



LEO FOUNDATION

Guidelines for the LEO Foundation's whistleblower scheme

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Guidelines for submitting reports through the LEO Foundation's Whistleblower Scheme

These guidelines describe the purpose of the LEO Foundation's Whistleblower Scheme (hereinafter referred to as "**the Scheme**"), how the Scheme works, who can use the Scheme and the concerns that can be reported through the Scheme.

The Scheme covers the LEO Foundation as well as the LEO Foundation's subsidiaries, LEO Holding A/S and LH Capital A/S (hereinafter referred to as "**the LEO Foundation**").

Reports related to LEO Pharma A/S and/or its subsidiaries are to be submitted through LEO Pharma's Whistleblower Scheme, which is available here: www.leo-pharma.com/contact/whistleblower-hotline

1 PURPOSE

The purpose of the Scheme is to ensure that persons affiliated with the LEO Foundation quickly, confidentially and by other means than the ordinary communication channels - through a special, independent and stand-alone channel - can report violations of the law and serious offenses committed by the LEO Foundation's employees or former employees, members of the Executive Board and the Board of Trustees, grant and award applicants and recipients, auditors, lawyers, suppliers and others who are affiliated with the LEO Foundation with the purpose of having an independent and stand-alone entity to assess which steps are required.

The Scheme is established as a part of the LEO Foundation's compliance policy.

2 WHO CAN USE THE SCHEME?

The Scheme may be used by the LEO Foundation's employees, former employees, members of the Executive Board and the Board of Trustees, grant and award applicants and recipients, auditors, lawyers, suppliers, customers, collaborators and others who are affiliated with the LEO Foundation.

3 WHAT CAN BE REPORTED THROUGH THE SCHEME?

Only knowledge or suspicion of a violation of the law and serious offenses may be reported through the system. Serious offenses are defined as, i.a.:

- Financial crime and violations of current accounting rules
- Bribery
- Fraud
- Forgery
- Corruption
- Theft
- Workplace safety violations
- Sexual harassment, systematic bullying, and violence
- Violation of the LEO Foundation's policies for grants and awards, impartiality, and conflict of interest
- Incidents where employees materially misuse system access to obtain information on their colleagues or others – without any work-related need
- Violation of applicable law, regulations, and other rules applicable to the LEO Foundation's business
- Violation of internal rules, provided that one or several of below conditions apply:
 - the infringement may lead to serious, recurring safety risks, or
 - the infringement may lead to serious financial risks, or
 - the infringement may lead to regulatory intervention, or
 - the infringement may lead to a serious qualification from the auditor, or
 - the infringement may cause serious damage to the LEO Foundation's relations with employees or external parties.



LEO FOUNDATION

Offenses that cannot be reported through the Scheme must be reported through the ordinary communication channels. This includes, for instance, minor offenses such as cooperation problems, violations of the LEO Foundation's internal guidelines on smoking, emails, internet, alcohol etc., as well as issues that are to be handled pursuant to the LEO Foundation's rules and guidelines on, for instance, complaints about employees' conduct or incompetence.

Reports can be submitted through the Scheme, if the whistleblower has either knowledge or suspicion of the issue. It is important to stress that the Scheme is a voluntary alternative to the ordinary communication channels.

To the extent that the whistleblower has knowledge or suspicion of a violation of the law or a serious offense, the whistleblower is requested to provide the following information:

- a description of the issue,
- the person(s) involved,
- whether other persons know about the suspicion,
- whether management knows about the issue,
- whether documents that support the issue exist,
- whether and where further information about the issue can be found,
- for how long the issue has existed, and
- whether the whistleblower knows of any attempts to conceal the offense.

To facilitate further investigation of the report, and to enable the LEO Foundation to uncover the offense, it is important that the whistleblower provides as much information as possible. Further investigation of a report is not possible if the report is unsubstantiated or if it only contains broad accusations without providing further details.

Overtly unfounded reports will not be subject to further investigation.

4 WHO HANDLES THE REPORT?

Reports can be submitted through Plesner Whistleblower Scheme which is accessible on the [LEO Foundation's website](#).

The LEO Foundation encourages the whistleblower to state his/her name when submitting a report so that the LEO Foundation may ask clarifying questions, and subsequently convey further update on the investigation, provided that there are no misgivings related to such follow-up.

It is, however, possible to submit a report anonymously. To ensure full anonymity, it is recommended that the whistleblower uses a private PC or a PC located at a public library.

The report is received by two lawyers at Plesner who will initially determine who will be able to process the report in question at the LEO Foundation – based on impartiality. The report is then sent to the relevant person at the LEO Foundation.

Everyone involved, including the LEO Foundation and Plesner will keep all reports confidential.

5 PROTECTION OF THE WHISTLEBLOWER

If a person in good faith submits a report through the Scheme which later turns out to be unfounded, this will not have any negative consequences for the whistleblower. In the event that a deliberate false report is submitted through the Scheme, the whistleblower's identity may be disclosed to the reported person, if the whistleblower's identity was disclosed at submission of the report. It will be assessed whether a deliberate



LEO FOUNDATION

false report gives cause for legal actions, including criminal proceedings. If the whistleblower is a LEO Foundation employee, it may have employment consequences for the employee, including dismissal.

The identity of the whistleblower will generally not be disclosed to the person about whom the report has been submitted. As mentioned, the identity of the whistleblower may be disclosed if it turns out that a deliberate false report has been submitted, or if the LEO Foundation is obligated to do so. However, in accordance with GDPR article 15, the data subject has a right to obtain access unless the data subject's request can be declined pursuant to section 22 of the Danish Data Protection Act.

The identity may also be disclosed in the event of a potential subsequent lawsuit regarding the reported issue.

6 INFORMATION TO THE REPORTED PERSON

A person who has been reported through the Scheme will be notified as soon as possible after a preliminary investigation and collection of all relevant evidence have been taken place. The person will, among other things, receive information on:

- the identity of the person/group responsible for the investigation of the report,
- a description of the accusations in the report, and
- who have seen the report.

Please refer to [Privacy Policy for Whistleblower Scheme](#) where further information about processing of personal data and the data subjects' rights can be found.

7 DATA SAFETY AND DATA RETENTION

The LEO Foundation handles all data reported through the Scheme, including data on persons who are reported through the Scheme in accordance with applicable law from time to time.

All reports will be securely stored, and only relevant personnel will be able to access the data.

Reports that turn out to be overtly unfounded will be closed immediately. A report that falls outside the category of offenses that can be reported through the Scheme (see section 3) will be disclosed to the LEO Foundation's CEO and closed in the Scheme.

If the offense is reported to the police or another authority, the LEO Foundation will stop its processing immediately after the authorities in question have closed the case.

Reports will be deleted from the Scheme 45 days after the LEO Foundation has finalized the processing.

If, based on the data gathered, employment sanctions are imposed against the reported person, or if other reasons exist as to why it is reasonable and necessary to continue to store the person's data, the data will, if the person is an employee, be stored in the employee's personnel file for up to five years following the employee's resignation. The report is stored in accordance with the LEO Foundation's deletion policy.

8 QUESTIONS

If you have any questions regarding these guidelines, please contact Peter Kjeldsen, Director Legal & Business Development at peter.kjeldsen@leo-foundation.org.