

# POLICY ON WHISTLEBLOWER

Document type:	Policy
Function(s):	All
Responsible:	Chief Operating Officer (COO)
Date:	November 2024

## 1. INTRODUCTION AND PURPOSE

This whistleblower policy ("**Whistleblower Policy**") applies to Global Evolution Asset Management A/S ("**GE AM**"), CVR-no.: 30602153, Buen 11, 2., DK-6000 Kolding, and Global Evolution Holding ApS and Global Evolution Financial ApS collectively "**Global Evolution**".

The whistleblower scheme is mainly intended to ensure compliance with the rules in the Danish Act no. 1731 of 5 December 2023 on the "**Financial Business Act**" (in Danish *lov om finansiel virksomhed*) regarding mandatory whistleblower schemes for financial institutions and thereby to encourage and enable employees and members of the board of directors to report violations and potential violations of financial regulation (as defined below in section 2) and the Danish Act no. 213 of 24 June 2021 on the protection of whistleblowers (the "**Whistleblower Act**" in Danish *Whistleblowerloven*). The scope of the whistleblower scheme is further described below.

This Whistleblower Policy includes a detailed description of the whistleblower scheme, specifying who has a right of reporting, which matters may be reported, and the reporting procedure. The Whistleblower Policy further explains which action must be taken to report incidents under the whistleblower scheme.

The Whistleblower Act supplements the provisions in the Danish Investment Firm Act. It is specified in this Whistleblower Policy when the granted protection under the different legislation differs.

The protection described in this policy is based on the rules in the Danish Investment Firm Act, the Whistleblower Act and Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law (the "**Whistleblower Directive**"). Thus, you may not be protected pursuant to this legislation if you are resident outside of EU. However, Global Evolution will provide you with the same protection regardless of where you are resident if your report is covered by the scope of this policy.

The document is available electronically on Global Evolution's website [www.globalevolution.com/whistleblower-policy/](http://www.globalevolution.com/whistleblower-policy/).

## 2. SCOPE

### 2.1. Violation of financial regulation

In terms of financial regulation, the scope of the whistleblower scheme is all matters concerning breaches or potential breaches of financial regulation committed by Global Evolution.

The financial regulation includes laws, executive orders and directly applicable EU regulations, including regulations and directly applicable level 2 regulation (e.g., binding technical standards), which have a direct effect on Danish companies in the financial sector, and which the Danish Financial Supervisory Authority supervises (together "**Financial Regulation**").

Examples of matters covered by the scope of the Financial Regulation are (the list is not exhaustive):

- Anti-money laundering regulations, such as the Danish Anti-Money Laundering Act;
- Rules on insider trading, where applicable;
- Management and salary rules in the Danish Investment Firm Act;
- Rules on professional secrecy and confidentiality in the financial sector, such as the rules on disclosure in the Danish Investment Firm Act;
- Rules on good business practice in the financial sector (for instance, the Danish Investment Firm Act).

All violations can be reported without a specific threshold, also violations that are not serious or not of decisive importance to Global Evolution. It may, for instance, be cases which can only lead to an order or a reprimand from the Danish Financial Supervisory Authority. Further, cases of suspicion of violation of the Financial Regulation can also be reported.

A breach or a potential breach committed by Global Evolution, including by employees or members of the Board of Directors, includes any breach or potential breach of Global Evolution's obligations, even if the breach cannot be attributed to a specific person, but is caused by a fundamental system failure within Global Evolution. Violations or potential violations due to omissions can also be reported.

## 2.2. The Whistleblower Act

The following concerns can also be raised under the whistleblower scheme: (i) breaches of EU law that fall within the scope of the Whistleblower Directive (EU) 2019/1937 of 23 October 2019 on the protection of persons who report breaches of Union law (the "**Whistleblower Directive**") and (ii) other serious breaches of Danish and EU law as well as other serious concerns.

Suspected breaches of the specific EU legal acts that fall within the scope of the Whistleblower Directive do not have to be serious. The Whistleblower Directive applies to breaches of those EU legal acts that are listed exhaustively in Part I in the annex to the Directive, inter alia in the following areas:

- public procurement,
- financial services,
- products and markets,
- prevention of money laundering and terrorist financing,
- product safety and compliance,
- transport safety,
- protection of the environment,
- public health,
- protection of privacy and personal data, and
- security of network and information systems.

Breaches affecting the financial interests of the EU and breaches relating to the internal market, including breaches of EU competition and state aid rules are also included in the scope.

As noted above, serious breaches of Danish and EU law and other serious concerns may also be reported, including, inter alia:

- criminal acts such as breaches of non-disclosure obligations, abuse of funds, theft, fraudulent misrepresentation, embezzlement, fraud, and bribery,

- serious or repeated infringements of the law, including legislation on the use of force, the Danish Public Administration Act, the Danish Act on Access to Public Records and legislation intended to protect public health, provide safety in the transport sector, or protect the nature and the environment, etc.,
- sexual harassment in the workplace,
- serious person-related conflicts in the workplace, for instance serious harassment on grounds of race, political affiliation, religious belief, etc.,
- serious violations of occupational safety rules, and
- serious breaches of data protection laws.

### 2.3. Matters outside the scope of the whistleblower scheme

Minor irregularities and HR issues such as dissatisfaction with pay, incompetence, collegial difficulties, absence, breach of internal guidelines on smoking and consumption of alcohol, and other forms of misconduct cannot be reported under the scheme. Such issues must be reported through the usual channels, e.g., by contacting the immediate superior or Executive Management directly. If such issues are reported under the whistleblowing scheme, the report will be deleted.

### 2.4. Right to report

**Financial Regulation:** For reports concerning breaches or potential breaches of Financial Regulation the wrongdoing must be committed by Global Evolution, including by the employees or members of the board of directors, and reporting regarding breach or potential breach of Financial Regulation can only be reported by such internal parties. Thus, violations of Financial Regulation cannot be reported by external parties.

**The Whistleblower Act:** Employees as well as members of the board of directors of Global Evolution may report issues under the whistleblower scheme. Issues may also be reported by external parties with affiliations to Global Evolution such as customers, business partners, advisors and suppliers. However, please note that customers and advisors are not listed in the Whistleblower Act as persons that are defined as whistleblowers. Thus, these persons will not be protected pursuant to the Whistleblower Directive or the Whistleblower Act. Any information regarding protection in this Whistleblower Policy does not apply to these persons.

Violations committed by employees or members of the board of directors of Global Evolution can be reported. Also, acts that are not attributable to any individual, but result from e.g., fundamental (system) failure at Global Evolution can be reported.

The violation must have been committed by Global Evolution or by a third party undertaking to which Global Evolution has outsourced some of its obligations. The violation will be deemed committed by Global Evolution where acts or omissions taken on behalf of Global Evolution result in a potential violation. Violations committed by a third-party contractor to which Global Evolution has outsourced its obligations will be subject to the scheme.

In case of doubt, you are encouraged to submit a report as it will be determined on a case-by-case basis if the alleged wrongdoing falls within the scope of the whistleblower scheme.

## 3. REPORTING PROCEDURE

Reporting under the whistleblower scheme takes place electronically, using the online form made available by the law firm of Kromann Reumert and the systems provider EQS Group A/S. Reports may be submitted only by the parties who are entitled to use the whistleblower scheme as specified in paragraph 0 above.

The technical solution is provided by Kromann Reumert's subcontractor, EQS Group A/S, Bag Elefanterne 1, 1. th, 1799 Copenhagen V, CVR no.: 33057431. Whistleblower reports are handled by Kromann Reumert. Global Evolution has engaged Kromann Reumert as data processor to handle all reports submitted under the whistleblower scheme.

The reporting form is accessible via a link on Global Evolution's website [www.globalevolution.com/whistleblower-policy/](http://www.globalevolution.com/whistleblower-policy/). After you submit a report online via the whistleblower scheme, you will receive an automated acknowledgement of receipt.

Personal data disclosed under the whistleblower scheme in the reporting form will be stored on the server of Kromann Reumert's subcontractor. The server is located within the EEA.

You may report your concerns anonymously under the whistleblower scheme, or you may state your contact details to allow Kromann Reumert to contact you and ask any additional clarifying questions. If you submit a report, Global Evolution encourages you to state your name and contact details in the reporting form. Anonymous reports will be investigated, but experience shows that they are often less powerful. Also, anonymity may make further investigations difficult as it will not always be possible to ask additional or clarifying questions to the anonymous whistleblower. Read more about confidentiality and anonymity under paragraph 0.

If, nevertheless, you have submitted a report anonymously under the scheme, Kromann Reumert is required to delete your personally identifiable data, including your IP address, when forwarding the report to Global Evolution. If you state your name in the reporting form, your data will not be deleted when Kromann Reumert forwards the form to Global Evolution.

## 4. HANDLING OF REPORTS

### 4.1. Procedure following submission of reports

Global Evolution has appointed GE AM' Head of Legal & Compliance (the "**Whistleblower Unit**") to manage Global Evolution's internal whistleblower scheme in an impartial manner.

The reports will be received by trusted Kromann Reumert employees who will forward them to GE AM' Head of Legal & Compliance, unless the report involves the Head of Legal & Compliance. In that case, the report will be forwarded to the Chief Executive Officer of GE AM. If the report concerns the Chief Operating Officer & Chief Financial Officer or the Chief Executive Officer of GE AM, it will be forwarded to the Vice-chair of the Board of Directors of GE AM.

### 4.2. Record keeping of reports received

Global Evolution must keep record of your report and of all documents accompanying it.

Global Evolution keeps such records subject to its non-disclosure obligation as described in more detail in paragraph 0. Accordingly, Global Evolution keeps records of your report in a manner that guarantees non-disclosure of your identity as a whistleblower.

The purpose of the record keeping is, inter alia:

- to preserve evidence of the reports received to ensure that the disclosures can be used as evidence in enforcement proceedings,
- to safeguard the right of defence of the person concerned in connection with any criminal proceedings or other actions where the disclosures serve as evidence, and

- to enable the linking together of information from multiple reports on the same matter, where such linking makes it possible to address and follow up on the matter and where this would not be possible on the basis of a single report.

Records of your report will be kept in accordance with applicable data protection legislation. To learn more about the criteria used when determining the storage period, see paragraph 0 in this Whistleblower Policy.

### 4.3. Feedback to the whistleblower

Global Evolution will give you feedback on your report as soon as possible and no later than three months after the date of acknowledgement of receipt.

Subject to compliance with applicable law, including the rules on non-disclosure, we will inform you of the action envisaged or taken as follow-up to the report and the ground for the choice of that follow-up. Follow-up could include, for instance, filing of a police report, launch of an internal enquiry, or referral to a supervisory authority.

If Global Evolution has not, within three months of having acknowledged receipt of the report, decided on the follow-up action to be taken, you will be notified of this and of any further feedback you may expect.

### 4.4. Notification of persons concerned

Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) stipulates that the persons concerned must generally be notified of the report within one month. If there is a genuine risk that such notification will jeopardize the investigations, notification can be postponed for as long as the risk exists (see paragraph 0).

### 4.5. Confidentiality and anonymity

You may choose to report your concerns anonymously under the whistleblower scheme.

In that case, Global Evolution undertakes not to make any attempt to trace back the information to a specific person even if it would be technically possible to e.g., track your computer's IP address or take other steps to reveal your identity.

Anonymous reports will also be investigated, but experience shows that they are often less powerful as described in paragraph 0 above. However, it is possible for Kromann Reumert and/or Global Evolution to contact the whistleblower through the platform that was used for the reporting, also where the whistleblower is anonymous, provided that the whistleblower keeps the line of communication open to answer any additional questions which Kromann Reumert and/or Global Evolution may have. Neither Kromann Reumert nor Global Evolution will be able to gain information about the anonymous whistleblower's identity.

If you wish to submit a report anonymously under the whistleblower scheme and have unintentionally disclosed your personal data, Kromann Reumert is required to delete your personal data before forwarding the report to Global Evolution. If you state your name in the reporting form, your data will not be deleted when Kromann Reumert forwards the form to Global Evolution.

#### 4.5.1. Duty of confidentiality

The members of Global Evolution's Whistleblower Unit and the employees at Kromann Reumert who assist in managing the whistleblower scheme have a duty of confidentiality in respect of all disclosures made in whistleblower reports. The duty of confidentiality also applies to other members of staff who are authorised

to receive or follow up on reports and, in doing so, receive information about your identity or other details that must be treated confidentially.

#### 4.5.2. Disclosure of information about your identity

Information about your identity and other information from which your identity can be deduced, directly or indirectly, may not be disclosed without your explicit consent to anyone beyond the authorised staff members in Global Evolution who are competent to receive or follow up on reports. You may withdraw your consent at any time. However, the withdrawal of consent will not affect the lawfulness of disclosures based on consent before its withdrawal.

Your identity may be disclosed to public authorities without your consent, where disclosure is necessary to address breaches falling within the scope of the Danish Investment Firm Act, the Whistleblower Act, or to safeguard the rights of defence of persons concerned. Where Global Evolution contemplates a disclosure from which your identity may be directly or indirectly deduced, Global Evolution must notify you before the disclosure, unless such notification will jeopardize the related investigations or judicial proceedings.

Other information in reports from which your identity as whistleblower cannot be deduced may be disclosed to persons who are not members of Global Evolution's Whistleblower Unit and to Kromann Reumert only for the purpose of following up on a report or addressing breaches that fall within the scope of the Whistleblower Act. The recipient will be subject to the same duty of confidentiality in respect of such information as employees in Global Evolution's Whistleblower Unit and in Kromann Reumert.

## 5. PROTECTION OF THE WHISTLEBLOWER

### 5.1. Protection criteria

The Danish Investment Firm Act and the Whistleblower Act offers protection to whistleblowers against retaliation, etc. As whistleblower you will receive protection under the set of rules which grants you the most favourable protection, irrespective of whether your report concerns breach or potential breach of Financial Regulation or concerns the scope of the Whistleblower Act as described above in this Whistleblower Policy.

As whistleblower, you will be afforded protection under the Whistleblower Act only if you had reasonable grounds to believe, based on the information available to you at the time of reporting, that the matters reported were true, and that the matters were covered by the scope of the whistleblower scheme as described above. If you report inaccurate information on breaches by honest mistake, you will also be entitled to protection.

If your report concerns the scope of the Danish Investment Firm Act, you are granted protection if you report a violation or potential violation of the Financial Regulation. Protection is also granted if the report concerns suspicion of violation of the Financial Regulation.

You cannot waive your rights, including your protection.

### 5.2. Protection granted

#### 5.2.1. Exemption from liability for breach of confidentiality and acquisition of information

##### Protection pursuant to the Whistleblower Act

If you meet the criteria for protection, you will not be deemed to have breached any statutory non-disclosure obligation and will not incur liability in that respect, provided that you had reasonable ground to believe that the report was necessary to disclose a breach falling within the scope of the Whistleblower Act. Nor will you

incur liability for getting access to the reported disclosures, provided that such access did not constitute a self-standing criminal offence.

### 5.2.2. Protection against retaliation

#### **Protection pursuant to the Whistleblower Act**

If you meet the criteria for protection, you will enjoy statutory protection against retaliation, including threats of retaliation and attempts of retaliation as a result of the reporting, and no one can hinder or attempt to hinder you from reporting your concerns.

Retaliation means any direct or indirect act or omission which occurs in a work-related context, which is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person.

#### **Specific protection pursuant to the Danish Investment Firm Act**

Employees or former employees may not be subject to unfavourable treatment or unfavourable consequences as a result of the employee reporting Global Evolution's violation or potential violation of the Financial Regulation to the Danish Financial Supervisory Authority or to Global Evolution's internal whistleblower scheme. The same applies to the determination, allocation and payment of variable pay to the employees or former employees.

### 5.2.3. Request for dismissal of a case

#### **Protection pursuant to the Whistleblower Act**

The whistleblower has the right to rely on a report to seek dismissal of a case, provided that the whistleblower had reasonable grounds to believe that the reporting was necessary for revealing a breach that falls within the scope of the Whistleblower Directive and/or the Danish Whistleblower Act.

The protection constitutes that a whistleblower can seek dismissal in case a counterparty has initiated a lawsuit against the whistleblower. Such lawsuits can be e.g., slander, copyright infringement, breach of professional secrecy, disclosure of trade secrets etc. However, the right to seek dismissal of a lawsuit presupposes that the whistleblower had reasonable cause to assume that the report was necessary to reveal an infringement which is covered by the scope of the Whistleblower Directive and/or the Danish Whistleblower Act.

### 5.3. Protection by employment law

If you submit a report under the whistleblower scheme that does not concern breach or potential breach of Financial Regulation or concerns the scope of the Whistleblower Act, you will be protected under the general employment and labour law rules and principles on protection against unfair dismissal and detrimental treatment, including downgrading, transfer to another job, or harassment.

## 6. POSSIBLE OUTCOMES OF THE INVESTIGATIONS

### **Consequences for the whistleblower**

Reports submitted in good faith will not have any adverse consequences for you.

If, however, you have submitted a report in bad faith/for the purpose of harassing or causing other harm to your colleagues or members of the board of directors without reason, it may have consequences for you as an employee.

## Consequences for the person concerned

A whistleblower report may have the following consequences for the person concerned:

- depending on the circumstances, a disciplinary action against the reported employee or director may result in termination of the employment or the office,
- it will not have any consequences for the reported employee or director if the allegations are not supported by evidence or by the investigator's findings.

## 7. PROCESSING OF PERSONAL DATA

Global Evolution is the data controller for processing of any personal data that are necessary for handling the whistleblower scheme. The collection of personal data provided in connection with a whistleblower report and the processing of personal data for the purpose of following up on a report are generally governed by the data protection legislation, including the GDPR and the additional rules in the Danish Data Protection Act (the "**Data Protection Act**").

Processing of personal data may take place if *necessary* to handle reports received under Global Evolution's whistleblower scheme.

### 7.1.1. Categories of data subjects

Unless you submit the report anonymously as described in paragraph 0, the investigation will involve processing of your personal data and the personal data of the person concerned and, in some cases, also the personal data of other persons mentioned in the report.

### 7.1.2. Categories of personal data

The personal data that are most frequently processed in connection with whistleblower reports include name and contact details and a description of the matter/incident that has triggered the report, including details on any criminal offences and other private affairs.

For the purpose of the investigations, it may be necessary to collect and process further personal data, conduct interviews with the employees and directors involved, impose employment law sanctions and notify relevant authorities and the police, etc.

It is not the intention with the whistleblower scheme to collect sensitive personal data through the scheme, such as health data. Such collection will solely take place if the personal data are relevant and necessary to investigate a reported violation (for instance if the reported violation relates to work safety and personal data on potential work-related injuries or possible accidents must be processed).

### 7.1.3. The purpose and legal basis for the processing of personal data

Global Evolution may process the personal data of whistleblowers, persons concerned, and other persons referred to in the report, where it is necessary to handle reports received under this whistleblower scheme.

Processing of personal data may also take place where necessary in order to follow up on reports, for instance, for the purpose of interviewing members of staff, the executive board or the board of directors, imposing disciplinary sanctions, or notifying competent authorities or the police.

The legal basis for the processing of personal data in connection with any of the (potential) violations referred to in paragraphs 0 and 0 will be based on section 22 of the Whistleblower Act.



#### 7.1.4. The right of persons concerned and reported third parties to receive information

Global Evolution must inform the person concerned and any third party referred to in the report about the processing of their personal data in connection with the handling of a report. As a general rule, they must receive this information within a reasonable time, but at the latest within one month after the personal data have been obtained. However, provision of this information may be postponed or omitted, for instance for the purpose of investigating a matter or safeguarding the interests of the whistleblower and/or Global Evolution where such interests override the data subjects' interests. Deviation from this obligation to provide information will be allowed if and to the extent provided in Article 14(5) of the GDPR or section 22(1) of the Data Protection Act.

#### 7.1.5. Transfer to third countries

If the processing of your personal data involves a transfer of your data to third countries, i.e., countries outside of the EU/EEA, for instance through a hosting provider located in a non-EU country, then Global Evolution will ensure that such transfer is lawful at all times, and that the requirements in the GDPR for an adequate level of protection are satisfied.

#### 7.1.6. Storage of personal data

Whistleblower reports will be stored only as long as is necessary and proportionate for the purpose of complying with the Danish Investment Firm Act and the Whistleblower Act. Accordingly, reports will be kept only as long as is necessary to ensure documentation for any claims raised under the Danish Investment Firm Act and the Whistleblower Act, including in particular the need of whistleblowers and persons concerned to preserve evidence and Global Evolution's obligation to follow up on reports received, including by linking such reports to previous reports.

The necessary storage period for whistleblower reports will be assessed on a regular basis. For this purpose, it will be taken into account if individuals entitled to protection under the Danish Investment Firm Act and the Whistleblower Act are likely to need proof of the relevant report. Continued storage may also be justified where there is ground to believe that the report will be confirmed by subsequent reports on the same matter, for instance because Global Evolution has already received multiple reports on that matter. Further, continued storage may be necessary to comply with a legal obligation prescribed by other legislation.

If a disciplinary sanction is imposed on an employee who has been named in a whistleblower report, or if there are other objective and compelling reasons for retaining information, the information may be kept in the employee's staff file. In that case, the information must be deleted no later than 5 years after termination of the employment, unless there are objective and compelling reasons for retaining the information for a longer period, for instance because of a pending lawsuit.

#### 7.1.7. Your rights

As data subject - i.e., whistleblower or person concerned or other person mentioned in the report - you have the following specific rights, unless otherwise exceptionally provided by the GDPR:

- Right of access
- Right to rectification
- Right to erasure
- Right to restriction
- Right to data portability
- Right to object

### Right to complain to the Data Protection Agency

If you disagree with the way in which Global Evolution processes your personal data, you may file a complaint with the Data Protection Agency at [www.datatilsynet.dk/kontakt/](http://www.datatilsynet.dk/kontakt/). However, we hope that you will contact us first, using the below contact details, so that we may reach agreement.

## 7.2. Recipients of personal data

It may be necessary for Global Evolution to share personal data from a whistleblower report with others. In that case, the personal data will be shared with the following categories of recipients:

- Relevant entities/departments in the Global Evolution organisation.
- Data processors, including sub-processors who administer the whistleblower scheme on behalf of, or according to instructions given by, Global Evolution and who provide legal, technical or administrative assistance for that purpose.
- Third-party advisers who provide e.g. legal assistance for the purpose of handling a specific report.
- Public authorities such as the police if the report makes it necessary to notify the police.

## 8. VIOLATION OF THE DANISH ANTI-MONEY LAUNDERING ACT

In the event of a suspected violation of the Danish Anti-Money Laundering Act (Act on Measures to Prevent Money Laundering and Financing of Terrorism), Kromann Reumert may be under an obligation to report such potential violation to the State Prosecutor for Serious Economic and International Crime and to disclose data for that purpose. Such reports will be handled in accordance with the rules in the Anti-Money Laundering Act. In cases like that, Kromann Reumert will act as data controller independently of Global Evolution's instructions.

## 9. EXTERNAL WHISTLEBLOWING

The Whistleblower Act provides for the establishment of an external whistleblower scheme managed by the Danish Data Protection Agency, which allows all of the persons enjoying statutory protection (and not only employees) to report the wrongdoings that can also be reported under Global Evolution's whistleblower scheme, including breaches of EU law, other serious breaches of the law, or other serious concerns. The Danish Data Protection Agency's whistleblower scheme can be accessed using this link: <https://whistleblower.dk/>

Breaches or potential breaches of the Financial Regulation can be reported to the Danish Financial Supervisory Authority.

External whistleblower schemes allow for both written and oral reporting, and a report can also, upon request, be submitted at a physical meeting within reasonable time.

If you choose to report your concerns under an external whistleblower scheme, you will receive an acknowledgement of receipt within seven days, unless you have expressly requested otherwise, or there is reasonable ground to believe that such acknowledgement of receipt will jeopardize the protection of your identity.

You are free to choose whether to report your concerns under Global Evolution's internal whistleblower scheme or under any relevant external whistleblower scheme or under both. However, we advise you to use Global Evolution's internal whistleblower scheme if the breach can be effectively addressed internally and if you consider the risk of retaliation to be non-existent.

## 10. QUESTIONS IN RELATION TO THE WHISTLEBLOWER SCHEME

If you have any questions or comments in relation to the whistleblower scheme, please contact the Head of Legal & Compliance at +45 79 32 11 20.

## 11. REPORTING

The Head of Legal & Compliance shall provide summary reports to the Board of Directors of all complaints and any remedial actions taken in connection therewith, subject to any confidentiality deemed appropriate due to ongoing investigations.

The Head of Legal & Compliance shall upon request report the following to Conning Holdings Limited ("CHL UK"):

- how many reports have been received through the whistleblower scheme,
- how many of such reports have been within the scope of the whistleblower scheme, including the category i.e., whether it concerns bribery, fraud, sexual harassment or similar, and
- how many of such reports have been outside of the scope of the whistleblower scheme.

Further, the Head of Legal & Compliance shall include in the reporting to CHL UK a risk assessment of whether the reports within scope involves a high, medium or low risk for Global Evolution.

## 12. IMPLEMENTATION OF THIS POLICY

This policy, appendices and the related documents are communicated to staff. The Company ensures that all staff are aware of their roles and responsibilities and adhere to the standards and procedures set out in this policy and the related documents.

## 13. REVIEW AND APPROVAL OF THIS POLICY

The review and approval of this policy and the related documents are the responsibility of the Board of Directors of the Company, with the input and advice of the Executive Management, the Head of Legal & Compliance, and the external auditor. Any amendments or revisions to this policy and the related documents are communicated to relevant staff in a timely manner.

This policy is reviewed and approved by the Board of Directors on an annual basis.

Version	Approval Date	Revision details	Made by	Approved by
1	25 August 2016	Minor updates	KJ	BOD
2	21 January 2021	New policy to implement online reporting tool.	KJ	BOD
3	August 2021	Updated to replace references to the Business Act	AMH	BOD
4	15 December 2021	Updated to include protection pursuant to the Danish Whistleblower Act	Kromann Reumert	BOD
5	17 November 2022	Minor updates	KJ	BOD

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6	28 November 2023	Only date update	SJ	BOD
7	14 November 2024	Template change	MKT	BOD