

## LANSWEEPER GENERAL WHISTLEBLOWING POLICY

### I. Introduction

This General Whistleblowing Policy (hereinafter "**Policy**") applies to Lansweeper<sup>1</sup> (hereinafter "**LANSWEEPER**" or "**We**").

LANSWEEPER considers integrity to be one of the cornerstones of its DNA. For this reason, LANSWEEPER has established a whistleblowing mechanism that allows both employees and external parties to report any violation of internal policies and procedures, unethical behaviour, fraud, poor quality and other violations of laws in accordance with article III of this Policy and regulations in a confidential manner.

This Policy is in line with EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting on breaches of Union law (hereinafter the "**Directive**"), the Belgian law transposing this Directive of 28 November 2022 on the protection of reporting persons of breaches of Union or national law adopted within a legal entity in the private sector (Belgian *Official Gazette* of 15 December 2022), as well as the Spanish Act 2/2023 on the protection of persons who report regulatory breaches and anti-corruption measures.

### II. Personal and territorial scope

This Policy applies to all whistleblowers, which are natural persons who have a working relationship with LANSWEEPER, (hereinafter the "**Whistleblower**" or "**You**") including:

1. Employees;
2. Other non-salaried employees;
3. Legal representation of the employees;
4. Temporary workers such as contractors;
5. (Un)paid volunteers or interns;
6. Persons who provide services to the self-employed, such as external consultants;
7. Shareholders;
8. Suppliers.

This Policy also applies to persons who have a professional relationship with LANSWEEPER outside of the European Economic Area.

This Policy also applies to persons whose working relationship has ended or is about to begin, if they have obtained information about incidents during or after the termination of the working relationship or during the recruitment process or other pre-contractual negotiations.

### III. What can be reported?

The following topics are covered by this Policy and form the content of reports (hereinafter "**Report**"):

1. Alleged violations of statements or procedures communicated by us, including unethical conduct, poor quality performance, incompetence and professional misconduct;
2. Alleged bullying, harassment, discrimination or substance abuse;
3. Alleged criminal offences, including theft, social fraud, tax fraud or other types of fraud;
4. Alleged failures to comply with legal obligations such as failures in product safety;
5. Alleged breaches of privacy and personal data protection;
6. Alleged deficiencies in the security of our network and information systems;

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<sup>1</sup> Lansweeper NV, a limited liability company existing under Belgian laws with registered office at Fraterstraat 212, 9820 Merelbeke and registered in the Crossroads Bank for Enterprises under company number 0538.668.417 and its affiliates.

7. Attempts to suppress or conceal information related to any of the above.

LANSWEEPER wishes to remind the Whistleblower that the following areas are excluded from the scope of the Directive and Belgian law on Whistleblowing and cannot be subject to a Report: national security, classified data, information covered by medical confidentiality, information between a lawyer and his client, as well as the confidentiality of judicial deliberations.

#### IV. Protection of the Whistleblower

At LANSWEEPER, We are aware that you may be concerned about the potential implications and retaliation following a Report. This protection aims to shield you as a Whistleblower from potential retaliation, including harassment, threats, discrimination, intimidation, withholding of pay, demotion, or termination.

LANSWEEPER has therefore created this publicly available Policy to ensure, in all transparency, that a framework exists within which Whistleblowers, including employees, can submit a Report and voice their concerns without fear of retaliation.

Yet, it is important that you do not discuss your concerns with anyone involved in the incident or disclose your suspicions to anyone other than the person from whom you sought confidential advice.

No Whistleblower who reports an incident can be penalized or subject to a discriminatory action because he or she has made a Report in good faith through this Policy. After all, the law prohibits any form of retaliation or unfavorable treatment against the Whistleblower as long as his report meets the aforementioned conditions.

The conditions are:

- LANSWEEPER does not allow retaliation against those who report a violation or suspected violation of the policies or procedures in good faith.
- If you file a Report and it is later found that you have made a mistake or if there is a valid explanation for your concern, you will not be punished or discriminated against.

#### V. Submittal of the reports

You are strongly encouraged to report your concerns through internal channels if you become aware of a violation of laws, regulations, or internal policies and procedures, in accordance with the procedure as written out in the subsequent articles of this Policy.

As a Whistleblower, you can submit either an internal or an external report. If you communicate information in writing or orally about a breach within LANSWEEPER, then it is an internal report.

You can also opt for an external report by publishing via a blog or via a journalist if appropriate measures have not been taken within a reasonable period of time or if the infringement may be addressed to a compromised recipient, an imminent or real danger to the public interest or if there is a risk of retaliation or if the infringement is unlikely to be effectively remedied.

#### VI. Internal reporting channels

LANSWEEPER has several whistleblowing reporting channels that are accessible to internal and external whistleblowers.

Reports can be submitted via:

1. You can submit a **report** via our specific contact form on the [www.lansweeper.com/whistleblowing](http://www.lansweeper.com/whistleblowing) website;
2. You can send an **e-mail** stating "Whistleblowing" to: [whistleblowing@lansweeper.com](mailto:whistleblowing@lansweeper.com);

3. For Whistleblowers who want to report incidents dealing with Spanish entity a third option is available via the procedure as set out in Annex I: Spain.

## VII. Content of the Report

The Report should include the following information:

1. Your name and relationship with LANSWEEPER and optionally your contact details;
2. Your role or involvement in the incident mentioned in the Report;
3. A detailed description of the incident you wish to report, along with the time, date and location;
4. The name and contact details of other persons who witnessed or have more information about the incident;
5. Any information you may have about similar previous incidents involving the person or persons named in your Report;
6. Any evidence or useful documents you have in connection with the Report.

## VIII. Confidentiality of the Report

If you raise an issue, the confidentiality of your identity is guaranteed in accordance with the Directive, the national laws and other applicable (inter)national regulations.

Your identity will not be disclosed to persons other than those authorized to receive or follow up on reports without your explicit consent. This also applies to all other information from which your identity can be (in)directly derived.

Your identity may be disclosed in the event of a necessary and proportionate obligation imposed by EU or national law in the context of investigations by national authorities or judicial proceedings. Among other things, to protect the rights of the defence of the data subject.

## IX. Receipt of the Report

Reports will be received and will be handled by the designated reporting administrator(s) (hereinafter "**Reporting Administrator**") for the follow-up of Reports by Whistleblowers, being only specifically mandated person(s) within the Legal Department followed by specifically mandated person(s) within the HR department in case of a conflict of interests by the former department in relation to the submitted Report.

If, due to the nature of the Report, the Reporting Administrator cannot fully guarantee impartiality, another reporting administrator will be appointed.

Upon receipt of the Report, the Reporting Administrator shall verify that the Report falls within the scope of the whistleblowing scheme.

Within 7 calendar days of receipt of the Report, the Whistleblower will be informed by the Reporting Administrator whether the Report has been accepted or denied for follow-up.

This feedback is not possible when it concerns an anonymous report made via a telephone conversation or via a written communication.

In order to be subject to this Policy, LANSWEEPER and the Whistleblower both need to have reasonable grounds to believe that the information reported is true at the time of the Report and that it has followed the procedure provided for in this Policy. Finally, the Whistleblower must have obtained the information on which the Report is based in a professional context.

If the report does not fall within its scope, it will be rejected and the whistleblower will be asked to contact the external public authorities in accordance with Article XII of this Statement.

## **X. Investigation of the Report**

After acceptance of the Report, the Reporting Administrator will start an investigation into the content of the Report. The Whistleblower has the right to be informed of the status of the investigation. Within three months of the receipt of the Report, the Reporting Administrator shall inform the Whistleblower on the present state of affairs of the investigation. However, the Reporting Administrator is not obligated to share the content of the investigation.

As required by the Directive, LANSWEEPER is obliged to give the persons named in the report the opportunity to be heard in due course to explain their side of the facts, taking into account the confidentiality of the report and where this does not harm the investigation.

## **XI. Termination of the investigation**

When the investigation is completed, the Whistleblower will be informed of the outcome.

However, if the Reporting Administrator is not a party to the case, the Reporting Administrator is not entitled to detailed information on how LANSWEEPER handles the report. As required by the Directive, LANSWEEPER is obliged to inform the persons named in the Report in due course of the termination of the investigation, taking into account the anonymity and confidentiality of the report.

## **XII. External reporting channels**

Finally, in accordance with the Directive, the Belgian state is obliged to designate the authorities competent to receive external reports, give feedback and follow up, and to provide them with sufficient resources.

You can also opt for an external report by publishing via a blog or via a journalist if appropriate measures have not been taken within a reasonable period of time or if the infringement may be an imminent or real danger to the public interest or if there is a risk of retaliation or if the infringement is unlikely to be effectively remedied.

## **XIII. Annex I: Lansweeper Belgium**

The following bodies were designated to receive external reports on private sector breaches, each for their own domain.

1. the Federal Public Service Economy, SMEs, Self-employed and Energy;
2. the Federal Public Service Finance;
3. the Federal Public Service Health, Food Chain Safety and Environment;
4. the Federal Public Service Mobility and Transport;
5. the Federal Public Service Employment, Labor and Social Dialogue;
6. the Public Service Social Integration, Poverty Reduction, Social Economy and Urban Policy Programming
7. the Federal Agency for Nuclear Control;
8. the Federal Agency for Medicines and Health Products;
9. the Federal Agency for the Safety of the Food Chain;
10. the Belgian Competition Authority;
11. the Data Protection Authority;
12. the Financial Services and Markets Authority;
13. the National Bank of Belgium;
14. the Supervisory Board of auditors;
15. the authorities reported in Article 85 of the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash;
16. the National Committee for the Security of the Supply and Distribution of Drinking Water;
17. the Belgian Institute for Postal Services and Telecommunications;
18. the National Institute for Health and Disability Insurance;

19. the National Institute for the Social Insurance of the Self-Employed;
20. the National Employment Office;
21. the National Social Security Office;
22. the Social Intelligence and Investigation Service;
23. the Autonomous Anti-Fraud Coordination Service (CAF).

#### XIV. Annex II: Lansweeper Spain

The following deviations from the General Whistleblowing Policy are applicable to the Spanish affiliate of LANSWEEPER, namely Lansweeper Spain, having its registered office at Doctor Jiménez Díaz Avenue, nº 19, 1st floor, box-3, 03600, Alicante, Spain and registered at the Tax Agency Administration with the number CIF B-42629949.

1. The information received will be deleted if no investigation has been initiated within three months of receipt unless it is kept to demonstrate the functioning of the system. In such case, the information will be kept anonymised, and such personal data will be stored in a "blocked" manner, according to Article 32 of the Spanish Data Protection Act.

2. In accordance with the Directive, the Spanish state is obliged to designate the authorities competent to receive external reports, give feedback and follow up, and to provide them with sufficient resources. The following bodies were designated to receive external reports on private sector breaches, each for their own domain.

- the Federal Public Service Economy, SMEs, Self-employed and Energy;
- the Federal Public Service Finance;
- the Federal Public Service Health, Food Chain Safety and Environment;
- the Federal Public Service Mobility and Transport;
- the Federal Public Service Employment, Labour and Social Dialogue;
- the Public Service Social Integration, Poverty Reduction, Social Economy and Urban Policy Programming
- the Federal Agency for Nuclear Control;
- the Federal Agency for Medicines and Health Products;
- the Federal Agency for the Safety of the Food Chain;
- the Spanish Competition Authority;
- the Spanish Data Protection Authority;
- the Financial Services and Markets Authority;
- the National Bank of Spain;
- the Supervisory Board of auditors;
- the authorities reported in Article 85 of the Law of 18 September 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash;
- the National Committee for the Security of the Supply and Distribution of Drinking Water;
- the Spanish Institute for Postal Services and Telecommunications;
- the National Institute for Health and Disability Insurance;
- the National Institute for the Social Insurance of the Self-Employed;
- the National Employment Office;
- the National Social Security Office;
- the Social Intelligence and Investigation Service;
- the Autonomous Anti-Fraud Coordination Service.

3. Once the information is received, receipt will be acknowledged within a period of no more than 5 business days from said receipt.

4. You can submit a report:

1. via our **specific contact form** on the [www.lansweeper.com/whistleblowing](http://www.lansweeper.com/whistleblowing) website;
2. You can send an **e-mail** stating "Whistleblowing" to: [whistleblowing@lansweeper.com](mailto:whistleblowing@lansweeper.com);
3. You can call us by **phone** on the following phone number: +34 633 51 47 04.