

WHISTLEBLOWER POLICY

Introduction

Hytrans is committed to conducting its business with honesty and integrity and expects all employees to uphold high standards per our code of conduct and the applicable laws. Therefore, Hytrans considers it important that any alleged misconduct is reported so that the organisation can conduct an investigation and take appropriate action as necessary.

This whistleblowing policy outlines how employees can report concerns and how the organisation handles such reports. The purpose of these rules is to ensure that suspected misconduct is reported as promptly as possible. All concerns will be taken seriously, investigated appropriately, and treated with the utmost confidentiality. Additionally, the rules set out guidelines on how to express concerns.

Who do these rules apply to?

These rules apply to all Hytrans employees and to anyone who carries out work on behalf of Hytrans. In the following, we will refer to these individuals as **notifier(s)**.

What is whistleblowing?

The Hytrans Code of Conduct outlines the standards and values that everyone must adhere to. In addition, everyone must comply with the legal requirements and what we consider to be "normal" in society.

Whistleblowing is the disclosure of information about (alleged) misconduct or hazards at Hytrans. Misconduct is a dangerous, immoral, or illegal practice that compromises the public interest.

Included here are:

- a work-related (imminent) breach of EU law
- a work-related (imminent) breach of internal rules which has a legal basis, is specific and clear, and involves matters of public interest
- an imminent breach of a legal provision involving a matter of public interest

The public interest is compromised if the act or omission not only affects personal interests but also displays a pattern or structural character, or if the act or omission is serious or extensive.

(Alleged) misconduct may relate to the following matters:

- criminal and unethical activities;
- public health and safety hazard;
- damage to the environment;
- bribery or any other form of corruption;
- financial fraud, tax evasion, money laundering, or mismanagement;
- violation of human rights;

- breaches of law relating to discrimination, intimidation, coercion, or incitement to hatred;
- serious misconduct or activities that could damage our reputation;
- unauthorised disclosure of confidential information;
- deliberate concealment of any of the above.

If you suspect that any of the above fall within Hytrans' scope of responsibility, please report them per this policy. Together, we can ensure a better and more integrity-based working environment.

Protection for whistleblowers

We believe it is important that you feel safe when reporting misconduct. At Hytrans, we do everything possible to ensure that you do not suffer any adverse consequences as a result of making a report.

You and anyone assisting you (family member, advisor, or colleague) will be protected against adverse treatment resulting from reporting a concern or suspicion. The same applies to internal investigators. Adverse treatment includes mobbing, dismissal, disciplinary action, threats, the withholding of promotions or bonuses, intimidation, and the premature termination of a contract, as well as any other form of unfavourable treatment.

Confidentiality:

We will treat your report confidentially. Your identity will only be shared if you give your consent. However, we may share details of your report with the person who will look into the matter. If we are required to share your identity with an authority because that authority deems it necessary for the investigation, we will only do so after discussing this with you. You are not obliged to consent to the sharing of your data.

You can also choose to submit a report completely anonymously. However, we do not recommend doing so. It is difficult to conduct a thorough investigation if we are unable to obtain further information. If you are concerned about adverse consequences, you can always contact a confidential counsellor. If you choose to remain anonymous, we ask you to provide as much information as possible when submitting the report.

INTERNAL REPORTING PROCEDURE (INCL. HYTRANS TRUSTED PERSONS)

Step 1: Discussion

If you suspect misconduct and are unsure whether you should report it, you can always discuss your concerns confidentially with your supervisor or an advisor. Internally, you can contact the HR advisor. You can also contact one of our external confidential advisors or the Counselling Service of the "Whistleblower Authority." (Home | Huisvoorklokkenluiders)

Step 2: Internal reporting

If you decide that you want to report misconduct, you can do so verbally or in writing by emailing or calling our HR department. You can also request a meeting with HR at an external location to discuss your concerns. They will invite you to an interview within a reasonable period of time. HR can help to resolve any issue quickly and effectively. They can also refer the matter to upper management.

When making a verbal report, you will be asked whether the conversation may be recorded. If you do not agree to this, a report of the conversation will be drawn up afterwards. The interview report will be sent to you for review and approval.

If you would prefer not to discuss the matter directly, you can contact one of our confidential advisors. We have two external confidential advisors whom you may approach without informing anyone else. The confidential advisors work independently of Hytrans. This contact is completely anonymous. You can find the details of our confidential advisors in the message box in Nova.

If you prefer to submit a report anonymously, please send a letter FTAO HR department, Hytrans, Lemsterpad 56, 8531 AA Lemmer. Please describe the situation in as much detail as possible.

Register

All reports are kept in a whistleblowing report register. We will retain the report for as long as is necessary for either Hytrans or an external authority to investigate the matter. Your data will be processed only to the extent necessary.

Step 3: Investigation

You will receive confirmation that your report is being processed within seven days. The person investigating the issue will contact you as soon as possible to discuss the report and make sure that the investigation starts quickly.

When a report is received, it is initially assessed to determine the scope of the investigation. Depending on this assessment, we may decide to appoint an investigator or a team of investigators. These could be specialist employees or a committee of three people, for example, a confidential advisor, an employee from HR, and a member of the management team. During the investigation, you may be asked to provide further clarification.

The investigation will be conducted in strict confidence. This may mean that we may not be able to disclose all details of the investigation to you. We will do our best to keep you informed. We ask that you treat all information as confidential.

Step 4: Outcome

The investigator(s) will come to a conclusion and, if necessary, recommend measures to be taken. As the notifier, you will receive a transcript of the conclusions. Where possible, we will inform you about our next steps.

EXTERNAL REPORTING

Reports may relate to actions taken by Hytrans employees; however, you may also want to report the actions of a third party or collaborations with a third party (a customer, supplier, or service provider). Although we encourage you to raise your concerns internally first, you are also welcome to contact an external authority. These are authorities that possess specialist knowledge or have a supervisory role.

In any case, external third parties are understood to be:

- the investigation department of the Whistleblowers Authority;
- the Authority for Consumers and Markets (ACM) in the event of violations of consumer law;
- the Data Protection Authority (AP) in the event of breaches of the General Data Protection Regulation (GDPR);
- Nederlandsche Bank N.V. (DNB) and the Financial Markets Authority (AFM) in the event of violations of financial and economic regulations;
- the Health and Youth Care Inspectorate and the Dutch Healthcare Authority in the event of violations of healthcare regulations;
- the Nuclear Safety and Radiation Protection Authority in the event of violations of agreements concerning nuclear safety regulations;
- any authority responsible for investigating criminal offences;
- an authority responsible for supervising compliance with the law.

If you report a matter to an external authority that is not authorised to investigate it, that authority will forward the report to the appropriate supervisory body with your consent.