

DONKEY REPUBLIC

Whistleblowing Policy

Version no. 1 2024

Adopted by the board of directors on

March 2024

Overview

At Donkey Republic we protect employees who report misconduct and/or cooperate with an audit or investigation. This protection aims to reinforce the possibility for all employees to report cases where ethical standards, laws or company policies have been disregarded without fear of retaliation.

Purpose

The purpose of this policy is to ensure that Donkey Republic follows the law on Whistleblowing and that a potential Whistleblower is protected. We are committed to follow up on reported incidents and to resolve them within the timeframe provided by the law.

Scope

This policy sets out specific obligations to the Whistleblower Unit at Donkey Republic, as well as certain other employees who may be involved in the investigation and resolution process.

Whistleblower Protection

In a potential whistleblower protection situation, there is the need to protect not only the staff member alleging retaliation but also the rights of the accused employee, ensuring the fairness and transparency of the whole procedure. It is especially important in such a sensitive situation to strictly follow the rules of natural justice and due process.

Any report, complaint or information concerning possible misconduct can be brought to the Whistleblowing Unit's attention by reporting this through Donkey Republic's internal



whistleblower tool solution. The process and the link to the tool can be found in the Employee Handbook and are regularly communicated to all employees.

The report will be handled by the Whistleblower Unit according to the Danish Whistleblower Regulation¹. The Whistleblower Unit consists of the Chairperson of the Board, the elected General Employee Representative and a representative of the People & Culture team. The Whistleblower Unit will handle the confidentiality of the whistleblower's identity and the identity of persons named in the report.

Reports need to be followed up carefully, with confirmation of the report provided to the reporter within 7 days. The case needs to be resolved and detailed feedback provided to the reporter within 3 months.

The whistleblower policy will be periodically reviewed to check that it is operating effectively and whether any changes are required to the policy. The composition of the members of the Whistleblowing Unit will also be reviewed periodically and can be subject to change.

This Whistleblowing Policy has been reviewed by Donkey Republic Board in March 2024 and it will be reviewed on an annual basis. The policy will be available on the Company's website at: <https://invest.donkey.bike/esg/>

¹ <https://www.danskindustri.dk/vi-radgiver-dig/virksomhedsregler-og-varktojer/csr-etisk-ansvarlighed/eus-whistleblowerdirektiv/>



Signatures

Executive Board

Niels Henrik Rasmussen
Chief Executive Officer

Christian Dufft
Chief Financial Officer

Board of Directors

Caroline Søbørg Ahlefeldt-Laurvig-Bille
Chairperson

Laurent Mercat

Karl Erik Wenngren

Marina Kolesnik

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