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# **WHISTLEBLOWER POLICY**

Sif Group



## FOREWORD

Sif Holding N.V., Sif Netherlands B.V., KCI the engineers B.V. and Sif Property B.V. are legal entities that are related to the group of companies under the name of Sif Group (hereinafter: “the Company”). The Company highly values the health and well-being of their employees and those of business partners. Besides, the Company also pursues workplace safety, both physically and mentally. To safeguard the health and well-being of the employees but also of those of business partners and to pursue workplace safety, the Management Board of the Company has developed the whistleblowing policy. The aim of this whistleblowing policy is to stimulate integrity and workplace safety by offering Reporters the opportunity to report suspected abuse or misconduct along a clear, safe, user-friendly, yet formal procedure.

This policy seeks to:

- Create a clear process for identifying and responding to suspected abuse or misconduct;
- Encourage employees and business partners to speak up in case of suspected abuse or misconduct;
- Explain the process of reporting;
- Ensure that reports are properly assessed, investigated, and adequately dealt with; and
- Ensure that the Reporter is protected from any retaliation that may arise as a result of reporting suspected abuse or misconduct.

Besides promoting integrity in business and workplace safety, the whistleblowing policy also helps in detecting and tackling abuse, preventing reputational damage, and improving its trust in the Company.

The Company highly stresses the importance of first reporting (suspected) abuse or misconduct internally, so that the Company can carry out its own investigations, take measures or remedy the situation. However, the Reporter can also decide to report a (suspected) abuse or misconduct externally.

## ARTICLE 1: DEFINITIONS

For the purposes of this policy, the following terms and phrases shall have the following meanings:

1.	Advisor	Any person who enjoys the confidence of the Reporter and who is under an obligation of confidentiality regarding the information reported to him/her.
2.	Business partner	A company or person that is contracted by the Company to operate under the instructions of the Company as temporary or hired staff or as a subcontractor
3.	Company	Sif Group, consisting of Sif Holding N.V., Sif Netherlands B.V., KCI the engineers B.V. and Sif Property B.V.
4.	Confidant	An external person, contracted and remunerated by the Company who can be consulted confidentially by a Reporter for independent advice on the intentions of the Reporter to report a suspected abuse or misconduct.
5.	Reporting Officer	The person designated by the Management Board to function as such in the context of this policy.
6.	External Party	a. An authority charged with the investigation of criminal offences, such as the Public Prosecution Service. b. An authority charged with supervising compliance with the provisions of or pursuant



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		to any statutory provision, such as the SZW Inspectorate. c. Another competent authority to which the Suspicion of Abuse or Misconduct can be reported, such as the Dutch Whistleblowers Authority.
7.	Management Board	Those (or an individual) appointed as statutory directors of the
8.	Reporter	An (former) employee of the Company or of a Business partner of the Company who submits a report of a suspected abuse or misconduct under this policy.
9.	Suspected abuse or misconduct	The Reporter's suspicion that there has been serious abuse or misconduct within the company insofar as: a. the suspicion is based on reasonable grounds, resulting from the experience gained by the Reporter at the Company. Or arising from knowledge gained by the Reporter through his work at the Company; and b. the suspicion relates to abuse or misconduct such as for example: i. theft ii. embezzlement iii. infringement of the Company's policies/procedures iv. (imminent) violation of a statutory provision v. (imminent) danger to public health vi. (imminent) danger to the safety of persons such as, but not limited to harassment, intimidation, discrimination vii. (imminent) danger of damage to the environment viii. (imminent) danger to the proper functioning of the Company as a result of an improper act or omission.

## **ARTICLE 2: REPORTING SUSPECTED ABUSE OR MISCONDUCT**

1. The Reporter reports a suspicion of abuse or misconduct to the Reporting Officer in accordance with the procedure described in this policy. In case of doubt as to whether there is a suspicion of abuse or misconduct, the Reporter may, in good faith and confidentially, review this with his or her direct manager, with the HR officer, the Reporting officer, a Confidant or an Advisor before making a formal report.
2. Unless there is an exception as referred to in Article 6(2) of this policy, the Reporter shall report a suspicion of abuse or misconduct to the Reporting Officer by mail, phone or consultation.
3. The Reporting Officer records this report in writing and notifies the Reporter within 7 days that the report has been correctly received. He/she notifies the Reporter of the date of receipt and has this notification signed for approval by the Reporter, who receives a copy of it. The Reporting Officer will inform the Management Board of a reported suspicion of abuse or misconduct as soon as possible, stating the date on which the report was received.
4. An investigation will be started as soon as possible after receipt of a report. In doing so, the Reporting Officer will assess, in consultation with the Advisor, whether external disclosure should be made.



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## **ARTICLE 3: REPORTING OFFICER**

1. The Reporting Officer acts as process manager of the reporting procedure.
2. The Reporting Officer acts with authority, credibility and in this capacity is independent of (the Management Board of) the Company.
3. If the Reporting Officer is an employee of the Company, then the Reporting Officer is subject to the protections of Article 21 of the Works Councils Act and Article 7:658b of the Dutch Civil Code.
4. Both the Reporter and the person to whom the suspicion of abuse or misconduct has been reported will treat the report confidentially.

## **ARTICLE 4: ADVISOR**

1. In the context of reporting a suspicion of abuse or misconduct, the Reporter may engage an Advisor and, if desired, be represented by him/her. If the suspicion of abuse or misconduct is found to be well founded following the disclosure procedure, the Company will reimburse the reasonable legal fees so incurred.
2. If the Advisor is an employee of the Company, the legal protection of Article 21 of the Works Councils Act and Article 7:658b of the Civil Code shall apply mutatis mutandis to the Advisor.

## **ARTICLE 5: PROCEDURE**

1. Within a period of twelve weeks from the submission of the internal report, the Reporter will be informed in writing by the Reporting Officer or Management Board on the reported suspicion of abuse or misconduct. This will include an indication of the steps taken as a result of the report. The information will be set out in an investigation report with due observance of the possibly confidential nature of the (business) information to be provided and the applicable legal provisions, such as privacy regulations.
2. If the information cannot be provided within twelve weeks, the Reporter will be informed of this in writing by the Management Board or by the Reporting Officer, as the case may be. This information will also indicate the period within which the Reporter can expect the report to be communicated.

## **ARTICLE 6: PROVISIONS**

1. If a report of suspicion of abuse or misconduct concerns the Reporting Officer, it shall be submitted to the Management Board. The Management Board will decide upon next steps to be taken.
2. If the Reporter has a reasonable suspicion that the CEO is involved in the suspected abuse or misconduct within the Company, the report of suspicion of abuse or misconduct will be made to the Chair of the Supervisory Board. The Chair of the Supervisory Board will, in consultation with the Reporting Officer, decide upon next steps to be taken.  
The Management Board or the Chair of the Supervisory Board respectively and the Reporting Officer will offer the Reporter the opportunity to respond to the investigation report and the



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opinion of the Management Board or the Chair of the Supervisory Board on the reported suspicion of abuse or misconduct.

3. If the Reporter, in response to the investigation report or the opinion of the Management Board or Chair of the Supervisory Board respectively, indicates with reasons that the suspicion of abuse or misconduct has not been investigated or has not been properly investigated, or that there are material inaccuracies in the investigation report or in the opinion of the Management Board or the Chair of the Supervisory Board, the Management Board or Chair of the Supervisory Board shall respond and, if necessary, initiate a new or additional investigation. The rules applicable to this review or additional investigation are the same as those applicable to the initial investigation.
4. If the Management Board or the Chair of the Supervisory Board informs or has informed an external body, the Reporter's response to the investigation report and the opinion of the Management Board or Chair of the Supervisory Board will also be sent to that external body. The Reporter will receive a copy of this.

## **ARTICLE 7: EXTERNAL REPORT**

1. Reporters can report a suspected abuse or misconduct externally directly. Competent authorities such as the Whistleblowers Authority, the Authority for Consumers & Markets for infringements of consumers law, the Dutch Data Protection Authority, the Financial Markets Supervisor Autoriteit Financiële Markten (hereinafter: "AFM") are designated to receive and investigate reports in case:
  - a. there is an imminent danger with serious and urgent public interest;
  - b. of a situation in which the Reporter can reasonably fear countermeasures as a result of an internal report;
  - c. there is a clearly identifiable threat of concealment or destruction of evidence;
  - d. of a prior report concerning the same suspicion of abuse or misconduct, which has not removed the suspicion of abuse or misconduct;
  - e. of a legal obligation to report directly to an External Party.
2. The Reporter may also submit the external report to a party other than an External Party as provided in Article 7(1) of this policy if in his/her opinion the public interest is so important that it outweighs the interest of the Company in maintaining confidentiality. That other third party must then, in the reasonable opinion of the Reporter, be deemed capable of directly or indirectly remedying the suspected abuse or of having it remedied. In doing so, the Reporter shall consider, on the one hand, the capability of the other third party of his choice to intervene and, on the other hand, the interest of the Company in minimizing the damage resulting from such intervention. The Reporter will only submit the external report referred to in this paragraph in the absence of other potentially less harmful alternatives.



## **ARTICLE 8 LEGAL PROTECTION OF REPORTER**

1. The Reporting Officer will keep the identity of the Reporter confidential as far as possible. If confidentiality of the Reporter's identity is not possible in connection with further actions that need to be taken to combat suspicion of abuse or misconduct, the Reporting Officer will first contact the Reporter for consultation.
2. The Reporter of suspicion of abuse or misconduct who acts in good faith and with care falls under the protection of Article 7:658b of the Dutch Civil Code. This means that the Reporter is not in any way disadvantaged by or because of his/her reporting of a suspicion of abuse or misconduct. This means that, in making a report, the Reporter is not treated any worse by the Company and/or his/her colleagues than he/she would have been treated had he/she not made a report. This legal protection applies both during the handling of the internal or external report and afterwards.
3. If it appears during the investigation that it cannot be confirmed that there was a suspicion of abuse or misconduct, while the Reporter acted with care, no measures will be taken against the Reporter.
4. If the investigation reveals that a report of suspicion of abuse or misconduct was made falsely or in bad faith, this may be ground for taking measures against the Reporter in reasonable proportion to such ground.
5. If the Reporter is punished by a particular person, treated unfairly or otherwise disadvantaged without reasonable cause, this will have consequences for that person.
6. Careful action has been taken when:
  - a. the Reporter has first raised the relevant facts internally as referred to in Article 2 of this policy, unless this could not reasonably be required of him/her as provided in this policy;
  - b. the Reporter discloses the facts in an appropriate and balanced manner in the event of a report to an External Party as provided in Article 7 of this policy;
  - c. the Reporter has a suspicion, based on reasonable grounds, that the relevant facts are correct as referred to in Article 1(3a) of this policy;
  - d. a public interest as referred to in Article 1(3b) of this policy is involved in the notification to an External Party; and
  - e. at the time of the notification within the meaning of Article 6(3) of this policy the importance of such disclosure in the public interest prevails over the interest of the Company in maintaining confidentiality.
7. All retention of data relating to the report, including personal data, is in accordance with the General Data Protection Regulation (hereinafter: "GDPR").



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## **ARTICLE 9: PRIVACY**

1. Any personal data processed by the Company under this policy will be used solely for the purpose of fulfilling the objectives of this policy. The data will only be provided to persons who need them for these purposes, or in order to comply with the law, or in the event of substantial public interest.
2. If a report is found to be unfounded, all data relating to the report will be destroyed as soon as possible, unless the data is necessary to secure evidence in any proceedings.
3. If a report appears to be founded, the data associated with the investigation will be deleted within two months of completion of the investigation, unless disciplinary action is taken, or the data is necessary to secure evidence in any proceedings.
4. Reports within parts of the Company are shared with other parts of the Company only if a report of suspicion of abuse or misconduct may affect those other parts of the Company. If this requires the processing of personal data outside the European Economic Area, the Company will take the necessary legal privacy measures to make this possible.
5. In all circumstances, unless waived by the Reporter him- or herself, the identity of the Reporter shall be kept confidential by the Company.

## **ARTICLE 10: CONCLUDING PROVISIONS**

1. This policy entered into force on 31 December 2017 and was revised on 14 March 2024. Every three years the policy will be evaluated and considered for adjustments resulting from experience in the years prior to evaluation.
2. This policy shall be made available to persons working for the Company in writing and/or electronically in the following ways:
  - Publication on intranet
  - As part of the information received at the time of entry into service
3. In terms of this policy and from the time of its entry into force Fons van Lith is appointed as the Reporting Officer.

# WHISTEBLOWER POLICY

Have you witnessed abuse or misconduct? Do not hesitate and report immediately!  
This can be done both internally and externally.

## FOLLOW THE STEPS BELOW:

### A. Internal reporting

**A1.** Consult your supervisor, HR Business Partner, or one of the Confidential Advisors before making an official internal notification to the Reporting Officer.\*

*Is it a notification involving the executive board or the Reporting Officer? Then report to the Board of Supervisors.*

**A2.** Make a notification to the Reporting Officer,

*possibly through the Confidential Advisor.*

**A3.** You will receive confirmation of the correct receipt of your notification within 7 days.

*The Reporting Officer informs the executive board about the notification and determines whether an investigation is necessary. You can involve an External Advisor\*, such as a lawyer or a union representative.*

**A4.** Is further investigation necessary? Then an external party receives a copy of the notification, including the opinion of the Reporting Officer. > B1

**A5.** The Reporting Officer or the executive board informs you of their opinion and any possible follow-up steps within 12 weeks.

*If more time is needed to come to an opinion, you will receive clarification within 12 weeks on when they will share their opinion.*

**A6.** Do you think your notification has not been adequately investigated? Or do you believe that the opinion of the executive board, the Reporting Officer, and/or the Board of Supervisors is inaccurate? Respond immediately and possibly initiate a new investigation.

### B. External reporting

**B1.** Engage an External Supervisor in a notification with significant public interest.

*External Supervisors include: the Public Prosecutor's Office (corruption), the FIOD (tax fraud), AP (privacy violation), ACM (price agreements to limit competition), or AFM (insider trading or incorrect reporting of transactions).*

**B2.** You will receive confirmation of the correct receipt of your notification within 7 days.

*The External Supervisor determines whether an investigation is necessary and informs you and the executive board of Sif about the follow-up steps.*

#### External notification can be done when:

You believe that an external expert provides better protection and/or better represents for your interests. For example, if there is:

- > Imminent danger with urgent public interest or;
- > Fear of reprisals due to the notification;
- > Clear threat of concealment or destruction of evidence or;
- > Previous official notifications of abuse or misconduct or;
- > Legal obligation to directly report externally.

*\*Note: We only reimburse your costs for an external advisor if the notification proves to be valid.*

Consult the complete document '**Sif whistleblower policy**' for a detailed explanation of how we handle reporting abuse or misconduct. You can find the policy on the Sif Portal.