

## Whistleblower Policy

### INTRODUCTION

Employees and all individuals who otherwise carry out (or have carried out) work for the company, such as trainees or independent contractors must be given the opportunity to internally report suspected misconduct.

This Whistleblower Policy meets the requirements of the Dutch corporate governance code of having a whistleblower policy for its employees.

The Whistleblower Policy is described below:

### 1 REPORTING

- 1.1** Any employee of the Company or of a direct or indirect subsidiary of the Company must at all times must report irregularities regarding the implementation of the Company's principles or any other legal, operational or other issues that concern the Company its subsidiaries or the employees personally, including (suspicion of) acts of bribery, through the Whistleblower Policy.
- 1.2** Upon becoming aware of an irregularity, the respective employee should:
- (a) consult with his/her direct supervisor; or
  - (b) if consultation with his/her direct supervisor is not an option, consult with local management of the Company where the Employee is employed; or
  - (c) if consultation with local management is not an option, consult with the Company's corporate counsel or the Company's Management Board; or
  - (d) if consultation with the Company's corporate counsel and the Management Board is not an option, consult with the chairperson of the Company's Supervisory Board. A similar procedure applies if reporting to the Management Board is not an option.
- 1.3** Consultation with the respective level of management is not an option, when this level of management is subject of or contributes to the irregularity, or if after various consultations on the subject matter, this level of management does not address the issue adequately.
- 1.4** Employees are expected to report their concerns internally. Exceptional circumstances (involving the Public Interest) can be reported outside the Company to the Institute for Whistleblowers (*Huis voor Klokkenuiders*). External reporting of suspicions involving the Public Interest could be appropriate if an internal report was not adequately followed up by the Company. Given the possible severe consequences of external reporting, Employees are encouraged to seek advice before reporting any concern outside the Company.

## **2 PROCEDURES**

- 2.1** When an irregularity is reported, the issue is discussed between the reporting Employee and the consulted level of management, and subsequently documented.
- 2.2** If the consulted level of management finds it necessary to do so, he/she informs the Management Board of the report.
- 2.3** The consulted level of management must inform the Management Board in case the irregularity, or the (potential) consequences thereof if the irregularity is not remedied in time, are not limited to the local group company.
- 2.4** Acts of bribery or suspicion of acts of bribery must be disclosed immediately by the consulted level of management to the Management Board at all times.
- 2.5** Reporting to the Management Board is not an option when the Management Board is subject of or contributes to the irregularity.

## **3 PROTECTION**

No Employee who in good faith raises a concern involving matters covered by this Whistleblower Policy will suffer harassment, retaliation or any other adverse (employment) consequences as a result of raising a concern.

The Company may only take disciplinary actions if the Company concludes that a report has not been made in good faith. The Company will not tolerate any form of threat or retaliation and will take (disciplinary) action against relevant co-workers or managers where appropriate.

If it turns out that the Employee has been personally involved in suspected misconduct, reporting such misconduct does not exempt the Employee from possible (disciplinary) actions by the Company or civil, criminal or regulatory liability. In its actions, the Company will, however, at all times take into consideration that an Employee has voluntarily and in good faith reported the suspicions of misconduct through this Whistleblower Policy.

## **4 CONFIDENTIALITY**

Any irregularity reported under this Whistleblower Policy shall be treated as confidential and shall only be disclosed in the manner as described in the procedures. The identity of the reporting Employee shall not be disclosed to the respective level of management in case the irregularity concerns this management, nor to higher levels of management, and the irregularity shall be dealt with objectively and swiftly.