

IFU Whistleblower Unit Disclosure 2024

1. General

IFU has had a Whistleblower Policy since 2023, which is supported by an online reporting platform and other channels for reporting concerns about misconduct. IFU’s whistleblower system ensures that IFU employees, employees in IFU investments, and external stakeholders of IFU and IFU investments can report potential breaches of IFU policy or legislation related to IFU and IFU investments, and be assured that their concerns will be assessed, and, as appropriate, investigated, remedied or sanctioned, through a confidential process. IFU’s online reporting platform is hosted by an external party.

Summary of reports received in 2024

In 2024, IFU received a total of four reports related to alleged misconduct implicating an IFU employee or IFU. IFU investigated (realitetsbehandlede) two of the four reports and closed the other two reports following plausibility assessment. The two reports that IFU closed following the plausibility assessment were thoroughly reviewed but did not proceed to full investigation (realitetsbehandling) due to a lack of plausibility.

The concerns in one investigated report related to sexual harassment and other harassment (bullying).

The concern in the second investigated report related to breach of confidentiality owed to a whistleblower.

Neither of the investigations gave rise to sanctions. The findings of the investigation regarding breach of confidentiality owed to a whistleblower lead to a decision by IFU to strengthen its training and internal procedures with respect to the obligation to protect the confidentiality owed to a whistleblower.

Overview of reports received in 2024 and themes of the reports	
1. January 2024-31. December 2024	Number of reports
<i>Total number of reports</i>	4
<i>Reports that were closed following plausibility assessment</i>	2
<i>Reports that were investigated following plausibility assessment (realitetsbehandlede)</i>	2
<i>Reports that were reported to the police</i>	0
<i>Reports that were referred to another authority</i>	0

<i>Themes of the reports that were investigated following plausibility assessment (realitetsbehandlet)</i>	<ul style="list-style-type: none"> • Sexual harassment • Other harassment • Offences against other laws
<i>Themes of the reports that were closed following plausibility assessment</i>	<ul style="list-style-type: none"> • Violation of administrative law principles • Offences against other laws

2. Definitions

Closed following plausibility assessment

This includes reports that are closed because the assessment of a concern finds that a concern either falls outside the scope of IFU's Whistleblower Policy or the Danish Whistleblower Act, or that there is no reasonable basis for a suspicion of a breach of IFU's Whistleblower Policy or the Danish Whistleblower Act. When a report contains several concerns, and some concerns are assessed as plausible and others are not, the report remains open, and the plausible concerns are investigated (realitetsbehandlet).

Concern

A concern is a suspicion of misconduct that is communicated in a report. More than one concern may be communicated in a single report, and these concerns may relate to different themes.

Report

A report is a communication to IFU in which one or more themes or concerns about misconduct are expressed. Follow up communications with the whistleblower made before the report is closed that are intended to obtain more information are not considered additional reports.

Following the closure of a report, a new communication that contains additional information regarding the closed report is registered as a new report.

Infringement of EU law

This includes alerts related to violations of EU law that fall within the scope of the Directive of the European Parliament and of the Council on the protection of persons reporting breaches of EU law.

Criminal offences

This includes reports of offences against criminal law.

Offences against other laws

This includes reports of violations of laws and regulations issued pursuant to laws (e.g., circulars) that are not covered by the Criminal Code.

Violation of administrative law principles

In addition to violations of basic principles of administrative law, this includes reports of violations of the IFU's internal policies, instructions, guidelines, etc.

Sexual harassment

This includes reports of offensive behaviour of a sexual nature and all forms of unwanted sexual attention.

Other harassment

This includes reports of bullying, other degrading behaviour and other impact on the psychological work environment.

Other behaviour

This includes reports that fall outside of the aforementioned themes.

Referred to another organisation or authority

This includes reports that have been submitted to the wrong whistleblowing organisation or authority. The whistleblower has been counselled about the correct whistleblowing scheme or authority and informed about how to contact them.

Questions regarding IFU's Whistleblower Policy should be addressed to the IFU Whistleblower Unit at (WBunit@ifu.dk).