

# HOW TO USE THE WHISTLEBLOWER SCHEME

#### Whistleblower scheme

We have set up a whistleblower scheme, which you can read more about on this page. We encourage you to read this before reporting your suspicion or concern.

## Who can submit a report?

You can submit a report if you are a former or current employee in Sticks'n'Sushi, a supplier, a business partner or customer, or if you otherwise have a connection to Sticks'n'Sushi.

#### What can be reported?

You can make a report through the whistleblower scheme if you have knowledge or suspicion of serious issues regarding Sticks'n'Sushi. Examples include the following:

- Criminal offences, including fraud, embezzlement, misuse of assets, forgery of documents, accounting manipulation, bribery, corruption and money laundering
- Competition law breaches
- Serious or repeated violations of legislation
- Serious or repeated breaches of occupational health and safety legislation
- Significant infringements of environmental regulations and pollution of the environment
- Serious or repeated breaches of important internal guidelines in Sticks 'n' Sushi
- Serious workplace conflicts, e.g. severe bullying, harassment, discrimination, physical violence, threats and sexual abuse

Other matters, including HR matters, minor breaches of Sticks 'n' Sushi's internal guidelines, complaints about other employees' behavior or incompetencies, including information on less serious workplace conflicts and disagreements are not covered by the scope of whistleblower scheme. These types of matters must be raised in a dialogue with an immediate manager or the People Team.

Do not use the whistleblower scheme to report events that pose an immediate threat to life or health. If you need urgent help, please use the public emergency services.

While you are encouraged to report any real or suspected breaches of the law through this internal whistleblowing reporting scheme, you may also decide to use the external whistleblowing reporting schemes set up by the national authorities in the respective relevant countries.

#### **PwC**

The whistleblower is anonymous, and the whistleblower concerns that are reported through this whistleblower scheme are received by an external third party, PwC (PwC Statsautoriseret Revisionspartnerselskab "PwC"). PwC is an independent audit, tax and advisory firm, which receives reports on behalf of Sticks'n'Sushi to ensure an independent and anonymous channel for you to report your concerns. After a preliminary review, the reports will be forwarded for further processing in Sticks'n'Sushi.

Please note that the Chairman of the Board of Directors will be made aware of all reports made immediately upon receipt of the whistleblower report.

Read more about the whistleblower scheme in our Whistleblower Policy in Daruma

### **Anonymity**

You may submit your report anonymously. If you wish to remain anonymous, do not disclose your name or other personally identifiable information, such as address or phone number. If you choose to remain anonymous, you should know that it may complicate the investigation of the concern reported as we cannot engage in a dialogue and ask clarifying questions or request additional information or documentation. We therefore encourage you to provide your contact information so that PwC has the opportunity to investigate the circumstances of the report.

If you decide to disclose your identity to PwC, your identity will only be known by PwC. Your identity will be kept anonymous towards Sticks'n'Sushi. PwC will safeguard your anonymity towards Sticks'n'Sushi and information regarding your identity will under no circumstances be disclosed to us unless you grant such explicit permission.

## How is your report handled?

If you enter your contact information, you will receive a response within 24 hours of submitting your report.

PwC initially makes an assessment of whether the report is covered by the scope of the whistleblower scheme and evaluates who can handle the whistleblower report to ensure that the whistleblower report can be handled by an impartial and competent person and is not forwarded to a person whom the whistleblower report relates to.

If the report does not fall within the scope of the whistleblower scheme, it will be forwarded to Sticks'n'Sushi with a notice to this effect, and with a notice that there is no basis for processing the report, which must then be deleted.

If the report falls within the scope of the whistleblower scheme there is a basis for an actual case processing, then PwC forwards it to Sticks'n'Sushi, which initiates a further investigation of the matter.

Sticks'n'Sushi may conclude the following based on the investigation:

- The investigation is closed if the report is unfounded
- The investigation is closed by giving a reprimand/warning
- The investigation is closed with an expulsion/dismissal of an employee
- The investigation is closed with a recommendation to change policy/procedure/guidelines
- The investigation is handed over to the police for further investigation

Persons who make a report will, as a rule, be informed of the actions taken or envisaged based on the report and any results within three months of the report, insofar as this is possible.

#### Whistleblower protection

Sticks'n'Sushi does not tolerate harassment, acts of retaliation or any other type of penalty against persons who in good faith submit a report about a matter under the whistleblower scheme.

It is prohibited to deliberately submit incorrect or misleading information via the whistleblower scheme. Reports submitted in bad faith will, depending on the circumstances, result in negative employment law consequences for the person submitting the report.

# Submit a report

You can submit your report here:  $\underline{https://forms.gle/DgTtw7DYhz7pvWPD6}$ 

