

Whistleblower policy for Roblon A/S

Version 1

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1 Introduction

Roblon A/S is introducing a whistleblower policy to enable employees, former employees, customers, suppliers, business partners, shareholders and other stakeholders to report suspected unlawful or unethical conduct within the Roblon Group, such as: suspected financial crime, bribery, corruption, breach of competition law or environmental and climate regulation, discrimination or sexual harassment. The whistleblowing policy is to be used solely for reporting of actual or suspected serious misconduct, including any acts that are potentially harmful to Roblon's business or reputation. Employees should not use the whistleblowing policy to report issues related to employment terms, working environment or the like. Such issues should be reported to Management or HR, unless they are unusually serious or for a particular reason cannot be reported through regular channels. Customers should not use the whistleblowing policy to make complaints about Roblon's deliveries. Such complaints should be made to the customer's regular Roblon contact person. Concerns may be reported anonymously or non-anonymously and will be treated as confidential. Roblon prefers persons reporting concerns to disclose their name and other contact details, so that it is possible to ask clarifying questions, if needed.

2 Reporting

Concerns may be reported by e-mail to: whistleblower@roblon.com or by letter to: Roblon A/S for the attention of the Chairman of the Board or, if the issue relates to the Chairman, of the Deputy Chairman, Nordhavnsvej 1, 9900 Frederikshavn, Denmark.

PLEASE MARK ENVELOPE "CONFIDENTIAL"

Confidential personal data should not be sent by e-mail, as they may not be transmitted in unencrypted form via the open internet. Therefore, reporting of concerns comprising confidential personal data must be sent by letter.

To facilitate thorough examination of all reported concerns, whistleblowers are encouraged to identify and describe their concerns in as much detail as possible. A form for this purpose is available on Roblon's website under Investors (see appendix 1).

3 Receipt and examination of whistleblower reporting

All reporting sent as indicated above will be received directly by the Chairman of the Board of Directors and will not be seen by anyone else before the Chairman. The Chairman will thoroughly examine all reported concerns and take any necessary action. All reporting will be treated as confidential.

Depending on the nature of the individual concerns reported, the Chairman may choose to involve Roblon's Management or external advisers, such as the company's legal advisers or auditors.

If the reported concerns relate to the Chairman, the matter should be reported by letter addressed to the Deputy Chairman. All reporting sent to the Deputy Chairman of the Board of Directors will be received directly by the Deputy Chairman and will not be seen by anyone else before the Deputy Chairman.

4 Retribution or misuse of the whistleblower policy

Roblon A/S will not tolerate any form of retribution against or punishment of persons reporting concerns in good faith via the whistleblowing policy.

Any persons believing that they have faced retribution for reporting a concern or participating in examinations should immediately report this via the whistleblowing policy. Such reports will be examined in confidence.

Any misuse of the whistleblowing policy and any false reporting made deliberately and in bad faith will be duly sanctioned.

Appendix 1 – Reporting form

Form for reporting concerns under Roblon’s whistleblowing policy

When reporting concerns of misconduct under the whistleblowing policy, please answer the following questions as fully as possible.

Reporting form:

What is the nature of your concern?	
Who is/are the person(s) involved?	
Where did the misconduct take place?	
Is the misconduct still going on?	
Does the reported misconduct represent a financial value?	
How did you become aware of the information?	
What is your name? (not required, but preferable)	
How may we contact you, if necessary? (not required, but preferable)	