

Whistleblower Policy

The company has established the following whistleblower policy (Whistleblower Policy) for its employees as per the Dutch corporate governance code (Code):

All employees of the Company or of a subsidiary of the Company (Employee) are required to immediately report any breach regarding the implementation of the Company's principles or any other legal, operational or other issues that concern the Company as a whole, its subsidiary or the Employees personally, including (suspicion of) acts of bribery.

To report any breach, the Employee should:

- bring it to the attention of its direct supervisor; or
- if not possible with its direct supervisor, then bring it to the attention of local management of the Company where the Employee is employed; or
- if that is not an option, then bring it to the attention of the Company's management board (Management Board); or
- if consultation with the Management Board is not an option, then bring it to the attention of the chairperson of the Company's board. The chairperson can be addressed by sending a mail to Greg Garvey;

When a breach is reported:

- the matter should be discussed between the reporting Employee and the consulted level of management, and subsequently documented and if necessary, brought to the attention of the Management Board;
- the matter should be informed to the Management Board in case the breach, or the (potential) consequences of the breach is not remedied in time;
- all acts of bribery or suspicion of acts of bribery must be disclosed immediately by the consulted level of management to the Management Board;
- reporting to the Management Board is not an option, when the Management Board is subject of or contributes to the breach;

Any breach reported under this Whistleblower Policy shall be treated as confidential. The reported breach shall be dealt with objectively and swiftly. The Company will not accept an Employee reporting a breach that he/she knows or reasonably ought to know is false. Such a false report may have adverse employment-law or other consequences for that Employee who may be held liable for any damages or subject to disciplinary action.