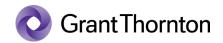




Table of contents

Section 1:	Enreach Campaigns A/S' statement	1
Section 2:	Independent service auditor's assurance report on the description of controls, their design and operating effectiveness	3
Section 3:	Description of Enreach Campaigns A/S' services in connection with the operating of Flows by Enreach, and related IT general controls	
Section 4:	Control objectives, controls, and service auditor testing	13



Section 1: Enreach Campaigns A/S' statement

The accompanying description has been prepared for customers who have used Enreach Campaigns A/S' Flows by Enreach, and their auditors who have a sufficient understanding to consider the description along with other information about controls operated by customers themselves, when obtaining an understanding of customers' information systems relevant to financial reporting.

Enreach Campaigns A/S is using the subservice organisations Global Connect A/S, Interxion Denmark and Amazon Web Services. This assurance report is prepared in accordance with the carve-out method and Enreach Campaigns A/S' description does not include control objectives and controls within Global Connect A/S, Interxion Denmark and Amazon Web Services. Certain control objectives in the description can only be achieved, if the subservice organisation's controls, assumed in the design of our controls, are suitably designed and operationally effective. The description does not include control activities performed by subservice organisations.

Some of the control areas, stated in Enreach Campaigns A/S' description in Section 3 of IT general controls, can only be achieved if the complementary controls with the customers are suitably designed and operationally effective with Enreach Campaigns A/S' controls. This assurance report does not include the appropriateness of the design and operating effectiveness of these complementary controls.

Enreach Campaigns A/S confirms that:

- (a) The accompanying description in Section 3 fairly presents the IT general controls related to Enreach Campaigns A/S' Flows by Enreach processing of customer transactions throughout the period from 1 September 2022 to 31 August 2023. The criteria used in making this statement were that the accompanying description:
 - (i) Presents how the system was designed and implemented, including:
 - The type of services provided
 - The procedures within both information technology and manual systems, used to manage IT general controls
 - Relevant control objectives and controls designed to achieve these objectives
 - Controls that we assumed, in the design of the system, would be implemented by user entities, and which, if necessary, to achieve the control objectives stated in the accompanying description, are identified in the description along with the specific control objectives that cannot be achieved by us alone
 - Other aspects of our control environment, risk assessment process, information system and communication, control activities, and monitoring controls that were relevant to IT general controls
 - (ii) Contains relevant information about changes in the IT general controls, performed during the period from 1 September 2022 to 31 August 2023
 - (iii) Does not omit or distort information relevant to the scope of the system being described, while acknowledging that the description is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the system that each individual customer may consider important in their own particular environment



- (b) The controls related to the control objectives stated in the accompanying description were suitably designed and functioning during the period from 1 September 2022 to 31 August 2023 if relevant controls with the subservice organisation were operationally effective and the customers have performed the complementary controls, assumed in the design of Enreach Campaigns A/S' controls during the entire period from 1 September 2022 to 31 August 2023. The criteria used in making this statement were that:
 - (i) The risks that threatened achievement of the control objectives stated in the description were identified
 - (ii) The identified controls would, if operated as described, provide reasonable assurance that those risks did not prevent the stated control objectives from being achieved
 - (iii) The controls were used consistently as drawn up, including the fact that manual controls were performed by people of adequate competence and authorization, during the period from 1 September 2022 to 31 August 2023

Søborg, 24 May 2024 Enreach Campaigns A/S

Casper Langhoff Head of Product



Section 2: Independent service auditor's assurance report on the description of controls, their design and operating effectiveness

To Enreach Campaigns A/S, their customers and their auditors.

Scope

We have been engaged to report on a) Enreach Campaigns A/S' description in Section 3 of its system for delivery of Enreach Campaigns A/S' Flows by Enreach throughout the period from 1 September 2022 to 31 August 2023 and about b)+c) the design and operational effectiveness of controls related to the control objectives stated in the description. Enreach Campaigns A/S is using the subservice organisations Global Connect A/S, Interxion Denmark and Amazon Web Services. This assurance report is prepared in accordance with the carve-out method and Enreach Campaigns A/S' description does not include control objectives and controls within Global Connect A/S, Interxion Denmark and Amazon Web Services. Certain control objectives in the description can only be achieved if the subservice organisation's controls, assumed in the design of our controls, are appropriately designed and operationally effective. The description does not include control activities performed by subservice organisations. Some of the control objectives stated in Enreach Campaigns A/S' description in Section 3 of IT general controls, can only be achieved if the complementary controls with the customers have been appropriately designed and works effectively with the controls with Enreach Campaigns A/S. The report does not include the appropriateness of the design and operating effectiveness of these complementary controls.

Enreach Campaigns A/S' responsibility

Enreach Campaigns A/S is responsible for preparing the description in Section 3 and accompanying statement (Section 1) including the completeness, accuracy, and method of presentation of the description and statement. Additionally, Enreach Campaigns A/S is responsible for providing the services covered by the description; stating the control objectives; and for the design, implementation, and effectiveness of operating controls for achieving the stated control objectives.

Grant Thornton's independence and quality control

We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour and ethical requirements applicable to Denmark. Grant Thornton applies International Standard on Quality Control 11 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Auditor's responsibility

Our responsibility is to express an opinion on Enreach Campaigns A/S' description (Section 3) as well as on the design and operation of the controls related to the control objectives stated in that description based on our procedures. We conducted our engagement in accordance with ISAE 3402, "Assurance Reports on Controls at a Service Organisation", issued by International Auditing and Assurance Standards Board. This standard requires that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, the description is fairly presented, and the controls are suitably designed and operating effectively. An assurance engagement to report on the description, design, and operating effectiveness of controls at a service organisation involves performing procedures to obtain evidence about the disclosures in the service organisation's description

Enreach Campaigns A/S

¹ ISQC 1, Quality control for firms that perform audits and reviews of financial statements, and other assurance and related services engagements.



of its system, and the design and operating effectiveness of controls. The procedures selected depend on the service auditor's judgement, including the assessment of the risks that the description is not fairly presented, and that controls are not suitably designed or operating effectively. Our procedures included testing the operating effectiveness of those controls that we consider necessary to provide reasonable assurance that the control objectives stated in the description were achieved. An assurance engagement of this type also includes evaluating the overall presentation of the description, the suitability of the objectives stated therein, and the suitability of the criteria specified by the service organisation in Section 3.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Limitations of controls at a service organisation

Enreach Campaigns A/S' description in Section 3, is prepared to meet the common needs of a broad range of customers and their auditors and may not, therefore, include every aspect of the systems that each individual customer may consider important in their own particular environment. Also, because of their nature, controls at a service organisation may not prevent or detect all errors or omissions in processing or reporting transactions.

Furthermore, the projection of any functionality assessment to future periods is subject to the risk that controls with service provider can be inadequate or fail.

Opinion

Our opinion has been formed based on the matters outlined in this report. The criteria we used in forming our opinion were those described in Enreach Campaigns A/S' statement in Section 1 and based on this, it is our opinion that:

- (a) The description of the IT general controls, as they were designed and implemented throughout the period from 1 September 2022 to 31 August 2023, is fair in all material respects.
- (b) The controls related to the control objectives stated in the description were suitably designed throughout the period from 1 September 2022 to 31 August 2023 in all material respects, if controls with subservice organisations were operationally effective and if the customers have designed and implemented the complementary controls assumed in the design of Enreach Campaigns A/S' controls throughout the period from 1 September 2022 to 31 August 2023
- (c) The controls tested, which were the controls necessary for providing reasonable assurance that the control objectives in the description were achieved in all material respects, have operated effectively throughout the period from 1 September 2022 to 31 August 2023.

Description of tests of controls

The specific controls tested, and the nature, timing and results of these tests are listed in the subsequent main Section 4 including control objectives, test, and test results.

Intended users and purpose

This assurance report is intended only for customers who have used Enreach Campaigns A/S and the auditors of these customers, who have a sufficient understanding to consider the description along with other information, including information about controls operated by customers themselves. This information serves to obtain an understanding of the customers' information systems, which are relevant for the financial reporting.

Copenhagen, 24 May 2024

Grant Thornton

Godkendt Revisionspartnerselskab

Kristian Randløv Lydolph State Authorised Public Accountant Isabella Ørgaard Jensen Director, CISA



Section 3: Description of Enreach Campaigns A/S' services in connection with the operating of Flows by Enreach, and related IT general controls

Introduction

The purpose of this description is to supply information to Enreach Campaigns' customers and their stakeholders (including auditors) regarding the requirements in the International Standard for Assurance Engagements on controls at a service organisation, ISAE 3402.

Additionally, the purpose of this description is to provide information on our information security code of practice which is applicable for our delivery of the product and service Flows by Enreach to our customers.

The description comprises the control areas and controls regarding Flows by Enreach, which cover the majority of our customers and are based on our standard delivery. Individual customer relations are not included in this description.

Enreach Campaigns and our software Flows by Enreach

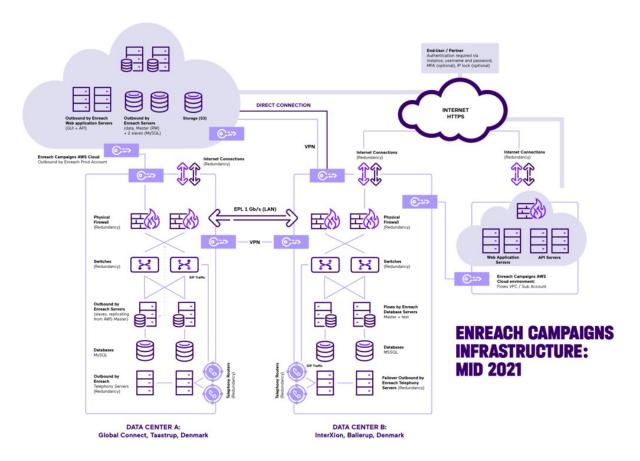
Enreach Campaigns is a Danish IT company based in Søborg. We develop, host, and supply software in the form of a SaaS solution to contact centres. One of our core products is supplying the software Flows by Enreach (hereafter just named "Flows"), which is supplied as a SaaS-solution, which means it is hosted in our own data centres and is based on a flexible and scalable subscription-based model.

Flows, which this assurance report concerns, is one of the largest products in our palette of solutions.

Technical setup and placement

Flows is a web application based on .NET (the primary language is C#) and with a front end based on e.g. JavaScript and MVC. The database technology is MSSQL, and hosting is via the Danish data centres GlobalConnect (Taastrup) and InterXion (Ballerup) as well as AWS' (Amazon Web Services) Frankfurt and Dublin locations, and Enreach's European based data centres. The only AWS locations we have chosen services in, and where data thereby is located in, are AWS' Dublin site in Ireland and AWS' site in Frankfurt, and thereby no data in Flows leaves the EU. Our infrastructure and architecture are designed in such a way that there is redundant failover equipment for everything from firewalls and switches to database and web servers. Most of the equipment is also placed in both data centres, which means that one location can resume operations, if another location is impacted by reduced access or other problematic circumstances, internal as well as external.





Organisation and responsibility

Enreach Campaigns employs 40 persons in Denmark, Sweden, Ukraine, and Finland. About half the employees are placed in Denmark and have their daily workplace at the office in Søborg.

The management consists of an ultimately responsible Head of Product, and below him a head of development and a head of operations with all technical responsibilities; a CXO responsible for customer contact, customer relations, and support; and a CSO responsible for sales. In addition, a staff function with CFO as well as administration and HR.

The IT department, led by the head of development and the head of operations, consists primarily of developers in a "DevOps" constellation, where two persons are dedicated to operations, optimising servers and infrastructure, monitoring and handling operational issues, but where all have operations as their first priority in case of technical issues on the platform.

The developers are organised in frontend and backend expertise, with a chief architect who makes the general decisions on language, technology, and new frameworks on the basis of a thorough analysis and in cooperation with the head of development. In addition, a network administrator is responsible for network and telephony, whereas a project manager and tester have a close cooperation with Enreach Campaigns' other departments.

Management has the overall responsibility for IT security and that the company's general IT security policy is observed.

Next to the daily organisation based on function, a security organisation has been organised with an information security committee comprising key employees from various parts of Enreach Campaigns, including management, and an information security coordinator who has the daily, operational responsibility for a number of tasks defined in Enreach Campaigns' information security code of practise. The information security coordinator is additionally responsible for all employees being aware of the information security manual, including rules and procedures, helps them to access and understand it, and acting on and observing the rules. In conclusion, the responsibility for a variety of matters related to the business systems that support the daily work with supplying the product and service Flows is delegated to the system owners.



Risk management in Enreach Campaigns A/S

Risk management in Enreach Campaigns A/S is done for all areas connected with delivering the product and service Flows, and which thereby may have financial consequences for our customers. Risk analysis, assessment, and management are based on ISO 27005, and are based on impact analyses and vulnerability analyses at service level. Service is understood as business systems supporting the delivery of Flows as well as Flows in itself as a customer system.

The business in Enreach Campaigns answers the questions in the impact analysis, while the IT department in Enreach Campaigns performs the vulnerability analyses. Vulnerability analyses are reported at service level, but are based on assets, which are the physical and virtual sub-elements that altogether constitute the platforms or business systems.

Risk analyses are conducted as consequence and vulnerability analyses at least annually, after which the collected security overview is brought up for the information security committee and finally Enreach Campaigns' management, for the definition of further actions.

Generally on our control objectives, including rules and procedures as well as implemented controls

Working procedures and processes connected with the supply of the product and service Flows are based on our information security code of practice, on top of which are defined procedures and controls with associated contingency plans etc.

Above all is our top-level information security policy, which is signed by Enreach Campaigns' Head of Product, and which sets the framework for the information security work. This is valid for all employees and close cooperative partners (such as consultants).

The framework for the information security code of practice is ISO 27001, and the code of practice is classified according to the following control areas:

- Information security management and security policy
- Organisation of information security
- Human resource security
- Access control
- Cryptography
- Physical and environmental security
- Operations security
- Communications security
- System acquisition, development, and maintenance
- Supplier relationships
- · Information security incident management
- Information security aspects of business continuity management
- Compliance

Information security management and security policy

Enreach Campaigns' general information security policy is prepared for the purpose of ensuring a continuous embedding of working methods, principles, and routines that comply with the determined security level.

The management approves the policy, which is signed by our Head of Product, and management is responsible for the policy being observed.

The information security policy must be observed in all regards and aims to ensure a secure and stable delivery of the product and service Flows, including compliance with relevant legislation, such that all significant risks of breakdowns, data theft, and data breaches are reduced.

The policy is reviewed and approved annually. The information security coordinator is the management's and information security committee's "auxiliary arm" in the daily embedding of the policy, and this ensures communication on an ongoing basis to all relevant parties. Additionally, all employees annually sign that they have read and comply with the policy and the associated information security code of practise.



Organisation of information security

Segregation of duties

We have a clear and well-defined organisation with segregation of duties, which entails that dependency on key persons is reduced as much as possible. In addition, segregation of duties has been introduced to areas where there is a risk of the occurrence of misuse of the company's data and information.

Equipment and teleworking

We have a procedure for the use of mobile devices and home workplaces/remote workplaces. Minimum requirements have been defined for the protection of all devices, as well as access to business systems and data. All devices must be protected by antivirus and firewall. A number of system accesses to Enreach Campaigns' business systems require VPN access. These are issued and installed by the IT department (approval by the head of operations, issuing and configuration of an employer in the IT department). VPN can be installed on PCs supplied and owned by Enreach Campaigns, but never on privately owned PCs.

Human resource security

We have defined a number of procedures that ensure security before, during and, if applicable, after employment.

Procedures concerning processes before a potential employment ensure that potential employees are screened and that relevant matters are checked within the framework of current legislation.

All employees must adhere to a number of conditions regarding confidentiality regarding their own, Enreach Campaigns,' and customers' matters. This is described in each employee's employment contract.

During employment it is ensured, in cooperation between the employee, day-to-day leader, and the information security coordinator that the employee is kept up to date, and complies with aspects regarding, information security.

We have procedures that ensure that employees at termination of employment cannot cause damage to Enreach Campaigns or the system Flows, by means of instantly removing rights to business systems and checking this.

In addition, a number of sanctions have been defined, in case information security is breached or disregarded.

Access management

We have a string of procedures that ensure that access control and the allocation of rights occur in compliance with the established security level.

Only employees with a work-related need for having access to systems and data are granted access to the concerned business systems and associated data.

The heads of department are responsible for access rights being granted on the basis of a work-related need and in consideration of regulatory and contractual obligations.

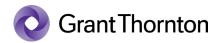
We have a number of controls that ensure that this occurs on an ongoing basis, and that all access corresponds to the work-related needs in each function and for each employee.

We have defined a string of requirements for the protection of all devices (PCs, mobile phones, tablets) as well as passwords in all business systems. Employees are trained and checked continually within these areas.

We have a number of procedures that ensure that only a group of privileged personnel has access to system administrator tools, central servers (e.g. domain controller), source code etc.

Production servers and other servers containing production data and customer data are only present in Enreach Campaigns' data centres and not at any office locations. Only specially trusted employees with a work-related need have access to the data centres. These accesses are assessed and inspected regularly.

Enreach Campaigns A/S



Cryptography

We have procedures for the use of cryptography, including the generation and management of encryption keys and certificates.

This means, i.a., that Flows must have a valid SSL certificate, which Enreach Campaigns verifies, such that data exchange only occurs in a secure and encrypted manner (through HTTPS). SSL-certificates are managed solely by the IT department, where the application architect and network administrator are responsible for SSL certificates. No certificates may be acquired or issued bypassing these.

This requirement concerns access to Flows through the user interface and through API alike.

Physical and environmental security

Servers are only placed in data centres provided by suppliers who have been issued, and annually can show, assurance reports at the level of ISAE 3402.

Enreach Campaigns' office premises are subject to a number of procedures that secure the office as well as material and units stored at the office, regardless of servers only being placed in data centres.

This entails, i.a., procedures aimed at employees describing security measures for offices, common areas, and similar areas.

Operations security

Operating procedures and monitoring

We have operating procedures for the IT department's most significant duties, and these procedures are subject to versioning and change management.

We have defined the responsibility for ensuring that an assessment of the capacity requirements for critical IT systems is performed regularly.

The IT department, led by the head of development and the head of operations, consists primarily of developers in a "DevOps" constellation, where two persons are dedicated to operations, optimising servers and infrastructure, monitoring and handling operational issues, but where all have operations as the first priority in case of technical issues on the platform or information security issues.

All instances of Flows are monitored by means of monitoring tools.

Critical levels and values are defined for all these monitoring areas. Alarms must trigger when these values are reached and must be sent to key employees either via email (for less critical alerts) or SMS (critical alerts).

Historical logs and events are regularly reviewed in a structured manner to perform improvements and optimisation.

The usability of backups for restore is regularly checked.

Development of Flows, management, and quality assurance

The development of Flows, including release of changes, occurs according to Enreach Campaigns' formalised and embedded development model.

The development process is Enreach Campaigns' own method derived from an agile approach to development, SCRUM, and RUP. The development takes place in sprints, but not of an eternal, specified duration, as sprints are defined according to prioritised tasks in backlog.

Next to master releasees, hot fix releases are performed with corrections of distinct errors and significant inexpediencies. Significant errors and disclosed security weaknesses with the priority of 1 or 2 (cf. Enreach Campaigns' operations procedure) must always be handled as quickly as possible, and no later than within 3 working days.

Development occurs in development environments where code is branched from the main branch/"default." These development branches are connected with the staging database, where test data is found. Test data and production data are thus completely segregated, and customers' data must not be copied from master to staging without approval from the Head of Operations. If this permission is granted, it can and will only comprise configuration



data in order to test and develop up against true, complex data in order to ensure the quality of the development, but it must and can never comprise data on the customer's prospects, employees or similar.

Beneath please find in detail and chronological order how all cases are processed from creation, prioritisation, and approval, up through the development flow.

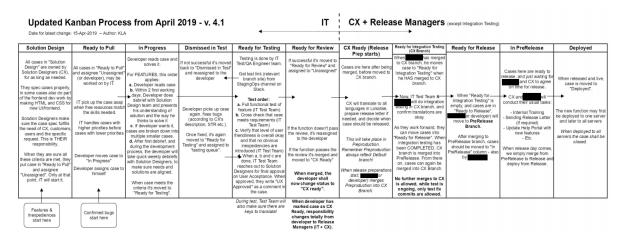


Fig. 2: Process and development model for Enreach Campaigns

The release manager is the day-to-day responsible person for the process.

Logging

We have procedures concerning the scope, processing, protection, and check of logging on various system types.

All logins and significant user actions in Flows are monitored and logged. The logging of significant user actions concerns i.a. data export.

All changes to data are registered.

Communications security

We have procedures for network management and monitoring, including maintenance of network and network equipment.

Traffic on all connections and interfaces are monitored in relation to data volume over periods of time. Alarms have been set up that are triggered and sent to technical personnel in case of abnormalities.

Exchange of information occurs by means of secure connections. If this occurs via the public Internet, data is encrypted (in principle by means of HTTPS).

Systems acquisition, development, and maintenance

We have procedures that ensure secure change management in business supporting systems. The procedures prescribe i.a. that change logs are obtained and evaluated, and that changes are tested before they are released.

As all significant internal work processes are documented, the process documentation is updated where necessary, in connection with changes.

Please note that this section and the procedures referred to herein concern maintenance and changes in business supporting systems, not the solution Flows itself. Procedures and principles for changes in Flows are described in a previous, separate section.



Supplier relationships

In all cooperation agreements with suppliers, we have defined security requirements and minimum requirements for the services provided to us by the supplier.

We have ensured that the matters we base our agreement on regarding the use of the product and service Flows in relation to customers are in accordance with our requirements to our suppliers.

We regularly, and at least annually, review the cooperation agreements, just as we obtain assurance reports for the entered agreements.

Information security incident and event management

The information security committee has defined procedures for information security incidents and events, which are embedded in Enreach Campaigns and which the management is responsible for are being observed.

We define information security incidents as:

- The detection of successful external and unwanted intrusion in systems
- Finding customer data (hosted in the master database for Flows) online, where there is an obvious or strong suspicion that the publication of data has not occurred with the customer's approval and intent
- Finding data on current or former employees in Enreach Campaigns online, where publication of data has occurred without Enreach Campaigns' involvement or intent
- Finding other confidential business data online (according to the same directions) defined as customer contracts, revenue, or information which is classified as secret according to further definition by the information security committee

We define information security events as:

- Events that, if they had not been discovered, could have led to security incidents
- Situations where unintended data or information by accident (due to human error) has been sent to other
 recipients than the intended, and that it is assessed that this may entail damage or serious consequences
 for Enreach Campaigns

Procedures have been defined for both, which describe for employees and managers how they should act in case of incidents and events, including (but not limited to) gathering evidence and contact with authorities, if necessary.

Information security aspects of business continuity management

We have defined the responsibility for preparing emergency plans, contingency plans, and restore plans.

We have established adequate redundancy to meet the requirements for availability and the guarantees for uptime that we have agreed in contracts with our customers.

All technical employees have trained the plans.

Plans and procedures are regularly reviewed and after each operational issue where human action has been necessary to re-establish operations on parts of the platform.

Compliance

Information security is subject to annual audit by an independent external IT auditor.

Significant changes in IT-environments

There have been no changes to IT-environments in the period.



Complementary controls

Regarding our customers, Enreach Campaigns is responsible for delivering the services and the operations described in the contract concerning Flows between the customer and Enreach Campaigns.

Matters not comprised by the contract are the customer's own responsibility.

Creation of users, protection of user information, and secure login procedures are the responsibility of the customer. The customer can enable MFA login on users in Flows. Enreach Campaigns recommends our customers to do this to the extent it is possible for the customer, in order to protect the customer's data and activities in Flows.



Section 4: Control objectives, controls, and service auditor testing

Purpose and scope

A description and the results of our tests based on the tested controls appear from the tables on the following pages. To the extent that we have identified significant weaknesses in the control environment or deviations therefrom, we have specified this.

This statement is issued according to the carve-out method and therefore does not include controls of Enreach Campaigns A/S' subservice organisations.

Controls, which are specific to the individual customer solutions, or are performed by Enreach Campaigns A/S' customers, are not included in this report.

Tests performed

We performed our test of controls at Enreach Campaigns A/S, by taking the following actions:

Method	General description
Inquiries	Interview with appropriate personnel at Enreach Campaigns A/S regarding controls. Inquiries have included questions on how controls are being performed.
Observation	Observing how controls are performed.
Inspection	Review and evaluation of policies, procedures and documentation concerning the performance of controls. This includes reading and assessment of reports and documents in order to evaluate whether the specific controls are designed in such a way, that they can be expected to be effective when implemented. Further, it is assessed whether controls are monitored and controlled adequately and with suitable intervals. The effectiveness of the controls during the audit period, is assessed by sample testing.
Re-performance	Re-performance of controls in order to verify that the control is working as assumed.



Test results

Below, we have listed the tests performed by Grant Thornton as basis for the evaluation of the IT general controls with Enreach Campaigns A/S.

A.5 Information security policies

A.5.1 Management direction for information security

Control objective: To provide management direction and support for information security in accordance with business requirements and relevant laws and regulations

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
5.1.1	Policies for information security A set of policies for information security is defined and approved by management, and then published and communicated to employees and relevant external parties.	We have inspected that the information security policy has been approved by management, published, and communicated to employees and relevant external parties. We have inspected that the risk assessment covers relevant services.	No deviations noted.
5.1.2	Review of policies for information security The policies for information security are reviewed at planned intervals or if significant changes occur, to ensure their continuing suitability adequacy and effectiveness.	We have inspected that the information security policy has been reviewed and approved by management.	One sub-policy for the information security policy was last updated in 2021. No further deviations noted.

Enreach Campaigns A/S Page 14 of 34



A.6 Organisation of information security

A.6.1 Internal organisation

Control objective: To establish a management framework to initiate and control the implementation and operation of information security within the organisation

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
6.1.1	Information security roles and responsibilities All information security responsibilities are defined and allocated.	We have inspected an organisation chart showing the information security organisation. We have inspected the description of roles and responsibilities within the information security organisation.	No deviations noted.
6.1.2	Segregation of duties Confliction duties and areas of responsibility are segregated to reduce opportunities for unauthorized or unintentional modification or misuse of the organisations' assets.	We have inspected documentation for segregation of duties. We have inspected general organisation chart for the organisation.	No deviations noted.

A.6.2 Mobile devices and teleworking Control objective: To ensure the security of teleworking and use of mobile devices

	No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
(6.2.1	Mobile device policy Policy and supporting security measures are adopted to manage the risk introduced by using mobile devices.	We have inspected policy for securing of mobile devices. We have inspected, that technical controls for securing of mobile devices have been defined.	No deviations noted.
(6.2.2	Teleworking Policy and supporting security measures are implemented to protect information accessed, processed and stores at teleworking sites.	We have inspected the policy for securing of remote workspaces. We have inspected the underlaying security measures for protection of remote workspaces.	No deviations noted.

Enreach Campaigns A/S Page 15 of 34



A.7 Human ressource security

A.7.1 Prior to employment
Control objective: To ensure that employees and contractors understand their responsibilities and are suitable for the roles for which they are considered

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
7.1.1	Screening Background verification checks on all candidates for employment is being carried out in accordance with relevant laws regulations and ethics and are proportional to the business requirements the classification of the information to be accessed and the perceived risks.	We have inspected the procedure for screening new employees. We have inquired about screening of new employees during the period.	We have not received documentation of screening of four out of four employees during the period. No further deviations noted.
7.1.2	Terms and conditions of employment The contractual agreements with employees and contractors are stating their and the organisation's responsibilities in information security.	We have inspected the procedure for onboarding new employees. We have inspected documentation that new employees have been informed about their roles and responsibilities in information security.	We have not received an onboarding checklist for one out of four new employees during the period. In one out of four samples, the procedure has been deviated from. No further deviations noted.

Enreach Campaigns A/S Page 16 of 34



A.7.2 During employment Control objective: To ensure that employees and contractors are aware of and fulfil their information security responsibilities Enreach Campaigns A/S' control No. Grant Thornton's test Test results 7.2.1 Management responsibility We have inspected the information security policy regarding No deviations noted. the setting of requirements for employees and contractors. Management is requiring all employees and contractors to apply information security in accord-We have inspected that the duty of confidentiality is stated in ance with the established policies and procedures employment agreements with new employees. of the organisation. 7.2.2 Information security awareness education and We have inspected that activities to develop and maintain Eight employees have not completed the employees' security awareness have been carried out. campaign. training All employees of the organisation and where rele-We have inspected documentation that all employees have No further deviations noted. vant contractors, are receiving appropriate awarecompleted the awareness training provided. ness education and training and regular updates in organisational policies and procedures as relevant for their job function. 7.2.3 Disciplinary process We have inspected that a formal disciplinary process has No deviations noted. been established and communicated to employees and con-There is a formal and communicated disciplinary tractors. process in place, to act against employees who

	A.7.3 Termination and change of employment Control objective: To protect the organisation's interests as part of the process of changing or terminating employment			
	No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
7	7.3.1	Termination or change of employment responsibility Information security responsibilities and duties that remain valid after termination or change of employment have been defined, communicated to the employee or contractor, and enforced.	We have inspected that there are procedures, ensuring that accesses are revoked. We have inspected that the applicable duty of confidentiality is stated in employment contracts for employees terminated during the period. We have inspected that the offboarding procedure has been followed for resigned employees.	No deviations noted.

have committed an information security breach.

Enreach Campaigns A/S Page 17 of 34



A.9 Access control

A.9.1 Business requirements of access control Control objective: To limit access to information and information processing facilities

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
9.1.1	Access control policy An access control policy has been established, documented, and reviewed based on business and information security requirements.	We have inspected the access control policy. We have inspected that the policy has been reviewed and approved by management.	No deviations noted.
9.1.2	Access to network and network services Users are only being provided with access to the network and network services that they have been specifically authorized to use.	We have inspected that a procedure has been established for allocating access to networks and network services. We have inspected extracts of users with access to networks and network services has a work-related need.	No deviations noted.

A.9.2 User access management Control objective: To ensure authorised user access and to prevent unauthorised access to systems and services. No. Enreach Campaigns A/S' control Grant Thornton's test Test results 9.2.1 User Registration and de-registration We have inspected that formalised procedures for user regis-No deviations noted. tration and de-registration have been established. A formal user registration and de-registration process has been implemented to enable assignment We have inspected that new hires during the period have had their user access rights approved. of access rights. We have inspected that resigned users' access rights have been revoked.

Enreach Campaigns A/S Page 18 of 34



No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
9.2.2	User access provisioning A formal user access provisioning process has been implemented to assign or revoke access rights for all user types to all systems and services	We have inspected, that a procedure for user administration has been established. We have inspected that new hires during the period have had their user access rights approved.	No deviations noted.
9.2.3	Management of privileged access rights The allocation and use of privileged access rights have been restricted and controlled.	We have inspected the procedures for allocation, use and restrictions of privileged access rights. We have inspected a list of privileged users and inquired into whether access rights have been allocated based on a work-related need. We have inspected, that periodical review of privileged access rights is being performed.	We have been informed that an admin user has been shared between several employees. Access control has only been carried out two out of four times during the period. No further deviations noted.
9.2.4	Management of secret-authentication information of users The allocation of secret authentication information is controlled through a formal management process.	We have inspected the procedure regarding allocation of access codes to platforms. We have inspected documentation that the password policy is implemented in systems used to manage secret authentication information about users.	No deviations noted.
9.2.5	Review of user access rights. Asset owners are reviewing user's access rights at regular intervals	We have inspected the procedure for regular review and evaluation of access rights. We have inspected that a review and evaluation of access rights is carried out during the period.	Access control has only been carried out two out of four times during the period. No further deviations noted.
9.2.6	Removal or adjustment of access rights Access rights of all employees and external party users to information and information processing facilities are being removed upon termination of their employment contract or agreement or adjusted upon change.	We have inquired into procedures about discontinuation and adjustment of access rights. We have, by sample test, inspected that resigned employees have had their access rights cancelled.	No deviations noted.

Enreach Campaigns A/S Page 19 of 34



A.9.3 User responsibilities Control objective: To make users accountable for safeguarding their authentication information			
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
9.3.1	Use of secret authentication information. Users are required to follow the organisations' s practices in the use of secret authentication information.	We have inspected guidelines for use of secret passwords. We have inspected, that the implemented password policy is according to established guidelines.	No deviations noted.

A.9.4 System and application access control Control objective: To prevent unauthorised access to systems and applications			
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
9.4.1	Information access restriction Access to information and application system functions has been restricted in accordance with the access control policy.	We have inspected policies and procedures to ensure the restriction of access to the functions of application systems. We have inspected extracts of users with access to information and application system functions and we have inquired whether the users have a work-related need.	No deviations noted.
9.4.2	Secure logon procedures Access to systems and applications is controlled by procedure for secure logon.	We have inspected the procedure for secure logon. We have inspected, that MFA has been established in connection with logon.	No deviations noted.
9.4.3	Password management system Password management systems are interactive and have ensured quality passwords.	We have inspected that policies or procedures set requirements for the quality of passwords. We have inspected that the systems for managing passwords are set up in accordance with the requirements.	No deviations noted.
9.4.5	Access control to program source code Access to program source code has been restricted.	We have inquired into procedures for restricting access to program source codes. We have inspected, that access to source codes has been limited to employees with a work-related need.	No deviations noted.

Enreach Campaigns A/S Page 20 of 34



A.10 Cryptography

A.10.1 Cryptographic controls

Control objective: To ensure proper and effective use of cryptography to protect the confidentiality, authenticity and/or integrity of information

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
10.1.1	Policy on the use of cryptographic controls A policy for the use of cryptographic controls for protection of information has been developed and implemented.	We have inspected the policy for the use of encryption. We have inspected that transmission over the internet is done with a secure connection.	One out of two domains support an outdated encryption protocol. No further deviations noted.
10.1.2	Key Management A policy on the use protection and lifetime of cryptographic keys has been developed and implemented through their whole lifecycle.	We have inquired into the policies for administering crypto- graphic keys, which supports the company use of crypto- graphic techniques. We have inspected that cryptographic keys are active, and that their renewal is being followed up on.	No deviations noted.

A.11 Physical and environmental security

A.11.1 Secure areas

Control objective: To prevent unauthorised physical access, damage and interference to the organisation's information and information processing facilities

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
11.1.1	Physical security perimeter Security perimeters have been defined and used to protect areas that contain either sensitive or critical information and information.	We have inspected the procedure for physical protection of facilities and perimeter security. We have inspected that access to locations with equipment is limited to employees who need the access.	No deviations noted.

Enreach Campaigns A/S Page 21 of 34



A.11.2 Equipment Control objective: To prevent loss, damage, theft or compromise of assets and interruption to the organisation's operations No. Enreach Campaigns A/S' control Grant Thornton's test Test results 11.2.1 Equipment sitting and protection We have inspected the procedure regarding the placement No deviations noted. and protection of equipment. Equipment is sited and protected to reduce the risks from environmental threats and hazards and We have inspected that access to locations with equipment opportunities for unauthorized access. is limited to employees with a work-related need. 11.2.7 Secure disposal or re-use of equipment We have inquired into the procedure for deletion of data and We have been informed that there has software on storage media, before disposing of same. been no destruction or reuse of equipment All items of equipment containing storage media during the period, wherefore we have not have been verified to ensure that any sensitive We have, by sample test, inspected that data and software been able to test the effectiveness of the data and licensed software have been removed or have been deleted prior to disposal. supplier's controls. securely overwritten prior to disposal or re-use. No deviations noted. 11.2.8 Unattended user equipment We have inspected the procedure for ensuring the protection No deviations noted. of unattended equipment. Users are ensuring that unattended equipment We have inspected documentation of the implementation of a has appropriate protection.

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Enreach Campaigns A/S Page 22 of 34



A.12 Operations security

A.12.1 Operational procedures and responsibilities
Control objective: To ensure correct and secure operation of information processing facilities

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
12.1.1	Documented operating procedures. Operating procedures have been documented and made available to all users.	We have inspected that requirements for documentation and maintenance of operating procedures have been established. We have inspected that documentation for operating procedures is updated and accessible to relevant employees.	No deviations noted.
12.1.2	Change management Changes to the organisation business processes information processing facilities and systems that affect information security have been controlled.	We have inspected the procedure for changes in information processing facilities and systems. We have, by sample test, inspected documentation that change requests are being managed according to the established procedure.	No deviations noted.
12.1.3	Capacity management The use of resources is monitored and adjusted, and future capacity requirements are projected to ensure that the required system performance is obtained.	We have inspected the procedure for monitoring use of resources and adjustments of capacity, to ensure future capacity requirements. We have inspected that relevant platforms are included in the capacity requirement procedure.	No deviations noted.
12.1.4	Separation of development-, test- and operations facilities. Development testing and operational environments are separated to reduce the risks of unauthorized access or changes to the operational environment.	We have inspected technical documentation that used system environments have been separated.	No deviations noted.

Enreach Campaigns A/S Page 23 of 34



A 12.2 Protection from malware Control objective: To ensure that information and information processing facilities are protected against malware				
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results	
12.2.1	Control against malware Detection prevention and recovery controls to protect against malware have been implemented combined with appropriate user awareness.	We have inspected guidelines for anti-malware checks. We have inspected that the ongoing control of malware on employee PCs has been carried out during the period.	No deviations noted.	

A.12.3 Backup Control objective: To protect against loss of data				
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results	
12.3.1	Information backup Backup copies of information software and system images are taken and tested regularly in accordance with an agreed backup policy.	We have inspected documentation that the procedure for back-up has been reviewed and updated during the period. We have, by sample test, inspected that backups are taken according to the procedure. We have inquired about ongoing testing of backup.	No continuous testing of backup has been carried out during the period. No further deviations noted.	

Enreach Campaigns A/S Page 24 of 34



	A.12.4 Logging and monitoring Control objective: To record events and generate evidence				
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results		
12.4.1	Event logging Event logs recording user activities exceptions faults and information security events shall be produced, kept, and regularly reviewed.	We have inspected procedures for logging of user activities. We have inspected that logging configurations contain user activities, exceptions, faults, and incidents.	No deviations noted.		
12.4.2	Protection of log information Logging facilities and log information are being protected against tampering and unauthorized access.	We have inspected procedures for securing log information. We have inspected that access to logging information is restricted.	No deviations noted.		

A.12.5 Control of operational software Control objective: To ensure the integrity of operational systems				
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results	
12.5.1	Installation of software on operational systems Procedures are implemented to control the installation of software on operational systems.	We have inspected the procedure for patching and upgrading systems and that it has been reviewed and updated during the period.	We have not been able to get documentation of the patch window and history for the period.	
	, ,	We have, by sample test, inspected that systems are up to date.	No further deviations noted.	
		We have inquired about patch windows and history for selected servers.		

Enreach Campaigns A/S Page 25 of 34



A.12.6 Technical vulnerability management Control objective: To prevent exploitation of technical vulnerabilities			
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
12.6.1	Management of technical vulnerabilities Information about technical vulnerabilities of information systems being used is obtained in a timely fashion, the organisation's exposure to such vulnerabilities evaluated and appropriate measures taken to address the associated risk.	We have inspected that malware protection checks have been performed during this period. We have inspected that systems are patched.	No deviations noted.

A.13 Communications security

A.13.1 Network security management
Control objective: To ensure the protection of information in networks and its supporting information processing facilities

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
13.1.1	Network controls Networks are managed and controlled to protect information in systems and applications.	We have inspected that there are defined requirements for the management and control of networks, including requirements and rules for encryption, firewalls, and other relevant security measures. We have inspected that there is monitoring of networks. We have inspected that the firewall is implemented according to the defined requirements.	No deviations noted.
13.1.2	Security of network services Security mechanisms service levels and management requirements of all network services are identified and included in network services agreements whether these services are provided inhouse or outsourced.	We have inspected that supplier agreements contain requirements for a suitable level of network security.	No deviations noted.

Enreach Campaigns A/S Page 26 of 34



No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
13.1.3	Segregation of networks Groups of information services users and information systems are segregated on networks.	We have inspected technical documentation that system environments are being segregated.	No deviations noted.

A.14 Aquisition, development and maintenance of systems

A.14.1 Security requirements of information systems

Control objective: To ensure that information security is an integrated part of information systems through the entire lifecycle. This also includes requirements of information systems, rendering services on public networks

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
14.1.1	Information security requirements analysis and specification The information security related requirements are being included in the requirements for new information systems or enhancements to existing information systems.	We have inspected the procedure for software development. We have inspected documentation that the procedure has been reviewed and updated during the period.	No deviations noted.

A.14.2 Security, development- and supporting processes Control objective: To ensure that information security is planned and implemented with the development life cycle

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
14.2.1	Secure development policy Rules for the development of software and systems have been established and applied to developments within the organisation.	We have inspected rules for developing software and systems. We have, by sample test, inspected that the rules have been followed.	No deviations noted.

Enreach Campaigns A/S Page 27 of 34



No.	Enreach Campaigns A/S' control	Grant Thornton's test	Enreach Campaigns A/S' control
14.2.2	Change control procedures Changes to systems within the development lifecycle are being controlled using formal change control procedures.	We have inspected that the procedure for change management contains the following requirements: Test Approval System documentation We have, by sample test, inspected that implemented changes were performed according to the change management procedure.	No deviations noted.
14.2.3	Technical review of applications after operating system changes When operating platforms are changed business critical applications are reviewed and tested to ensure there is no adverse impact on organisational operations or security.	We have, by sample test, inspected that changes have followed the procedure.	No deviations noted.
14.2.5	Secure system engineering process Principles for engineering secure systems have been established, documented, maintained, and applied to any information system implementation efforts.	We have inspected that the procedure for development of systems is established and documented. We have, by sample test, inspected that development of secure systems have followed the procedure.	No deviations noted.
14.2.6	Secure development environment There is established appropriately protect secure development environments for system development and integration efforts that cover the entire system development lifecycle.	We have inspected documentation that the development environment is separated from production.	No deviations noted.
14.2.9	System acceptance testing Acceptance testing programs and related criteria have been established for new information systems upgrades and new versions.	We have inspected that the procedure for software development contains sections about system acceptance testing. We have, by sample test, inspected that system test is an integrated part of system development.	No deviations noted.

Enreach Campaigns A/S Page 28 of 34



A.14.3 Test Data Control objective: To ensure the protection of data used for testing. No. Enreach Campaigns A/S' control Grant Thornton's test Test results We have inspected that test data is stored according to internal procedures. No deviations noted. No deviations noted.

A.15 Supplier relationships

A.15.1 Information security in supplier relationships Control objective: To ensure protection of the organisation's assets that are accessible by suppliers

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
15.1.1	Information security policy for supplier relationships Information security requirements for mitigating the risks associated with supplier's access to the organisation's assets have been agreed with the supplier and documented.	We have inspected the supplier management procedure. We have inspected that the supplier agreements entered into contain information security requirements.	No deviations noted.
15.1.2	Addressing security within supplier agreements All relevant information security requirements are established and agreed with each supplier that may access process store communicate or provide IT infrastructure components for the company's information.	We have inspected that supplier agreements contain relevant information security requirements.	No deviations noted.

Enreach Campaigns A/S Page 29 of 34



15.2 Supplier service delivery management Control objective: To maintain an agreed level of information security and service delivery in line with supplier agreements

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
15.2.1	Monitoring and review of third-party services Organisations are regularly monitoring review and audit supplier service delivery.	We have inspected that the procedure for managing suppliers and supplier agreements contains requirements of yearly monitoring and review of services rendered, are according to the contract. We have inspected, that review and assessment of relevant audit reports on significant subservice organisations have been performed.	We have not received documentation for the result for the review of two out three supplier audits during the period. No further deviations noted.
15.2.2	Manage changes to the third-party services Changes in supplier services, including maintenance and improvement of existing information security policies, procedures, and controls, are managed under consideration of how critical the business information, systems and processes involved are, and are used for revaluation of risks involved.	We have enquired about changes of suppliers during the period.	We have been informed that there have been no changes in the use of suppliers during the period. No deviations noted.

Enreach Campaigns A/S Page 30 of 34



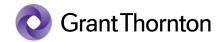
A.16 Information security incident management

A.16.1 Management of information security incidents and improvements

Control objective: To ensure a consistent and effective approach to the management of information security incidents, including communication on security events and weaknesses

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
16.1.1	Responsibilities and procedures Management responsibilities and procedures are established to ensure a quick effective and orderly response to information security incidents.	We have inspected the procedure for managing security incidents. We have inspected that the procedure has been reviewed and updated during the period.	No deviations noted.
16.1.2	Reporting information security events Information security events are being reported through appropriate management channels as quickly as possible.	We have inspected guidelines for reporting information security incidents. We have inspected that information security incidents have been reported according to the procedure.	No deviations noted.
16.1.3	Reporting security weaknesses Employees and contractors using the organisation's information systems and services are required to note and report any observed or suspected information security weaknesses in systems or services.	We have inspected guidelines for reporting information security weaknesses. We have inspected that employees have reported weaknesses or suspected weaknesses in information systems and services.	No deviations noted.
16.1.4	Assessment of and decision on information security events Information security events are assessed, and it is decided if they are to be classified as information security incidents.	We have inspected the procedure for assessing information security incidents. We have inspected that information security incidents have been handled in accordance with the procedure.	One information security breach has not been written down in the incident log. No further deviations noted.
16.1.5	Response to information security incidents Information security incidents are responded to in accordance with the documented procedures.	We have inspected the procedure for handling information security breaches. We have inspected documentation that the procedure for handling breaches has been followed during the period.	No deviations noted.

Enreach Campaigns A/S Page 31 of 34



No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
16.1.6	Learning from information security incidents Knowledge gained from analysing and resolving information security incidents is used to reduce the likelihood or impact of future incidents.	We have inspected that experiences from information security breaches are handled.	No deviations noted.

A.17 Information security aspects of business continuity management

A.17.1 Information security continuity
Control objective: Information security continuity should be embedded in the organisation's business continuity management systems

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
17.1.1	Planning information security continuity Requirements for information security and the continuity of information security management in adverse situations e.g., during a crisis or disaster has been decided upon.	We have inspected that the contingency plan includes relevant areas.	No deviations noted.
17.1.2	Implementing information security continuity Processes procedures and controls to ensure the required level of continuity for information security during an adverse situation are established, documented, implemented, and maintained.	We have inspected documentation that the contingency plan is available to relevant employees. We have inquired about updating the contingency plan.	The contingency plan has not been updated during the period. No further deviations noted.

Enreach Campaigns A/S Page 32 of 34



No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
17.1.3	Verify review and evaluate information security continuity	We have inspected documentation that risk areas in the contingency plan have been tested during the period.	No deviations noted.
	The established and implemented information security continuity controls are verified on a regular basis to ensure that they are valid and effective during adverse situations.		

A.17.2 Redundancies Control objective: To ensure availability of information processing facilities			
No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
17.2.1	Availability of information security processing facilities	We have inspected the redundancy has been established to ensure availability in processing facilities.	No deviations noted.
	Information processing facilities have been implemented with redundancy sufficient to meet availability requirements.		

Enreach Campaigns A/S Page 33 of 34



A.18 Compliance

A.18.2 Information security reviews

Control objective: To ensure that information security is implemented and operated in accordance with the organisational policies and procedures

No.	Enreach Campaigns A/S' control	Grant Thornton's test	Test results
18.2.1	Independent review of information security Processes and procedures for information security) (control objectives, controls, policies, processes, and procedures for information security) are reviewed independently at planned intervals or when significant changes occur.	We have inspected documentation that independent review of the information security has been performed.	No deviations noted.
18.2.2	Compliance with security policies and standards Managers are regularly reviewing the compliance of information processing and procedures within their area of responsibility with the appropriate security policies standards and any other security requirements.	We have inspected documentation, that the control has been performed during the period.	No deviations noted.

Enreach Campaigns A/S Page 34 of 34

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Isabella Ørgaard Jensen

Grant Thornton, Godkendt Revisionspartnerselskab CVR: 34209936 **Underskriver 2**

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Kristian Randløv Lydolph

Grant Thornton, Godkendt Revisionspartnerselskab CVR: 34209936 Underskriver 3

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