

WHISTLEBLOWER POLICY

1. WHAT IS THE WHISTLEBLOWER POLICY

If you identify wrongdoing in the course of your work, as a "whistleblower" you can report that wrongdoing. The whistleblower regulation defines the organization and operation of the internal and external reporting channels in such a way that confidentiality, anonymity and quality of the treatment of reports is guaranteed.

2. WHO CAN BE A WHISTLEBLOWER

- (former) employees
- self-employed persons
- shareholders and directors/managers of a company
- interns
- applicants
- persons working under the supervision and direction of (sub-)contractors
- facilitators (these are natural persons who assist reporters of a violation in the reporting process)
- third parties connected to the reporter who are at risk of retaliation in a work-related context (e.g., colleagues and family members),...

3. WHAT VIOLATIONS CAN CLOCK DETECTORS REPORT

- Public procurement
- Financial services, products and markets, prevention of money laundering and counter-terrorism
- Product safety and product compliance
- Transportation safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety, animal health and welfare
- Public Health
- Consumer Protection
- Protection of privacy and personal data, and security of network and information systems
- Combating tax fraud
- Social fraud prevention

4. GUARANTEES AND PROTECTION

The procedures and systems used to receive and follow up reports provide the necessary guarantees of confidentiality, anonymity and quality of treatment. The regulations provide for the prohibition of retaliation. The definition of retaliation is broad. Consider, for example, retaliation in the



context of negative reviews or dismissal, as well as in the case of change of duties, financial penalties or reputational damage. Protection against retaliation is unlimited in time.

As a reporter, you must have reasonable grounds to believe that what you are reporting is correct, based on the information available to you at the time of the report. If you intentionally or knowingly report false or misleading information, you enjoy no protection and risk a penalty.

5. REPORTING CHANNELS

Internal reporting channel

this information can only be accessed by members of the HR team, Yasmine Goethals or Queenie DeRudder, they are the reporting managers.

- Written notification:
 - By letter: Laroy Group NV, attn. HR, Industrieweg 98-100 9032 Wondelgem with stating "confidential" on the envelope
 - Via email: hr@laroygroup.com
- Oral notification:
 - After an appointment with the HR department
 - via the phone numbers 0494 40 32 21 (Queenie DeRudder) or 0473 25 96 89 (Yasmine Goethals)
- Receipt notification:

As the reporter, you will receive a receipt notification within seven days of the day the reporting channel received your report
- Follow up on notification:

Within three months of the day on which the reporting channel sent the receipt notification, you will receive information about what happened to your notification. You will find out what actions have been or will be taken as a result of your report.

External reporting channel:

If you have already made an internal report, or if you believe that an internal report cannot deal with the violation effectively or that there is a risk of reprisals, you can make a report (anonymously or not) to the Flemish Ombuds Service.

By mail: Chaussée de Louvain 86, 1000 Brussels, by e-mail: klokkenluiden@vlaamseombudsdienst.be, by phone: 02 552 48 48

Public reporting channel:

You can also make your report public but this comes with a risk. If you disclose information publicly, you only enjoy protection if you have first reported the breach internally or externally and appropriate action has not been taken within three months of your report being received.

