

1. Introduction

1.1. Acomomo's principles for a responsible work environment are laid down in the Acomomo Code of Conduct. Misconduct or irregularities can be reported through Acomomo's whistleblower procedure. This procedure ensures that all employees, interns, temporary staff, or stakeholders have the opportunity to confidentially (anonymously) report any alleged misconduct and irregularities. Reports made using the whistleblower procedures are thoroughly examined, as such reports enable us to maintain the highest standards of business integrity.

2. Objective

2.1. The purpose of this document is to describe how instances of actual or suspected misconduct and irregularities, and indications from whistleblowers are communicated and reported to the Acomomo Board of Directors (hereafter: "Board") by the Acomomo Compliance Officer, in order for the Board to obtain an oversight and to monitor effectiveness thereof. This also includes the examining of procedures on the adequate follow-up of any investigations and recommendations.

3. Guidance & responsibilities

3.1. The Executive members of the Board should monitor the operation of the internal risk management and control systems and should carry out a systematic assessment of their design and effectiveness at least once a year. This monitoring should cover all material control measures relating to strategic, operational, compliance and reporting risks. Attention should be given to observed weaknesses, instances of misconduct and irregularities, indications from whistleblowers, lessons learned and findings from the internal audit function and the external auditor. Where necessary, improvements should be made to internal risk management and control systems.¹

3.2. The Non-Executive members of the Board monitor the operation of the procedure for reporting actual or suspected misconduct or irregularities, appropriate and independent investigations into signs of misconduct or irregularities, and, if an instance of misconduct or irregularity has been discovered, an adequate follow-up of any recommendations for remedial actions. In order to safeguard the independence of the investigation in cases where the Executive Board members themselves are involved, the Non-Executive Board members should have the option of initiating their own investigation into any irregularities that have been discovered and to coordinate this investigation.²

3.3. Article 12 - Complaints, Whistle-Blowers as stated and published in the *Rules of procedure for the Board containing principles for the Acomomo Board*.

- The Board shall ensure that employees have the opportunity, without jeopardizing their legal position, to report alleged irregularities of a general, operational and financial nature within the Company and/or the Group Companies to the Board and/or to the Chair of the Board.
- Alleged irregularities that relate to the functioning of the members of the Board shall be reported to the Chair of the Board.

¹ Dutch Corporate Governance Code, best practice provision 1.2.3.

² Dutch Corporate Governance Code, best practice provision 2.6.4.

- The Board shall ensure that complaints received by the Company in relation to the financial reporting, the internal risk management, control systems and the audit are recorded and dealt with.

4. Communication and reporting

- 4.1. All actual or suspected misconduct or irregularities are reported to the Executive members of the Board and to the Chair of the Board by the Compliance Officer in relation to misconduct or irregularities reported per the Whistle-blower procedures as they occur.
- 4.2. Each reported matter is documented, investigated, responses and measures issued and follow-up of any recommendations are monitored by the Compliance Officer.
- 4.3. On an annual basis, the Acomo Board receives an overview report, which includes the procedures and follow-up responses performed and measures are taken, from the Compliance Officer of all reported matters from the past financial year, which is then subsequently reviewed and discussed at the annual Board meeting. Based on this report, the Board determines whether adequate measures have been taken to strengthen the internal control within the affected operating company and group to prevent the repetition of similar incidents in the future. The Board should take minutes on the conclusions discussed and provide subsequent feedback to the Compliance Officer.