

Group Policy:

Applicable for:

Scandlines Data Ethics Policy

Scandlines Infrastructure ApS & its subsidiaries

Objective: The overall purpose of this policy is to set out the principles for handling of data within Scandlines Infrastructure ApS and its subsidiaries ("Scandlines").

Recipients: All employees.

Validity: This policy is valid from 20 December 2021.

This data ethics policy should be seen as a supplement to Scandlines' data protection statements for customers, applicants and vendors.

Scandlines Infrastructure ApS and its subsidiaries ("Scandlines") comply with Danish, German and EU law on data and privacy protection.

The data ethics policy comes into play in scenarios requiring thoughtful and responsible decision-making where existing laws and regulations do not necessarily provide clear ethical guidance. This can include, but is not limited to:

- Large-scale use of non-personal data which can affect customers, employees or vendors,
- Technological development,
- Evolving risks.

The data ethics policy consists of six fundamentals. The policy complements the rules for handling of data set forth in employment contracts, non-disclosure agreements, and vendor agreements.

Fundamentals of the Scandlines' policy on data ethics and responsible handling of personal data:

- 1) For Scandlines, data ethics aspects are more comprehensive than compliance with the law.
- 2) A fundamental value for Scandlines is respect for the privacy of customers, vendor employees, and employees.
- 3) Scandlines only discloses data to authorities if there is an obligation to do so according to legislation and authority decisions.
- 4) Openness and transparency is another fundamental aspect for Scandlines. Sharing of best practices for handling of data within the industry, organisations in general and authorities is a must for Scandlines.
- 5) Machine learning, artificial intelligence, and the use of algorithms will be applied to improve the services Scandlines delivers to our customers, and to boost openness and transparency about Scandlines' activities and social impact.

Use of computer programs, artificial intelligence and algorithms

- Analysis and evaluations for supporting our work to become a better partner for our customers and to be transparent about Scandlines' societal impact are performed using computer software and algorithms.

Revised date: 08.12.2025
Rev./Appr. by: DPC/CFO
Replaces date: 02.12.2024

First issued date: 20.12.2021
Issued by: Scandlines Infrastructure ApS
Revision no.: 4

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- We will use new technologies, databases and research methods to help customers of Scandlines to be served better, by reduced processing time, and tailor-made solutions for customers.
- Customers and (potential) employees must at all times be assured that material decisions are always made involving human interaction.

Security controls

To minimise the risk of unauthorized disclosure of personal data, proprietary knowledge, trade secrets etc. Scandlines has implemented a set of security controls including:

- All employees have signed a non-disclosure clause,
- Access to data is kept to a minimum in order to fulfil the purpose,
- Data is stored securely, kept accurate, retained for no longer than necessary, and is only used for a specific and legitimate business.

Internal Organization

Responsibility for data ethics and the handling of personal data lays with the Data Protection Committee, including representatives from the IT department, IT security manager, Group Legal & Compliance, Human Resources and Marketing, ultimately reporting to the C-Suite.

Reporting of non-compliance

Any significant matters that could constitute a breach of law or internal procedures can be reported to Scandlines' compliance function (e.g. compliance@scandlines.com); e.g. in cases where an employee has a suspicion that somebody has gained unauthorized access to employee or customer data. Further, Scandlines has set up a whistleblower scheme which allows for anonymous reporting.

For questions please contact: Data Protection Committee

This work instruction is revised bi-annually, or if required, sooner.