

As approved by BoD on 30. June 2020

# **LOGSTOR**

## **Whistleblowing Policy**

## **1. Background and purpose**

LOGSTOR is committed to run its business in full compliance with all laws and regulations.

The reputation of LOGSTOR is mainly determined by the activities and the behaviour of its employees. In order to ensure full compliance of the company's operations and to protect the high reputation of LOGSTOR in the public, the company has decided to establish a whistleblowing system.

The whistleblowing system provides a platform by which the (actual or suspected) violation of certain laws and regulations can be reported. The scope of reportable (actual or suspected) violations extends to:

- Violations of anti-trust laws and regulations (including the company's Anti-Trust Policy),
- Violation of anti-corruption (anti-bribery) laws and regulations (including the company's policies in this regard),
- Fraud, including falsification of documents, creation of wrong or misleading books or records (including tax returns), violation of laws and regulations regarding accounting or auditing,
- Illegal payments; money laundering issues,
- Other criminal matters (for example, theft)

The purpose of the whistleblowing system is:

- A means of reporting (actual or suspected) violations anonymously,
- To ensure that employees, members of management and the board of LOGSTOR as well as external stakeholders have an opportunity to report serious breaches of applicable laws or LOGSTOR policies,
- To enable LOGSTOR to take timely and appropriate action,
- To serve as early warning system by ensuring that the top management and/or board of directors of LOGSTOR are made aware of any such matters as early as possible in order to (i) assess and investigate the matter and (ii) be able to take appropriate action

Reporting under the whistleblowing system is voluntary and may be anonymous.

However, LOGSTOR encourages all whistleblowers to identify themselves as it improves the speed and quality of the process.

## **2. Reporting by LOGSTOR employees**

If an employee wish to report a matter, he/she may use the whistleblowing system, or instead – depending on the matter- raise the issue through ordinary reporting channels to their supervisors/managers or other appropriate LOGSTOR personnel such as HR, EC representative or CEO.

### **3. What may/may not be reported?**

What may be reported:

Serious and sensitive concerns that could have an adverse impact on the operations and performance of LOGSTOR or which may have a significant effect on a person's life or health may be reported in the whistleblowing system. Such concerns could include, without limitation, concerns regarding:

- Serious breaches of safety related policies;
- Other issues posing a serious threat to life or health of individuals;
- Violence, sexual assaults and serious discrimination by or against employees;
- Pollution and breaches of environmental laws and rules;
- Material breaches of LOGSTORs various policies, e.g. breach of the Anti-Trust Policy (e.g. price fixing);
- Other severe irregularities of a general and/or operational nature; or
- Accounting or auditing matters or irregularities of a financial nature, legal and/or ethical nature, such as:
  - fraud (e.g. financial fraud, document fraud or embezzlement);
  - serious deficiencies or deliberate error (in e.g. financial reports or statements, or in internal accounting controls);
  - bribery or corruption; and/or
  - providing false information to authorities

What may not be reported:

Issues not listed above or of a less severe nature may not be handled under the whistleblowing system.

If reported anyway under the whistleblowing system, the reporting will be disregarded and deleted. Evaluation and decision regarding whether or not a specific report is within the scope of the whistleblowing system, will be made by the Compliance Committee (see section 6 below).

### **4. Who may report?**

All employees, management and board members in LOGSTOR; and external stakeholders (such as customers, suppliers or other similar third parties related to LOGSTOR).

### **5. About whom may the reporting be made?**

Employees, management, board members, auditors, lawyers, customers, suppliers and other similar third parties related to LOGSTOR.

## **6. How to report - process**

The whistleblowing system ensures confidential and, if desired, anonymous reporting.

Reporting is made by completing the electronic form, preferably in English, available on [www.LOGSTOR.com/Whistleblowing](http://www.LOGSTOR.com/Whistleblowing).

The reporting will be received directly by LOGSTOR's Compliance Committee. If the reporting, by the majority of the members of the Compliance Committee, is deemed unfounded, or outside the scope of this policy, the reporting will be disregarded and deleted.

The Compliance Committee consists of the Audit Committee as appointed by the board of directors, together with LOGSTOR's Compliance Officer. If any of these may be involved in the reported matter, the Compliance Committee will ensure that such involved party is excluded from the investigation of the reported matter in question.

## **7. Investigation of reported matters**

Once the Compliance Committee have decided that a reported matter is bona fide and within the scope of what may be reported under the whistleblowing system, the Compliance Committee will initiate an investigation of the reported matter, and take the necessary actions.

A written report outlining the results of the investigation and the measures taken will be sent to the Board of Directors of LOGSTOR Denmark Holding ApS.

## **8. Contradiction and no retaliation**

The person(s) whose behaviour has been reported, will be notified of the main object of the reported concern as soon as possible and normally within 10 days, to allow such person to present objections. However, such notification may be delayed as long as there is a substantial risk that such notification will jeopardise the investigation or have a detrimental effect on any future measures or actions which may be necessary to implement as a result hereof.

If possible and appropriate, the Compliance Committee shall inform the whistleblower about whether a reported matter has been disregarded, or whether it will be subject to further investigation.

When a reporting is within the scope of this Whistleblowing Policy, the whistleblower is protected from any kind of retaliation or discriminatory or disciplinary action as a result thereof, including termination of employment, demotion, suspension, threats or any other kind of harassment. Any such retaliation against the whistleblower is considered a serious breach of this Whistleblowing Policy. However, such protection does not apply if the whistleblowing system is abused, i.e. if the whistleblower intentionally or to the best of his/her knowledge makes a false allegation or makes an allegation that, bearing in mind all the circumstances known to the whistleblower, is unjustified.

## **9. Abuse of the whistleblowing system**

Failure to comply with this Whistleblowing Policy may be grounds for disciplinary actions in accordance with local law, including potentially termination of employment.

## **10. Implementation**

The whistleblowing system has been adopted by the Board of Directors of LOGSTOR and it is applicable to the entire LOGSTOR group.

Subject to other requirements under local law, all reported and collected information will be deleted:

- immediately if the report is outside the scope of the whistleblowing system or is manifestly unfounded, or if no internal action is made in relation to the concern,
- right after the closing of the case by the authorities if a report is filed with the police or other relevant authorities,
- 2 months after the investigation has been completed if no further action is taken, or
- at the latest 5 years after the time of the employee's departure if disciplinary sanctions are made towards the reported employee on the basis of the collected information, or other reasons for it being factual and necessary to continue storing the information, the collected information will be stored in the personnel folder in question

## **11. Questions**

Any questions, both regarding practicalities related to usage of the whistleblowing system, as well as applicability on a particular issue, can be directed to LOGSTOR's Compliance Officer:

Line Dissing Mønster, Director, Global Counsel, LIMON@logstor.com, tel. +45 99661080

The data controller of data processed under this Whistleblowing Policy is LOGSTOR Denmark Holding ApS.

On behalf of the Company and the Board of Directors

**Line Dissing Mønster**  
Compliance Officer