

# Whistleblower Policy

## 1. PURPOSE

Birch Ejendomme Holding ApS, Reg. no. 40975292, and all its directly or indirectly owned subsidiaries (collectively referred to as "**Birch Ejendomme**") have set up a whistleblower scheme, which aims to give current and former Birch Ejendomme employees, business partners, and other people associated with Birch Ejendomme ("**Whistleblowers**") the opportunity to report information to the whistleblower scheme.

Information may be reported about serious violations of law, as well as other serious matters. This includes reasonable suspicions of actual or potential violations of legislation and/or guidelines issued by Birch Ejendomme, as well as any attempts to circumvent legislation and/or guidelines or conceal such violations. Matters of a more trivial nature, or reports relating to the Whistleblower's own employment, will generally not be covered by the scheme.

## 2. SCOPE OF APPLICATION

Reports to the whistleblower scheme may include the following:

- Criminal offenses such as e.g. fraud, embezzlement, misappropriation of assets, falsification of documents, accounting manipulation, bribery, corruption and money laundering
- Gross or repeated violations of legislation, including, for example, violation of competition rules, data protection legislation, confidentiality provisions, etc.
- Serious violations of occupational safety standards
- Material breaches of environmental regulations and pollution of the environment.
- Serious violations of internal guidelines and rules
- Aggravated harassment, sexual harassment, physical violence, threats and sexual abuse

Matters of a less serious nature must be reported to Birch Ejendomme via the normal management structure and are not regulated by this policy. Such matters may include information about minor violations of Birch Ejendomme's internal guidelines on sickness absence, smoking and alcohol, as well as complaints about employee behaviour or incompetence, including information about minor personnel-related conflicts and minor cooperation difficulties that do not pose a serious risk.

If there is any doubt as to whether a matter falls within the scope of the whistleblower scheme, Birch Ejendomme encourage that a report is submitted, after which it will be assessed whether the matter in question constitutes a violation specifically covered by the scheme.

## 3. REPORTING

### 3.1 Internal reporting via PwC

Reports to Birch Ejendomme's whistleblower scheme are made electronically by completing and submitting an online reporting form. This form is sent directly to an external third party, which is PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab ("**PwC**").

The link to the reporting form is available on our website and can be found [here](#).

Online reports via PwC can be submitted anonymously, however, Birch Ejendomme recommend that whistleblowers provide their name and contact details, as this allows for a more efficient investigation process.

PwC will initially assess whether the report is covered by the whistleblower scheme and then conduct an impartiality assessment to determine which Birch Ejendomme employee is authorised to handle the report. The report will then be sent to a competent, impartial person at Birch Ejendomme's Whistleblower Unit for further investigation.

The Whistleblower will receive an acknowledgement of receipt of the report within seven days.

### **3.2 External reporting via national whistleblower schemes**

Where any violations can be handled effectively internally and the Whistleblower assesses that there is no risk of retaliation, Birch Ejendomme encourage reports to be made directly to its internal whistleblower scheme via PwC, as mentioned in clause 3.1 above.

However, it is also possible to make a report through the national external whistleblower schemes made available through public authorities. Among other things, the Danish Data Protection Agency has established the National Whistleblower Scheme, where it is possible to submit reports on all the matters mentioned above. It is possible to access the National Whistleblower Scheme and read more about the scheme on the website [www.whistleblower.dk](http://www.whistleblower.dk).

In addition, a number of public authorities have established external whistleblower schemes. This includes the Danish Working Environment Authority, the Danish Environmental Protection Agency and the Danish Business Authority.

This Whistleblower Policy outlines Birch Ejendomme's guidelines for reporting, processing and following up on reports submitted via Birch Ejendomme's internal reporting channels, as described in clause 3.1 above.

## **4. PROCESSING OF REPORTS**

### **4.1 Birch Ejendomme's Whistleblower Unit**

Birch Ejendomme have appointed a Whistleblower Unit consisting of Birch Ejendomme's Chief Legal Officer (CLO), Chief Human Resources Officer (CHRO), the person responsible for compliance in the legal department and PwC.

Birch Ejendomme's CLO is responsible for overseeing the whistleblower scheme and decides whether to conduct an investigation of reports received and, if so, whether to conduct the investigation internally and/or with external assistance.

Birch Ejendomme's CLO will appoint an investigator who is responsible for conducting a detailed investigation of a specific report. The investigator may be either an employee of Birch Ejendomme or an external person, and the CLO may also choose to act as the investigator personally. The Whistleblower Unit is bound by a duty of confidentiality regarding the identity of the Whistleblower, regardless of who is responsible for the internal follow-up.

If Birch Ejendomme's CLO is absent or disqualified in relation to a specific report, the report will be forwarded to another member of the Whistleblower Unit, such as the CHRO or the person responsible for compliance in the legal department, who will then be responsible for handling the report and may appoint an investigator.

### **4.2 Receiving and investigating reports**

Birch Ejendomme carefully follow up on all reports and will, in collaboration with PwC, assess whether the report falls within the scope of the whistleblower scheme. The content and nature of the report determines how it is followed up.

If the report falls outside the scope of the whistleblower scheme or is manifestly unfounded, the report will be rejected. The Whistleblower will – as far as possible – be notified.

If the report falls within the scope of the whistleblower scheme, the report will be processed in accordance with this policy.

#### **4.2 Registration of reports**

The report will be registered in compliance with Birch Ejendomme's obligation to ensure confidentiality of the report and the report will be stored in accordance with Birch Ejendomme's privacy policy for whistleblowers, cf. clause 5 below.

#### **4.3 Obtaining documentation**

Depending on the content and nature of the report, additional information will be obtained internally in Birch Ejendomme and, depending on the circumstances, it may also lead to further dialogue with the Whistleblower. However, the latter assumes that the report is not submitted anonymously.

Additional information may consist of correspondence, documents, images, audio recordings, meeting minutes, internet history, etc. and it may be necessary to conduct interviews with relevant people.

#### **4.4 Feedback to the Whistleblower**

If the Whistleblower has provided contact details in connection with the report, the Whistleblower Unit will provide feedback to the Whistleblower within three months from the acknowledgement of receipt of the report. This means that the Whistleblower Unit will inform the Whistleblower about what actions have been taken or are planned and why these actions have been chosen.

If it is not possible to provide feedback within the deadline, the Whistleblower Unit will inform the Whistleblower about this and whether further feedback can be expected. For example, this could be because an internal investigation has been launched and cannot be completed within the deadline.

### **5. CONFIDENTIALITY AND PROCESSING OF PERSONAL DATA**

The Whistleblower Unit treats all reports confidentially to the greatest extent possible. The Whistleblower Unit is under a separate duty of confidentiality regarding the identity of the Whistleblower. All employees of Birch Ejendomme and PWC who receive, and process reports under the whistleblower scheme have a duty of confidentiality regarding information included in the report.

To process a report Birch Ejendomme may process personal data, which may include sensitive and/or confidential information. Information about Birch Ejendomme's processing of personal data can be found in the privacy policy for the whistleblower scheme, which can be found on Birch Ejendomme's website [here](#).

### **6. WHISTLEBLOWER PROTECTION**

Anyone who submits a report in good faith within the scope of the whistleblower scheme must not be threatened or subject to attempted reprisals because they have reported violations through the scheme. This applies even if the report later turns out to be unfounded.

Reprisals are any form of unfavourable treatment or unfavourable consequence in response to a report that may cause harm to the Whistleblower.

If Birch Ejendomme's employees and/or management attempt to prevent a Whistleblower from reporting or engage in reprisals against a Whistleblower who has reported in good faith, this will as a clear starting point have employment law consequences for the employee/manager in question.

However, if false or misleading information is knowingly (in bad faith) submitted through the whistleblower scheme, the Whistleblower is not protected and a report made in bad faith may, among other things, result in disciplinary sanctions or have negative contractual consequences.

## **7. NOTIFICATION OF AFFECTED PERSONS AND POSSIBLE THIRD PARTIES**

The affected individuals who are subject to an internal investigation will generally be informed of (i) who is responsible for the investigation (i.e. the investigator), (ii) the facts of which the individual is suspected, (iii) the departments, persons and/or relevant advisors who are expected to receive information about the investigation, and (iv) how the individual can exercise any rights of access to data, rectification of data, erasure of data and object to the processing of data by Birch Ejendomme.

Similarly, Birch Ejendomme will also inform any third parties mentioned in a report about the processing of their personal data in connection with the handling of the report.

In both cases, the notification will be given within a reasonable time and at the latest within one month after obtaining the information about the persons concerned and any third parties, unless it is assessed that the notification would jeopardize the purpose and conduct of the investigation. In this case, the notification can be delayed for as long as the risk remains.

## **8. POSSIBLE CONSEQUENCES OF REPORTING**

Depending on the specific circumstances, a report can *inter alia* result in the following:

- A disciplinary action against affected employees (warning, termination or summary dismissal)
- Contractual consequences for business partners.
- Handing over the case to the police or other public authority for their further investigation.
- The case is closed without consequences for the persons concerned as the report is manifestly unfounded or the information or evidence is insufficient after the internal investigations have been completed.

## **9. APPROVAL, AUDIT AND CONTACT INFORMATION**

This Whistleblower Policy has been approved by the board of directors of Birch Ejendomme on 3 December 2025.

Birch Ejendomme's CLO is responsible for continuously reviewing and possibly revising the Whistleblower Policy.

Any general questions about the whistleblower scheme can be sent to Birch Ejendomme's legal department at [compliance@birchgm.dk](mailto:compliance@birchgm.dk).