

WHISTLEBLOWER POLICY

1 Objective

In COWI, we are committed to exercising the highest levels of ethics and integrity in the way that we do business and in how we take care of our employees and partners. We believe that doing the right thing always is fundamental for our continued success and reputation. COWI encourages its employees, partners and other stakeholders to speak up and report any behaviour in COWI that does not live up to these commitments and expectations.

2 Scope

COWI in the UK & Ireland are companies of consulting professionals, specialising in the design and development of transportation infrastructure and energy projects. We undertake projects at our offices in Bristol, Derby, Dublin, Glasgow, London and York. We are a subsidiary of COWI A/S.

3 Policy statement

As a company with an open culture, everyone in COWI can speak their mind, and the preferred procedure for reporting observations of any matter of concern will always be for employees to talk to their line management.

However, we also acknowledge that some concerns are difficult to share in such a manner, and that our partners and other stakeholders also may need suitable means of reporting.

For this purpose, COWI will provide a dedicated whistleblower scheme that allows employees, partners and other stakeholders with a legitimate interest to file a report and share their concern.

The COWI whistleblower scheme shall be easily accessible for those wishing to make use of it.

COWI offers anyone utilising the whistleblower scheme to submit their report anonymously or by name.

Regardless of choice, all investigations will, to the maximum extent possible, be conducted in a confidential manner, and COWI will not tolerate retaliation in any form against any person who, acting in good faith, reports their concern via the whistleblower scheme.

Employees in COWI who engage in such retaliation, directly or indirectly, or encourage others to do so, may be subject to disciplinary action.

VERSION	DATE OF ISSUE	PREPARED	CHECKED	APPROVED	DATE OF NEXT REVIEW
1.0	1 ST March 2025	AIMA	CJW	ANSL	1 st March 2026

This policy applies to all COWI employees.

For more details about the scope and administration of the COWI whistleblower scheme, please refer to COWI's Whistleblower Guidelines.

Monitoring and reporting

All reports are processed through a specialist whistleblower IT system called EthicsPoint, which is operated by Navex, a third-party company that hosts the database. Navex informs COWI's Business Ethics Manager and General Counsel of the incoming report.

The Business Ethics Manager receives and considers all reports carefully and assesses whether (i) the report is unfounded and should be deleted from the EthicsPoint system, (ii) gathering of supplemental information is required to make a proper assessment, or (iii) a formal investigation of the reported matter should be conducted. The Business Ethics Manager is also authorised to take all other follow-up actions as part of the investigation of a report, including further communication with the whistleblower, requesting additional information and providing feedback to the whistleblower.

It may be necessary to involve experts from Group Finance, HR Business Partners or the Managing Director of the COWI Group company where the reported circumstances occur to ensure that the necessary skills and local expertise are present to conduct an independent, professional and objective investigation. The investigation is conducted independently, with due diligence and in a confidential manner to the maximum extent consistent with a thorough and complete investigation.

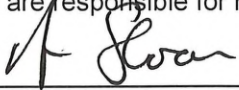
If a report concerns the Business Ethics Manager, its submission will be referred solely to and handled by the General Counsel.

If a report concerns the General Counsel, its submission will be referred solely to and handled by COWI's external lawyer.

A summary presentation of both investigated and unfounded reports is submitted quarterly to the Audit Committee under the Board of Directors of COWI Holding A/S and annually to the Board of Directors directly.

Accountability and responsibility

The Board of Directors are responsible for monitoring and reporting in the Annual Report.

Signed: 

Andrew Sloan
Senior Vice President
COWI UK Limited

31st March 2025

Useful links, including to other relevant COWI policies

› [COWI Group Whistleblower guidelines](#)