



# Whistleblower procedure

---

Acomomo has a single and uniform Whistleblower procedure that applies for all companies within the Group. This procedure ensures that all employees, interns and temporary staff working at the Acomomo Group have the possibility to confidentially report any alleged irregularities of a general, operational and financial nature.

We encourage all to report (alleged or threatening) misconduct so we can resolve the issue and/or limit possible damage for our organization, employees, customers and other stakeholders. Discussing matters internally also 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 are taken seriously and will be treated confidentially, consistent with a full and fair inquiry. Acomomo prohibits any retaliation against whistleblowers.

## **Where to report (alleged or threatening) misconduct**

Always start by talking to your managing director. If you're not comfortable doing so, or if your managing director doesn't properly address the situation, reach out to your Human Resources Manager or the compliance officer at Acomomo. If you wish to report to the compliance officer at Acomomo you can use the Speak Up! form on the Acomomo website. Any alleged irregularities concerning the functioning of management board member(s) can be reported to the Chairman of the Supervisory Board.

Although this is not the preferred route and we strongly encourage you to identify yourself to facilitate the investigation of your report, anonymous reporting to the compliance officer is also possible via the Speak Up! form on the website.

It is allowed to report alleged or threatened misconduct to a counsel for advice insofar that person is bound by professional confidentiality rules. In the following circumstances you may report the misconduct to an external third party (other than the above-mentioned counsel): (i) an acute danger in which a serious and urgent public interest requires an immediate external report, (ii) a previous internal report according to the same misconduct has not resulted in the misconduct being addressed, or (iii) a legal or statutory obligation to immediately report externally. In such cases you should also report the misconduct to the compliance officer as soon as possible. Seeking attention from the press or through any kind of (social) media is always considered wholly inappropriate.

## **Follow up process**

In order to ensure transparency, your report (whether via e-mail, telephone or the contact form on the website of Acomomo) will be put on record and is only visible for the confidential advisor and dedicated persons who are selected by the 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 threatening) misconduct is reported, must ensure that a record of the report is made and that the managing director of the company concerned is informed as soon as possible of any such misconduct and the date when the report was received. If the person making the report has only reported misconduct to the compliance officer of Acomomo, the compliance officer will, after verifying the misconduct, inform the managing director of that company on a confidential basis unless agreed otherwise with the person involved.

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

Each manager, or other dedicated person to which (alleged or threatening) misconduct is reported, will confirm receipt of your report within 5 business days after the date of receipt. You will be informed as soon as reasonably possible but in any case within 8 weeks about the procedure. Anyone who reports (alleged or threatening) misconduct has the possibility to be involved in the research and comment the research report.

**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, such situation or behaviour to be (threatening) misconduct, Acomo will do anything in its power to safeguard that you will not experience any sort of retaliation as a consequence of your report.

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. However, making a report in bad faith may be subject to disciplinary actions as permitted by local law. Especially, unfounded reports, malicious reports, or reports made to hurt someone are strictly prohibited and considered a breach of employee's duties.