

CORDSTRAP

WHISTLEBLOWER POLICY

INTRODUCTION

At Cordstrap we have the passion to protect. To support this mission, Cordstrap has developed a Whistleblower Policy which defines what Cordstrap believes is the right way to do business. The purpose of this Whistleblower Policy is to encourage employees and others to make good faith reports of possible wrongdoing in the context of work-related activities that is/seems unethical, illegal or goes against the values of Cordstrap's Code of Conduct. As a Dutch company, Cordstrap falls under the European Union and its legislation. This Whistleblower Policy therefore incorporates those regulations. In the paragraphs below we explain how the Whistleblower Policy works in practice and how you can speak up. Please take note that this Whistleblower policy is applicable to all entities within the Cordstrap Group and all Cordstrap employees, also if you live outside the European Union.

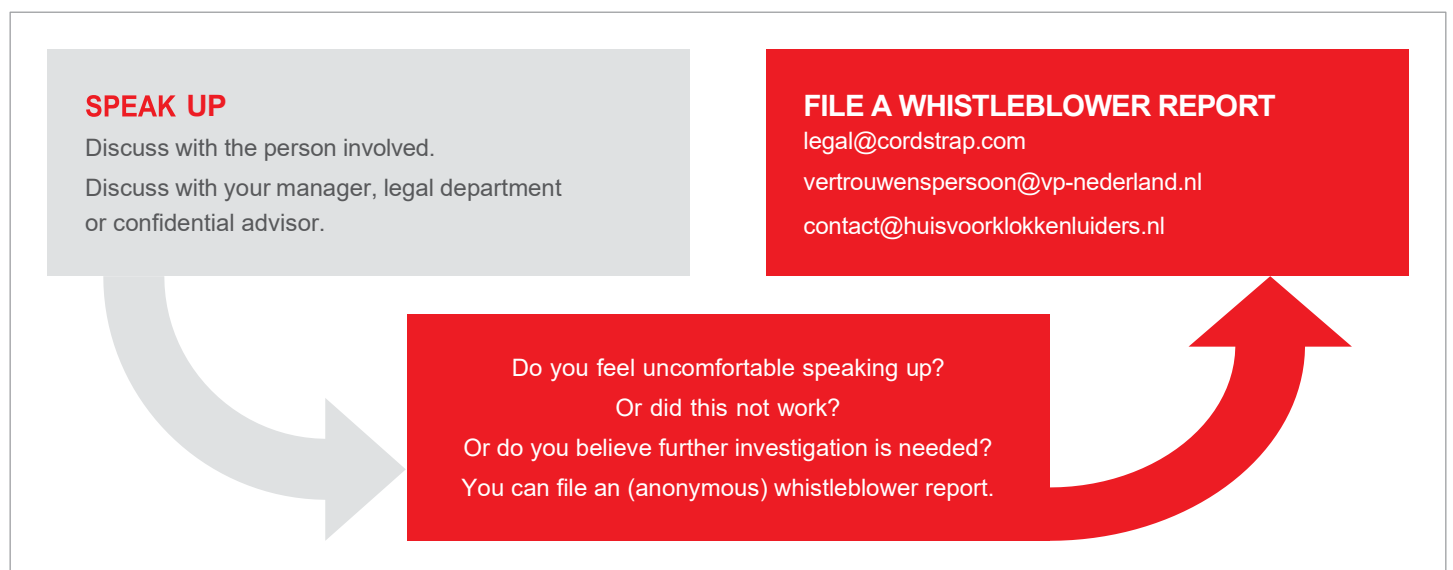
APPLICABILITY

The Whistleblower Policy applies to concerns about suspected or actual criminal conduct, unethical conduct or other misconduct including a (suspected) breach of (EU) law by or within Cordstrap but not limited to:

- Accounting, internal accounting controls or auditing matters.
- Danger to public safety, environment and safety of persons.
- Doing business with clients or suppliers who violate human rights or commit environmental crimes.
- Confidentiality or privacy breaches.
- Fraud.
- Bribery or corruption.
- Undesirable behaviors.
- Violations of any other laws, regulation or Cordstrap policies.

Hereinafter referred to as "Issue".

WHISTLEBLOWING PROCESS



In first instance, we would like to ask you to discuss any Issue with the specific person/colleague concerned. If this does not help, or if you do not feel comfortable discussing this with the person involved, Cordstrap would recommend that you discuss the Issue with your manager.

If for some reason you would rather not discuss the Issue directly with your manager, you also have the option to discuss the Issue with the Legal Department or with our external Confidential Advisor. You always have the option to file a whistleblower report immediately without discussing the issue first internally or externally.

WHISTLEBLOWER REPORT

If you think after having discussed the Issue with your direct colleague and/or manager that further investigation is required or if you don't feel comfortable discussing the Issue first, you have the option to file a whistleblower report.

- Please file a whistleblower report by sending an email to the Legal Department (legal@cordstrap.com). An example of a whistleblower report can be found in [Annex 1](#).
- You can also file a whistleblower report anonymously via our external Confidential Advisors from [VP-Nederland](#): Yvonne (NL), René (NL/UK) or Zuzanna (NL/PL). You can reach them via e-mail vertrouwenspersoon@vp-nederland.nl, phone 0800 - 66 222 66 and/or the application “Opgelucht App” (<https://opgelucht.app/>). The Confidentiality Advisor can act as an intermediate and file the (anonymous) report to the Legal Department.
- Another option is to file a whistleblower report via the “Huis voor Klokkenuiders” (contact@huisvoorklokkenuiders.nl). For more information about the “Huis voor Klokkenuiders” we refer to www.huisvoorklokkenuiders.nl.

Please note that you are not obligated to file the whistleblower report in first instance internally.

FOLLOW UP PROCEDURES OF THE WHISTLEBLOWER REPORT

The Legal Department will address the whistleblower report with the CEO and CFO and will involve others only to the extent needed to investigate and handle the case. In case you file the whistleblower report verbally, you will receive a written confirmation which you can amend and be asked to sign. Within seven (7) days after having received the whistleblower report whether it is in writing or verbally, you will receive confirmation of your report.

Within ultimately three (3) months after the confirmation of your whistleblower report, you will be informed if your whistleblower report will be followed up and what steps will be taken to investigate your whistleblower report. If your whistleblower report is not followed up, you will receive an explanation why it is not followed up.

The Legal Department will receive and further process your whistleblower report. They will keep you informed about the status of the investigation directly or through our external Confidential Advisor.

CONFIDENTIALITY

Whistleblower reports and related investigations will be treated confidential; however, it can be necessary to share the information with a third party if this is required by law, a governmental body, a court order or a legal investigation. In extreme cases, you may even have to make a statement in court or at a tribunal.

YOUR RIGHTS

In case you file a whistleblower report based on reasonable suspicions, Cordstrap will not retaliate against you or the persons that helped you in discussing the Issue and filing the whistleblower report. By reasonable suspicions we mean that you don't have to prove the Issue but you will need to sustain your suspicion. Your suspicion must be concrete and based on your own observations or documents (e.g. emails, reports, letters) and not solely based on hearsay. If for some reasons you are of the opinion that Cordstrap has retaliated against you because of the whistleblower report, you can request the “Huis voor Klokkenuiders” (contact@huisvoorklokkenuiders.nl) to start an investigation. You will not be held liable for e.g. breach of confidentiality, copyright or personal data protection rules, if this was necessary in order to file the whistleblower report. Your identity will be kept confidential and may not be disclosed without your consent unless this is required by law.

PLEASE TAKE NOTICE

Notifications of Issues and filing of whistleblower reports must be made in good faith. All managers who receive a notification of an Issue are obliged to investigate this notification.

Whistleblower reports that have been found unsubstantiated shall be removed as soon as possible, including all personal data in or related to these whistleblower reports. Personal data relating to sustained whistleblower reports will be retained only for a period as allowed by the general data protection laws and regulations.

ROLES & RESPONSIBILITIES

It is the responsibility of the Chief Financial Officer (CFO) to oversee this policy and ensure that it is applied across the Cordstrap organization and third parties acting on behalf of Cordstrap.

Employees are responsible for reading and understanding the contents of this policy. To support this, employees may be given access to (online) training resources, at Cordstrap's discretion. Employees are required to periodically acknowledge that they have read and understood this policy. In case of any doubt about how to comply with the obligations or if any part of this policy is unclear, please discuss this with your manager.

This policy is reviewed periodically and updated as necessary.

This policy has been approved by the Chief Executive Officer (CEO) B.J. Tribble.

Signature:

A handwritten signature in black ink, appearing to read 'B. Tribble', is positioned below the 'Signature:' label.

ANNEX 1: WHISTLEBLOWER REPORTING FORM

Before submitting a whistleblower report:

- Make your report in Dutch or English only. Reports received in any other language will not be handled;
- Describe the Issue as accurately as possible, at least indicating what happened, when it happened, by whom, where and how it did occur (perhaps because of a lack of control or collusion);
- Please provide your email address and/or mobile phone number. If you do not provide this, we cannot contact you for more information. As a result, we might be unable to conduct further investigation into your report. If you have provided contact details these will be handled with strictest confidentiality;
- The Whistleblower Policy is intended solely for reporting actual or suspected Issues;
- Make sure the report is made in good faith.

Describe the Issue.

Does the Issue relate to Cordstrap B.V. or any of its subsidiaries? If it relates to a subsidiary, please mention which subsidiary it relates to.

Are there any witnesses that can confirm your Issue? Please mention their names, function and email address.

Your personal details (optional)

Name:

Phone number:

Email address:

Function within Cordstrap:

If you have any additional questions, you can email these to the Legal Department (legal@cordstrap.com).