

SYSTEMATIC POLICY FOR THE WHISTLEBLOWER SOLUTION “TELL US” (POL001)

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Introduction

At Systematic we want to protect our company and our employees and ensure that we remain a fair, safe and honest place to work. That is why we have made a whistleblower solution available to which third-party and all Systematic employees who become aware of any kind of inappropriate and illegal misconduct or violations of Systematics' Code of Conduct can report such concerns.

The whistleblower solution includes all companies in Systematic GROUP.

The purpose of this instruction is to:

- reduce the risk of retaliation and harmful acts against the whistle-blower.
- to create transparency
- to ensure that Systematic have effective and reliable mechanisms that encourage reporting of potential or actual breaches of law.

What is covered

Systematic encourages serious offences to be reported through the whistleblower solution. However, it is stressed that the system is a voluntary alternative to the regular communication channels in the organization.

Serious violations include:

- Violation of legislation
- Bullying
- Bribery/Corruption
- Policy/procedure breach
- Conflicts of interest
- Violation of safety or security rules
- Discrimination
- Fraud
- Health/Safety/Environment
- Sexual harassment and assault
- Misconduct
- Theft
- Other serious violations of Systematic's code of conduct

Description of the whistleblower solution

HOW IT WORKS

Systematic has entered into an agreement with Deloitte to operate our whistleblower solution, named "Tell Us".

Reports to the whistleblower solution are made via an electronic whistle-blower notification portal, to which third-party and employees are able to report 100% anonymously. The portal and a Q&A can be accessed through this [link](#).

The whistleblower will be able to communicate anonymously with the Deloitte analyst appointed to the task. The Deloitte analyst will review the information been given and will then suggest specific follow-up action to the investigating officer in Systematic.

The Investigation officer is by default the Chairman of the Board. If a report concerns the Chairman of the Board, Deloitte will instead forward the report to an independent third-party external lawyer at Gorrisen & Federspiel.

The Investigation officer will delegate the case to a specific investigator within Systematic, who will investigate the specific disclosure and decide what possible reaction from Systematic, the investigation shall lead to, including whether the incident should be reported to the police. The involvement of others must always be subject to the requirement of strict confidentiality.

Disclosures that appear manifestly unfounded or that are manifestly outside the solution are immediately deleted and the Deloitte employee notifies the whistleblower of the rejection through the Whistleblower system and use the general chain of command.

Protection of INVOLVED PERSONS

Protection of the whistleblower: If the whistleblower chooses to give his name at the time of the alert and the case develops into a trial, the whistleblower may be called as a witness in accordance with the rules of the Code of Civil Procedure. This could be, for example, if the alert leads to criminal proceedings in which the accused or his defense counsel requests access to the alert.

Protection of notified: In most countries the law states, that the person who is the subject of an alert (the Notified) must be informed, that an alert has been made concerning the person concerned. Such a notification may only be omitted if the public interest is in conflict with the key private or public interest, including investigations into, for example, market abuse or similar serious crimes.

Reporting to the Board of Directors

Once a year in December, the Board of Directors receives a report from the Chairman of the Board on whether the whistleblower solution has worked satisfactorily in the past year, including:

- The results of the annual review test in the whistleblower system
- The result of the six-monthly check of access holders to the whistleblower system

Finally, the annual reporting provides information on the number of cases reported in the past year (in anonymized form).

Data security and data retention

Data security

Personal data processed within the whistle-blower solution, are governed by your general rights under the Danish Data Protection Act. This includes investigative reports and attachments that are processed securely and only authorized personnel have access to the information, including sensitive personal data.

Systematic and Deloitte has entered into a written agreement that complies with the requirements of the Personal Data Act and the EU General Data Protection Regulation when using data processors.

Data retention

Where disciplinary proceedings begin or a sanction is enforced against the employee, or there are other reasons for continuing to store information about the employee is legitimate and necessary, information will be stored in the employee's OurPeople file. Information about the employee is kept up to 5 years after the end of his employment.

Annual checks

An annual check shall be carried out on the satisfactory functioning of the system, whereby the contact person in People & Culture conducts a test case in the system in accordance with the agreement with the contact person in Deloitte. This checks functions and accesses to the reporting page and the administration side respectively.