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Whistleblower policy

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1 Context

The Act concerning the reporting channels and the protection of persons reporting integrity violations in the federal public authorities and in the integrated police (hereinafter the 'Act') was adopted on 8 December 2022 and came into force on 2 January 2023.

The Act provides for the transposition of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law in relation to federal public authorities and the integrated police.

It aims to provide a high level of protection to persons reporting integrity violations in the federal public authorities and the integrated police.

skeyes, as an autonomous public company, implements a policy for the management and follow-up of reports of integrity violations (hereinafter the 'Policy'). To fulfil its obligations, skeyes designates a responsible person within its teams and establishes a reporting procedure.

2 I want to report a concern

2.1 Who can report a concern?

This procedure applies to anyone who has acquired information about breaches in a work-related context involving skeyes: employees, contractors, subcontractors, suppliers, shareholders, trainees, managers, etc.

2.2 What types of violations can be expressed?

Concerns about:

- a possible breach of laws and regulations;
- a possible breach of the Code of Conduct and other skeyes policies;
- issues that may affect the public interest;
- issues that may affect an entity of skeyes.

2.3 How do I report an integrity violation?

skeyes provides both an internal and an external reporting channel.

We strongly recommend reporting through the internal reporting channel first, before reporting through the external reporting channel. By reporting through the internal reporting channel, the problem can be effectively addressed internally by the person responsible for following up on reports, allowing skeyes to take immediate action.

2.4 How to file an internal report?

Anyone with information about an integrity violation as defined in this document can report it.

The report can be filed¹:

¹ In application of article 7 of the RD 20 October 2023 (Belgian Official Gazette, 27 October 2023).

- via the external electronic reporting point <https://whistleblowersoftware.com/secure/skeyes>



- by e-mail to the following address: alerts@skeyes.be;
- by phone to the person responsible for following up on the report: 02.206.20.66 or 0478.52.00.54
- by appointment with the person responsible for following up on reports. That request can be made by e-mail or telephone;
- by letter addressed to the person responsible for following up on reports: Prevention advisor, skeyes, Tervuursesteenweg 303, 1820 Steenokkerzeel.

2.5 Handling of the report

The person responsible for following up on the report sends an acknowledgement of receipt of the report to the person reporting, within seven days of such receipt.

He carefully follows up on all reports (including anonymous reports), maintains communication with the person reporting, asks for further information if necessary and provides feedback.

Feedback is given within a reasonable period of not more than three months after the acknowledgement of receipt of the report or, if no acknowledgement of receipt was sent to the person reporting, three months after the expiry of the seven-day period following the report.

The report can also be made anonymously.

2.6 Analysis of the report

The person responsible for following up on the report analyses its admissibility with the support of the Integrity Committee, consisting of the following people:

- Chief Compliance Officer or his replacement;
- Legal Senior Advisor or his replacement;
- HR Director or his replacement.

In the case of inadmissibility, the person responsible for follow-up notifies the person reporting accordingly and gives reasons for the decision.

In the case of admissibility, the person responsible for follow-up establishes an investigation cell to fully analyse the report. The members of the cell are chosen according to the content of the report.

2.7 External reporting channel

The whistleblower can submit the report to the competent authority (the Federal Ombudsman: www.federaalombudsman.be) through the external channel.

3 Obligation of confidentiality

If you raise a concern, the confidentiality of your identity as a whistleblower will be ensured in accordance with applicable laws and regulations. Your identity will not be disclosed to anyone other than those authorised to receive or follow up on reports without your explicit consent. This also applies to any other information from which your identity can be (in)directly deduced. Only if there is a necessary and proportionate obligation imposed by EU or

national law in the context of investigations by national authorities or judicial proceedings, may your identity be disclosed, including for the purpose of protecting the rights of defence of the person involved.

4 You can remain anonymous

You can file a report anonymously. This means that even the recipient of the concern will not know your identity. Therefore, you can also submit your concern by letter. We urge you to mark CONFIDENTIAL on the envelope so that your letter follows the process for confidential mail by our internal postal services. skeyes recommends that you disclose your identity when reporting a concern. That way, we know whom we need to protect (you) and to whom we can turn for additional information so that no one is falsely accused based on false information. An anonymous report will only be considered valid if it contains sufficient factual elements to allow an investigation of the facts. Therefore, please include as many details as possible to limit difficulties in the investigation and follow-up of an anonymous report.

5 Protection of the whistleblower

In accordance with applicable laws and regulations, no staff member who reports an incident may be penalised or be the subject of any discriminatory action because he or she selflessly and in good faith reported an alert through the whistleblowing mechanism. skeyes does not permit any retaliation against those who in good faith report a breach or suspected breach of the rules or guidelines. If you report a concern and it turns out that you were genuinely mistaken or there is an innocent explanation for your concern, you will not be penalised or discriminated against.

This insurance does not apply to those who maliciously file a report to a case that is false.