

Speak Up Policy

At Vandebtron, we think an open culture is very important. That includes being able to speak up when undesirable situations arise.

Vandebtron conducts business in an honest and reliable manner, in accordance with laws and (external and internal) regulations. Nevertheless, undesirable situations can arise. If that happens, we think it is important that you can report such a situation in a safe way. By speaking up, an undesirable situation can be investigated and remedied, and we can learn from it for the future.

In this speak up policy, you will find information on what you can report, how to make a report, what happens after you have made a report and how you are protected.

1. To whom does this policy apply?

This policy applies to all employees and former employees of Vandebbron and for other persons who have (had) dealings with Vandebbron through their work. This includes freelancers, temporary employees, volunteers, trainees, applicants and shareholders, but the policy is also applicable to persons from other organisations such as suppliers, (sub)contractors and partners.

2. What can you report?

You can report a (suspicion of) a breach of integrity, wrongdoing, fraud, violation of human rights or the environment at or by Vandebbron.

1. **Breach of integrity:** a breach of the integrity standards that apply at Vandebbron and the E.ON Group. These standards are set out in the E.ON Code of Conduct.

Example: conflicts of interest or leaking confidential business information.

2. **Wrongdoing:** a (potential) violation of European Union law, or an act or negligence where the public interest may be harmed. This includes:
 - a. a (potential) breach of legislation or of Vandebbron's internal rules which contain a specific obligation and which have been established on the basis of a statutory provision; or
 - b. a danger to public health, to the safety of persons, to environmental damage or to the proper functioning of the public service or a company as a result of an improper act or omission.

The public interest is at stake in any case when a situation does not only affect personal interests and (1) there is a pattern or structural character, or (2) if the event is serious or extensive.

Example: corruption, tax evasion.

3. **Fraud:** an intentional act to pursue undue advantage.

Example: fraud with payments to or by Vandebbron, such as refunds.

4. **Violation of human rights or the environment:** violation of the prohibition of child labour, forced labour and all forms of slavery; disregard of health and safety regulations at work and work-related health risks; violation of freedom of association and collective bargaining; violation of the prohibition of unequal treatment at work and

the prohibition of withholding a fair wage; destruction of natural habitat through environmental pollution; environmental risks related to mercury, persistent organic pollutants (POPs) and hazardous waste.

Important: your report must, of course, always be made in *good faith*. This means that you must have reasonable grounds for your suspicion, gained through your work. False suspicions or rumours are therefore not covered by this. Anyone who deliberately and knowingly reports false or misleading information is not protected under this speak up policy and may even be punished for doing so.

3. What is not covered by this policy?

This policy does not apply to:

- Complaints about Vandebron's services and products → these can be reported to our customer service.
- Complaints about your evaluation and/or career development at Vandebron → you can contact your manager for this.
- (Suspected) data breach → report this as soon as possible to your manager and Vandebron's Data Protection Officer (DPO).
- Reports about sexual harassment, aggression, bullying, violence or discrimination → for these reports, you can contact Vandebron's person of trust.

4. If possible: discuss it

If you feel that something is wrong or not going well, always try to discuss it with the person concerned first. This way, you give that person the opportunity to do something about the situation and prevent it from getting worse or repeating itself.

5. You can always ask for advice

Is a situation or event making you feel uncomfortable? Are you unsure about making a report or are you not sure whether the situation falls under this speak up policy?

You can always ask the Compliance Officer for advice on how best to handle a situation. You can also go to the Compliance Officer with all your questions about integrity, conduct, policy and (internal) regulations. Your questions will always be treated confidentially. You can reach the Compliance Officer at **compliance@vandebron.nl**.

6. How to make a report?

If you decide to make a report, it is important that you provide as much information and facts as possible with your report. You can do this in writing (email), verbally over the phone, a voice message or a physical or online conversation.

You may choose how and where to make your report. You can report the situation internally at Vandebron, at our parent companies Essent and E.ON or through an external reporting channel.

- **Through the Compliance Officer of Vandebron**

You can make your report internally to the Compliance Officer by emailing to compliance@vandebron.nl. Would you prefer to make your report by phone? Please indicate this in your email and include your telephone number. The Compliance Officer will then contact you by phone. You can also ask to make the report in an (online or physical) conversation.

- **Through parent companies Essent or E.ON**

You can also make your report to Essent or E.ON, Vandebron's parent companies. You can reach Essent's SpeakUp hotline at: speakup@essent.nl. This hotline is managed by Essent's Compliance & Integrity department. At E.ON, you can make your report through the external [hotline](#). Reports made through this hotline are handled by E.ON Group Compliance.

- **Through one of the external reporting channels of authorities**

Preferably, you make your report internally. For reports concerning a violation of European Union law, you can also contact the competent authorities directly in writing or orally via their external reporting channel.

These authorities are:

1. the Netherlands Authority for Consumers and Markets
2. the Dutch Authority for the Financial Markets

3. the Dutch Data Protection Authority
4. De Nederlandsche Bank N.V.
5. the Dutch Whistleblowers Authority*
6. the Health and Youth Care Inspectorate
7. the Dutch Healthcare Authority
8. the Authority for Nuclear Safety and Radiation Protection, and
9. other organisations and administrative bodies designated by order in council or ministerial regulation, or parts thereof.

* The Advice Department of the Dutch Whistleblowers Authority provides independent advice to potential reporters (and those who assist them and third parties involved) who suspect wrongdoing and/or are in doubt whether to report it. The Investigation department of the Dutch Whistleblowers Authority can launch an investigation against a suspicion of a wrongdoing, or the way in which the employer has behaved towards the reporter in response to a report.

7. What happens after your report?

Confirmation of receipt and information about the handling of the report

If you have made a report to Vandebbron's Compliance Officer, you will receive confirmation of receipt within 7 days. The Compliance Officer will keep you informed about the further handling of your report. Within 3 months after confirmation of receipt, you will receive feedback about the follow-up to your report, for example about measures planned or taken.

Your report may not be covered by this policy (see article 3). In that case, the Compliance Officer will advise you on where to turn.

If you have made a report through one of the other reporting channels (see article 6), contact will continue through the relevant channel.

Investigation into the report

The investigation into your report will be carried out at the same level where you made your report. So at the level of Vandebbron, Essent or E.ON. It is up to you where you make your report and therefore where it will be investigated. You can also indicate whether the report you made to Vandebbron can be shared with Essent and/or E.ON and vice versa.

Is the investigation carried out by Vandebbron's Compliance Officer? Then the process is as follows.

The Compliance Officer will first assess whether the report is valid and whether conducting an investigation is appropriate. This may require more information and the Compliance Officer may need to ask you additional questions. It may be decided that no investigation will be conducted. The Compliance Officer will keep you informed on this.

If an investigation is launched, the Compliance Officer will determine what the follow-up steps will be. During the investigation, various parties involved may be asked to provide information. The principle of hearing both sides always applies here.

After completion of the investigation

Once the investigation is completed, the Compliance Officer will prepare a report. This contains the findings of the conducted investigation, the conclusion and what is advised as a result. Does the outcome of the investigation give reasons for measures? In that case, advice will be given to the department concerned, whether or not in consultation with the manager and/or People & Culture. The Compliance Officer will monitor whether the measure has been implemented.

8. Objection

Do you disagree with the handling of your report? Then you can lodge an objection with E.ON Group Compliance via the E.ON Whistleblower hotline, with the Dutch Whistleblowers Authority or one of the other external reporting channels (see article 6).

9. Legal protection

Did you report in good faith and follow the provisions of this policy? Then you don't have to fear any retaliation against your labour functionality initiated by Vandebron as a result of the respective reporting. Nor does Vandebron accept you being disadvantaged by other employees as a result of the reporting. Vandebron also protects those who have assisted you as a reporter.

Others who carry out tasks related to the handling of the report will also be protected as a result of their actions under this speak up policy.

Has a report been made about you? Then you will also be protected. Your identity as an accused will only be known to those who are involved in handling the report through their

professional position. You will always have the opportunity to respond to the content of the report. If the report turns out to be unfounded, Vandebbron will not accept you being disadvantaged because a report has been made about you.

10. Confidentiality

When you make a report, your identity will remain confidential unless you explicitly consent to your identity being disclosed. By way of derogation the disclosure of your identity incidentally might become necessary, thus only in a proportionate way and compulsory mandated under EU or national law for the purpose of investigation by national authorities or judicial proceedings. In such a case, you will be informed in advance of the disclosure of your identity, unless this would jeopardize the investigation or judicial proceedings.

It is possible to make a report anonymously, if you wish to do so. However, it will then be more difficult to conduct an investigation on the basis of hearing both sides of the argument. If your identity is not known to the investigator, you can also not be kept informed of the outcome of any investigation.

11. Personal data

Information received in the context of this policy will be treated confidentially. Personal data of both the reporter and others involved will be processed in compliance with the General Data Protection Regulation (GDPR). For questions about the processing of your personal data, please contact Vandebbron's DPO: dpo@vandebbron.nl.