

Whistleblower Reporting Policy

November 2015



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Columbus A/S has made it possible for employees, former employees, customers, suppliers, business partners, shareholders and other stakeholders to report any suspected unlawful activity or unethical misconduct in the Columbus Group, such as: financial fraud, bribery, corruption, violation of competition laws, discrimination or sexual harassment.

The whistleblower system is only meant for serious and sensitive concerns that could have an adverse impact on the operations and performance of the business, including actions which may harm Columbus' business and reputation.

Employees with concerns related to employment terms, working environment etc. should not report these issues via the whistleblower system. Instead such issues must be resolved locally with management or local HR, unless the matter is exceptionally serious or cannot be reported through the normal reporting lines.

Customer complaints cannot be reported via the whistleblower system. Such complaints must be reported to the customer's contact person in Columbus.

All communication can be reported anonymously and will be handled confidentially. However, Columbus prefers that the person reporting a concern states his/her name and other contact details in order for Columbus to be able to ask additional questions if needed.

1. How to report

Concerns can be reported via e-mail to: whistleblower@columbusglobal.com or by post to:

Columbus A/S

Chairman of the Board, or Deputy Chairman of the Board in the event that the concern involves the Chairman of the Board

Lautrupvang 6

2750 Ballerup

Denmark

MARK THE LETTER "CONFIDENTIAL"

Confidential personal data must not be sent via e-mail, as such data must not be sent non-encrypted via open internet. Concerns which include personal data must therefore always be sent by letter post.

In order to be able to facilitate thorough investigation of all matters, all concerns should be identified and described in sufficient detail. For this purpose, a reporting form is available on Columbus' Investor Relations site (see Appendix 1).

2. Receipt of concerns and investigation

All concerns reported as instructed above will be sent directly to the Chairman of the Board. Thus, no other persons will get insight in reported concerns before the Chairman. The Chairman will investigate the concerns and proceed with appropriate action. Any investigation will be conducted thoroughly in a confidential.

Based on the content of the individual concern, the Chairman of the Board may decide to involve relevant managers in Columbus or involve external advisors, such as a lawyer or auditor.

In case the concern involves the Chairman of the Board, the concern must be sent by post for the attention of the Deputy Chairman of the Board. All concerns reported as instructed above will be sent directly to the Deputy Chairman of the Board. Thus, no other persons will get insight in reported concerns before the Deputy Chairman.

3. Retaliation or misuse of the whistleblower system

Columbus A/S will ensure that there will not be discrimination or retaliation against anyone reporting a concern via the whistleblower system in good faith based on his/her personal knowledge.

If a person reporting a concern believes that he/she has been retaliated against for reporting or participating in an investigation, he/she should immediately report this via the whistleblower system. All such reports will be investigated confidentially.

Persons who knowingly make false reports or who otherwise abuse the system will face disciplinary action.

The whistleblower policy has been registered at the Danish Data Protection Agency (Datatilsynet), cf. applicable rules.

The whistleblower policy has been adopted by the Board of Directors on 3 November 2015.

Appendix 1 – Reporting form

Reporting form for Columbus' whistleblower system.

When reporting a concern via Columbus' whistleblower system, we recommend that you – to the extent possible - answer the questions below.

Reporting form:

What does your report concern?	
Who does your report concern?	
Where did the actions concerned take place?	
Do you know if the actions concerned are still taking place?	
Does the report involve an financial value?	
How did you come into possession of the information?	
Who are you? (voluntary)	
How can we contact you, if necessary? (voluntary)	