ZITON

December 2025

WHISTLEBLOWER PROTECTION POLICY

ZITON A/S (the “Company”) is committed to full compliance with all applicable laws, regulations, accounting standards, internal accounting controls, audit practices, the Company’s Code of Conduct, as well as all other established policies and procedures. The Company upholds the highest standards of integrity and expects all **stakeholders** – including employees, shareholders, contractors, suppliers, customers, and other external parties – to adhere to these principles and comply with all relevant obligations.

This Whistleblower Protection Policy has been adopted to:
Encourage the timely disclosure and investigation of any improprieties before they disrupt the Company’s business or operations or result in significant loss.
Foster a culture of accountability with respect to Company resources.
Ensure that stakeholders can lawfully raise legitimate concerns without fear of disadvantage or retaliation.

At the Company’s request, this Whistleblower Protection Policy has been adopted by all Group Companies, including ZITON Contractors A/S, ZITON Ltd, ZITON GmbH, Hangout A/S, Zappy Topco ApS, MEIF 7 Wind Services Investments ApS, MEIF 7 Wind Services Bidco ApS and DiscoveryCo ApS (collectively, the “Group Companies”).

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Eligibility to Report

All stakeholders in the Company and Group Companies are entitled to report concerns under this Whistleblower Protection Policy.

Stakeholders are encouraged to report any suspected misconduct, unethical behaviour or other concerns covered by this policy. Reports made in good faith may be submitted without fear of dismissal, retaliation or any form of adverse action. A "good faith report" is defined as a report made with an honest belief that the information is accurate, even if the concern is ultimately determined to be unfounded.

Scope of Policy

Subject to all applicable laws and regulations, and where not specifically addressed in another policy of the Company or the Group Companies, this policy governs the reporting and handling of complaints, reports and concerns from stakeholders regarding potential violations of, including but not limited to:

- the Company's policies and instructions on trading in Company Securities, as well as other policies and procedures related to accounting, internal accounting controls or auditing matters (collectively, "Financial Matters"),
- applicable laws, rules and regulations,
- fraud, including financial fraud, document fraud or embezzlement,
- violations of antitrust regulations, such as price-fixing,
- bribery or corruption,
- the Company's Code of Conduct,
- the Company's Harassment, Sexual Harassment and Bullying Policy, and
- any other code, policy or procedure established by the Company

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Reporting Process

The Company has engaged Whistleblower Software ApS to facilitate the secure and confidential handling of complaints. Whistleblower Software ApS provides an online platform for reporting and managing all reported cases. Individuals wishing to submit a complaint may contact one or more of the individuals listed in online system. Complaints, concerns or reports can be submitted via the following link or by scanning the QR code:

Link to whistleblower software report site

If a complaint involves any of the persons listed in the online system, you have the option to exclude that person as a recipient of the report or to contact the CEO or any member of the Board directly.

The Company's officers and the Board members can be reached through the executive office at Bygholm Søpark 21E, 8700 Horsens, Denmark / phone: +45 8744 4400.

For guidance on submitting a report, please refer to the "Guide for Reporting", which is available upon accessing the online system.

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Confidentiality

The Company and the Group Companies encourage stakeholders to identify themselves when submitting a report and to provide relevant details – such as names, dates and locations – to facilitate an effective investigation. However, stakeholders who prefer to remain anonymous have the right to submit reports anonymously.

All reports will be handled with strict confidentiality. If a stakeholder submits a complaint in good faith and discloses their identity, the Company will protect their anonymity unless disclosure is necessary to ensure a fair and thorough investigation, required by law or regulation, or justified by an overriding reason.

Handling of Complaints and Investigations

Unless otherwise required by an applicable Company policy, law, regulation or any specific request from the Audit Committee, the Company will manage complaints and investigations in accordance with the procedures outlined below.

Initial Handling of Complaints

Financial Matters

Complaints related to Financial Matters will be reported to the Chairman of the Audit Committee. The Chief Financial Officer ("CFO"), or such other person designated by the Chairman of the Audit Committee, will conduct a preliminary investigation to assess the validity of the report. The CFO will inform the Chairman of the Audit Committee if further action is required to fully evaluate the report. If additional action is deemed necessary, the complaint will be brought to the attention of all members of the Audit Committee for further evaluation.

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Non-Financial Matters

Complaints related to non-Financial Matters will be reported to the Chief Legal Officer ("CLO") and the CEO, and, when appropriate, to the relevant committee of the Board. The CLO will conduct a preliminary investigation to determine whether the complaint can be substantiated. If further action is required, the CLO will inform the CEO and, if necessary, the applicable Board committee for further review.

Investigation and Resolution of Complaints

Following the completion of a preliminary investigation, the Audit Committee, CEO, or Board may direct the CLO to initiate an internal investigation. They may also, or alternatively, require an independent investigation conducted by outside counsel or other third-party consultants.

The CLO has the discretion to involve relevant members of Company management or Group Companies as deemed appropriate. Additionally, the CLO may authorize an independent investigation or engage external consultants to support assist in the investigation, even if not mandated by the Audit Committee, CEO or Board.

The CLO shall report the findings of the internal investigation to the Audit Committee, CEO or Board (or the relevant committee thereof), as appropriate. Prompt and appropriate corrective action will be taken when warranted in the judgment of the Audit Committee, CEO or Board.

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Notification of Complaints

The CEO and the CFO will be informed of the existence of any investigation and will receive regular updates on its progress at least quarterly, as well as before the conclusion of any reporting period in which they are required to provide written certifications or representations to external auditors or regulatory authorities.

Notwithstanding the above, any individual who is the subject of a complaint or investigation – including the CEO and the CFO – will not receive notification of said complaint.

Complaint Recordkeeping and Periodic Reporting

The Chief Legal Officer will maintain a comprehensive record of all reports received and will monitor the progress of each report through the investigation and resolution process. A periodic summary of these reports will be provided to the Audit Committee or the relevant committee of the Board, as appropriate.

No Retaliation

The Company and the Group Companies are committed to ensuring that no stakeholder faces negative or adverse actions as a result of making a good faith report regarding any of the policies, rules, or regulations outlined in this policy, even if the report later proves to be incorrect.

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Specifically, the Company and its Group Companies will not terminate, demote, suspend, threaten, harass, or in any way discriminate against any employee in their terms and conditions of employment, nor take retaliatory action against any other stakeholder, due to their lawful reporting of concerns related to Financial Matters or any other issue in good faith.

Additionally, the Company may face criminal or civil liability for retaliating against stakeholders who report law violations or other legal offenses.

Retaliation in any form will not be tolerated. Any allegation of retaliation must be reported immediately and will be thoroughly investigated and resolved.

Duty of Cooperation

All stakeholders are required to cooperate fully in the investigation of complaints. Failure to cooperate may result in disciplinary action, up to and including termination of employment.

Interaction with Outsiders

No stakeholder shall take any action to fraudulently influence, coerce, manipulate, or mislead any independent public or certified accountant engaged in the Company's audit.

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In addition to the complaint procedures outlined in this policy, stakeholders should be aware that certain governmental agencies are authorised to investigate improper accounting practices, internal accounting controls, auditing matters, or potentially fraudulent financial fraud. This policy does not prevent stakeholders from reporting relevant information to the appropriate agencies. Furthermore, no documents related to such investigations or complaints will be intentionally altered or destroyed.

Data Deletion

In accordance with applicable local laws, the collected information will be deleted under the following conditions:

1. immediately, if the report is deemed outside the scope of the Whistleblowing Protection Policy, is found to be unfounded, or if no internal action is taken in response to the concern,
2. upon closure of the case by relevant authorities, if the report has been filed with the police or other appropriate authorities,
3. two months after the completion of the investigation, if no further action is taken, or
4. for employees, no later than five (5) years after the end of the employee's employment, if disciplinary action has been taken based on the collected information or if it is necessary to retain the data for factual or legal reasons. In such cases, the information will be stored in the relevant personnel file.

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Policy Review

The Audit Committee will review this policy annually to ensure its alignment with the Company's objectives and compliance with applicable laws, regulatory requirements, bond rules and stock exchange rules. If necessary, the policy will be revised, subject to the approval of the Board.