WHISTLEBLOWER POLICY

Policy for use of the whistleblower platform

Date: 21/11/2026 22:00

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1 Introduction and purpose

1.1 A whistleblower system is a place where employees, business partners or others with an interest and relation to Clipper Bulk safely can address their concerns regarding violations of legislation, good practice, or breach of internal policies.

1.2 At Clipper Bulk, we strive to have an open culture where everyone has a confidential place to direct any suspicion of irregularities or illegalities, regardless of whether the suspicion concerns employees, management, clients, or suppliers.

1.3 The establishment of a whistleblower scheme is part of handling and preventing cases that do not live up to the principles we want to operate according to, and which can have great economic and reputational significance for us.

1.4 Employees are often the first to discover irregularities or unethical behaviour in the workplace and are, therefore, a key element in using the whistleblower scheme as a part of securing our future.

1.5 A key element of the whistleblower scheme is that employees and others who report an incident feel confident in reporting irregularities or suspected irregularities. Of course, this requires that all reports are handled confidentially. We have chosen that our whistleblower system will be administered by Lund Elmer Sandager as external lawyers to ensure professional and efficient handling of the cases and for the highest degree of confidentiality as possible.

1.6 The whistleblower system allows employees, business partners and other people with collaborative relations with Clipper Bulk to make anonymous and confidential reports to the whistleblower platform in case of reasonable suspicion of irregularities or illegalities. The whistleblower system ensures that such reports are treated seriously and appropriately without risk of reprisals or the like against the person who made the report.

1.7 The purpose of this whistleblower policy is to explain how the whistleblower platform works, including how reporting through the platform can take place and which incidents are to be reported.

1.8 All questions regarding the whistleblower platform can be directed to Lund Elmer Sandager at whistleblower@les.dk.

2 Scope

2.1 At Clipper Bulk, we comply with both the law and internal rules to ensure the proper operation of our company. The whistleblower policy applies to all Clipper Bulk.

2.2 All employees and collaborative relations with fair grounds and reasonable suspicion can make use of the whistleblower system. This applies to employees, management associates, partners, suppliers, and the like.

2.3 The whistleblower platform may be used to report irregularities, unethical behaviour, breaches of law or reasonable suspicion. Irregularities and unethical behaviour also apply to non-compliance with internal guidelines.

2.4 A report does not have to be attributed to a specific person. Potential violations or attempted violations may also be reported on the whistleblower platform.

2.5 Examples of matters that can be reported may be but are not limited to:

- ❖ Financial crimes (embezzlement, bribery, fraud, forgery)
- ❖ Incorrect or misleading information to public authorities
- ❖ Physical violence or sexual harassment
- ❖ Breach of safety at the workplace
- ❖ Threats towards the environment, health and safety
- ❖ Other offences related to Clipper Bulk
- ❖ Gross violation of internal guidelines and policies

2.6 Examples of matters that cannot be reported in the whistleblower system may be but are not limited to:

- ❖ Dissatisfaction with salary
- ❖ Lack of co-operation and collegial conflicts
- ❖ Complaints from customers

2.7 If you are uncertain as to whether your suspicion or the circumstances you have become aware of are within the scope of the whistleblower scheme, we encourage you to report the matter. Lund Elmer Sandager will then assess whether the matter is within the scope of the whistleblower scheme.

3 Whistleblower reports

3.1 Reporting to the whistleblower system is done through the electronic form. The form is set up in such a way that the report is handled confidentially and securely. It is also possible to be anonymous. Read more below.

3.2 The processing of reports from the whistleblower platform is carried out by Lund Elmer Sandager. Lund Elmer Sandager handles the cases individually and independent of the management. Lund Elmer Sandager reports and communicates about whistleblower cases to the contact persons in the company assigned to receive such reports. Thus, Lund Elmer Sandager ensures efficient processing of the report while protecting the whistleblower and ensuring legal capacity in connection with handling the report.

3.3 Relevant employees at Lund Elmer Sandager are to complete annual training in handling whistleblower cases.

3.4 All reports are taken seriously and treated confidentially. The identity of the whistleblower is only published by prior agreement with the whistleblower or to authorities if Lund Elmer Sandager or we have a duty to do so in connection with the report, or if it is necessary for the sake of legal consequences.

4 Case processing

4.1 The case processing in connection with a report to the whistleblower system follows the following steps:

4.1.1 The report is received on the whistleblower platform

4.1.2 Assessment of whether the matter is within the scope of the whistleblower scheme

4.1.3 Contact to the assigned contact person(s) in the company is established

4.1.4 Further investigation of the matter including communication with the whistleblower if relevant

4.1.5 Reporting and recommendation to the contact person(s) of the company

4.2 If a report if assessed to be outside the scope of the whistleblower scheme, the whistleblower will be encouraged to contact the appropriate management team/administration. In this connection, public authorities will guide the whistleblower to whom the report may be directed. In certain cases, public authorities may be obliged to forward reports that are outside the scope of the whistleblower scheme to the appropriate authority. In such case, the forwarding takes place in such a way that the whislteblower's confidentiality and anonymity are protected, and the whistleblower will be informed of where the report has been forwarded. After this, the report will be marked in the system as being outside the scope of the whistleblower scheme, and it will be deleted/anonymised in accordance with terms set out in the Privacy Policy.

4.3 The reporter is continuously informed about the development of the case to the extent possible and can be contacted during the case processing for follow-up questions. When the reporter has reported a matter, the reporter will receive a receipt of the report on the screen as well as by email if the reporter has provided an e-mail address in connection with filing the report. Final feedback on the case is given to the whistleblower on the whistleblower platform within 3 months of receipt of the report.

4.4 Lund Elmer Sandager may continuously involve necessary resources from the company to carry out the necessary investigations in connection with the reporting. This will take place in collaboration with one of the two contact persons who have been appointed. In this connection, Lund Elmer Sandager may only pass on the information necessary for the departments in question to carry out the investigation. Lund Elmer Sandager may ask the employees in question to sign a non-disclosure agreement before the work is commenced.

5 Confidentiality and anonymity (processing of personal data)

5.1 When you report a matter to the whistleblower system, you may choose to be anonymous. If you wish to remain anonymous, we will not be able to see your personal information. If you are anonymous, it is more difficult for us to communicate with you, and you must, therefore, access and check your case yourself if you want to help us with the further investigation.

5.2 Although there is this possibility of anonymity, you must be aware that circumstances in relation to the reported matter may involve that someone will still be able to identify you.

5.3 In any case, all reports are handled confidentially, and your identity will not be published, unless you have consented to this or if disclosure is necessary for the authorities or in connection with a lawsuit.

5.4 As a starting point, you should first use the company's internal whistleblower scheme. If you are particularly concerned about reprisals or are in doubt as to whether the case can be dealt with effectively internally, you have the opportunity to submit a report to an external whistleblower scheme. You can read more about the external whistleblower scheme here: https://www.datatilsynet.dk/om-datatilsynet/whistleblowerordning, you may submit a report to an external whistleblower system.

6 Protection of the reporter and abuse of the system

6.1 Everyone who reports to the whistleblower platform in good faith is protected against any form of reprisals relating to employment law, harassment, exclusion, discrimination, unfair treatment, damage of reputation, blacklisting, termination or termination of collaboration, revocation of permission, etc.

6.2 Anyone who attempts to retaliate against a whistleblower may be subject to sanctions in relation to employment law, civil law and criminal law.

6.3 It may result in employment law consequences when reporting to the whistleblower system in bad faith, e.g. to harass someone. The same applies to the reporting of incorrect information if the reporter is aware that the information is incorrect at the time of reporting.