

Capelle a/d IJssel, February 2021

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WHISTLEBLOWING REGULATION – DEALING WITH A SUSPICION OF MISCONDUCT

Chapter 1. Definitions

Article 1

In these regulations the following terms have the following meanings:

- *the employee*: a person who may or may not be employed for the benefit of the company and its group companies.
- *the company*: the limited liability company GeoJunxion N.V.
- *the chairman of the Board of Directors*: the chairman of the Board of Directors of the company.
- *the chairman of the Supervisory Board*: the chairman of the Supervisory Board of the company.
- *the manager*: the person who directly supervises the employee.
- *the person of confidence*: the person designated by the chairman of the Board of Management to act as such for the company and its group companies.
- *a suspicion of misconduct*: a suspicion based on reasonable grounds relating to the company, in connection with:
 - a. an (imminent) criminal offense.
 - b. an (imminent) violation of laws and regulations.
 - c. a (threat of) deliberate incorrect information to public bodies.
 - d. a violation of the rules of conduct applicable within the company; or
 - e. (a threat of) knowingly withholding, destroying, or manipulating information about these facts.



Chapter 2. Procedure

Article 2

- 2.1 Unless there is an exception prohibition as referred to in Article 4 paragraph 2, the employee reports a suspicion of abuse internally to his supervisor or, if he does not consider reporting to his supervisor desirable, to the confidential advisor. Reporting to the confidential advisor can also take place in addition to reporting to his superior.
- 2.2 If requested, the manager or the confidential adviser will record the report in writing, together with the date on which it was received, and have the employee sign this record for approval, who will receive a copy of it. The manager or the confidential adviser will ensure that the chairman of the Board of Directors is immediately informed of a reported suspicion of misconduct and of the date on which the report was received and that the chairman of the Board of Directors has a copy. of the commitment.
- 2.3 The chairman of the Executive Board sends a confirmation of receipt to the employee who has reported a suspicion of abuse. The acknowledgment of receipt refers to the original notification. This also applies if the employee has not reported the suspicion to his supervisor but to the confidential adviser.
- 2.4 Immediately after reporting a suspicion of abuse, the Board of Management will start an investigation.
- 2.5 The employee who reports the suspicion of an abuse and the person to whom the suspicion of the abuse has been reported will treat the report confidentially. No information will be provided to third parties within or outside the company and its group companies without the permission of the chairman of the Executive Board. When providing information, the name of the employee will not be mentioned, and the information will also be provided in such a way that the employee's anonymity is guaranteed as far as possible.

Article 3

- 3.1 Within a period of eight weeks from the moment of the internal report, the employee will be informed in writing by or on behalf of the chairman of the Board of Directors, of the position of the Board of Directors, regarding the reported suspicion of misconduct. It also indicates which steps the report has led to.
- 3.2 If the position cannot be given within eight weeks, the employee will be informed of this by or on behalf of the chairman of the Executive Board and indicated within which period he can expect a position.



Chapter 3. Report to the chairman of the Supervisory Board

Article 4

- 4.1 The employee can report the suspicion of malpractice to the chairman of the Supervisory Board if:
- a. he does not agree with the position referred to in Article 3.
 - b. he has not received a position within the required period, as referred to in the first and second paragraphs of Article 3.
 - c. the term referred to in the second paragraph of Article 3 is unreasonably long in view of all circumstances and the employee has objected to this to the chairman of the Board of Management, but the latter has not indicated a shorter reasonable term.
 - d. the suspicion of misconduct concerns a director of the company, or
 - e. there is an exception as referred to in the following paragraph.
- 4.2 An exception as referred to in the previous paragraph about e occurs if there is.
- a. a situation in which the employee can reasonably fear countermeasures as a result of an internal report.
 - b. an earlier internal report in accordance with the procedure of essentially the same abuse, which has not removed that abuse.
- 4.3 The chairman of the Supervisory Board shall, on request, record the notification in writing, together with the date on which it was received, and have the employee signed this record for approval, who will receive a copy thereof.
- 4.4 The chairman of the Supervisory Board will send a confirmation of receipt to the employee who has reported a suspicion of abuse. If the employee has previously reported the suspected abuse, the confirmation of receipt will refer to the original report.
- 4.5 An investigation will be started immediately following the report of a suspicion of abuse.
- 4.6 The employee who reports the suspicion of abuse and the person to whom the suspicion of abuse has been reported will treat the report confidentially. No information will be provided to third parties within or outside the company and its group companies without the permission of the chairman of the Supervisory Board. When providing information, the name of the employee will not be mentioned, and the information will also be provided in such a way that the anonymity of the employee is guaranteed as far as possible.

Article 5

- 5.1 Binnen een periode van acht weken vanaf het moment van de interne melding wordt de werknemer door of namens de voorzitter van de Raad van Commissarissen schriftelijk



op de hoogte gebracht van een inhoudelijk standpunt omtrent het gemeld vermoeden van een misstand. Daarbij wordt aangegeven tot welke stappen de melding heeft geleid.

- 5.2 Indien het standpunt niet binnen acht weken kan worden gegeven, wordt de medewerker door of namens de voorzitter van de Raad van Commissarissen hiervan in kennis gesteld en aangegeven binnen welke termijn hij een standpunt tegemoet kan zien.

Chapter 4. Legal Protection

Article 6

An employee who, with due observance of the provisions in these regulations, has reported a suspected abuse in good faith, will in no way disadvantage his position because of reporting it.

Chapter 5. Enactment

Article 7

This regulation has been in effect since April 2010.
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