



WHISTLEBLOWING POLICY

An overview of GreenTec's policy for the protection of Whistle-blowers

(1) Statement of Intent

In line with our vision, mission, and values, considering the interest of our stakeholders, we strive to prevent and detect unlawful behavior. Whistleblowing is an effective technique for this purpose as it encourages communicating suspicions and reasonable doubts to the management about malicious activities without fear and prejudice.

As such, the policy for the protection of Whistleblowers (as defined below) ('Whistleblowing Policy') is of vital importance:

- To support a culture of openness, accountability, and integrity.
- To provide an environment in which Whistleblowers can report, without fear of retaliation, all possible breaches, misconducts or omissions which may lead to impairment of a Company's (as defined below in point 2.3 'Personal Scope') integrity, financial loss and/or reputational damage.
- To create awareness regarding the Companies' existing channels to report suspected or actual breaches.
- To increase the likelihood of alerting management at an early stage about breaches and take appropriate actions.
- To provide assurance to the Whistleblowers about secrecy and protection of their legitimate personal interests upon report of possible breaches.
- To ensure compliance with the Companies' principles governing investigations, as defined in a separate section below.

All possible breaches shall be assessed according to the guidelines defined within this Whistleblowing Policy.

(2) Scope

2.1 General

This Whistleblowing Policy is based on the requirements expressed in the EU whistleblowing directive. (Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law), and as implemented locally

2.2 Personal Scope

With respect to the personal scope of this Whistleblowing Policy:

- In local jurisdictions where a Company employs fifty or more employees and local laws or regulations set stricter rules than those set out in the Whistleblowing Policy, the stricter local rules shall prevail
- In local jurisdictions where a Company employs less than fifty employees, the Whistleblowing Policy applies without application of the additional local rules.

The Whistleblowing Policy applies to 'persons who acquired information on breaches of EU law by a Company in a work-related context':

- 'work-related context' meaning:
- all workers in a professional context, i.e. persons having the status of employees, selfemployed workers status or consultants
- 'employees' for this purpose meaning any person working under supervision and

direction of a Company

- shareholders and members of supervisory bodies, as well as volunteers and paid or unpaid trainees
- any person working under the supervision and direction of independent third-party contractors, subcontractors and suppliers, clients, joint venture partners
- in a work-related context which:
 - is ongoing,
 - has ended, or
 - is yet to begin in cases where information is acquired during the recruitment process or other pre-contractual negotiations
- in a work-related context with:
- GreenTec Workforce Solutions ApS

The persons indicated above are herein referred to as “Whistleblowers(s)”.

2.3 Protection of Whistleblowers

Whistleblowers will qualify for protection under the Whistleblowing Policy provided that:

- they had reasonable grounds to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of this Whistleblowing Policy, and
 - they were reported either internally or externally in accordance with this Whistleblowing Policy.
- The use of internal reporting channels before reporting through external reporting channels is encouraged.

2.4 Material Scope

This Whistleblowing Policy lays down common minimum standards for the protection of Whistleblowers reporting the following breaches of EU law by a Company (without prejudice to material scope resulting from any more stringent applicable local laws):

- Breaches falling within the scope of the EU acts that concern the following areas: (i) public procurement, (ii) financial services, products and markets, and prevention of money laundering and terrorist financing, (iii) product safety and compliance, (iv) transport safety, (v) protection of the environment, (vi) radiation protection and nuclear safety, (vii) food and feed safety, animal health and welfare, (viii) public health, (ix) consumer protection, (x) protection of privacy and personal data, and security of network and information systems.

For the avoidance of doubt, above areas include, but are not limited to, breaches with respect to bribery (e.g. hospitality and gifts), corruption and anti-trust.

- Breaches affecting the financial interests of the EU; and
- Breaches relating to the internal market.

For the avoidance of doubt, this Whistleblowing Policy:

- does not apply to personal work-related concerns such as concerns or dissatisfaction with wages, shifts or workplace circumstances, inter-personal issues, psychosocial risks (including but not limited to harassment, violence, etc.) or performance evaluations.

- is not designed to question the commercial approach of a Company nor should it be used for complaints for which specific procedures have already been established within a Company.

You should first report the matter through the regular internal channels (in accordance with the Code of Conduct). If for any reason the matter cannot be reported through these internal channels, the

Whistleblowing Policy shall apply. If there are doubts as to how the intended disclosure should be channelled, please contact the Compliance department for guidance.

(3) Investigation Process

3.1 General Principals

All investigations of possible breaches shall be conducted according to the following principles:

- **Equity:** Investigations shall be conducted with a high level of professionalism and independence, also taking into account the principles of confidentiality, impartiality and fairness. All Whistleblowers and persons concerned - either the subjects of, or otherwise involved in an investigation - shall be treated with respect, shall be heard, and shall be taken seriously. The initial presumption is that all individuals accused of a breach are innocent until the evidence suggests otherwise.
- **Consistency:** Investigations shall follow a formal procedure to guarantee equal treatment to all employees, either during the investigation or at the stage of decision and administration of the consequences of the breach. Evidence shall be preserved for future use by the authorities, if needed, in accordance with GDPR regulations.
- **Speed:** Investigations shall be conducted in reasonable time, considering the complexity of the allegation but without sacrificing the quality of execution. Detailed information on specific follow-up timings can be found in the investigation process overview.
- **Confidentiality:** Investigations shall be managed with the highest level of discretion and shall be known only by those persons who should be informed of their existence and progress. Such confidentiality guarantees the integrity of the procedure, the safety of the persons involved and respect to the subjects of the investigation. The identity of the Whistleblower (including any other information from which such identity can be directly or indirectly deduced), the content of the breach as well as any other detail related to the breach cannot be disclosed to anyone beyond the Compliance Officer, the (local) investigator, the Compliance Committee, without explicit consent of that person. This effort of confidentiality may never prevent a Company from disclosing certain information retrieved throughout the investigations when obliged thereto by the law, especially when it is enforced by authorities mandated thereto, in which case we will inform you before any disclosure is made, unless it would jeopardise the investigations or proceedings concerned.

3.2 Investigation Process

The investigation process starts with a report of a possible breach under this Whistleblowing Policy, and is followed by a determination whether the allegation falls within the material scope (as outlined in point 2.5 above) and requires an investigation of the alleged facts. All allegations of possible breaches, that fall within the material scope (as outlined in point 2.5 above) must be promptly communicated to the Compliance Officer, who will partake in all decisions throughout the investigation process. Upon conclusion of the investigation, the Compliance Officer assesses and recommends a course of action to the Compliance Committee. Once the corrective measures have been taken, the Compliance Officer communicates the result of the investigation to the affected parties.

3.2.1.1 Reporting channels

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- Internet: Whistleblowing reporting system
- Although not recommended, anonymous reporting is possible through this channel. In that case it is however not possible to inform/update the Whistleblower about the status or to ask for extra information.

This channel is managed by designated Compliance Officers. Due to its independency, the Compliance Department will serve as a central point where all whistleblowing reports and cases are received and monitored.

3.2.1.2 Acknowledgment of receipt The Whistleblower will be informed on the receipt of the report within 7 days of that receipt.

3.2.2 Investigation

3.2.2.1 Preliminary investigation The Compliance Officer or the (local) investigator appointed by the Compliance Officer, will determine whether the alleged facts require further investigation. It may happen that:

- the report does not include enough information to start an investigation
- the allegation does not fall within the material scope of this Whistleblowing Policy (as outlined in point 2.5 above), in which case the report shall be forwarded to the relevant department; or
- the allegation does not fall within the material scope of this Whistleblowing Policy (as outlined in point 2.5 above) but can be solved through coaching or mediation between the parties. In above-mentioned cases, the Compliance Officer or the (local) investigator will notify the Whistleblower of the decision and the reasons therefor. In the event the Compliance Officer or the (local) investigator deems the report to be validly made, they will conduct a thorough investigation.

During the course of the investigation, the Compliance Officer or the designated (local) investigator, is responsible for:

- planning the investigation steps,
- conducting interviews (with a view to gathering relevant information on the alleged facts),
- gathering relevant information,
- determining whether the information gathered is sufficient to conclude the investigation, and
- issuing a final report to the Compliance Committee, where relevant.

Additionally, they are also responsible for the communication with the Whistleblower (if not anonymous). The final report must contain the main conclusions that emerge from the analysis carried out by the Compliance Officer and/or the (local) investigator, as well as a recommendation regarding the course of action. The Compliance Officer will keep the Compliance Committee of the concerned Company informed about the number of reports made in any given period, the nature and object of the reports. Furthermore, the Compliance Committee's suggestions and/or observations will be taken into consideration for the definition of the course of action, with respect for the principles of confidentiality, impartiality and fairness.

3.2 Decision

The outcome of an investigation may show that the alleged breach was substantiated or unsubstantiated. If the breach was substantiated, mitigating and aggravating factors related to the actions of the subject of the investigation, must be taken into account.

The assessment is important to determine whether disciplinary measures, legal proceedings or corrective actions must be taken.

The designated Compliance Officers or local investigator need to provide feedback on the decision regarding the report, to the (possible) Whistleblower, within a period not exceeding 3 months from the acknowledgement of receipt.

3.2 Consequences for the whistle blower

Unless the Whistleblower acted in bad faith, he/she will not be subject to any sort of (threats or attempts to) retaliation measure. In the event that the investigation shows that the Whistleblower did not make the report in good faith (e.g., when the reporting contains false and unfounded allegations or is made for the sole purpose of defaming or causing prejudice to others or forgery or impersonation by the Whistleblower), the concerned Company may take appropriate disciplinary or legal measures (e.g. civil or criminal pursuit for defamation)

3.2 Consequences for the subject of the report

If the allegation is confirmed, disciplinary measures are generally determined for the subject of the investigation, along with corrective actions to remedy the facts and prevent them from happening again. Disciplinary sanction may vary, depending on the seriousness of the breach, from a warning, suspension, or dismissal (with or without cause), to alerting the authorities of a suspected crime. It may however be possible that disciplinary actions are not recommended. This being the case, the communication of the result of the investigation to the subject of the investigation will be in the form of guidance or coaching regarding the nature of the breach, the need to avoid its recurrence, and the actions required from the subject in the future. When appropriate, legal proceedings may also be initiated. • If the allegation is dismissed due to lack of evidence, corrective actions may also be taken. This can include improvement of processes, policies, controls, training of employees and improvement of internal communications or any other corrective action in order to solve the

3.2 Protection

If a report was made in good faith, the Whistleblower will not be subject to any sort of (threats or attempts to) retaliation measure which causes or may cause unjustified detriment to the Whistleblower because of the report, such as (without limitation) suspension, lay-off, dismissal, demotion, withholding of promotion, transfer of duties, change of location, reduction in wages, a negative performance assessment, penalty, coercion, intimidation, harassment, discrimination, unfair treatment, harm reputation, blacklisting or any other form of retaliation. Complaints of retaliation are taken very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated. The measures for protection apply to the Whistleblower as well as those persons who could suffer retaliation in a work-related context by aiding the Whistleblower, e.g. facilitators, third persons connected with the Whistleblower, and legal entities that the Whistleblower owns, works for or is otherwise connected with. In addition to this Whistleblowing Policy, local legislation may give the Whistleblower further protection in accordance with the applicable scope of application and rules

3.2 Data Protection & Privacy

In the handling of a report, the concerned Company will comply with any applicable law on the protection of personal data. Personal data which are clearly not relevant for the processing of the report will not be collected or, if collected accidentally, will be deleted without undue delay. The name, job title, contact details and company number (if any) of the Whistleblower and the reported person shall be stored until the offence reported has been prescribed. If the report is not followed by any disciplinary or legal proceedings, all other personal data relating to the reported concern shall be deleted promptly after the completion of the investigation, unless there is a legal obligation to retain such information. If a disciplinary or legal proceedings is initiated, the personal data relating to the reported concern shall be kept until the conclusion of these proceedings and the period allowed for any recourse, in accordance with national legal and regulatory requirements. In any event, all documents related to the report (report, minutes of meeting, investigation files, ...) shall be registered and archived by the Compliance Officer on a dedicated and protected file in accordance with data protection rules.

At any time the Whistleblower, as well as the subject of the report, can exercise any of the rights granted under the General Data Protection Regulation (or GDPR), including (without limitation) the rights of access, rectification and erasure of their personal data within the legal limits. More information can be found in the GreenTec Workforce Solutions ApS Privacy Policy.