enreach

WHISTLEBLOWING POLICY

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Introduction

This Whistleblowing Policy outlines the procedures and protections in place to encourage and facilitate the reporting of unethical or illegal behaviour, fraud, or any other wrongdoing within Enreach. Enreach is committed to maintaining a culture of openness, accountability, and integrity.

Scope

This policy applies to all current and former employees, (sub)contractors, suppliers, and any other stakeholders associated with Enreach.

Reporting Mechanisms

Employees, contractors, suppliers, and any other stakeholders are encouraged to report any concerns or wrongdoing through the following channels:

- **Direct Reporting to Circle Lead or Management** - Employees are encouraged to report concerns directly to their circle lead, immediate supervisor, manager, or any other appropriate authority within Enreach.
- **Reporting Portal** - An (anonymous) online portal is provided for anyone who wishes to report concerns confidentially. This service is provided by an external third party to ensure anonymity.
- **Written Reports** - Employees may submit written reports detailing their concerns to the designated whistleblower coordinators, being the Circle Lead Legal and the Circle Lead Talent Lab.

Protection of Whistleblowers

Enreach is committed to protecting whistleblowers from retaliation. No employee who, in good faith, reports a concern shall be subject to reprisals or adverse employment actions. Any form of retaliation against a whistleblower is strictly prohibited and will be treated as a serious violation.

Investigation Process

All reports will be promptly and thoroughly investigated by an impartial and competent party. The Circle Lead from Legal together with the Circle Lead from Talent Lab (Enreach HR) are co-owners of the process. In case your complaint relates to either one of the affected Circle Leads, you have the option to connect with the counterparty.
Investigations will be conducted discreetly, respecting the confidentiality of all parties involved to the extent possible.

Confidentiality

To those who report non anonymously, Enreach will keep the identity of the whistleblower confidential, to the extent allowed by local law, or by an order of the Court.

Reporting Categories

Concerns may include, but are not limited to, financial irregularities, sexual harassment, violations of company policies, breaches of legal or regulatory requirements, and unethical behaviour. Enreach encourages whistleblowers to report concerns in good faith and with a reasonable belief that the information provided is accurate.

Disciplinary Action

If an investigation reveals that a violation has occurred, appropriate disciplinary action will be taken, up to and including termination of employment, legal action, or other appropriate remedies.

Communication

Enreach will communicate this policy to all employees and raise awareness on the topic of whistleblowing. The policy will be made available online: on the Enreach Intranet for internal use and on all Enreach websites for the respective countries and holding (enreach.com).

Retention period

Different categories of reports may necessitate varying retention periods. Reports that do not result in disciplinary or judicial proceedings should be retained for a specific period, not exceeding two months from the date of closing the report. In cases where an investigation or legal proceedings ensue, the processed personal data will be retained for a duration of five years after the proceedings' conclusion. For reports related to environmental liability, a 30-year retention period is valid. Data that is irrelevant or of no interest to the allegations will be promptly destroyed.

Review and Revision

This policy will be reviewed periodically and revised as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

Contact Information

You can click on this link to enter the portal:
https://whistleblower.enreach.com

In case of any questions related to this Whistleblowing Policy please contact the Circle Lead Legal or the Circle Lead Talent Lab within Enreach.

Enreach is committed to fostering a culture of integrity and ethical behaviour, as also described in the Code of Conduct. This Whistleblowing Policy is an integral part of that commitment, and we encourage all stakeholders to contribute to maintaining a transparent and accountable working environment.