

Whistleblower program

SP Group and all its subsidiaries and affiliated companies are committed to providing a business environment where a high level of integrity and responsibility is encouraged and safeguarded.

Accordingly, we have set up a Whistleblower program providing safe access for anyone related to SP Group to raise concerns of suspected violations of SP Group policies and guidelines, laws and regulations as well as any other serious irregularities.

Who: The system can be used by all SP Group customers, suppliers, business partners, employees, managers, auditors, lawyers, consultants and other stakeholders related to SP Group.

What: The Whistleblower program can be used to report any potential concern regarding serious irregularities, e.g. bribery, theft, accounting irregularities, extortion, embezzlement, discrimination as well as violations of SP Group's Supplier Code and the United Nations' 17 sustainable development goals.

Concerns or issues about personal matters such as collaboration challenges, dissatisfaction with salary or other employment terms are out of scope of the Whistleblower program. Such issues of concerns should be reported to a manager or HR.

How: To report a concern to the Whistleblower program, send an email to hhe@sp-group.dk. The email will go directly to Hans-Henrik Eriksen, Chairman of SP Group's Audit Committee and an independent, shareholder-elected member of SP Group's Board of Directors. No SP Group managers and employees have access to this email.

When receiving a report, the Chairman of the Audit Committee will make an immediate screening to uncover if a report is unfounded or warrants further investigation. If a report is found to warrant further investigation, an investigation will be initiated. The Chairman of the Audit Committee must not disclose the identity of the whistleblower to anyone not directly involved in the investigation. SP Group prohibits any retaliation against a whistleblower.

Reporting can be done anonymously, or you may choose to identify yourself. If you wish to remain anonymous, do not report from a PC provided by your employer or a PC connected to your employer's network/intranet - and do not write your name and/or other personal details. Regardless of whether or not you choose remain anonymous or you disclose your name, we will ask you to make yourself available for further enquires via a post box or an anonymous email account because we may not be able to finalize the investigations without further information from you.