

Reporting procedure

Whistleblower Ormit Talent



Introduction

Ormit Talent aims to ensure that everyone at all locations, including managers and employees, always complies with applicable laws and regulations, the company regulations, and the rules of various authorities.

The whistleblowers' policy of Ormit Talent is designed to support compliance with the applicable laws and regulations, integrity in financial management, a healthier and safer work environment, and effective business operations.

Ormit Talent seeks to encourage all employees, as well as other individuals acting with or providing advice to Ormit Talent, to report violations, irregularities, or misconduct without the risk of retaliation, knowing that all reports will be treated confidentially and promptly investigated.

The whistleblowers' policy applies to all employees of Ormit Talent in Belgium and the Netherlands.

What is a whistleblower?

Whistleblowers take risks by exposing societal wrongdoings, including fraud, conflicts of interest, and mismanagement. A whistleblower does not speak out to benefit personally but consciously comes forward to alert society to immediate or impending wrongdoings.

What can you report?

In Belgium, various violations and irregularities can be reported through the whistleblowers' policy. The legislation is intended to address a wide range of irregularities within the framework of:

- Public procurement
- Financial services, products, and markets, prevention of money laundering and terrorist financing
- Product safety and conformity
- Transportation safety
- Environmental protection
- Radiation protection and nuclear safety
- Food and feed safety, animal health, and animal welfare
- Public health
- Consumer protection
- Protection of personal privacy and data, and security of network and information systems
- Combating tax fraud
- Combating social fraud

- Financial interests of the European Union
- Internal market of the European Union

The whistleblowers' policy should only be used for good faith reports. Please consider protecting our culture of trust, integrity, and dialogue. This whistleblowers' policy is not intended to replace our "open-door policy." You can always consult with your manager or the confidential advisor of Ormit Talent, Ann Cassimon or Jannes Baert, for a discussion.

How to make a report?

First, report internally

If you believe something is amiss in the workplace, you can report it internally. We encourage you to initially report the issue to your own manager. If this doesn't feel right, the matter can always be reported to the designated confidential advisors within Ormit Talent, namely Ann Cassimon and Jannes Baert.

We have appointed Céline Dutrieux, to receive and manage whistleblower reports. Violations can be reported in writing via the email address whistleblower@ormittalent.be, through which Céline will receive a submission. The receipt of this report will be confirmed within seven days of receipt. Within a reasonable timeframe and no later than three months after receipt, you will receive feedback from Céline.

What should be included in a report to be able to handle and follow up on the report smoothly:

- Your relationship to Ormit
- Your contact details
- Which violation do you want to report?
- Provide a clear description of the violation (who, what, where, when, ...)
- What is your role in relation to that violation (witness, victim, etc.)
- Any evidence you may have regarding the violation

External reporting

There may be situations where it is impossible to report internally first. In such exceptional cases, it is possible to contact the Federal Ombudsman, who serves as the federal coordinator for external reports. The Federal Ombudsman will receive your report, assess its admissibility, and determine if there is a reasonable suspicion that the reported violations have occurred. If so, your report will be forwarded to the authority responsible for investigating the violation.

You can contact the Federal Ombudsman directly via email (contact@federaalombudsman.be), by post (De Federale Ombudsman, Leuvenseweg 48 bus 6, 1000 BRUSSEL, Belgium), by phone (at +32 800 99 961), or through the website (<https://www.federaalombudsman.be/nl>).

Additionally, direct reports can also be made to the competent authorities appointed by Royal Decree designating the authorities responsible for implementing the law of November 28, 2022, concerning the protection of whistleblowers of breaches of Union or national law established within a legal entity in the private sector, Belgian Official Gazette (BS) January 31, 2023 (https://www.ejustice.just.fgov.be/doc/rech_n.htm).

Follow up of internal reporting

What happens after a report?

All reports under this policy will be investigated with the aim of finding evidence that either confirms or refutes the whistleblower's report. All reports will be treated confidentially, and confidentiality will be maintained to the extent possible. Additionally, the employee has the option to indicate that their report should be treated confidentially.

As soon as reasonably possible, but in any case, within 3 months, the investigation of the report will be concluded, and the whistleblower will be informed. If the investigation is not completed within 3 months, the whistleblower will be informed of the expected completion date. It is also possible that additional information may be requested.

The whistleblower is not entitled to full access to the investigation and the file, which are by definition confidential.

Whistleblower protection

Ormit Talent makes every effort to protect whistleblowers from reprisals. Reports will be handled with sensitivity, discretion, and confidentiality to the extent possible given the circumstances and legal boundaries. Generally, this means that reports will only be shared with those who need to be informed so that Ormit Talent can conduct an effective investigation, determine appropriate actions based on this investigation, and, if necessary, involve law enforcement.

Any employee who reports an issue in good faith via the internal or external channels or participates in an investigation into a report (and is found not to be involved in the issue or the report) will not personally be disadvantaged as a result of this participation. This protection applies not only during but also after the handling of the report. The whistleblower must have acted carefully and in good faith.

Whistleblowers must exercise sufficient caution to avoid unfounded accusations. Allegations that are unfounded and made in bad faith may lead to disciplinary or other actions.