

Speak Up Policy

Versuni is committed to conducting business with integrity and fairness and in compliance with the laws. Our Code of Business Conduct ("CBC") provides the solid foundation to establish and secure our trustworthiness as an employer, supplier, business partner and partner in society. The CBC sets the standard for acting with integrity at Versuni and governs our decisions and actions.

Anyone who wishes to raise a concern about possible misconduct within Versuni, is advised to read this Policy.

1. Why is Speaking Up important?

In spite of Versuni's integrity commitment, you may one day observe conduct that concerns you, or that seems to violate our Code of Business Conduct and/or its policies. If you observe or suspect such misconduct, you are encouraged to speak up. By doing so, you give our organization the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and undermine trust, while internally reporting possible misconduct allows the organization to address and resolve the issue, ideally before it becomes a violation of law or a risk to health, security or safety.

Versuni truly values the help of employees who identify and speak up about potential concerns that need to be addressed. Speaking up is encouraged and employees who speak up are protected. You will not suffer for raising concerns in good faith about suspected misconduct, and we do not tolerate any form of retaliation against you for speaking up. After all: speaking up is essential for keeping up with our commitment, to sustain our reputation, success and ability to operate – both now and in the future.

2. What is the Purpose of this Policy?

The purpose of this policy is to explain how you can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what you can expect from the organization if you speak up.

This policy intends to help you through the process of reporting a concern. It describes the process of filing a report, what information should be included and what happens after you have filed it. It also explains the process of the subsequent investigation.

We realize that an investigation process, whether you are the reporter, the subject or otherwise involved, can make you feel uneasy or worried. The information set out in this policy aims to take away any uncertainty around the process.

3. What should be reported?

You are encouraged to report any suspected violation of the CBC or any of the underlying policies ("a concern"). Examples of concerns that can be raised using this Speak Up Policy are:

Fraud	Conflict of interests
Human rights violations	Environmental, health and safety issues
Discrimination or harassment	Improper use of company resources
Violation of competition laws and rules	Disclosure of confidential information
Violation of sanction laws	Violation of any of our (other) policies
Violation of privacy or data protection laws	Theft
Bribery	Encouraging others to engage in any of these
Inadequate financial or non-financial recordkeeping	Retaliation against anyone for speaking up in good faith

Do not speak up by making accusations which you know are false. Doing so may lead to disciplinary measures against you.

4. How to Speak Up?

By speaking up internally, you give Versuni the chance to investigate the matter in line with this policy and to address and resolve the issue by taking corrective action as deemed appropriate or necessary by Versuni. Doing so allows the organization to address and resolve the issue, ideally before the situation becomes any worse. In this way we can truly improve our organization together.

You can speak up via any of the methods below.

4.1 Discuss

If you suspect misconduct, you are encouraged to address this directly with the person involved. If this would not be appropriate, you are encouraged to discuss it with your line manager first, or alternatively with your HR business partner or legal counsel.

If you are in doubt if your concern would qualify as a violation of the CBC, you can also contact your HR business partner or legal counsel.

4.2 Report a concern in the online Speak Up portal

You can also report your concern by using our online Speak Up portal (<https://versuni.integrityline.com>). You can do so in a confidential manner and, in many cases, in your own language. The online Speak Up portal is available 24/7, 365 days a year.

After you complete your online report in the Speak Up portal, you will receive unique login details to allow you to access the website to check progress on your report. You can see whether the expert assessing your report has feedback for you or further questions. You are encouraged to provide additional information, if so requested, as this may facilitate the assessment.

If you choose to remain anonymous, it is particularly important to retain and use your login in details and visit the Speak Up portal regularly, as we can only contact you through the portal in that case. Note that a comprehensive assessment of the reported concern may be more difficult when a concern is filed anonymously.

All reports received via the Speak Up portal are routed back to Versuni (through Group Legal - Corporate & Compliance and/or Group HR) for further handling.

Nothing in this policy is intended to prevent you from contacting or cooperating with any public authority in line with applicable rules and regulations.

4.3 Report a concern via regular mail

If you do not have access to the Speak Up portal, you can submit a concern via regular mail to the Secretary of the Ethics and Compliance Committee (Claude Debussylaan 88, 1082 MD Amsterdam, The Netherlands).

If the concern is about a member of the Executive Leadership Team, you may also submit your concern via regular mail to the Chairman of the Board (Claude Debussylaan 88, 1082 MD Amsterdam, The Netherlands).

5. What kind of information do you need to provide with your concern?

When you report a concern (in person, online or via regular mail), please provide as much detailed information as you can to enable Versuni to assess and investigate your concern, such as:

- The background, history and reason for the concern
- Names, dates, places and other relevant information
- Any documents that may support your report

For Versuni to properly respond to or investigate a concern, you are expected to disclose all relevant information known to you. A reported concern can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

6. What should you do if you do not have all the facts or information available?

We encourage you to speak up as soon as possible, ideally before situations get out of hand or damage is done. It is always better to discuss upfront than to report afterwards. If you know about or suspect misconduct, speak up with the facts that you have. We do not expect you to have all the answers and you are certainly not expected to prove that your concern is well founded. Let our experts look into the matter to determine if there is a reason for concern. Never investigate the matter yourself and do not seek evidence to build a strong case. We guarantee that no disciplinary measures will be taken against you if your genuine concern later turns out to be mistaken or misguided.

7. Safeguarding your position

7.1 Confidentiality

Any information about the reported concern, including the identity of those involved in an investigation, shall only be disclosed to a limited number of people on a strict need to know basis. These are representatives of Group Legal, Group HR and other functions as relevant to the particular concern. In some cases also external legal counsels and forensic auditors may become involved in the assessment or investigations.

Information will only be disclosed outside this small group if required to do so by law or an important public interest is at stake. Generally, we are obliged to inform the implicated person that a concern has been filed against him/her, but your identity will not be disclosed.

Recording of any disciplinary measures against an employee resulting from a reported concern shall be done in compliance with the internal procedures that Versuni maintains in relation to personnel records.

7.2 Non-retaliation

Rest assured that you will not suffer for raising concerns in good faith about suspected misconduct. Any form of threat or retaliation will not be tolerated. Retaliation against reporters is treated as a violation of our Code of Business Conduct and consequently may lead to disciplinary measures.

Your right to protection from retaliation does not automatically give you immunity in respect of any association or participation in the matters that are the subject of the concern or an ensuing investigation or judicial proceedings.

If you have reasonable grounds to fear that the reporting of a concern will lead to repercussions, you can inform your legal counsel or the Secretary of the Ethics and Compliance Committee of this in writing (Claude Debussylaan 88, 1082 MD Amsterdam, The Netherlands).

You will not be protected, however, if you maliciously raise a concern that you know is false. This may result in disciplinary measures taken against you.

8. What happens next?

8.1 Investigation

After a concern has been reported, you will receive a confirmation of receipt. Your report will undergo an initial review, and if necessary, it will be appropriately investigated. On average, investigating a reported concern can be expected to take up to 4 months. You will be informed once the investigation on your reported matter is completed. Please note that we will not be able to give you details of the outcome of the investigation (or related actions taken) for reasons of confidentiality, privacy and the legal rights of all concerned.

Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis with internal and external experts (auditors and legal counsels).

The Ethics and Compliance Committee is responsible for overseeing that the investigation:

- is conducted in an independent, fair and unbiased manner towards all parties involved;
- focuses on fact-finding;
- is conducted with due observance of national and international legislation and any applicable regulations.

8.2 Purpose

The purpose of an investigation is determining, through fact finding, if the reported behavior took place and if that behavior constitutes a violation of the CBC or any of its policies.

Details of the case, your identity and the identity of anyone else mentioned in the report, are kept confidential throughout and after the investigation and are only shared on a need-to-know basis.

8.3 Process

If you believe that your reported concern was not handled in accordance with this Speak Up Policy, you can inform the Secretary of the Ethics and Compliance Committee in writing (Claude Debussylaan 88, 1082 MD Amsterdam, The Netherlands) or via email (leonie.starmans@versuni.com) within 4 weeks after the date you were informed that the investigation was completed.

The Secretary of the Ethics and Compliance Committee, or someone assigned by the Secretary, will assess your message and provide you with the outcome of that assessment.

9. Questions

For any questions about any of the matters set out in this Speak Up Policy, you can contact your legal counsel or Group Legal Corporate & Compliance.

Version history

Version	Date	Comments
V1	December 2021	First Edition
V1.1	February 2023	Adoption of Versuni naming and business structure, and minor other updates
V1.2	March 2023	Update to Speak Up portal link

This policy is an integral part of the Code of Business Conduct

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