

### Whistleblower policy

Van Loon Group strives for a corporate culture in which misconduct is prevented and measures are taken to minimize the likelihood of incidents and reduce risks. We believe it is important that employees can report any suspicions of misconduct within the company in an adequate and safe manner. To provide employees with this opportunity, we have established the whistleblower policy.

Below you can read about the whistleblower policy as it applies within Van Loon Group. This concerns the reporting of misconduct and the regulations in force regarding this. We refer to the Whistleblower Protection Act.

The following abuses and/or irregularities, among others, fall under this whistleblower scheme:

- Failure to comply with laws and regulations;
- Consumer food safety is at stake;
- The general safety of persons is at stake;
- Human rights in the broadest sense;
- Product integrity is at stake: products do not comply with what is claimed on the packaging or what is communicated to customers;

An imminent danger to the proper functioning of the organization as a result of negligence or improper conduct.

Please note: you are required to report situations that violate our product integrity rules.

### Confidentiality and anonymity

All reports are treated confidentially. If you report a violation to the external confidential advisor or the product integrity officer, your identity will be known to them. The external confidential advisor or product integrity officer may not disclose your identity without your permission, except in the following cases:

- in the event of a statutory obligation to that effect;
- in the event that the report was not made in good faith;
- if this is required in the interest of a compelling public interest.

If the fact that not disclosing the identity of the reporting party hinders or complicates the investigation, or constitutes an obstacle to taking appropriate measures, the reporting party will be requested to consent to the disclosure of their identity. In the event that the identity of the reporting party is disclosed, the relevant information will only be entrusted to the persons who require this information to assess the report.

### Internal whistleblower scheme

You can report alleged misconduct to your direct supervisor. This supervisor must take appropriate action in response.

If, for whatever reason, it is not reasonably possible or appropriate to inform the supervisor, you have the option to contact the external party directly.

to report to the confidential advisor, the product integrity officer or the Group Executive Board.

The Group Management has authorized and obligated the designated external confidential counsellor and product integrity officer to investigate any complaint and to take appropriate measures in such a manner as they deem prudent.

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All reports to the Product Integrity Officer are recorded using a reporting form and verified and evaluated annually during the management reviews.

### What can you report where?

#### - Product Integrity Officer

You can approach this person regarding misconduct and/or irregularities concerning product integrity or food safety, and when you do not deem it desirable to report the matter to your line manager(s).

#### - External Confidential Advisor

Within the organization, two external confidential counsellors have been appointed whom you, as an employee, can turn to to discuss a concern or an infringement (or a reasonable suspicion thereof) 'without mentioning names'. You can contact the external Approach confidential counsellors regarding misconduct and/or irregularities concerning employee behavior. For a number of specific forms of unwanted behavior, there is also a Procedure on Unwanted Behavior regarding (sexual) harassment, aggressive and violent behavior.

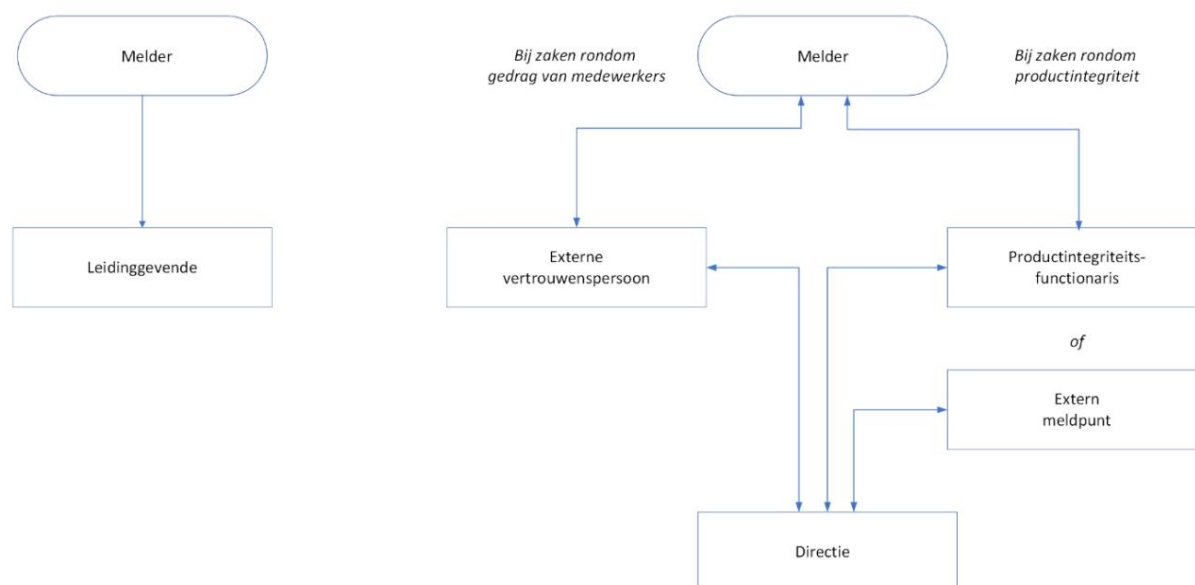
#### - Joint Works Council:

General points regarding company policy.

### External whistleblower scheme

In addition to the above arrangement, the Group Management also offers employees the opportunity to report misconduct to an external, independent reporting point. If desired, this can be done anonymously. Reports will be investigated by this reporting point and forwarded directly to the Group Management of Van Loon Group. Feedback can be provided on the report, which the reporter can request anonymously from the reporting point.

The reporting and processing structure is as follows:



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**Report and response**

The contact details of the external confidential counsellor, product integrity officer, Works Council members, and the external reporting point can be found on the Intranet, the notice boards, QR boards at your location, and are available upon request from HR.

You can report a violation (or a reasonable suspicion thereof) to the external confidential counsellor by telephone or email, and to the product integrity officer in person, in writing, by telephone, or by email.

You also have the option to consult an advisor in confidence regarding a suspected wrongdoing.

Try to make the information you provide as detailed as possible for the recipient to assess the case. Consider the background, history, and reason for your concern, as well as names, dates, locations, and other information.

The external confidential counsellor and the product integrity officer confirm receipt of a report. They send a concise report (reporting form) of the report to the reporter within 7 working days.

The external confidential counsellor or the product integrity officer sends the notification form with their assessment of the case to the Group Management within 3 weeks.

The Group Management will immediately commence the assessment and investigation into the reported violation. Within a period of 8 weeks after the submission of the report, the whistleblower will be informed in writing of the status of the reported violation by those to whom the report was initially made.

**Preventing punitive measures or unfair treatment**

Punitive measures or unfair treatment resulting from concerns expressed in good faith are not tolerated by Van Loon Group. Employees who report a violation will be protected and will under no circumstances be disadvantaged as a result of their report. If the whistleblower is punished or treated unfairly by a specific person, this will have consequences for that person.

**Abuse of the whistleblower scheme**

Van Loon Group assumes that employees will express their concerns in good faith.

If the investigation fails to confirm certain concerns or if they prove to be unfounded, no measures will be taken against employees who have expressed their concerns in good faith.

Only if employees intentionally submit reports that they know, or are deemed to know, to be incorrect can this have consequences for the employee concerned.

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### Implementation

The Group Management is responsible for:

- the implementation of the whistleblower scheme by means of mandatory training in Learn-it;
- the effective communication of this to all employees by including this document in the employee handbook;
- creating the conditions necessary for a situation in which nothing reasonably stands in the way of an employee reporting misconduct or violations (or a reasonable suspicion thereof).

The Location Managers will take at least the following actions:

- inform all employees about the existence of the procedure (including the content of the procedure, relevant names and addresses, telephone numbers and email addresses);
- appoint one or more confidential advisor(s) and product integrity officer(s) within the organization;
- the confidential advisor(s), product integrity officer(s) and the provided management with the appropriate instructions for the correct execution of the procedure.

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