

Whistleblower Policy

Valid from 24th January 2025

Purpose

This whistleblower policy is valid for all reports made through FANT – For A New Tomorrow’s Whistleblower Scheme.

The purpose of our Whistleblower Scheme is to give all employees, board members, volunteers, partners and people affected by our work, be that children, youth or adults, the opportunity to anonymously or not report on serious or criticisable conditions or events without the fear of retaliation or repercussions. Furthermore, the purpose is to secure the protection of the whistleblower who reports on mistakes or negligence which can lead to economical loss or harm to FANT.

As an employee, partner or person otherwise affected by FANT’s work, you are often the first to discover irregularities, corruption, illegal conditions or other instances of misconduct. Therefore, we at FANT have established this Whistleblower Scheme to provide a safe space for making reports on such instances. Identifying such events or action and handling them in a fitting manner is of the utmost importance for us.

How can you make reports?

Reports can be made through our Whistleblower Scheme, which can be accessed through FANT’s [website](#).
















Who can use our Whistleblower Scheme?

Our Whistleblower Scheme is available to all FANT employees, board members, volunteers, partners and people affected by FANT or FANT partners’ work, be that children, youth or adults. This extends to both Denmark and the countries which FANT works in (Sierra Leone, Ghana, The Gambia and Ukraine). Thus, the Whistleblower Scheme is also available to for example community members affected by work carried out by FANT partner organisations.

Which type of breaches can be reported?

The breaches falling within the material scope of the Whistleblower Scheme is primarily guided by the Danish Whistleblower Law (Lov nr. 1436 af 29/06/2021). Please refer to Section 5 in the Danish Ministry of Justice’s [guidelines on whistleblower schemes](#) for more information. Breaches falling within the material scope of FANT’s Whistleblower Scheme are:

1) Serious offences to national legislation or other serious conditions or events in the workplace, communities or the like. What constitutes serious offence depends on the specific assessment of the breach in question, but it can be breaches as:

-  Bribery and/or corruption
-  Sexual harassment, exploitation and abuse
-  Violence
-  Breaches of FANT's Code of Conduct
-  Gross harassment for example on the basis of race, gender, sexuality, skin color, language, national or social origin, political or religious affiliation
-  Theft/stealing
-  Hacking, recording conversations or wiretapping
-  Embezzlement
-  Fraud
-  Data fraud
-  Blackmailing
-  Document forgery
-  Severe bullying
-  Terror
-  Child labour

2) Breaches of the EU regulations as defined in article 2.1 in the whistleblower directive which can be found [here](#).

What cannot be reported?

The Whistleblower Scheme is a supplement to the normal daily dialogue between employees, partners, board, community members etc. Therefore, dissatisfactions with things like salary, cooperation difficulties, breach of smoking- or alcohol policies, sick leaves or other personal dissatisfactions cannot be reported through the Whistleblower Scheme.

It is important that the Whistleblower Scheme is not abused to make accusations against innocent people. All reports must therefore be done in good faith. If a report is made in bad faith, and is done in a rash of negative personal feelings, vengeance etc. it can result in warnings or termination of the employment etc.




Confidentiality and anonymity

All information or data received through our whistleblower solution is processed confidentially. Our whistleblower system is implemented in such a way that the confidentiality of both the

whistleblower and the person/people who is subject to the report is secure. This includes that receipt, registration, and storing of the reports only are available to relevant personnel who are investigating the reports.

If you choose to report non-anonymously, we ensure the same level of confidentiality. However, if the report leads to legal processing or lawsuits against the persons or persons who are subject to the report you may be called in as a witness. In such cases we cannot ensure your confidentiality.

Furthermore, there can occur situations where the identity of relevant people may be revealed to relevant parties. This can e.g., be:

-  A police investigation is being pursued
-  The investigation leads to a court case being filed
-  The person making the report is offered special accommodation during the process, such as a leave of absence

Secure postbox

When making a report as a whistleblower, you have the opportunity to create a secure postbox. The postbox can be used to provide further documentation related to the initial report. The internal investigators and whistleblower can communicate through the secure postbox without the whistleblower's identity being compromised. The use hereof is solely based on the whistleblower's willingness to log-on and answer questions or upload further documentation.

If you choose to create a secure postbox when making a report, you will create a password and be provided with a unique link to your postbox linked to the report. It's very important that you **save this link on your device as the link cannot be reproduced.**

Process for the handling of reports

Whistleblower reports submitted are initially sent to our partner GapSolutions A/S who are responsible for the whistleblower system itself. They make an initial screening of the report to ensure that there is no conflict of interest between the content of the reports and the internal investigators (Whistleblower Unit).

Subsequently, the report is released to our Whistleblower Unit, which consists of Karin Glavind, Board Member of FANT, and Cecilie Hauerberg, Head of Secretariat at FANT. They will then analyze the report to ensure that the content falls within the material scope of the Whistleblower Scheme. Hereafter, they will conclude whether the content of the report merits a further investigation or whether it will be rejected.

If the whistleblower report submitted concerns Karin Glavind or Cecilie Hauerberg from the Whistleblower Unit, then GapSolutions A/S will instead release the report to Svend Stenberg Mølholt, Chairman of the Board of FANT.

If the report does not fall within the material scope of the Whistleblower Scheme, then the Whistleblower Unit can advise the whistleblower on how they should proceed with their report.




If the report falls within the material scope, the Whistleblower Unit will then conduct an internal investigation of the content. The whistleblower will receive feedback on their report no later than 3 months after the report has been made to us. There can, however, occur circumstances where the Whistleblower Unit extends this deadline to 6 months. The Whistleblower Unit will inform the whistleblower of the extension and reasons within the initial period of 3 months.

If the report is sufficiently substantiated and the internal investigation finds it necessary, then appropriate measures will be applied to the person/people in question. This can be disciplinary sanctions, warnings, termination, police reports or in some cases lawsuit.









Whistleblower protection

When an employee, board members, volunteers, partners or people affected by FANT's work in good faith reports under the scope of the Whistleblower Scheme, they are granted protection.

As a whistleblower you cannot be held responsible for the following:

-  Disclosure of confidential information, if the whistleblower is in good faith of the necessity of the information to uncover breaches of the law or serious conditions or event.
-  Procurement of information, unless the procurement is a result of a criminal offence such as hacking, wiretapping etc.
-  Breaches of contractual non-disclosure agreement with the company

Furthermore, a whistleblower is protected against retaliation and attempts of retaliation as a result of the reports. This includes but is no limited to:

-  Termination, suspension
-  Changes in assignment, position, working hours, salary
-  Degradation or lack of promotions
-  Negative performance review
-  Harassment of any form
-  Exclusion of employee activities
-  Revocation of licenses or permissions
-  Other harmful action against the whistleblower or persons closest to the whistleblower

We take all claims of retaliations very seriously, and they will be investigated.

IT Security

Our whistleblower solution is hosted by GapSolutions A/S who is ISO 27001 and ISAE3000 certified and ensures the necessary security and anonymity in the solution.

GapSolutions A/S has taken the necessary technical and organizational measures to ensure that personal data is not a subject to accidental or unlawful destruction, is lost or compromised and that no unauthorised personnel is given access or can misuse personal data.

All data transmissions and storage of data are encrypted.

If a report is made from a device on the company's network, there is risk that visited websites is logged in your browser history and/or in the company's own logs. This risk can be eliminated by making your report on a device which is not connected to the company's network.

If you upload documents, you should pay attention to whether or not these contains metadata or other information that can compromise your on identify.

Logging

Registration of reports is done anonymously in the system. The only thing which is registered is the report itself. There is no log of the used IP-address or machine-ID on the device used to make the report.

Processing of personal data

Our processing of personal data regarding the whistleblower scheme is described in over privacy policy for the whistleblower solution.

Questions

If you have questions regarding the Whistleblower Scheme, you are welcome to contact us at fant@fant.dk. Please note that this form of contact will not be anonymous.

Approval

Code of Conduct FANT is latest approved by the Board on January 24, 2025, during a board meeting.

Signature lines for board members:

Ralf Jannick Lundby Nielsen

Louise Dalsgaard

Karin Glavind

Toke Hanghøj

Svend Stenberg Mølholt