

WHISTLEBLOWING STATEMENT

Article 1: Scope

This whistleblowing statement is applicable within the entire NHV Group NV, a Belgian limited liability company with registered office at Kalkaertstraat 101, 8400 Oostende, Belgium, registered in the Crossroad Bank for Enterprises under number 0544.424.376 and by all affiliated companies of NHV (hereinafter: "NHV").

NHV finds a just culture where people can expose breaches in a safe and transparent way of utmost importance.

As such this whistleblowing statement is established and covers, among other things, who can make a report, what and how you can make a report and how you are protected.

This whistleblowing statement is drafted in accordance with the European Directive 2019/1937 'on the protection of persons who report breaches of Union law' and its transposition into Belgian law.

Article 2: Who can make a report

A whistleblower can be anyone who has obtained information about breaches in a work-related context can make a report. This therefore concerns people who come into contact or have come into contact with NHV in the course of their work, such as current and former staff members, job applicants, trainees, consultants and suppliers, managers, shareholders, suppliers, contractors.

You can make a report anonymously or not. You can also provide witnesses and be assisted by third parties (such as family, colleague, etc.).

Article 3: What can you report

You may report breaches of all regulations and laws such as:

- breaches related to public procurement
- infringements relating to financial services, products and markets (incl. prevention of money laundering and terrorist financing)
- offences against the safety and conformity of products
- infringements against transport safety
- offences against environmental protection
- offences against nuclear safety or security against harmful radiations
- offences against food safety, animal feed and animal welfare
- infringements against public health
- offences against consumer protection
- offences against the protection of privacy and personal data and the security of network and information systems
- offences in the fight against tax fraud

- offences in the fight against social fraud
- offences against the Union's financial interests
- infringements relating to the internal market, including infringements of Union rules on competition and state aid.

An infringement is defined as an act or omission that is unlawful or contrary to the purpose or application of the regulations listed above.

Note: For reports of breaches in the areas of financial services, products and markets and prevention of money laundering and terrorist financing, any person can make a report, regardless of whether the reporter obtained the information in a work-related context.

Article 4: How can you make a report

You can make an internal report within NHV via e-mail on the address ethics@nhv.be.

The external reporting channel is the Flemish Ombuds Service, which works independently of the Flemish government.

As a reporter, you should prefer to use an internal channel if the violation can be dealt with effectively internally. In addition, it is important to note that there is no risk of reprisals. Each channel handles a report strictly neutrally and independently.

However, you can also disclose the information publicly, but you will then only receive protection against reprisals or sanctions under strict conditions. Therefore, use the internal reporting channels as much as possible.

Article 5: How are you protected

With each reporting channel, you can choose whether to disclose your name or not. If you disclose your name, your identity is protected.

Each reporting channel uses systems that protect the confidentiality of your own identity, the identity of others named in the report (such as those involved, witnesses, third parties) and the information that may reveal your identity or the identity of others. The information is only accessible to the reporting handlers at NHV, who must treat your report confidentially.

As a reporter, you are protected against reprisals. Think of negative measures that would be imposed on you as a result of your report. Witnesses and persons who have assisted you in reporting also receive protection if they become the victim of reprisals.

If you disclose information publicly, you only receive protection if you first reported the breach internally or externally and no appropriate action was taken within three months of your report being received. You are also protected if the reported infringement poses an imminent or real danger to the

public interest or if, if reported externally, there is a risk of reprisals or inadequate handling of the infringement.

As a reporter, you must have reasonable grounds to believe that what you are reporting is correct, based on the information available to you at the time of reporting. If you intentionally or knowingly report inaccurate or misleading information, you will enjoy no protection and risk a sanction.

Article 6: How is the report dealt with

Within seven days of the day on which the reporting channel received and registered your report, you will receive a receipt notification, unless the report has already been dealt with in the meantime or if your identity would no longer be protected by receiving a receipt notification. You can also indicate in your report that you do not want to receive a receipt notification.

The reporting channel stores the following data: the name, contact details and position of the reporter, the name and position of the person involved, the breach by the person involved, the name of witnesses, written reports and the recording or written record of oral reports. The name of any third parties is also kept if they too may become victims of retaliation.

The reporting channel investigates the information you have provided. If a breach is found, action is also taken.

Within a reasonable time, you will receive information about what happened to your report. This period is three months if you have received a notification of receipt and three months and seven days if no notification of receipt has been sent. You will be informed which measures have been or will be taken and the reasons for these measures.

The Flemish Ombuds Service has a maximum of six months to respond to your report.

Article 7: Questions

If you have any questions on the whistleblowing statement, please reach out to ethics@nhv.be. NHV is happy to assist.