

Whistleblower Policy





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Whistleblower Policy

This scheme describes the purpose, overall function and requirements for HE-VA's Whistleblower scheme.

A Whistleblower is an employee who reports an illegal or seriously problematic situation/circumstance that has occurred, or will occur, and which concerns the company.

Purpose

The purpose of HE-VA's whistleblower scheme is to:

- Ensure that potential whistleblowers are informed that they have the right and are given the
 opportunity to report
- Ensure correct processing of reports, so that any serious problems in HE-VA are resolved and unwanted behavior is stopped
- Signal and show openness to inquiries and concerns, including those of a sensitive nature
- Give employees reassurance that confidentiality is ensured about the identity of whistleblowers and that relevant matters can be reported without risk of reprisals.

In addition, this declaration is in compliance with legal requirements for the establishment and requirements for a whistleblower scheme (Appendix 1)

Reporting

Who can report to the scheme

All employees, former employees, as well as persons who are not yet employed but are in the hiring process. In addition, business partners/employees of business partners with whom HE-VA has a formalized collaboration can also report.

Reports that are known for certain not to originate from the above-mentioned groups of people must be rejected.

What can be reported

Serious circumstances which cannot be expected to be handled in the daily dialogue between management and employees. In addition, certain violations of EU law can be reported. Examples of conditions/situations that can be reported on:

• Punishable conditions, e.g. misuse of financial resources, theft, fraud, embezzlement, fraud, bribery, forgery, etc.



• Gross or repeated violations of the law, e.g. in relation to occupational safety or environmental regulations

• Gross or repeated violations of significant internal guidelines, e.g. about gifts, accounting, etc.

• Serious personal conflicts at the workplace, e.g. in the form of threats, physical violence, sexual harassment or other serious harassment

• Violations regarding the rules on product safety and conformity, transport safety and consumer protection.

The above are just examples. If you are in doubt as to whether or not to report, we encourage you to do so. The report will then be assessed in relation to whether it falls within the scheme, after which you will receive feedback. See possibly Appendix 1, Whistleblower Protection Act, for details.

How to report

It is encouraged that reports are made to the internal system, which can be done via the intranet, or by contacting the whistleblower unit's employees in person or by telephone. Reporting can also be done anonymously.

Anonymous reports will basically be treated in the same way as other reports, but will limit the possibilities for confirmation, feedback, and potentially further clarification of any situation/incident that may have prompted the report.

If the whistleblower does not believe that the internal whistleblower scheme can take appropriate measures, or for other reasons does not wish to report internally, reporting can be done to the public whistleblower solution, <u>https://whistleblower.dk</u>

How reports are processed

No later than 7 days after the report has been made, the reporter is informed that the report has been received in the whistleblower scheme, regardless of whether it falls within or outside the scheme.

If a report falls within the scheme, it will be followed up carefully, and written feedback on the report will be given as soon as possible, but no later than 3 months after confirmation of the report. It is encouraged that the whistleblower clearly states whether he or she believes that the matter being reported on is time-critical and gives reasons for this.

The whistleblower unit has a duty of confidentiality regarding all information included in reports. Whistleblowers must be protected against reprisals, which includes that their identity must not, without their express consent, be shared with people outside the whistleblower unit. Identity can only be disclosed without consent, if the disclosure is to prevent infringements or to ensure the right of defense of affected persons. In such cases, the whistleblower will be informed of the disclosure, incl. justification, unless this information could jeopardize any related investigations or legal proceedings.



Who processes reports

The whistleblower unit consists of:

Villy Christiansen	E-mail: <u>vc@he-va.com</u>	telephone +45 40 18 12 45
Heine Christiansen	E-mail: <u>hc@he-va.com</u>	telephone +45 40 19 08 71
Morten Høje Kristensen	E-mail: <u>mhk@he-va.com</u>	telephone +45 51 17 15 70
Jens Erik Søndergaard	E-mail: <u>jes@he-va.com</u>	telephone +45 40 31 99 00
Per Rasmussen	E-mail: <u>pr@he-va.com</u>	telephone +45 51 71 76 17

The technical solution, in which reports submitted via the intranet are processed, is based on SharePoint Online, offered by Microsoft in the USA, which is thereby technically a data processor.

HE-VA Whistleblower scheme

Description

The HE-VA whistleblower scheme must live up to its purpose by having at all times an established and maintained solution for receiving and processing reports and ensuring that relevant persons are aware of the possibility of reporting to either the internal unit or the public whistleblower solution.

The company's management is only involved to the extent necessary and may not instruct in the handling of specific cases.

Staffing and responsibilities

It must be ensured that there is an established whistleblower unit at HE-VA at all times. This unit is staffed by one or more named persons who, under confidentiality obligations and via channels communicated to all employees, can receive reports, incl. anonymous reports.

The whistleblower unit must be impartial and independent of the management, whereby the management e.g. may not give instructions on the processing of specific reports.

The whistleblower unit must always ensure confidentiality about the identity of whistleblowers. The whistleblower unit ensures that employees and other relevant persons are informed about the possibility of reporting and are encouraged to report to the internal system. The whistleblower unit must also ensure that information is also provided about the possibility of reporting to the public solution, <u>https://whistleblower.dk</u>

Processing

Receipt

The unit must confirm receipt within 7 days, if the report is not made anonymously. An initial assessment is made of whether the report falls within the scope of the law and whether the reporter meets the conditions to be a whistleblower.



If the report does not fall within the scope of the law, or if the reporter is not entitled to submit a report to the scheme, the report will be rejected. The report is also rejected, with a detailed message to the reporter, if the report is seriously deficient or otherwise unsuitable for further processing. In the notification of rejection, the reporter may be encouraged to contact the immediate manager or the HR department, if this is considered relevant to the report.

Follow-up

If the report is not rejected, clarification of the correctness, circumstances and extent of the report is started.

An internal investigation may include interviewing the whistleblower if this is deemed necessary and the whistleblower agrees, unless the report is made anonymously. Confidentiality of the whistleblower must in any case be ensured.

Follow-up and the details of final changes or measures depend on the situation/circumstances that motivated the whistleblower to report.

Notice to the whistleblower

Within 3 months of sending confirmation of receipt of the report, if this has not been made anonymously, feedback is sent to the whistleblower about the progress or conclusion of the case. Within the framework of the law, and to the extent that it does not compromise any further proceedings, other people's personal data or company trade secrets, the whistleblower is informed of any changes or measures that have either been made or are planned to be implemented to address the situation that gave rise to the report.

Should the treatment require longer than 3 months, the whistleblower will be informed of this and the reason for the extension. The whistleblower is also informed when the case is closed.



ANNEX 1

Whistleblower Protection Act

Chapter 1 Scope and definitions of the Act

§ 1. The Act applies to the following:

No. 1 Reports which relate to violations of EU law and which are covered by the scope of the European Parliament and Council directive on the protection of persons who report violations of EU law.

No. 2 Reports which otherwise relate to serious offenses or other serious matters.

Section 2. The Act, however, does not apply to reports of violations of the procurement rules regarding defense or security aspects, unless the reports are covered by the legal acts mentioned in Section 1, No. 1.

Section 3. The Act also does not apply to the following:

No. 1 Classified information that is covered by the Ministry of Justice's circular on the security protection of information of common interest to the countries of NATO or the EU, other classified information and information of security interest in general (the security circular), which are also confidential, cf. § 152 of the Criminal Code, Section 3.

No. 2 Information that is covered by lawyers' duty of confidentiality in accordance with section 129 of the Administration of Justice Act.

No. 3 Information which is covered by healthcare professionals' duty of confidentiality in accordance with Section 40 of the Health Act.

No. 4 Information about the court's deliberations and voting, which is subject to confidentiality.

No. 5 Cases within the criminal justice system.

§ 2. Special rules on the reporting of infringements, which have been laid down pursuant to sectorspecific EU legal acts and national rules implementing these legal acts, continue to apply. The rules in this act supplement those in the 1st point. mentioned rules, to the extent that a relationship is not invariably regulated there.

§ 3. In this Act, the following is understood to mean:



No. 1 Violations: Acts or omissions that

a) are illegal, cf. § 1, subsection 1, no. 1, or constitutes a serious offense or an otherwise serious matter, cf. § 1, subsection 1, No. 2, or

b) makes it possible to circumvent the purpose of the rules that fall under the scope of the Act, cf. § 1, subsection 1.

No. 2 Information about violations: Any information, including reasonable suspicion, about actual or potential violations that have occurred or are likely to occur in the organization where the whistleblower works or has worked, or in another organization that the whistleblower is or was in contact with through his work, and about attempts to conceal such violations.

No. 3 Reporting: Verbal or written communication of information about violations.

No. 4 Internal reporting: Verbal or written communication of information about violations to an internal whistleblower scheme in the private or public sector.

No. 5 External reporting: Verbal or written communication of information about violations to an external whistleblower scheme covered by this Act.

No. 6 Publication: The fact that information about violations is made publicly available.

No. 7 Whistleblower: A natural person who makes a report or publishes information about violations to which the person has obtained access in connection with the person concerned's work-related activities, and who belongs to the following groups of persons:

- a) Workers.
- b) Self-employed.

c) Shareholders and members of the executive board, the board of directors, the supervisory board or the corresponding management body in a company.

- d) Volunteers.
- e) Paid or unpaid trainees.

f) Persons who work under the supervision and management of contractors, subcontractors and suppliers.

g) Persons reporting or publishing information to which the person concerned has obtained access in an employment relationship that has since ended.



h) Persons whose employment relationship has not yet begun, who report information about violations to which they have gained access during the employment process or other precontractual negotiations.

No. 8 Intermediary: A natural person who assists a whistleblower with the reporting process in a work-related context, and whose assistance should be confidential.

No. 9 Work-related context: Current or previous work activities in the private or public sector, regardless of the nature of these activities, where individuals gain access to information about violations and where these individuals could be at risk of reprisals if they reported such information.

No. 10 Affected person: A natural or legal person who is indicated in the report or publication as a person to whom the violation can be attributed, or with whom said person has a connection.

No. 11 Retaliation: Any direct or indirect action or omission that takes place in a work-related context, is a consequence of internal or external reporting or of publication and causes or may cause unjustified harm to the whistleblower.

No. 12 Follow-up: Any action taken by the recipient of a report or the competent authority to assess the veracity of the allegations made in the report and, where relevant, to address the reported violation, including through actions such as an internal investigation , an investigation, prosecution, an action for recovery of funds or settlement.

No. 13 Feedback: Notification to the whistleblower about follow-up and about the rationale for such follow-up.

The relationship to agreement

§ 4. The law cannot be waived by agreement to the detriment of the whistleblower or affected persons.

Chapter 2

Conditions for the protection of whistleblowers and the content of the protection

§ 5. The Act applies to a whistleblower who does the following:

1) Reporting to an internal whistleblower scheme in accordance with chapter 3.

2) Reporting to an external whistleblower scheme in accordance with chapter 4.



3) Reporting to an external whistleblower scheme in institutions, bodies, offices or agencies under the European Union that have external reporting channels and procedures for receiving reports of violations that fall within the scope of the law.

Section 2. The Act applies to disclosure made by a whistleblower in the following cases:

1) When the whistleblower who makes the publication, has first made internal and external reporting or direct external reporting in accordance with chapters 3 and 4, without the relevant whistleblower unit having taken appropriate measures in response to the report within the period set in section 12, subsection 2, no. 3, and section 20, subsection 2, No. 3.

2) When the whistleblower who makes the disclosure has reasonable grounds to assume that the violation may constitute an imminent or obvious danger to the public's interests.

3) When the whistleblower who makes the disclosure has reasonable grounds to assume that, in the event of a report to an external whistleblower scheme, there is a risk of reprisals or, due to the specific circumstances of the case, there is little prospect that the violation will be dealt with effectively.

§ 6. The protection of the Act only applies if the whistleblower had reasonable grounds to assume that the reported or published information was correct at the time of the report or publication and that the information fell within the scope of the Act, cf. § 1, subsection 1.

§ 7. A whistleblower who meets the protection conditions in §§ 5 and 6 is not considered to have breached a statutory duty of confidentiality and does not incur any kind of liability for this, provided that the whistleblower had reasonable grounds to assume that the reporting or publication of the the information in question was necessary to reveal a matter covered by § 1, subsection 1.

Section 2. A whistleblower who meets the protection conditions in §§ 5 and 6 does not incur responsibility for gaining access to the information that has been reported or published, provided that such an act does not constitute an independent criminal offence.

§ 8. A whistleblower must not be subjected to reprisals, including threats of or attempted reprisals, as a result of the person concerned having made an internal or external report or made a publication in accordance with the relevant statutory provisions. Furthermore, the whistleblower must not be prevented or attempted to be prevented from making reports.

Section 2. The protection against reprisals according to subsection 1 also includes the following persons:

1) Intermediaries.



2) Third parties who are connected to the whistleblower and who risk being exposed to reprisals in a work-related context.

3) Companies and authorities that the whistleblower owns or works for or is otherwise connected with in a work-related context.

Section 3. A whistleblower has the right to rely on a report or publication in order to seek dismissal of the lawsuit, provided that the whistleblower had reasonable grounds to assume that the report or publication was necessary to reveal a violation covered by § 1, subsection 1.

Chapter 3 Internal whistleblower arrangements

Duty to establish an internal whistleblower scheme

§ 9. Employers with 50 or more employees must establish an internal whistleblower scheme where employees can report information covered by § 1, subsection 1.

Section 2. Following a concrete risk assessment and after negotiation with the relevant minister, the Minister of Justice can lay down rules that employers with fewer than 50 employees must establish an internal whistleblower scheme.

Section 3. Employers covered by subsection 1 can establish group-wide whistleblower schemes. The Minister of Justice can lay down rules that 1. pt. shall not apply.

Procedures for internal reporting and follow-up

§ 10. An internal whistleblower scheme must enable written or oral reporting or both. If an oral report is possible, the report must be possible at the whistleblower's request via a physical meeting within a reasonable period of time.

Appointment of internal whistleblower unit

§ 11. An employer covered by § 9 must internally appoint an impartial person or department who must carry out the following tasks:

1) Receive reports and have contact with the whistleblower.

2) Follow up on reports, cf. § 12, subsection 2, No. 2.

3) Give feedback to the whistleblower, cf. § 12, subsection 2, No. 3.



Section 2. The tasks mentioned in subsection 1, can be handled by an external third party or an employer in a group-affiliated company, who must comply with the processing requirements that follow from this Act. The Minister of Justice can lay down rules that 1. pt. shall not apply.

§ 12. An internal whistleblower scheme must be designed, established and operated in a way that ensures confidentiality about the identity of the whistleblower, the affected person and any third party mentioned in the report and prevents unauthorized access to it.

Section 2. An employer must introduce appropriate procedures for the whistleblower scheme that ensure the following:

1) That the whistleblower receives a confirmation of receipt of the report within 7 days of receiving it.

2) That reports are carefully followed up.

3) That the whistleblower receives feedback as soon as possible and not later than 3 months from confirmation of receipt, cf. no. 1.

Section 3. An internal whistleblower scheme can reject reports that are not covered by the scope of the law, cf. § 1, and is not obliged to forward these to another authority.

Duty to Inform

§ 13. An employer covered by § 9 must make the following information available to his employees in a clear and easily accessible form:

1) The procedure for making a report to the internal whistleblower scheme, including an invitation to report internally in cases where the violation can be dealt with effectively internally and where the whistleblower assesses that there is no risk of reprisals.

2) The procedure for reporting externally, cf. chapter 4, and, where relevant, to European Union institutions, bodies, offices or agencies.

Common reporting channels and procedures

§ 14. Employers in the private sector with 50-249 employees can share resources with regard to receiving reports and any investigations that must be carried out in connection with such reports.

§ 15. A municipal council can carry out the tasks mentioned in § 11, subsection 1, on behalf of other municipal councils and entrust the execution of these tasks to other municipal councils. Two or more municipal boards can establish their internal whistleblower scheme in a municipal community, cf. § 60 of the Act on the Board of Municipalities.



Duty to Document

§ 16. An employer covered by § 9 must keep written documentation for the establishment of and the procedures for the whistleblower scheme, cf. §§ 10-15.

Chapter 4 External whistleblower schemes

Establishment of external whistleblower schemes

§ 17. The Danish Data Protection Authority establishes an independent and independent external whistleblower scheme for receiving and processing information covered by § 1, subsection 1.

Section 2. The Ministry of Justice establishes an independent and autonomous external whistleblower scheme for receiving and processing information about violations, cf. § 1, subsection 1, in the Police Intelligence Service.

Section 3. The Ministry of Defense establishes an independent and autonomous external whistleblower scheme for receiving and processing information about violations, cf. § 1, subsection 1, in the Defense Intelligence Service.

Section 4. External whistleblower schemes established pursuant to sector-specific EU legislation, cf. § 2, are maintained.

Requirements for external whistleblower schemes

§ 18. An external whistleblower scheme must enable written and oral reporting and, at the whistleblower's request, reporting via a physical meeting within a reasonable period.

Section 2. The Minister of Justice may, after negotiation with the relevant minister, lay down detailed rules on requirements for an external whistleblower scheme, which is mentioned in section 17.

§ 19. An external whistleblower scheme must appoint employees who are responsible for the following:

1) To receive reports and have contact with the whistleblower.

2) To follow up on the reports received, cf. section 20, subsection 2, No. 2.

3) To give feedback to the whistleblower, cf. section 20, subsection 2, No. 3.

Procedures for external reporting and follow-up



§ 20. An external whistleblower scheme must be designed, established and operated in a way that ensures the completeness, integrity and confidentiality of the information and prevents unauthorized employees from gaining access to it.

Section 2. An external whistleblower scheme must introduce appropriate procedures that ensure the following:

1) That the whistleblower receives a confirmation of the report within 7 days of receiving it, unless the whistleblower has expressly requested otherwise or there is reasonable reason to assume that a confirmation of the report will endanger the protection of the whistleblower's identity.

2) That reports are carefully followed up.

3) That the whistleblower receives feedback within a reasonable period that does not exceed 3 months from confirmation of receipt or 6 months in duly justified cases.

4) That the whistleblower receives notification of the final result of investigations triggered by the report, if such notification is not given in connection with feedback according to no. 3.

5) That the whistleblower receives a reasoned written notification prior to passing on information, cf. section 26, subsection 4.

Section 3. An external whistleblower scheme can reject reports that are not covered by the scope of application of the Act, cf. § 1, subsection 1, and is not obliged to forward these to another authority.

Section 4. In the event of a large influx of reports, an external whistleblower scheme can determine that reports of a more serious nature must be prioritized. The one in para. 2, no. 3, the deadline set must, however, be observed.

Case closure

§ 21. An external whistleblower scheme can decide to end the processing of reports that

1) contains information about violations that are clearly less serious and do not require further follow-up, or

2) does not contain significant new information regarding violations in relation to a previous report for which the relevant procedures have been completed, unless new legal or factual circumstances justify a different follow-up.

Section 2. Decisions pursuant to subsection 1 cannot be brought before another administrative authority.



Chapter 5

Case processing rules for internal and external whistleblower schemes

§ 22. Processing of personal data may take place when it is necessary to process reports received as part of a whistleblower scheme established in accordance with this Act.

Common rules for registration etc. in internal and external whistleblower schemes

§ 23. Reports received must be registered. Registration must take place in accordance with the duty of confidentiality laid down in § 25.

Section 2. Pursuant to this Act, reports may only be kept for as long as is necessary and proportionate to comply with the requirements arising from the Act.

§ 24. Verbal reports must be documented by recording the conversation or meeting with the whistleblower's consent, or by preparing an accurate report of the meeting or conversation, which the whistleblower has the opportunity to check, correct and accept by signing the report.

Section 2. Verbal reports submitted via a telephone system can also be documented by making an exact transcript of the conversation, which the whistleblower has the opportunity to check, correct and accept by signing the transcript.

Confidentiality

§ 25. The person appointed to receive and follow up on reports, cf. § 11 and § 19, has a duty of confidentiality with regard to information included therein.

Section 2. The duty of confidentiality in subsection 1 applies correspondingly to persons who, through disclosure pursuant to section 26, become aware of information as mentioned in subsection 1.

Section 3. The duty of confidentiality in subsection 1 applies correspondingly to unauthorized employees of authorities who operate external whistleblower schemes, cf. § 17, who inadvertently become aware of the information in subsection 1 mentioned information.

Disclosure



§ 26. Information about the whistleblower's identity and other information from which the whistleblower's identity can be directly or indirectly derived may not, without the whistleblower's express consent, be passed on to anyone other than authorized employees who are competent to receive or follow up on reports, cf. § 11, subsection 1, and § 19.

Section 2. Information covered by subsection 1 may, without the whistleblower's consent, only be disclosed to another public authority when the disclosure is made to address violations, cf. § 1, subsection 1, or with a view to ensuring the right of affected persons to a defence.

Section 3. Other information from reports than that in subsection 1 mentioned may only be passed on to others than the person appointed to receive and follow up on reports, cf. § 11, subsection 1, and § 19, when it happens as part of a follow-up to a report or to counter violations, cf. § 1, subsection 1.

Section 4. The whistleblower must be notified prior to disclosure pursuant to subsection 2, unless the notification would jeopardize related investigations or legal proceedings.

Section 5. Chapters 4-6 of the Administration Act on inspection of party files, hearing of parties and justification do not apply to the information mentioned in subsection 1.

Publicity scheme

§ 27. Authorities, etc. covered by the rules on access to documents in the Public Administration Act publish information about their business in accordance with this Act at least once a year.

Chapter 6

Compensation, assessment of evidence and punishment

§ 28. Whistleblowers or natural and legal persons covered by § 8, subsection 2, who have been subjected to reprisals as a result of a report or have been prevented or attempted to be prevented from making a report, cf. § 8, subsection 1, is entitled to compensation.

Section 2. If dismissal of an employee has occurred in violation of § 8, subsection 1, the dismissal must be rejected and the employment relationship maintained or restored if the employee so wishes. However, this does not apply if, in special cases and after weighing up the interests of the parties, it is obviously unreasonable to demand that the employment relationship be maintained or restored.



Section 3. A whistleblower who, as a result of obtaining documentation or attempting to obtain documentation for information about violations, cf. § 7, subsection 2, has been subjected to reprisals, is entitled to compensation.

§ 29. If a whistleblower proves to have made a report or publication in accordance with this Act and suffered a disadvantage, it is incumbent on the other party to prove that the disadvantage did not constitute reprisals as a result of the report.

Section 2 pcs. 1 applies correspondingly to natural and legal persons covered by § 8, subsection 2, where relevant.

§ 30. Unless a higher penalty is due under other legislation, a person shall be fined who

1) intentionally or through gross negligence violates § 25 or

2) knowingly reports or publishes false information.

Section 2. An employer is also punished with a fine, cf. § 9, for failure to meet employers' obligations according to § 10, § 11, § 12, subsection 1 or 2, § 13 or § 16.

Section 3. Companies etc. can be imposed (legal entities) criminal liability according to the rules in Chapter 5 of the Criminal Code.

Chapter 7

Entry into force and transitional provisions and changes in other legislation, etc.

§ 31. The Act enters into force on 17 December 2021.

Section 2. Chapter 3 has effect for employers in the private sector with between 50 and 249 employees from 17 December 2023.

Changes in other legislation

§ 32. In the Auditors Act, cf. Executive Order No. 25 of 8 January 2021, the following change is made:

1. In section 28 a, subsection 4:

"Section 4. The Act on the Protection of Whistleblowers applies to the scheme pursuant to subsection 1, cf. however § 2 of the Act on the Protection of Whistleblowers.'



§ 33. In the Act on the Protection of the Marine Environment, cf. Executive Order No. 1165 of 25 November 2019, as amended by Section 4 of Act No. 126 of 30 January 2021, the following change is made:

1. In § 58 c inserted as subsection 3:

"Section 3. The Act on the Protection of Whistleblowers applies to the scheme pursuant to subsection 1, cf. however § 2 of the Act on the Protection of Whistleblowers.'

§ 34. In the Offshore Safety Act, cf. Executive Order No. 125 of 6 February 2018, the following change is made:

1. In section 63 a, subsection 4:

"Section 4. The Act on the Protection of Whistleblowers applies to the scheme pursuant to subsection 2, cf. however § 2 of the Act on the Protection of Whistleblowers.'

Chapter 8

Territorial validity

§ 35. The Act does not apply to the Faroe Islands and Greenland. By royal decree, the law can be fully or partially put into effect for the national authorities in the Faroe Islands and in Greenland with the changes that the Faroese and Greenlandic conditions require.

Certified at Gråsten Castle, 29 June 2021

Under Our Royal Hand and Seal

MARGRETHE R.

/ Nick Hækkerup

Official notes

1) The Act contains provisions implementing Directive 2019/1937/EU of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of EU law, Official Journal of the European Union 2019, No. L 305, page 17.