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## WHISTLEBLOWER POLICY

### 1. Introduction

Acomomo has a single and uniform Whistleblower procedure that applies to all companies within the Acomomo Group. This procedure ensures that all employees, interns, temporary staff, volunteers, trainees, freelancers, (sub)contractors, suppliers, shareholders, and applicants who perform work-related activities at the Acomomo Group have the opportunity to confidentially report any alleged or suspected misconduct or wrongdoing.

### 2. Objective

We encourage all to report (alleged or suspected) misconduct or wrongdoing, which includes suspicions of violations/infringements of applicable laws and regulations, in order for us to resolve the issue and/or limit possible damage to our organization, employees, customers, and stakeholders. Discussing matters internally contributes to an open work environment in which we can depend on each other to speak up, rather than allowing the situation to continue. The whistleblower procedure helps to establish and sustain an ethical workplace environment and sound business practices.

All reports of misconduct or wrongdoing are taken seriously and will be treated confidentially, consistent with a full and fair inquiry. Acomomo prohibits any retaliation or disadvantage against whistleblowers as a consequence of your report.

### 3. Detailed instructions

#### 3.1. Where to report (alleged or suspected) misconduct or wrongdoing

Start by talking to your local Managing Director. If you're not comfortable doing so, or if your Managing Director fails to properly address the situation, reach out to your local Human Resources Manager or the Compliance Officer at Acomomo. If you wish to report to the Acomomo Compliance Officer, you can either use the SPEAK UP! form on the Acomomo website at [www.acomomo.nl/speak-up/](http://www.acomomo.nl/speak-up/) or phone the SPEAK UP! hotline number at +31 85 020 3785. Any alleged or suspected misconduct or wrongdoing concerning the functioning of Executive Board member(s) can be reported to the Chairman of the Acomomo Board of Directors.

We strongly encourage you to identify yourself to facilitate the investigation of your report, however, anonymous reporting to Acomomo's Compliance Officer is also possible by either using the SPEAK UP! form on the Acomomo website or by phoning the SPEAK UP! hotline number as provided above.

Reporting internally first remains the preference and is encouraged as much as possible, however it is allowed to report alleged or suspected misconduct or wrongdoing to counsel or designated competent authorities such as the 'Huis voor klokkenluiders' insofar that person or body is bound by professional confidentiality rules.

### 3.2. Follow-up process

#### *Registration obligation*

In order to ensure transparency, your report (whether verbal or written via e-mail, telephone, or the SPEAK UP! form on the website of Acomo) will be registered and placed on record. Where a verbal report is made or conversation occurred, you must give permission in advance to record the conversation. If a written representation is stored of the verbal report or conversation, you will be given the opportunity to review, correct and approve the written representation if necessary. Reports are only visible to the confidential advisor and dedicated persons who are selected by the Acomo Compliance Officer to assist on a case-by-case basis. Each such person is bound by strict confidentiality.

Each manager, or other dedicated person to which (alleged or suspected) misconduct or wrongdoing is reported, must ensure that a record of the report is made and that the local Managing Director of the company concerned is informed as soon as possible of any such misconduct or wrongdoing and the date when the report was received. If the person making the report has only reported misconduct or wrongdoing to the Compliance Officer of Acomo, the Acomo Compliance Officer will, after verifying the misconduct or wrongdoing, inform the Managing Director of that company on a confidential basis, as and if appropriate and required, of the (alleged or suspected) misconduct or wrongdoing that was reported. In no such case is the identity of the person who made the report to be disclosed without their consent.

#### *Acknowledgement of receipt*

If under applicable law a person affected by reports must be informed of an investigation, Acomo shall do so as soon as reasonably possible. Unless obliged by law or insofar you agree to disclose your identity, the Acomo Compliance Officer will keep your identity strictly confidential.

*Entity level:* Each manager, or other dedicated person to which (alleged or suspected) misconduct or wrongdoing is reported, will confirm receipt of your report within 7 days after the date of receipt, if this was not done anonymously. You will be informed as soon as reasonably possible, but in any case, within 3 months after the acknowledgment of receipt about the procedure/(s) that has been and/or will be taken, if your name and contact details were included in your report. Anyone who reports (alleged or suspected) misconduct or wrongdoing has the possibility to be involved in the research and comment on the research report.

*Group-level:* If you made use of either the SPEAK UP! form on the Acomo website or the SPEAK UP! hotline, then the Acomo Compliance Officer will confirm receipt of your report within 7 days after the date of receipt, if this was not done anonymously. You will be informed as soon as reasonably possible, but in any case, within 3 months after the acknowledgment of receipt about the procedure/(s) that has been and/or will be taken, if your name and contact details were included in your report. If the report was made anonymously, then the Acomo Compliance Officer will further investigate the matter as reasonably achievable.

If you wish to report anonymously, then please create and provide an anonymous email account to which the receiver of the complaint can respond to and provide feedback.

### *Duty of confidentiality*

Your identity may not be disclosed without your consent. Any person who receives confidential information as part of a report must keep this information confidential. Confidential information includes the identity of the reporter, the identity of persons named in the report and confidential business information. If people are legally obliged to report certain information, this obligation of confidentiality does not apply.

### 3.3. Report safely and in a completely confidential way

If you have reported a situation or behaviour in accordance with the procedures set out in this whistleblower procedure and you have assumed, in good faith, and have reasonable grounds to believe that the report or disclosure is necessary to disclose such situation or behaviour to be (alleged or suspected) misconduct or wrongdoing, it is now legally regulated that you will not experience any form of retaliation or disadvantage as a consequence of your report. You must also have reasonable grounds to believe that the information reported is accurate and truthful.

In case you have misjudged the situation or behaviour, this will not be held against you and the fact remains that you have contributed to the work environment to which we are committed. This extends to persons who assist you, such as a confidential adviser, family relatives and colleagues. However, making a report in bad faith may be subject to disciplinary actions as permitted by local law. Unfounded reports, malicious reports, or reports made to hurt someone are strictly prohibited and considered a breach of an employee's duties.

## ONE-GLANCE OVERVIEW OF ACOMO'S WHISTLEBLOWER PROCEDURE

### SPEAK UP!

Always start by talking to your local Managing Director.

If you're not comfortable doing so, or if your local Managing Director fails to properly address the situation, reach out to your local Human Resources Manager or the Compliance Officer at Acomomo at the following email: [complianceofficer@acomomo.nl](mailto:complianceofficer@acomomo.nl).

If you wish to report to the Compliance Officer at Acomomo you can either use the SPEAK UP! form provided on the Acomomo website at [www.acomomo.nl/speak-up/](http://www.acomomo.nl/speak-up/) or phone the Acomomo SPEAK UP! hotline number at +31 85 020 3785.

Although we strongly encourage you to identify yourself, it is possible to anonymously report using the same reporting channels as indicated above.

### Confirmation of your report

To ensure transparency, your report (whether via e-mail, telephone, or the SPEAK UP! form on the Acomomo website) will be placed on record. Professional judgement will be used to best decide whom to inform and involve on the reported matter as soon as possible.

Each manager, or other dedicated person to which (alleged or suspected) misconduct or wrongdoing is reported, will confirm receipt of your report within 7 days after the date of receipt if this was not done anonymously.

If you made use of either the SPEAK UP! form on the Acomomo website or the SPEAK UP! hotline, the Compliance Officer will confirm receipt of your report within 7 days after the date of receipt, if this was not done anonymously, otherwise the Compliance Officer will further investigate the report as reasonably achievable.

### Further procedure

You will be informed as soon as reasonably possible but, in any case, within 3 months after the acknowledgment of receipt about the procedure/(s) that have been and/or will be taken.

Anyone who reports (alleged or suspected) misconduct or wrongdoing has the possibility to be involved in the research and comment on the research report.





# SPEAK UP!

In case you notice business practices which you believe are not inline with our **Acomomo Code of Conduct** please report this by speaking up.

Report your concerns to your local Managing Director, or to your local Human Resources Manager or to the Compliance Officer at Acomomo.

Contact **SPEAK UP!** By web [www.acomomo.nl](http://www.acomomo.nl)  
or by phone +31-85-020-3785

Acomomo will not permit retaliation against any employee who, in good faith, seeks advice or reports improper behaviour under the **Acomomo Code of Conduct**. Anonymous use of these functions are also allowed.

