investigate any actual or suspected reported misconduct thoroughly and in a timely manner
- highlight the importance of Ørsted being recognised as a trustworthy and ethical company with competent and honest employees and business partners who can speak up when they become aware of suspected irregularities.

## 2) Who can use the Whistleblower Hotline?

The following can report:

- Employees (paid and voluntary, as well as former employees and new hires who have not started yet).
- External contractors.
- Shareholders.
- Business partners.
- Suppliers.
- B2B customers.
- Any affected community.

## 2.1 Your rights as a whistleblower

As a whistleblower, you have the following rights:

- You may report anonymously.
- If you file a report in good faith, it will not have any adverse consequences as Ørsted has a zero-retaliation policy.
- Your information is confidential.
- You may report individuals at all levels in Ørsted, including executive management, as the whistleblower cases are handled by Internal Audit, which is an independent department who reports functionally to Ørsted's Board of Directors.

## 3) What can be reported to the Whistleblower Hotline?

### 3.1 Examples

The Whistleblower Hotline allows you to report any suspected illegal or inappropriate conduct in a safe and confidential manner. Below, we list some examples:

- Theft and embezzlement.
- Accounting manipulation.
- Breaches of legislation on insider trading.
- Financial fraud.
- Bribery and corruption.
- Breach of internal guidelines and policies.
- Breach of competition laws.
- Breach of EU tender rules.
- Breach of EU data protection regulation (GDPR), noting that data breaches must be reported via our IT Service Desk.
- Breach of financial regulation, including (but not limited to) AML, MiFID, MAR, and REMIT.
- Breach of US energy regulations.
- Breach of global or local policies regarding workplace harassment, including sexual harassment and discrimination.
- Violation of human rights and labour rights.
- Breach of regulation on environment and safety.

### 3.2 Do not report the following

We ask that you do not report matters that are less serious than those mentioned above, e.g. disagreements between colleagues, absence and violation of guidelines governing smoking, alcohol, and use of email.

If you have serious concerns regarding any of these matters, please speak to your people leader, your leader's leader, or another leader at a higher level.

Please note that the Whistleblower Hotline is not an emergency response call centre.

## 4) How to report

The whistleblower set-up allows everyone to communicate directly with Internal Audit. The Whistleblower Hotline is hosted by an independent external supplier to secure anonymous reporting channels for whistleblowing reports. In the system a secure and anonymous mailbox can be opened to allow communication between the whistleblower and the investigator. This allows Internal Audit to engage with the whistleblower, e.g. by asking clarifying questions.

You can report a case through different reporting channels (see below).

#### 4.1 Web page, apps, email, or direct contact

- You can fill out a written report via the web page [orsted.whistleblownetwork.net](https://orsted.whistleblownetwork.net).
- You can use the Ørsted Ethics app (available in Orsted Apps) or the Ørsted Whistleblower Hotline app or if you are an external stakeholder (available in Google Play or App Store).
- You can send an email directly to [whistleblower@orsted.com](mailto:whistleblower@orsted.com).
- You may also report a case in person and request a physical meeting through the web page linked to above.

For reports filed via email or in person, the whistleblower has the possibility to remain anonymous going forward if desired. This will be agreed upon with the whistleblower.

Information received via email, the web page, apps, or direct contact is entered into the whistleblower system for registration purposes and to ensure transparency.

#### 4.2 By phone

You can also call the hotline. The line is open 24/7, all year round, and is free of charge. You can also send us a voice message directly via the hotline reporting page if you do not wish to record a voice message by calling the [local toll-free numbers](#).

Please remember to choose your country, as this will give you access to country-specific phone numbers. You can report a case in your preferred language, and your message will automatically be translated into English.

#### 4.3 People leader

You may also consider reaching out to your people leader or your leader's leader to get their support. In all cases, leaders should, following agreement with the employee, report the case to the Whistleblower Hotline on the employee's behalf.

For all whistleblowers who choose to identify themselves, the leader should ensure that the employee reports the case to the Whistleblower Hotline.

Leaders are responsible for supporting and creating an open culture to encourage individuals to report concerns. All leaders in Ørsted must be familiar with and able to identify the types of irregularities related to good business conduct and compliance in general that can occur within their areas of responsibility.

All leaders are reminded that neither leaders nor employees should carry out any investigations themselves unless specifically requested to do so by Internal Audit.

*\*See section 6 of the policy for information on anonymity.*

#### 4.4 Compliance officers

You may reach out directly to a [compliance officer](#) from one of the organisational areas.

*\*See section 6 of the policy for information on anonymity.*

#### 4.5 Business Ethics Compliance

You may contact the Business Ethics Compliance team by sending an email to [bec@orsted.com](mailto:bec@orsted.com).

*\*See section 6 of the policy for information on anonymity.*

## 5) Roles and responsibilities

### 5.1 Board of Directors

The Board of Directors supervises Ørsted A/S and its subsidiaries' activities and must, among other things, ensure that their activities are managed in compliance with our articles of association, licenses and permits, current legislation, and any other provisions governing Ørsted A/S and its subsidiaries' activities.

The Board of Directors has established an Audit & Risk Committee.

### 5.2 Audit & Risk Committee

The Audit & Risk Committee is responsible for establishing the Whistleblower Hotline.

The Chair of the Audit & Risk Committee has full access to the hotline and all case intakes.

The Audit & Risk Committee has delegated the authority to administer Ørsted's Whistleblower Hotline and set supplementing guidelines to the Chief Audit Executive.

### 5.3 Internal Audit

Headed by the Chief Audit Executive, a small team of compliance specialists within Internal Audit are tasked with the day-to-day managing and administration of the Whistleblower Hotline and all investigations related to reported cases. The Chief Audit Executive and the Head of the Audit & Risk Committee have full access to the hotline and all case intakes. The Chief Audit Executive provides regular quarterly reporting to the Audit & Risk Committee on all cases.

## 6) Anonymity and confidentiality

While you are encouraged to identify yourself when you file a report, you can always choose to file a report anonymously. The Whistleblower Hotline and all the channels are set up to support and ensure that anonymous reporting is available. If you choose to remain anonymous, neither Ørsted nor the service provider will have any means of tracking or identifying you. No cookies, IP address, or similar are stored.

If the concern is raised through a people leader, Business Ethics Compliance, or a compliance officer, the whistleblower can choose to remain anonymous going forward. This should be agreed upon with the whistleblower.

Reports made through the system are only available to the Chair of the Audit & Risk Committee under the Board of Directors and compliance specialists of Internal Audit.

## 7) Outcome

Investigation conclusions and actions taken in response to a case are reported to the Audit & Risk Committee, and corrective actions are carried out by people leader with assistance from People & Development when needed.

## 8) Criminal investigations and potential sanctions

All reports of criminal offences, such as fraud, bribery, or corruption, should be thoroughly investigated using appropriate means and resources. When the internal investigation is terminated, or sufficiently advanced to allow an assessment, it should be decided if the case should be transferred to the police for a criminal investigation and prosecution and/or if a damage suit should be filed. These decisions are taken by the Chief Audit Executive and should mainly be based on an assessment of the evidence and indications discovered in the internal investigation. In the final phase of the investigation, the investigator(s), together with the Chief Audit Executive, need to decide if the investigation entails

potential sanctions. Leaders in the relevant organisational area and People & Development decide on sanctions. Internal Audit provides recommendations on such.

### 9) Protection/no retaliation of the whistleblower

Individuals who file a report to the hotline in good faith are protected against retaliation, and so is anyone who cooperates in an investigation.

We do not tolerate any form of retaliation taken directly or indirectly against a whistleblower as a result of filing a report or for cooperating in an investigation (e.g. as a witness or provider of information). We are committed to taking all appropriate steps to protect a whistleblower and other individuals involved from such retaliation upon notification.

National laws, where applicable and relevant, that require better protection to whistleblowers or individuals cooperating in an investigation, will supplement or override this commitment.

We take all allegations of retaliation very seriously, and they will be investigated separately by our team of compliance specialists within Internal Audit. If an allegation of retaliation is substantiated, it will be considered as misconduct and a breach of the policy and may result in disciplinary action.

### 10) Data security and data storage

All reports will be stored properly and in restricted folders so that only relevant persons will be able to access the information.

Personal data with no obvious relevance for the case cannot be collected and must, if collected incidentally, be deleted.

The information received under the whistleblower policy will be retained by Ørsted only for the period required by regulation and for Ørsted's processing of the data in question.

[Please also see Ørsted's privacy policy.](#)

### 11) Ownership

This policy has been approved and is owned by Audit & Risk Committee.

### 12) Local amendments

Local laws may apply in addition to this policy. Please refer to the following local amendments:

- Ireland

### 13) Appendix

- [Good business conduct](#)
- [Code of conduct for business partners](#)
- [General privacy policy](#)
- [Compliance framework and Ørsted compliance officers](#)

14) Change log

Version	Date	Initials	Description
1	2023-12-12	MIRAP	New policy approve by Head of ARC