

NIRAS Internal Whistleblower Arrangement

In NIRAS we call for transparency and openness, also when it concerns subjects such as corruption and other types of improper or illegal behaviour. However, there might be occasions where open case handling is not possible. In order to deal with such cases, NIRAS has established an internal whistleblower arrangement, managed by the NIRAS Compliance Unit (NCU) as regards corruption cases involving NIRAS, and by the NIRAS HR Department if it concerns harassment, bullying and discrimination. All NIRAS employees, partners, clients and other NIRAS affiliates can make use of NIRAS Internal Whistleblower Arrangement.

Reporting of incidents that do not concern NIRAS affairs, like for example serious offences or violations of EU or other international law, is referred to the relevant national set-ups. In Denmark reference is made to the Data Protection Agency or the police. Similar set-ups will apply in most other countries.

Reporting of corruption or suspicion of corruption can be made openly by email, letter, note, telephone call or personal appearance to NCU or one of its three Compliance Officers: Claus Jørgensen (cjg@niras.dk), Rasmus Klitgaard (rki@niras.dk) and Merete Reeves (mree@niras.dk) - or it can be made anonymously, for example by use of an anonymous email address from where the message can be sent to either NCU's joint mailbox (compliance@niras.dk), established to secure confidentiality and anonymity, or to the personal inbox of any of the three Compliance Officers.

Reporting on harassment (e.g. sexual), bullying and discrimination, can be made openly by email, letter, note, telephone call or personal appearance to NIRAS HR Department, or it can be made anonymously, for example by use of an anonymous email address from where the message should be sent to the fit-for-purpose HR mailbox (harassment@niras.dk), established to secure confidentiality and anonymity. The HR guidelines on managing such cases can be found under InNiras/Employee ([internal link](#)).

For an investigation to be successful, it is important for the investigators to have a point of contact, preferably a known email address, in order to ask initial questions and understand the given situation in as many details as possible.

All information received from the Whistleblower and other informants will be filed, stored and timely deleted in accordance with EU's General Data Protection Regulation (GDPR). Emails and other correspondence will be managed in a closed mailbox system, only accessible for the NCU officers by use of their personal access insight codes. For the right of the Whistleblower with regard to data protection and access to data, reference is made to the EU website: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/my-rights/what-are-my-rights_en.

However, the Duty of Confidentiality, when handling personal data in connection with whistleblower cases, might set certain limits for access to insight in particular sensitive data.

NCU or the NIRAS HR Department will conduct an in-depth investigation of the reported incident. If the investigation reveals that NIRAS' Code of Ethics has been violated, or it is beyond reasonable doubt that such violation has occurred, depending on the character and severity of the violation, the offender(s) will either be sanctioned by NIRAS or the case will be reported to the police.

If the investigation, on the other hand, leads to the conclusion that it is beyond reasonable doubt that the reported accusation has been purposely and falsely made, such a deceitful act will also be subject to disciplinary action.

Please note that as a whistleblower, you will not necessarily receive updates or reports during the investigation of the reported case. However, within seven days from the date your reporting has been received at NIRAS, you will receive a response to your reporting, and within three months you will receive feedback on the outcome of the investigation together with an explanation hereof.