



Whistleblower Policy - Questions and Answers

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What is the purpose of this policy?

At the end of 2019, the European Union adopted the Whistleblower Directive (Directive (EU) 2019/1937). This European whistleblower directive led to the Dutch Whistleblowers Protection Act entering into force in the Netherlands on 18 February, 2023. The purpose behind this legislation is to improve how misconduct is reported within organisations. Other European Union member states where A-ware operates have also implemented the directive into their national legislation.

What type of misconduct can be reported?

The Whistleblower Policy defines what constitutes misconduct (see the definition of “misconduct”). The whistleblower policy concerns matters which are against the public interest. The whistleblower policy is therefore not intended for individual problems within A-ware. To discuss matters not covered by this whistleblower policy, please refer to other channels, such as the grievance procedure.

What is meant by suspected misconduct?

Suspected misconduct is where, through your work or other business interaction at A-ware, you have become aware that there has been misconduct at A-ware. It is important that the suspicion is based on your own observation and is sufficiently specific. It can also be based on documents (emails, reports, correspondence, photos, etc.). You must be able to justify your suspicions to some extent when making the report; hearsay alone is not sufficient.

Can I report something, and how do I do it?

Anyone who carries out work for A-ware in a work-related context can make a report. This includes employees, self-employed people, trainees, applicants, contractors, shareholders, directors or suppliers.

You can submit a report directly within A-ware. This will then be addressed internally and a decision might be taken to notify an external body. You may also decide only to make an external report. However, A-ware prefers internal reports initially so that the report can be investigated internally.

Where can I seek advice?

If you work for A-ware, you can contact the workers' representative in confidence. You may seek information, advice and support regarding suspected misconduct.

Even if you do not work for A-ware, you can also contact the advice department at the Dutch Whistleblowers Authority or the equivalent set up for this purpose in your country. You can also seek information, advice and support about (reporting) suspected misconduct.



Which external bodies can I send a report to?

Suspected misconduct can be reported to various external bodies. You can report it to whichever body you feel is most suitable. These bodies have websites explaining how to report something. Please refer to the country addendum for the local competent authority. In the Netherlands, these organisations are:

1. Netherlands Authority for Consumers and Markets (ACM);
2. Netherlands Authority for the Financial Markets (AFM);
3. Dutch Data Protection Authority (AP);
4. Dutch central bank (DNB);
5. Dutch Whistleblowers Authority;
6. Healthcare and Youth Care Inspectorate (IGJ);
7. Dutch Healthcare Authority (NZ);
8. Authority for Nuclear Safety and Radiation Protection (ANVS), and
9. organisations and administrative bodies, or departments of these, appointed by the executive board or under government authority.

Who can I send a report to internally?

You can send a report to your immediate manager or your contact within A-ware. If you suspect that your manager, contact or someone who sits on the A-ware executive board is implicated in the potential misconduct, you can alternatively report it directly to the general counsel at A-ware (“compliance officer”). The general counsel may also appoint a legal counsel as a compliance officer. If you are an A-ware employee, you can also submit your report to a workers' representative, who will forward the report to the compliance officer.

Reports can be in writing or verbally. You may use the phone or other voice messaging system, but you can also request a meeting at a particular location. This conversation will not be recorded without your consent. You can also use the reporting form on www.royal-aware.com.

Can I also send a report anonymously?

Yes, you can also send your report anonymously. Please use the reporting form at www.royal-aware.com. If you send your report anonymously, you cannot be kept informed of the outcome of your report and cannot be involved in further investigations. Also, you cannot enjoy protection against retaliation because it is not known who you are.

What happens after making an internal report?

Receiving and forwarding a report: The manager or contact will forward your report to the compliance officer and, if you have made the report verbally, a written record will be provided. You will be sent confirmation of receipt within 7 days. The report will be stored in a special register and the executive board will be advised. If any company director is implicated in the misconduct you reported, only the other company directors will be advised. If the entire executive board is potentially implicated, the chair of the supervisory board will be advised instead. Should either of these be the case, you should



substitute 'company director' or 'chair of the supervisory board' respectively in place of 'executive board' below.

Processing the report:

The executive board, together with the compliance officer, will conduct an investigation into the report of suspected misconduct. Where the report is not based on reasonable grounds, or where it is clear from the outset that what was reported does not relate to suspected misconduct, no investigation will be initiated. You will be advised of this in writing within three months of making the report.

If an investigation is initiated, it will be delegated to investigators who are independent and impartial. The investigation will not in any circumstances be carried out by anyone who may be or has been implicated in the suspected misconduct.

The executive board, together with the compliance officer, will assess whether any external bodies should be advised about the internal report of suspected misconduct. Anyone who is the subject of a report will be notified, unless this could jeopardise how the report is processed.

Investigation into the report:

The investigators can request and examine any documents from the A-ware organisation which are reasonably necessary to conduct the research. The investigators may interview you and other parties involved in order to establish the facts. The investigators will ensure that this is recorded in writing and show this record to the person who was interviewed, for approval and signature. Anyone interviewed will be given a copy of this. Anyone involved is free to provide the investigators with any documents they reasonably consider necessary for the investigators to consider as part of the investigation.

The investigators will compile a report of the investigation once it is complete.

Feedback following the investigation:

You will be advised as soon as possible, but no later than three months after making the report, of the executive board's principal findings with regard to the report of suspected misconduct. You will also be told what action has been taken as a result. If it becomes clear that the findings cannot be reported within the three-month timescale, you will be advised of this in writing.

Once the investigation is complete and the findings established, the executive board, together with the compliance officer, will assess whether any external body should be notified about the report. You will be told about this, where possible. You will then be afforded the opportunity to respond to the report of the investigation and the board's findings. If you feel that the matter has not been investigated, or has not been investigated properly, you can state this and, if necessary, a new or further investigation will be initiated.



Will my report be treated confidentially?

Yes, the report and relevant information will be treated confidentially. Your identity will not be disclosed. Information relevant to the report will only be accessible to those involved in processing the report in question.

If I report something, might there be any adverse consequences for myself or anyone else?

If when you make the report you have reasonable grounds for believing that the information reported about the suspected misconduct is correct, A-ware may not discriminate against you. Even if it later turns out that there was no misconduct. Anyone else involved, who, for example, was interviewed by the investigators as part of their work, will not suffer any adverse consequences either.

What if I do suffer adverse consequences after making the report?

If you feel you have suffered adverse consequences since making the report, you can request the A-ware executive board or compliance officer to investigate. If there are any adverse consequences, A-ware will take appropriate action. You can also ask the investigations department at the Dutch Whistleblowers Authority to conduct an investigation into the way A-ware behaved towards you after reporting suspected misconduct.

Where can I get more information?

A-Ware has published its Whistleblower Policy on its website.