

Whistleblowing Policy – KK Wind Solutions Holding A/S

1. The object of the Whistleblowing Policy

KK Wind Solutions Holding A/S wishes to encourage an open dialogue on all issues related to KK Wind Solutions Holding A/S and its subsidiaries' in Germany, India, Taiwan and the US (hereafter “**KK Group**”) business methods, compliance with the company's policies or issues which are considered illegal.

The purpose of KK Group's whistleblower system is further to ensure a safe environment in which employees within KK Group have the confidence to speak out about reprehensible practices without fear of repercussions. Thus, the whistleblower system is intended to contribute to ensuring that serious errors and omissions are detected and to the widest extent possible prevented.

The whistleblower system is a supplement to the direct and daily communication at the workplace regarding errors and unsatisfactory conditions, etc.

Reports are filed electronically through the whistleblower system via a web portal, Safe2Whistle, which may be accessed via the intranet or the internet.

2. Who can report and where?

All employees and others with an affiliation to KK Group, such as customers, or suppliers, as well as members of KK Group's management board and members of the board of directors are comprised by the whistleblowing system and can as such report to the system and be subject to investigations.

3. What to report

The whistleblowing system is solely for the reporting of serious violations. Thus, you may file a report to the KK Group's whistleblowing system regarding

- violations of specific areas of the EU law
- serious offences and other serious matters

In regard to violations of specific areas of the EU law, you may e.g., file a report regarding

- Violations regarding EU law concerning protection of the environment as well as product safety and compliance. For the remaining areas of relevant EU law, reference is made to article 2 of the EU Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law.

By other serious offences and other serious matters, reports may e.g., concern

- Punishable offences, e.g., abuse of funds, theft, fraudulent misrepresentation, embezzlement, fraud, bribery, etc.
- Serious or repeated violations of local legislation, including e.g., rules pertaining to the environment
- Serious or repeated violations of material internal guidelines, e.g., on business trips, gifts, financial reporting, etc., however, please note that reports with regard to this bullet does not apply for reports made from the Germany entity.
- Serious workplace conflicts, e.g., in the form of sexual harassment or other serious harassment.

The whistleblower system cannot, in general, be used for expressing dissatisfaction with salary levels, minor offences such as violations of guidelines regarding smoking and less serious workplace conflicts and disagreements. Instead, KK Group refers you to report such cases in accordance with KK Group's general policies.

Epecially for India

Claims about sexual harassment cannot be raised through KK Group's whistleblower system but should be reported to the Internal Committee constituted by KK Wind Solutions India Private Limited under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

4. How to report

If you file a report, the information listed below will generally be useful in connection with further investigation of the issue:

- A description of the issue in question, including date, place, and the name(s) of the person(s) involved
- Any documentation or evidence concerning the violation or other information which may assist the investigation

It is up to you whether you want to file the report in your own name or anonymously. If you choose to report a case anonymously, please note that there is a risk that your report may be more difficult to investigate. Thus, it is important that you regularly follow your report on the whistleblower portal to see if the whistleblower unit has any follow-up questions to your report.

If you choose anonymity, it is important that you do not state your name anywhere in the report. In addition, you should be aware that your identity might be inferred from the information you have provided in the report.

5. How we handle the issue

As mentioned above, reports to the whistleblowing system can be made electronically via a web portal, Safe2Whistle, which is accessible via the intranet or internet.

A whistleblower unit within KK Group receives all reports and will begin by filtering out the reports that do not fall within the scope of the system, cf. clause 3. Filtered out reports are to be processed through the ordinary channels of communication. You will in this regard be encouraged to direct your report to a relevant person, e.g., your immediate manager or your manager's superior. Reports falling within the scope and purpose of the whistleblower system will be processed and investigated by the whistleblower unit.

The whistleblower unit at KK Group consists of VP – Finance Reporting & Compliance, VP - People and VP- Legal.

Reports concerning a member of KK Group's whistleblower unit will be processed by the remaining members of the whistleblower unit who are not disqualified in regard to investigate the specific case. If a report concerns the CEO of KK Group, the whistleblower unit will inform the Chairman of the board. If considered necessary, the whistleblower unit will to the extent possible involve the CEO or the Chairman of the board in the investigations of a management member or the CEO respectively.

No later than 7 days after your report has been received in the whistleblowing system, you will receive a confirmation of the receipt of your report. As a main rule, you will receive a notification concerning the closure of your report no later than 3 months from receiving this confirmation unless other time limits with regard to report concerning specific matters are specified according to local law. If the processing of your report requires longer than 3 months, you will receive a notification regarding the reason why further investigation time is necessary. You will as a main rule, within the limits of applicable local legislation, practices, and contractual obligations, receive information about the outcome of your report.

All communication between you and the whistleblower unit will take place over the whistleblower portal. Thus, it is important that you follow your report on the whistleblower portal if you want to receive confirmation of receipt of your report, a reason for why your report require longer processing time and if you want to receive a notification about the outcome of the investigations of your report.

6. Protection of the whistleblower

KK Group does not tolerate harassment, vengeful actions, retaliation or other types of sanctions against any person who in good faith files a report.

Even though you have not made an anonymous report, your identity will be kept confidential to the extent possible, considering KK Group's need to make a thorough investigation. However, it may be necessary to disclose information about your identity, for instance if the issue is reported to the police. In such case you will receive information beforehand.

You may not knowingly report incorrect or misleading information through the whistleblower system. Persons who report in bad faith are not protected by this whistleblowing policy and may be subject to employment law sanctions, including possible dismissal.

Epecially for India

The identity of the whistleblower may need to be disclosed on a need-to-know basis in relation to the investigation or any ensuing disciplinary or regulatory proceedings.

7. Duty of confidentiality

KK Group's whistleblower unit is subject to a special duty of confidentiality. Further, any person who is involved in the investigations of a report will be subject to the same special duty of confidentiality in regard to any information that has or is subject of the investigation of the report received through the whistleblowing system.

8. Notice to the reported person and to other persons

If information about you is reported in the whistleblower portal, and the report falls within KK Group's whistleblower system, you will as a general rule, not receive any information about the processing of your personal data.

If, on the other hand, the report does not fall within KK Group's whistleblower system, you will within the scopes of local law be informed of the processing of your personal data in accordance with the rules of the Data Protection Regulation and the local implementations hereof and/or other applicable data protection laws to the subsidiaries.

Epecially for India

The notice to reported persons should likewise, without limitation, be in accordance with the (Indian) Information Technology Act, 2000 (IT Act) and rules or directions issued thereunder, as amended from time to time.

Epecially for Germany

Section 8 does not apply for the German entity of KK Group. Thus, please refer to section 9 below with regard to reported persons rights concerning their personal data.

9. Data protection

With respect to personal data about persons in the European Union, the General Data Protection Regulation and local implementations hereof will apply to any processing of personal data in the whistleblower system.

Especially for India

Any processing of your personal data will be in accordance with the [KK Group's Privacy Policies]. For the purposes of this Whistleblower Policy, the term 'personal data' means "any information that relates to a natural person, which, either directly or indirectly, in combination with other information available or likely to be available with a body corporate, is capable of identifying such person, however, such data will not include sensitive personal data or information as defined under the (Indian) Information Technology Act, 2000 (IT Act) and rules or directions issued thereunder, as amended from time to time.

To the extent that any personal data of persons in India is collected, processed, disclosed or transferred pursuant to this whistleblower policy, the above rules shall apply.

KK Wind Solutions A/S, Bøgildvej 3, 7430 Ikast, CVR no 25746716 is the data controller for purposes of managing the whistleblower system.

Please contact us (e-mail: Whistleblowing_questions@kkwindsolutions.com) if you have any questions about the Whistleblowing Policy. This e-mail address is not intended for reporting violations.

You may also file a complaint with your local data protection authority. You can find the local authority here https://edpb.europa.eu/about-edpb/about-edpb/members_en).

If you do not feel safe using KK Group's whistleblowing system, or due to other reason feel safer using an external whistleblowing system, you may file a report via Danish Data Protection Agency's external whistleblowing system, in which you may file a report either in writing or orally. The Danish Data Protection Agency's whistleblowing system is available via www.datatilsynet.dk.