

TwentyThree Whistleblower Policy

The purpose of this policy is to enable individuals to report serious concerns or irregularities in a secure and confidential manner. This policy complies with the Danish Whistleblower Protection Act (Lov nr. 1436 af 29. juni 2021) and the EU Whistleblower Directive (2019/1937).

Scope

This policy applies to:

- Current and former employees
- Freelancers and consultants
- Job applicants
- Volunteers and interns
- Contractors, suppliers, and business partners

What Can Be Reported?

Reports must concern serious matters, including:

- Breaches of EU or Danish law (e.g., data protection, environmental, tax fraud)
- Criminal offenses
- Gross misconduct
- Harassment or discrimination
- Serious violations of internal policies or ethical guidelines

Excluded are personal grievances or HR conflicts not involving illegal conduct.

How to Report

Reports can be submitted via a secure online portal, including anonymously:
<https://www.twentythree.com/whistleblower-report>

Additionally reports can be submitted by mail to: whistleblower@twentythree.com

Whistleblower Unit

Reports are handled by:

Name/Department: Carla dos Santos

Email: carla@twentythree.com

Phone: +45 30144532

All reports will be treated confidentially.

Protection and Confidentiality

- Whistleblowers are protected from retaliation.
- The identity of the reporter will be kept confidential unless disclosure is required by law.
- Any retaliation will be treated as a serious disciplinary matter.

Procedure and Follow-Up

- Acknowledgement of receipt within 7 days, if identity of the submitter is known.
- Investigation and assessment within reasonable time
- Feedback provided within 3 months, subject to legal constraints

Data Protection (GDPR)

All personal data is handled in accordance with the General Data Protection Regulation (GDPR) and Danish Data Protection Act. Data is retained no longer than necessary and for a maximum of 2 years, unless ongoing legal matters apply.

External Reporting Option

You may also report directly to the Danish Data Protection Agency (Datatilsynet) via their external whistleblower channel at <https://whistleblower.dk>.

Review of the Policy

This policy is reviewed annually or upon legislative changes.

TwentyThree ApS
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